



## 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:	L8937/2015/1 (Dated September 2023)	Licence file number:	DER2015/002837-2-9
Licence holder name:	Pilbara Ports Authority		
Trading as:	Pilbara Ports		
ACN:	ABN 94 987 448 870		
Registered business address:	The Esplanade, Port Hedland WA 6721		
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
58, 58A	20,964,429 tonnes

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:	4	Date(s) of non-compliance:	See dates below
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**Details of non-compliance:**

Condition 4 of the Licence requires that Pilbara Ports calculate and maintain an Average Monthly Availability rate of 90% or more for all water sprays on stackers, chute sprays at transfer stations and ship loader, and stockyard water cannons when ore is stockpiled in that stockyard.

**Chute and Stacker Sprays**

The stacker sprays and chute sprays are automated to turn on with each outload event, however, Pilbara Ports does not have systems capable of undertaking real-time operational monitoring and data capture of utilisation for these two particular controls. Utilisation can be calculated manually by assuming the controls are utilised at all times except when maintenance records and operational logs indicate they were not available.

Further information on these controls is below:

**Chute Sprays:**

All chute sprays at transfer stations and on the shiploader at Utah Point are automated to turn on whenever the conveyor system is operated with physical locks in place on the valves to prevent them from being manually closed off. A plant walkthrough and operational inspection is completed each shift (12-hour day and night shifts commence at 06:00 and 18:00) by both the Pilbara Ports' Landside Operations Coordinator as well as a separate inspection by Qube, who operate the plant. These inspections include checking dust controls are effective.

In addition to operational inspections Pilbara Ports undertake regular routine maintenance of the dust suppression network including:

- Daily plant walkthroughs for each shift (day and night) to report or fix any issues; and
- Weekly inspections of the conveyor chute sprays.

The plant at Utah Point does not have the instrumentation required to automate the calculation of availability of the chute sprays. The plant does not have flow meters and loggers installed at the chute sprays and the current infrastructure and control system does not have the capacity for these to be integrated into the control system without significant infrastructure and control system works. As such availability is calculated manually by calculating any down time of the sprays from maintenance records and/or logs of daily inspections by operational and maintenance personnel.

Based on this data, all Chute Sprays had Monthly Availability Rates  $\geq$  90%.

**Stacker Sprays:**

The stackers at Utah Point, known as Radial Stacker Systems (RSS), are owned and operated by Qube in Stockyard 1 (SY1) and owned by Atlas and operated by Qube in Stockyard 2 (SY2). The water sprayers which control dust during stacking of product on the stockpiles are referred to as the stacker head-end sprayers. These sprayers are programmed to automatically activate at any time product is being stacked over the RSS units as per the stacker sprayer activation functional specification.

Qube undertake weekly preventative maintenance inspections of each of the RSS units to identify any faults or issues with the units including with the dust suppression systems and water sprays. Where faults with the dust suppression system are identified they are either rectified on the spot or a work order is created to resolve the issue.

Based on this data, the Stacker Sprays had Monthly Availability Rates  $\geq$  90%.

**Stockyard Water Cannons**

For the Annual Period, Pilbara Ports used a combination of manual calculations and automated data from its Controls system to calculate Monthly Availability Rates for the stockyard water cannons:

- **July 2024 to February 2025:** Manual calculations based on logs provided by QUBE.
- **March 2025 to June 2025:** Automatic calculations derived from Pilbara Ports new control systems.

Pilbara Ports identified that all stockyard water cannons had Monthly Availability Rates  $\geq$  90% except for the following months:

- **December 2024** (86.32%) - lower availability rate was due to shutdown of the cannon infrastructure for maintenance of the water pipeline infrastructure.
- **February 2025** (85.7%) - the lower availability rates was a result of the Controls system upgrades that were being made at the time which required frequent canon testing to be undertaken.
- **May and June 2025** (unable to be determined) - The Monthly Availability Rates in May and June 2025 were unable to be determined due to errors in the reporting function of the Controls system. These errors were rectified in late June 2025.

Further discussion on the Controls system upgrades is detailed below.

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

Failure to operate these dust controls could increase the potential for dust emissions during handling of bulk products at the Premises. This could then contribute to cumulative dust emissions at downwind locations and sensitive receptors.

Cause (or suspected cause) of non-compliance:	
<p>Pilbara Ports used a combination of manual calculations and automated data from its Controls system to calculate Monthly Availability Rates for the stockyard water cannons.</p> <p>There have been significant recent improvements in Pilbara Ports Controls system software, with a change from manual calculations and interpretation (from July 2024 to February 2025), to now being able to extract data directly from our Controls system (since March 2025). Further development in this space is still ongoing and the outputs from our Controls system are being reviewed and actively configured by Pilbara Ports to produce data that is fit for purpose.</p>	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>Pilbara Ports are currently working through a range of projects to improve management of dust emissions from the Premises. This includes a project to automate the calculations of Monthly Availability Rates, and systems to improve these rates.</p> <p><b>Dust Suppression – Water Cannons Functional Specification</b>                  This project is intended to automate and improve the control over the water cannons used for dust suppression at Stockyard 1 (SY1). The project is being implemented incrementally through Pilbara Ports maintenance budget with a number of improvements having already been delivered. The first phase of the project has been implemented to improve the automation of utilisation of the water cannons including optimisation and response to weather data including:</p> <ul style="list-style-type: none"> <li>• wind speed and direction – cannon selection optimised to provide coverage of stockpiles on the basis of wind conditions;</li> <li>• evaporation – automation of additional cannon runs during conditions likely to dry stockpile surfaces; and</li> <li>• optimisation of utilisation – improvement of rules and systems to control when and how cannons can be turned off automated run times.</li> </ul> <p>The improvements outlined above are the first phase of enhancements to water efficiency and water cannon control across the Premises and are enabling improved analysis of water cannon availability rates. This improvement program is still in its infancy and adjustments, and development of the system are ongoing.</p> <p><b>Citect system upgrade</b>                  This upgrade will allow Pilbara Ports to collect larger data sets for future analysis and site improvements, including those related to dust suppression on site. It will also allow for the remote access to the site Controls system which will improve maintenance and operation response times and access by multiple users. This upgrade is still in progress.</p>	
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 dates below
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Details of non-compliance:

Condition 19 of the Licence requires that, where the Dust Extinction Moisture (**DEM**) level can be determined for a Distinct Bulk Granular Material specified in Table 9 of Schedule 2, that Pilbara Ports must achieve a compliance rate of at least 95% of that material having a Moisture Content at or above the DEM level.

The averaging period for calculation of the compliance rate is not specified in the Licence. To align with quarterly reporting requirements under Condition 23 of the Licence, Pilbara Ports has elected to calculate the compliance rate on a quarterly basis.

Pilbara Ports has calculated the quarterly compliance rates for each material separately for Moisture Content provided by Premises Users under Condition 21, and Moisture Contents taken from sampling of out-loaded products under Condition 22. These results have been calculated separately due to differences in sample averaging frequencies making the results not directly comparable. Additionally, materials are blended during out-loading meaning the compliance rate needs to be calculated based on the groupings of materials which are blended (i.e., all iron ore fines products handled for a particular premises user).

All distinct bulk granular material received and outloaded at the Premises during the Annual Period had a DEM compliance rate greater than 95% for each quarter, with the exception of one product (Manganese Lump) outlined below.

During Q1 DEM non-compliances were from one shipment of Manganese Lump consisting of two 10,000 tonne parcels:

- A total of 50,000 tonnes were loaded onto the *Discovery Bay*, of which 20,000 tonnes (2 out of the 5 parcels) had moisture levels which were below the DEM (2.8% and 2.9%). However, the weighted average DEM for this shipment was 3.1% which is greater than the required DEM of 3.0%.
- Overall DEM compliance rate for this product for Q1 was 94.74%.

The Q2 DEM non-compliances were from two separate shipments of Manganese Lump consisting of two 10,000 tonne parcels each:

- A total of 30,000 tonnes were loaded onto the *Vega*, of which 20,000 tonnes (2 out of the 3 parcels) had moisture levels which were below the DEM (2.7% and 2.8%). However, the weighted average DEM for this shipment was 3.0% which equal to the required DEM of 3.0%;
- A total of 30,000 tonnes were loaded onto the *Pilatus Venture*, of which 20,000 tonnes (2 out of the 3 parcels) were below the DEM, with a moisture content of 2.8% and 2.5% recorded. The weighted average DEM for this shipment was 2.8% which is below the required DEM of 3.0%; and
- In total, 40,000 tonnes were under the DEM out of the total 140,000 tonnes that were exported during the Annual Period.
- Overall DEM compliance rate for this product for Q2 was 71.43%.

Section E – Details of non-compliance with licence condition	
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>Handling and storage of Bulk Granular Material with a Moisture Level below DEM can potentially result in increased dust emissions from the Premises which may, during certain wind directions, potentially contribute to the cumulative dust levels within residential areas of Port Hedland. However, as there were no localized or regional dust exceedances during the period these shiploading events occurred, and therefore the actual or suspected environmental impact of the non-compliance is considered negligible.</p> <p>The Manganese Lump product which was below the DEM compliance rate during Quarter 1 and Quarter 2, was loaded onto three vessels: <i>Vega</i> on 15 October 2024, <i>Discovery Bay</i> on 18 September 2024 and <i>Pilatus Venture</i> on 28 November 2024. There were no exceedances of Reportable Event criteria associated with any of the Monitoring Stations listed in the Licence during this period.</p>	
Cause (or suspected cause) of non-compliance:	
<p>The non-compliance during Q2 for the Manganese Lump product may have potentially occurred due to loss of moisture during storage and handling onsite.</p> <p>There were no further DEM non-compliances for this Premise User in Q3 or Q4.</p>	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>Pilbara Ports undertook the following actions in response to the non-compliance with Condition 19 in relation to out-loading material:</p> <ul style="list-style-type: none"> <li>• Pilbara Ports Landside Operations team closely monitor product condition onsite and request additional conditioning of products by premises users (at the mine site) as necessary;</li> <li>• Pilbara Ports sent a letter outlining the non-compliances with Condition 19 of the Licence to the Proponent and requested any details into the cause of these non-compliances. A response from the Proponent indicated moisture levels may have dropped during transport and storage of the product, and they are working with internal and external logistic stakeholders to implement processes to reduce the risk of this in future; and</li> <li>• Pilbara Ports continues to monitor moisture levels for received and out-loaded material on a weekly basis to minimise the risk of reoccurrence.</li> </ul>	
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: Q2 report submitted 31/ 01/ 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:	See dates below
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Details of non-compliance:

Condition 25 (d) requires that monitoring at the M5, M7 and M10 Monitoring Stations is undertaken continuously, which is defined under the Licence as a data recovery rate of at least 90% per financial year quarter. Operation of the Monitoring Stations met the requirement to capture continuous data with the exception of the following:

#### Quarter 2 (Q2)

- The M5 (Utah North) dust monitor did not meet the requirement to capture continuous data, with a data recovery rate of 79.5% for Q2. The average recovery rate was brought down by an instrument fault which occurred in December 2024. Intermittent flows and low capture rates occurred as a result of ongoing issues with the tape ripping. The BAM was replaced on 16 December 2024, with all issues with this dust monitor being resolved by 26 December 2024.

#### Quarter 3 (Q3)

- The M5 (Utah North) dust monitor did not meet the requirement to capture continuous data, with a data recovery rate of 84% for the Reporting Period;
- The M7 (Utah West) dust monitor did not meet the requirement to capture continuous data, with a data recovery rate of 76.2% for the Reporting Period; and
- The M10 (Utah East) dust monitor did not meet the requirement to capture continuous data, with a data recovery rate of 86.2% for the Reporting Period.

The average recovery rate of these three (3) events were brought down by multiple cyclone shut down events (18-22 January 2025 and 9-17 February 2025), as well as instrument faults occurring as a result of ongoing issues with the tape ripping.

Condition 25 (d) also requires that one 24 hour sample is collected from the M8 and M9 Monitoring Stations every sixth day, plus at least one 24 hour sample during the ship loading of manganese (Mn). Condition 25(e) requires that these samples are collected in accordance with AS3580.9.6. During the reporting period eight non-compliances occurred:

- **6 July 2024:** M8 HVAS (1/6 and Mn) – did not run due to faulty equipment
- **12 July 2024:** M8 HVAS (1/6) – programming error
- **10 September 2024:** M8 HVAS (1/6) – programming error
- **17 September 2024:** M9 HVAS (1/6 and Mn) – programming error
- **28 November 2024:** M9 HVAS (Mn) – programming error
- **13 February 2025:** M8 and M9 HVAS (1/6) – cyclone shut downs of the Pilbara Ports dust monitoring network
- **8 May 2025:** M8 and M9 HVAS (1/6) – power fluctuations/outages across Utah Point. Additional samples were run at M8 and M9 on 9 May 2025 to address this gap.

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.

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

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.

Cause (or suspected cause) of non-compliance:

The associated cause for each individual non-compliance is outlined in the section above.

In summary:

- The low data captures of M5, M7 and M10 in Q2 and Q3 were due to a combination of cyclone shutdowns and flow sensor faults where there were ongoing issues with the tape ripping; and
- The non-compliances associated with sampling at the M8 and M9 HVAS were due to cyclone shutdowns, flow sensor faults, power outages and programming errors.

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

Corrective actions implemented as a result of the low data capture rates included unscheduled maintenance to resolve the faults associated with the instrument, including the replacement of the M5 BAM. This was undertaken on 16 December 2024, with all issues with this dust monitor being resolved by 26 December 2024.

Non-compliances associated with the M8 and M9 Monitoring Stations were due mainly to instrument faults and programming errors. The actions implemented to address these non-compliances included:

- Contractor who supplies and maintains the equipment undertook unscheduled maintenance to resolve the faults associated with the instrument; and
- Internal processes have also been reinforced within the Environment and Heritage team to manage instances arising from programming error.

Was this non-compliance previously reported to DWER?

Yes, and

Reported to DWER verbally

Date: / /

Reported to DWER in writing

Date:  
 Q1 Quarterly report – 30/10/2024  
 Q2 Quarterly report – 31/1/2025  
 Q3 Quarterly report – 30/4/2025  
 Q4 Quarterly report – 31/7/2025



## 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:	30 September 2025	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.

