

1 October 2019

Audit and Assurance Section
Compliance and Enforcement Branch
Environment Assessment and Compliance Division
Department of the Environment and Energy
GPO Box 787, CANBERRA ACT 2601

BHP STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA) - ANNUAL REPORT 2018/19

The BHP Billiton Iron Ore Pty Ltd (BHP) Pilbara Strategic Assessment Program was endorsed by the Minister for the Environment and Energy on 11 May 2017 and an Approval Decision (the Approval) for taking actions in accordance with the Program was issued on 19 June 2017.

The Approval applies to the development of new iron ore mines and associated infrastructure and the expansion of existing iron ore mines and associated infrastructure within a defined Strategic Assessment Area in the Pilbara region of Western Australia (Figure 1). Key commitments of the endorsed Program and conditions of approval include preparation and approval of an Assurance Plan and Offsets Plan, and undertaking a validation process including preparation of a Validation Notice for each Notifiable Action (Figure 2).

In accordance with the conditions of the approval decision relating to the BHP Billiton Iron Ore Pilbara Strategic Assessment Program, BHP is hereby submitting an annual report for the reporting period between 1 July 2018 and 30 June 2019. An outline of the content of the report is provided below:

- Table 1 outlines compliance with the conditions of the Approval.
- Table 2 details the disturbance undertaken during the reporting period.
- Table 3 addresses the requirements of an annual report outlined in Part B, Chapter 5 of the endorsed Program.
- Table 4 addresses the reporting requirements outlined in the Assurance Plan.
- Table 5 addresses the reporting requirements outlined in the Offsets Plan.

Key milestones that have occurred during the reporting period include:

- The validation process was completed for Mining Area C during the reporting period, resulting in the issuance of the first Validation Notice. The Validation Notice includes the expansion of Mining Area C and the development of the Southern Flank infrastructure and deposits. Clearing commenced under the Validation Notice during the reporting period; and
- Completion of two further validation processes in respect of non-notifiable actions occurred during the reporting period.

We look forward to working with the Department throughout the review of this document.

Regards



Chris Serginson
Manager Environment Analysis & Improvement
chris.serginson@bhp.com

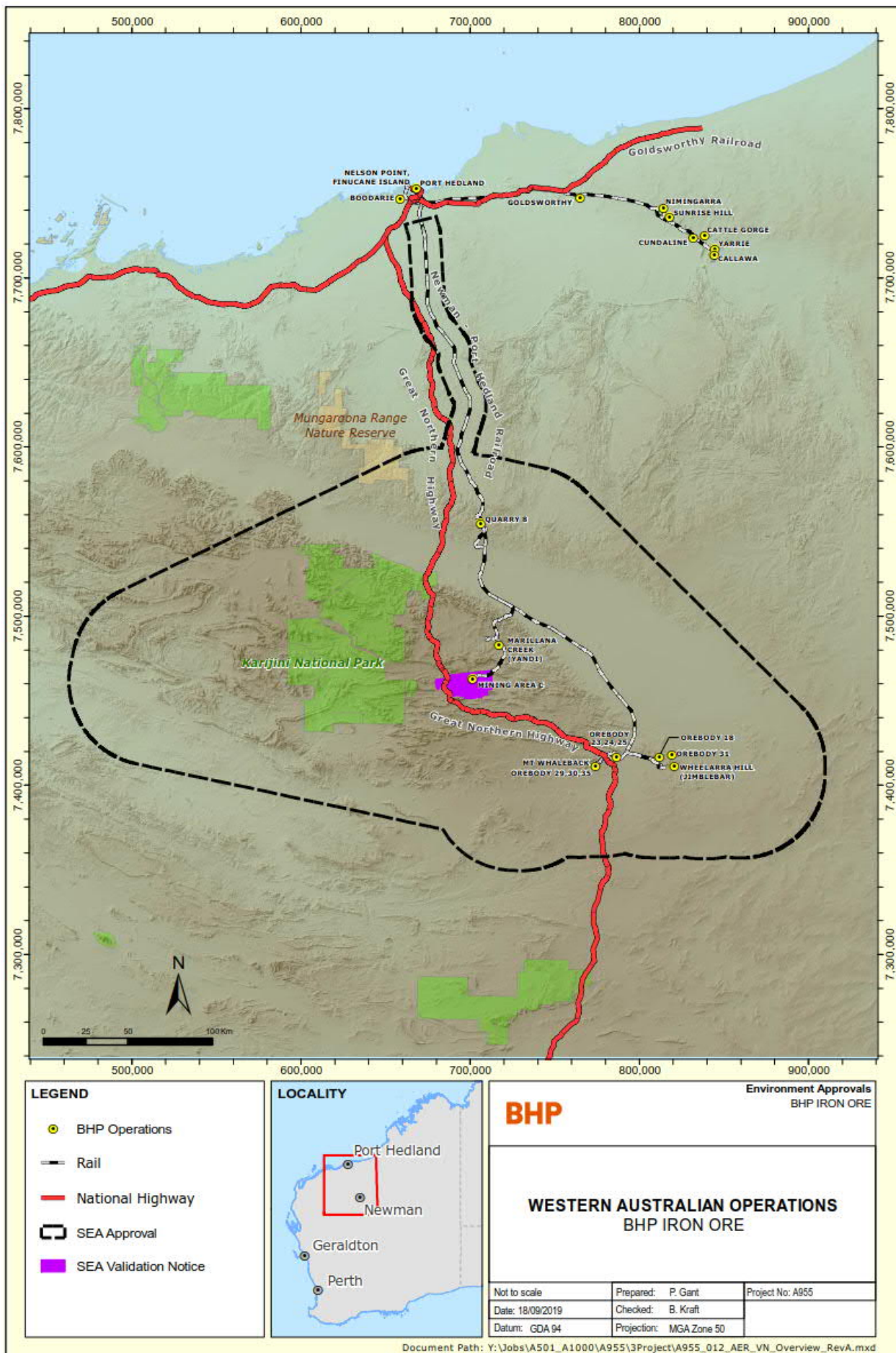


Figure 1: BHP Strategic Assessment Area



Figure 2: BHP Strategic Assessment – Approval Documents

Table 1: Audit Table for the EPBC SEA Approval Decision (Approved: 19 June 2017)

Condition/Section	Requirement	How	Documentation	Evidence	Timeframe	Status
1	The approval holder must implement the endorsed Program	Implement proposals in accordance with criteria in the Program.	Compliance reported annually in the BHP Iron Ore (BHP) Annual Environmental Report (AER).	Activities have been implemented in accordance with the endorsed Program (see Conditions 3 and 7).	Life of approval	Compliant
2	The approval holder must not make any validation decisions as outlined in Part C of the endorsed program after 70 years from the date of the approval	No validation decisions to be made after 19 June 2087	Compliance reported annually in the BHP AER.	The approval commenced on the 19 June 2017. Validation decisions were permitted during the reporting period.	From 19 June 2087	Not required at this stage
3	Within 12 months of the date of approval, the approval holder must prepare and submit for the Minister's written approval an Assurance Plan and an Offsets Plan in accordance with Section 3 of the endorsed Program.	Prepare and submit an Assurance Plan and Offsets Plan to the satisfaction of the Minister of the DoEE (or delegate).	Submitted Assurance Plan and Offset Plan.	An Assurance Plan and Offsets Plan were prepared and submitted to the Department on 1 March 2018. The Assurance Plan and Offsets Plan were approved by the Department on behalf of the Minister on the 11 May 2018 (Reference Letter from Greg Manning – Assistant Secretary Assessments (WA, SA, NT) and Post Approvals Branch Environment Standards Division dated 11 May 2018).	Prior to the 19 June 2018	Complete
	The approval holder must implement the approved Assurance Plan and Offsets Plan.	Implement proposals in accordance with the requirements of the approved Assurance Plan and Offsets Plan.	Compliance reported annually in the BHP AER.	The Assurance Plan and Offsets Plan have been implemented (see condition 7).	Annually for the duration of the Approval	Compliant
	The approval holder must publish the approved Assurance Plan and Offsets Plan on its website within one (1) month of receiving written notice that the Assurance Plan and Offsets Plan are approved.	Publish the approved Assurance Plan and Offsets Plan on the BHP external website	Submitted Assurance Plan and Offset Plan.	The Assurance Plan and Offsets Plan were published on the BHP website on the 15 May 2018. Email sent to V. Cox (Senior Assessing Officer – Post Approvals) on the 15 May 2018 advising the Plans were available on the website.	Within 1 month of approval	Complete
4	<p>Unless otherwise agreed to in writing by the Minister, every five years from the date of approval, the approval holder must review and revise the Assurance Plan and the Offsets Plan in accordance with Section 4.1 of the endorsed Program.</p> <p>The approval holder must submit the revised Plans for the Minister's approval within 6 months of the five year anniversary of the date of approval unless the Minister has agreed in writing that no revisions are necessary.</p> <p>If the approval holder does not submit the revised Plans for approval, the approval holder may not give any further validation notices under Part C of the endorsed Program until the revised Plans have been submitted and approved.</p> <p>The Minister may, within 60 days of receipt by the Department of the revised Plans, advise the approval holder in writing that (a) the revised Plans are approved; or (b) additional revisions are required to be made to the Plans.</p> <p>If the Minister does not advise the approval holder within the 60 days, the revised Plans are taken to have been approved by the Minister and the approval holder must implement the revised Assurance Plan and Offsets Plan.</p> <p>If the Minister requires additional revisions to the Plans, the approval holder has to make the required revisions and resubmit the Plans for approval.</p>	Prepare and submit a review and revision of the Assurance Plan and Offsets Plan to the satisfaction of the Minister of the DoEE (or delegate).	5 yearly review document and revised Assurance Plan and Offsets Plan	Not required at this stage	First Review due the 19 December 2021	Not required at this stage

Condition/Section	Requirement	How	Documentation	Evidence	Timeframe	Status
	<p>If the revised Plans are not submitted, no further validation notice may be given under Part C of the endorsed Program until the revised Plans have been submitted and approved.</p> <p>The Minister has 30 days to advise the approval holder in writing whether the revised Plans are approved. If the Minister does not advise the approval holder within the 30 days, the revised Plans are taken to have been approved and the approval holder must implement the revised Assurance Plan and Offsets Plan.</p> <p>After receiving written notice from the Department that the revised Assurance Plan and Offsets Plan are approved, the approval holder must implement the revised Assurance Plan and Offsets Plan.</p> <p>The approval holder must publish and maintain the revised Assurance Plan and Offsets Plan on its website within one (1) month of receiving written notice from the Department that the plans have been approved.</p>					
5	<p>At any time the approval holder may choose to review and revise the Assurance Plan and/or the Offsets Plan without requiring the Minister's approval of the revised Plans if the revision does not:</p> <ul style="list-style-type: none"> (a) include changes to Program Matters Outcomes; (b) affect the achievement or monitoring of Program Matters Outcomes; or (c) include changes to environmental offsets for any Program Matters. <p>If the approval holder makes this choice, the approval holder must notify the Department in writing that the current approved Assurance Plan and/or Offsets Plan has been revised and provide the Department with a copy of the revised Assurance Plan and/or Offsets Plan.</p> <p>The approval holder must implement the revised Assurance Plan and/or Offsets Plan from the date of the written notice to the Department.</p> <p>The approval holder must publish the revised Assurance Plan and Offsets Plan on their website within one (1) month of the written notice to the Department.</p>	<p>Prepare and submit a review and revision of the Assurance Plan and Offsets Plan to the satisfaction of the Minister of the DoEE (or delegate).</p>	<p>Revised Assurance Plan and Offsets Plan</p>	<p>Not required at this stage</p>	<p>Anytime during the duration of the approval</p>	<p>Not required at this stage</p>
6	<p>The approval holder must inform any person that they authorise, permit or request to undertake any activity of obligations under the endorsed Program and conditions attached to this approval that restrict or regulate the undertaking of activities within the strategic assessment area.</p>	<p>Obligations are maintained in the legal obligations register and documented within the Project Environmental and Aboriginal Heritage Review (PEAHR) prior to undertaking activities.</p>	<p>WAIO Environmental Legal Obligations Register (ELOR) and PEAHR documentation</p>	<p>Obligations from the approval and the first Validation Notice (Mining Area C) have been incorporated into the WAIO ELOR. The Mining Area C – Validation Notice took effect on 13 July 2018. Obligations from the approval and Mining Area C - Validation Notice are incorporated into the PEAHR for all activities related to the project. All activities meet the requirements of the PEAHR. All personnel carrying out works associated with activities relating to the Validation Notice and approval are required to comply with BHP's Sustainable Development Policy, environmental approvals (including this</p>	<p>Prior to undertaking activities</p>	<p>Compliant</p>

Condition/Section	Requirement	How	Documentation	Evidence	Timeframe	Status
				approval), the PEHR requirements and conditions and any other relevant legislative and licensing requirements.		
7	An upper disturbance limit of 110,000 hectares applies to the approval holder. All activities that result in a direct disturbance will account towards the upper disturbance limit. The approval holder may undertake activities that result in a direct disturbance up to the maximum of 110,000 hectares less any direct disturbance permitted in a section 146B approval given in relation to assets divested by the approval holder and for which a validation notice has been given.	Maintain the program disturbance tracking register	Program disturbance tracking register	Table 2 details the current disturbance undertaken during the reporting period against the upper disturbance limit.	Annually for the duration of the Approval	Compliant
8	By the first business day in October of each year after the commencement of this approval, the approval holder must submit a report to the Department and publish the report on its website. The report must address the requirements of an annual report outlined in Part B of the endorsed Program.	Prepare and submit annual report and publish on BHP external website	BHP AER	The first BHP AER was prepared and submitted to the Department on 1 October 2018. The first BHP AER was published on the BHP external website on the 1 October 2018. This document forms the annual report under the approval for the July 2018 to June 2019 period. Table 3 documents the requirements of an annual report in accordance with Part B, Chapter 5 Reporting, of the Program.	Annually for the duration of the Approval	Compliant
9	The approval holder must maintain accurate records substantiating all activities associated with or relevant to the conditions attached to this approval, including measures taken to implement the endorsed Program, Assurance Plan and Offsets Plan and make them available upon request to the Department. Such records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, or used to verify compliance with the conditions attached to this approval. Summaries of audits will be posted on the Department's website. The results of audits may also be publicised through the general media.	Maintain the program disturbance tracking register Document decisions regarding notifiable and non-notifiable actions Maintain the legal obligations register	Program disturbance tracking register Validation notices and decision reports WAIO Environmental Legal Obligations Register (ELOR)	Table 2 provides an extract of the program disturbance tracking register, which details the current disturbance undertaken during the reporting period against the upper disturbance limit. There were two actions determined to be not notifiable in the reporting period (Jimblebar OSA 1 Stage 1 and OB30 Creek Diversion). Decision reports were completed for both non notifiable actions. The draft Mining Area C - Validation Notice was made available for public comment from 15 June to 12 July 2018. BHP has recently replaced the outdated CMO online database with a purpose built WAIO Environmental Legal Obligations Register (ELOR) database to administer and report against legal and corporate obligations. Section 7.1 will be reviewed during the next revision of the Assurance Plan, to document this replacement.	Duration of the Approval	Compliant
10	Upon the direction of the Minister, the approval holder must ensure that an independent audit of compliance with the conditions attached to this approval is conducted and a report submitted to the Minister. The independent auditor must be approved by the Minister prior to the commencement of the audit. Audit criteria must be agreed to by the Minister and the audit report must address the criteria to the satisfaction of the Minister.	Appoint a Minister approved independent auditor to undertake an audit of compliance with conditions	Independent auditors report	Not required at this stage	When requested by the Minister	Not required at this stage

Table 2: Disturbance undertaken during the 2018/19 reporting period

Project Name	Activity completed during reporting period	Validation Decision	Proposed disturbance (ha)	Overall program disturbance remaining (ha)	Activity disturbance 2018/19 (ha)	Activity disturbance remaining (ha)
South Flank	Establishment of an access road from Mulla Mulla Camp to Primary Crushing Station (PC) 2, bulk earth works for PC1 and PC2, Mobile Equipment Maintenance (MEM) precinct conveyors from South Flank to Mining Area C, opening of mine pit areas at Mining Area C and the rail loop expansion at Mining Area C.	Notifiable Action	16,000	94,000	1,175.8	108,824.2
OSA1 Stage 1	Clearing of the OSA footprint and commencement of stockpiling of waste material.	Not a Notifiable Action	95	93,920	94.7	108,729.5
OB30 Creek Diversion	No activity completed during the reporting period.	Not a Notifiable Action	40	93,880	-	108,729.5

Table 3: Audit Table for the EPBC SEA Program Part B

Chapter	Condition/Section	Requirement	How	Documentation	Evidence	Timeframe	Status
5 Reporting	Item 1	Compliance with the Assurance Plan and Offsets Plan and Validation Notices.	Assess as part of the BHP annual reporting process	BHP AER	No non-compliances with the Assurance Plan, Offsets Plan or Validation Notices have been identified during the reporting period.	Annually for the duration of the approval	Compliant
	Item 2	Actions determined not notifiable.	Assess activities against the Program and Assurance Plan	Decision report	There were two actions determined to be not notifiable in the reporting period (Jimblebar OSA 1 Stage 1 and OB30 Creek Diversion). Decision reports were completed for both non-notifiable actions. Disturbance activities were undertaken at Jimblebar OSA1 Stage 1 during the reporting period. No disturbance activities were undertaken for OB30 Creek Diversion.	Duration of the Approval	Compliant
	Item 3	Activities determined to be a notifiable action.	Assess activities against the Program and Assurance Plan	Decision report and Validation Notice	No actions were determined to require a Validation Notice during the reporting period.	Duration of the Approval	Compliant
	Item 4	Progress of notifiable actions, including when notifiable actions have commenced and completed.	Review progress of notifiable actions	Program disturbance tracking register	The Mining Area C - Validation Notice was made available for public comment from 15 June to 12 July 2018. BHP submitted the Offsets Proposal for Mining Area C, in accordance with the Program, on 14 December 2018. Construction of the Mining Area C – Southern Flank activity commenced in July 2018 following the Validation Notice becoming effective. Details of disturbance undertaken during the reporting period is provided in Table 2. Activities at Mining Area C will continue into future reporting periods.	Annually for the duration of the approval	Compliant
	Item 5	Assets divested through the process described in Section 2.1, noting the status of environmental obligations under this Program at the time of divestment.	Review BHP divestment activities	Asset database	No assets, subject to the Program, were divested during the reporting period.	Annually for the duration of the approval	Not required at this stage
	Item 6	An account of the upper disturbance limit for all activities taken within the Strategic Assessment Area. This will include any direct disturbance that has occurred in the twelve month period and as a cumulative total.	Maintain the program disturbance tracking register	Program disturbance tracking register	Details of disturbance undertaken during the reporting period is provided in Table 2.	Annually for the duration of the approval	Compliant
	Item 7	Results of the five yearly review as described in Sections 4.1.1. and 4.1.2.	Prepare and submit a five yearly review to the satisfaction of the Minister.	Five yearly review document	Not required within this reporting period.	First Review due the 19 December 2021	Not required at this stage

Table 4: Audit Table for the EPBC SEA Assurance Plan

Chapter	Condition/Section	Requirement	How	Documentation	Evidence	Timeframe	Status
8 Reporting	Item 1	Notifiable Actions identified under the Program during the period covered by the report.	Assess activities against the Program and Assurance Plan	Validation Notice	No actions were determined to require a Validation Notice during the reporting period.	Annually for the duration of the approval	Compliant
	Item 2	Details of activities within the scope of the Program which were commenced during the period covered by the report but were determined not notifiable.	Review progress of non-notifiable actions and maintain the program disturbance tracking register	BHP AER Program disturbance tracking register	Clearing of native vegetation for the Jimblebar OSA 1 Stage 1 footprint was conducted during the reporting period at the approved and operating Jimblebar Iron Ore Mine. Stockpiling of waste material within the OSA footprint commenced. Details of disturbance undertaken for the Jimblebar OSA 1 Stage 1 during the reporting period is provided in Table 2 and Figure 3.	Annually for the duration of the approval	Compliant
	Item 3	Status of implementation (planned start date, action commenced and planned completion date; and action completed) of all Notifiable Actions.	Review progress of notifiable actions and maintain the program disturbance tracking register	BHP AER Program disturbance tracking register	Disturbance activities for Mining Area C, specifically Southern Flank, commenced in July 2018. Development of Southern Flank infrastructure commenced during the reporting period. These works included establishment of an access road from Mulla Mulla Camp to Primary Crushing Station (PC) 2, bulk earth works for PC1 and PC2, Mobile Equipment Maintenance (MEM) precinct conveyors from South Flank to Mining Area C, opening of mine pit areas at Mining Area C and the rail loop expansion at Mining Area C. Mining Area C project completion is planned for approximately 2068. Details of disturbance undertaken for Mining Area C during the reporting period is provided in Table 2 and Figure 3.	Annually for the duration of the approval	Compliant
	Item 4	Assets divested through the process described in Section 2.1 of the Program.	Review BHP divestment activities	Asset database	No assets, subject to the Program, were divested during the reporting period.	Annually for the duration of the approval	Not required at this stage
	Item 5	Status of offsets implemented for each Notifiable Action.	Review progress of offset plans for notifiable actions	BHP AER	No offsets were implemented during the reporting period. BHP submitted the Offsets Proposal for Mining Area C, in accordance with the Offsets Plan, on the 14 December 2018. The offsets proposed commences 2020 for a 5 year period. The Offsets Proposal is currently under review.	Annually for the duration of the approval	Not required at this stage
	Item 6	Disturbance areas associated with all actions, whether material or non-material, implemented since the Approval. Both the annual disturbance and the total disturbance (since the Approval) will be included.	Maintain the program disturbance tracking register	Program disturbance tracking register	Details of disturbance undertaken during the reporting period is provided in Table 2 and Figures 3 and 4.	Annually for the duration of the approval	Compliant
	Item 7	The outcomes of compliance audits undertaken during the period covered by the report will be included.	Review outcomes of compliance audits completed during the reporting period	Compliance audit reports	No compliance audits were completed during the reporting period.	Annually for the duration of the approval	Not required at this stage
	Item 8	Summary of any exceedances of the Program Matter Outcomes relevant to each Notifiable Action and corrective actions taken.	Review decision reports, notifiable actions and compliance audits undertaken during the reporting period.	Compliance audit reports	No exceedances of the Program Matter Outcomes were identified during the reporting period.	Annually for the duration of the approval	Compliant
	Item 9	Deviation from the Program or from information and management commitments contained in a Validation Notice for a Notifiable Action.	Review decision reports, notifiable actions and compliance audits undertaken during the reporting period.	Compliance audit reports	No deviations from Program were identified during the reporting period.	Annually for the duration of the approval	Compliant
10 Data Management	Item 1	An annual review of the site monitoring register and the guideline trigger values to ensure the program is efficient, risk based and meets compliance requirements.	Review site monitoring registers and compliance audits	Site monitoring register and compliance audit reports	The annual review of the monitoring program for Mining Area C Validation Notice, indicates that the site monitoring register meets the requirements of the Assurance Plan. Annual monitoring of the extent and location of land disturbance activities and groundwater monitoring, were undertaken during the reporting period. At this early stage in the project the current guidelines trigger values are considered appropriate. BHP is currently reviewing the species specific monitoring	Annually for the duration of the approval	Compliant

Chapter	Condition/Section	Requirement	How	Documentation	Evidence	Timeframe	Status
					programs in consultation with the Department of Biodiversity, Conservation and Attractions (DBCAs).		
	Item 2	Environmental monitoring and measurement equipment is to be maintained/calibrated/verified in accordance with manufacturers specifications.	Review site monitoring registers and compliance audits	Site monitoring register and compliance audit reports	Groundwater monitoring was undertaken during the reporting period. Calibration of flow meters and water level monitors was undertaken in accordance with the manufacturers specifications.	Annually for the duration of the approval	Compliant
	Item 3	Verify source data integrity – determine if the data from a sampling point has been mapped against the correct data program, data type, test methods and units of measurement are accurate.	Review site monitoring registers and compliance audits	Site monitoring register and compliance audit reports	Verification of the groundwater monitoring data was completed during the reporting period. Verification activities included reviewing sampling locations, checking test methods and associated units and ensuring consistency with previous monitoring data.	Annually for the duration of the approval	Compliant
	Item 4	Source monitoring data is analysed against trigger values, trends and outliers and in consideration of the target environmental outcomes.	Review site monitoring registers and compliance audits	Site monitoring register and compliance audit reports	Source monitoring data was compared against trigger values during the reporting period. No values from the Mining Area C - Validation Notice, exceeded triggers during the reporting period.	Annually for the duration of the approval	Compliant
	Item 5	An investigation is required for any values that are above triggers and thresholds.	Review site monitoring registers and compliance audits	Site monitoring register and compliance audit reports	No values from the Mining Area C - Validation Notice, exceeded triggers and thresholds during the reporting period.	Annually for the duration of the approval	Compliant

Table 5: Audit Table for the EPBC SEA Offsets Plan

Chapter	Condition/Section	Requirement	How	Documentation	Evidence	Timeframe	Status
4.5 Annual Environmental Report	Item 1	Notifiable Actions identified under the Program during the period covered by the report.	Assess activities against the Program and Assurance Plan	Validation Notice	No actions were determined to require a Validation Notice during the reporting period.	Annually for the duration of the approval	Compliant
	Item 2	Details of activities within the scope of the Program which commenced during the period covered by the report but were determined to not be notifiable.	Review progress of non-notifiable actions and maintain the program disturbance tracking register	BHP AER Program disturbance tracking register	Clearing of native vegetation for the Jimblebar OSA 1 Stage 1 footprint was conducted during the reporting period at the approved and operating Jimblebar Iron Ore Mine. Stockpiling of waste material within the OSA footprint commenced. Details of disturbance undertaken for the Jimblebar OSA 1 Stage 1 during the reporting period is provided in Table 2 and Figure 3.	Annually for the duration of the approval	Compliant
	Item 3	Status of implementation (planned start date, action commenced and planned completion date, and action completed) of all Notifiable Actions.	Review progress of notifiable actions and maintain the program disturbance tracking register	BHP AER Program disturbance tracking register	Disturbance activities for Mining Area C, specifically Southern Flank, commenced in July 2018. Development of Southern Flank infrastructure commenced during the reporting period. These works included establishment of an access road from Mulla Mulla Camp to Primary Crushing Station (PC) 2, bulk earth works for PC1 and PC2, Mobile Equipment Maintenance (MEM) precinct conveyors from South Flank to Mining Area C, opening of mine pit areas at Mining Area C and the rail loop expansion at Mining Area C. Mining Area C project completion is planned for approximately 2068. Details of disturbance undertaken for Mining Area C during the reporting period is provided in Table 2 and Figure 3.	Annually for the duration of the approval	Compliant
	Item 4	Status of offsets implemented for each Notifiable Action including monitoring and continuous improvement outcomes where applicable.	Review progress of offset plans for notifiable actions	BHP AER	No offsets were implemented during the reporting period. BHP submitted the Offsets Proposal for Mining Area C, in accordance with the Offsets Plan, on the December 2018. The offsets proposed commences 2020 for a 5 year period. The Offsets Proposal is currently under review.	Annually for the duration of the approval	Not required at this stage
	Item 5	Assets divested through the process described in Section 2.1 of the Program	Review BHP divestment activities	Program asset divestment register	No assets, subject to the Program, were divested during the reporting period.	Annually for the duration of the approval	Not required at this stage
	Item 6	Disturbance areas associated with all actions, implemented since the Approval. Both the annual disturbance and the total disturbance (since Approval) will be included.	Maintain the program disturbance tracking register	Program disturbance tracking register	Details of disturbance undertaken during the reporting period is provided in Table 2 and Figures 3 and 4.	Annually for the duration of the approval	Compliant
	Item 7	Details and outcomes of audits undertaken during the period covered by the report.	Review outcomes of compliance audits completed during the reporting period	Compliance audit reports	No compliance audits were completed during the reporting period.	Annually for the duration of the approval	Not required at this stage
	Item 8	Summary of any impacts that have prejudiced attainment of the Program Matter Outcomes relevant to each Notifiable Action and corrective actions taken.	Review decision reports, notifiable actions and compliance audits undertaken during the reporting period.	Compliance audit reports	No exceedances of the Program Matter Outcomes were identified during the reporting period.	Annually for the duration of the approval	Compliant
	Item 9	Deviation from the Program or from key management commitments contained in a Validation Notice.	Review decision reports, notifiable actions and compliance audits undertaken during the reporting period.	Compliance audit reports	No deviations from Program were identified during the reporting period.	Annually for the duration of the approval	Compliant
4.6 Offsets Reconciliation	Step 1	Prior to ground disturbance an assessment of native vegetation condition, occurrence of Program Matters and/or habitat of conservation value to Program Matters is undertaken.	Review vegetation condition prior to ground disturbance	PEAHR	For Mining Area C, flora condition assessment was undertaken as part of the Flora and Vegetation Surveys (Onshore Environmental, 2011/2012) completed as part of assessment process for the approval of Ministerial Statement (MS) 1072. Habitat mapping was undertaken as part of Vertebrate Fauna Desktop Assessment (Biologic, 2017) completed for the approval of MS 1072. The PEAHR process reviews proposed activities prior to disturbance to further assess the vegetation condition and occurrence of Program Matters.	Prior to commencing ground disturbance	Compliant

Chapter	Condition/Section	Requirement	How	Documentation	Evidence	Timeframe	Status
	Step 2	The vegetation and topsoil is cleared in accordance with the relevant internal ground disturbance controls.	Conduct vegetation clearing in accordance with PEHR conditions	PEHR	Implementation of on ground activities are managed via the PEHR. All ground disturbance activities will meet the requirements of the PEHR. Topsoil requirements are included within the conditions of PEHR. All personnel carrying out works associated with clearing activities are required to comply with BHP's Sustainable Development Policy, environmental approvals, the PEHR requirements and conditions and any other relevant legislative and licensing requirements.	Prior to commencing ground disturbance	Compliant
	Step 3	Annual recording and mapping of new disturbance is undertaken.	Maintain disturbance tracking register and annual map disturbance completed during reporting period	Program disturbance tracking register and BHP AER	Recording of annual disturbance is undertaken using on-site surveys, with confirmation through aerial photography from the end of the reporting period. Survey and aerial photography data is processed using ArcMAP, to generate maps for specific disturbance areas. Details of disturbance undertaken during the reporting period is provided in Table 2 and Figures 3 and 4.	Annually for the duration of the approval	Compliant
	Step 4	The total area disturbed within the scope of the Program is calculated using a geographical information system (GIS).	Review annual disturbance	Program disturbance tracking register and BHP AER	Disturbance is calculated using on-site surveys, with confirmation through current aerial photography. Survey and aerial photography data is reviewed and the final disturbance areas are calculated using ArcMAP.	Annually for the duration of the approval	Compliant
	Step 5	The total number of hectares disturbed over the reporting period and a cumulative period total against the Program, for each Validation Notice.	Maintain disturbance tracking register	Program disturbance tracking register	Details of disturbance undertaken during the reporting period is provided in Table 2 and Figures 3 and 4.	Annually for the duration of the approval	Compliant

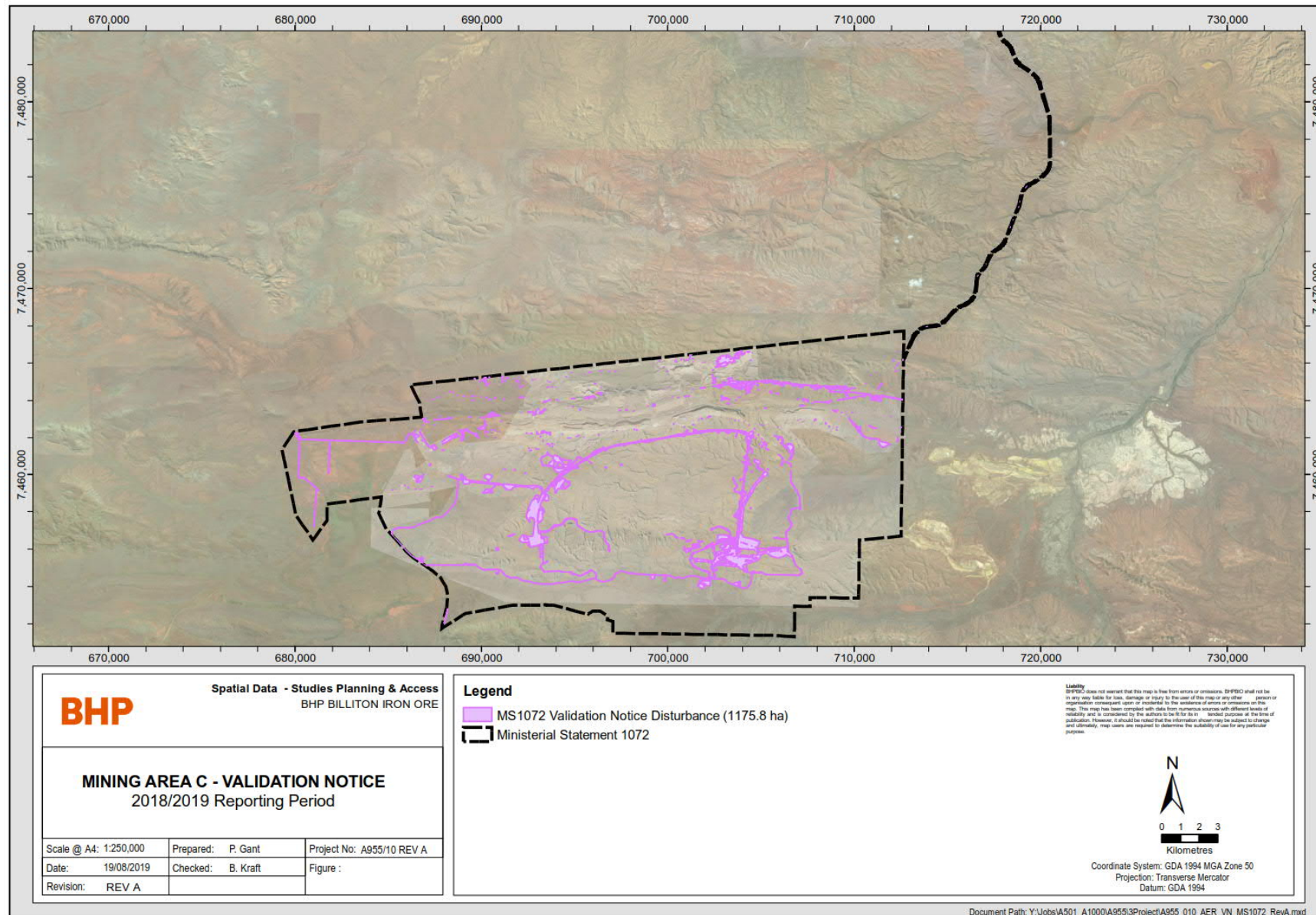


Figure 3: Mining Area C Disturbance 2018/19

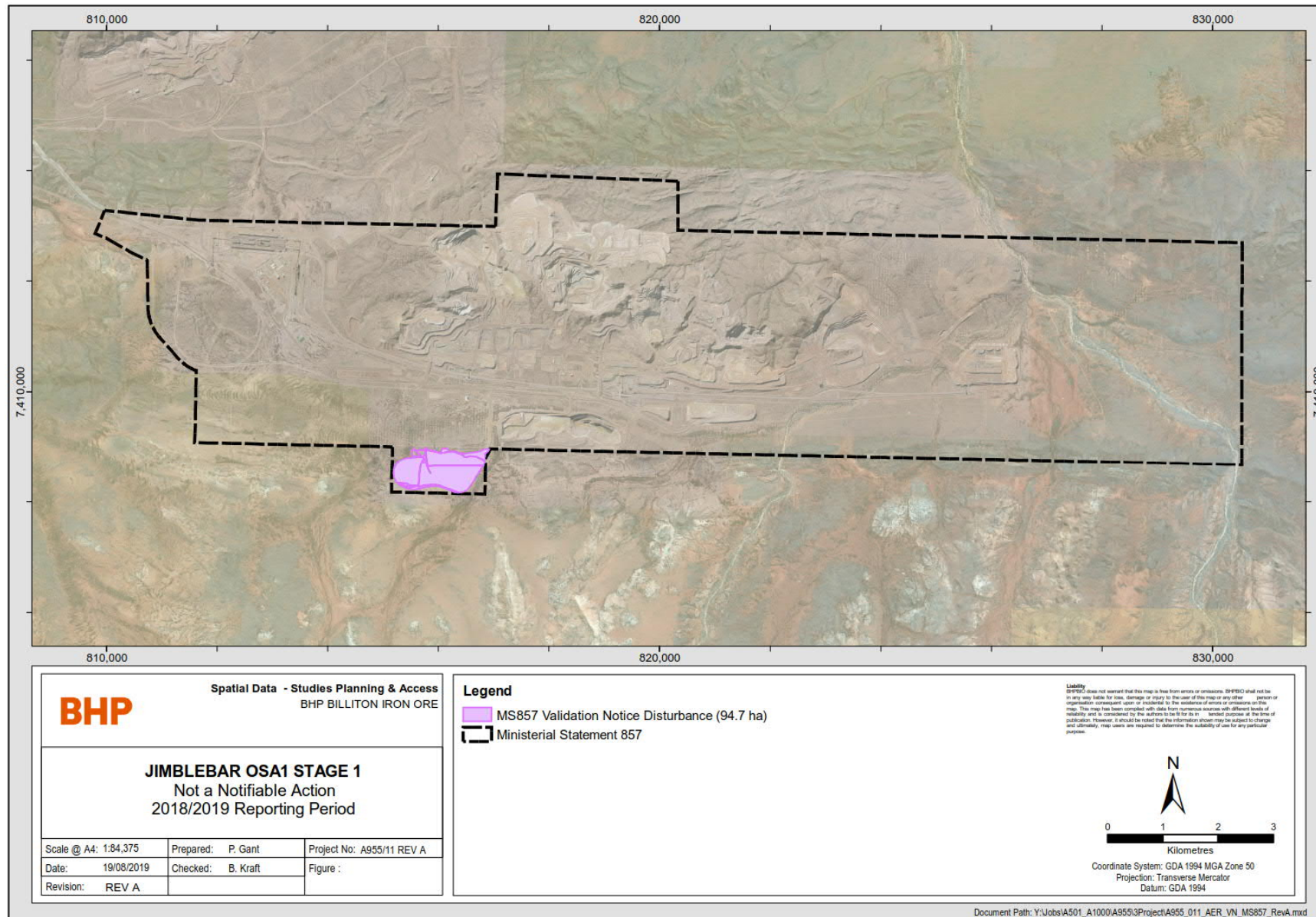


Figure 4: Jimblebar OSA 1 Stage 1 Disturbance 2018/19