



Yara Pilbara Nitrates
 2022 Compliance Assessment Report
 Ministerial Statement 870
 Technical Ammonium Nitrate Production Facility

07-10-2022 650-200-CAR-YPN-0043 Rev 0

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Document Custodian	Environment and Quality Manager
Document Approver	Plant Manager

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Confidential and commercial sensitive information

Yara Pilbara considers that the information contained in this report (the Information) comprises, confidential and commercially sensitive information about its business operations, particularly in relation to its propriety systems, procedures and processes at its plant and operations.

Yara Pilbara is concerned that disclosure of this confidential and commercially sensitive information may cause it to suffer loss and damage, including in relation to its dealings with suppliers and/or contracting parties.

Accordingly, Yara Pilbara requests that it be given 15 business days' notice prior to:

- a) any public disclosure or publication of the information; or
- b) any release of any Information or the substance of the Information or MHF Status to a third party, including but not limited to a proposed release pursuant to a request made under the Freedom of Information Act 1992 (WA).

Proponent Declaration

Yara Pilbara Nitrate Pty Ltd is pleased to submit this Compliance Assessment Report as per condition 4-6 of Ministerial Statement 870.

I, Ty Hibberd, Environment and Quality Manager, declare that I am authorised on behalf of Yara Pilbara Nitrates Pty Ltd (being the person responsible for the proposal) to submit this form and that the information contained in this form is true and not misleading.

Signature:

Date: 4/10/2022

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1 Introduction

1.1 Purpose

This Compliance Assessment Report (CAR) outlines the compliance status of Yara Pilbara Nitrates Pty Ltd (YPN) against the conditions of Ministerial Statement 870 (MS870) for the period 8 July 2021 to 7 July 2022.

This CAR has been prepared to meet the requirements of Condition 4-6 of MS870, which requires the proponent, YPN, to submit a compliance report to the Department of Water and Environmental Regulation (DWER) annually.

1.2 Project Details

The Technical Ammonium Nitrate Production Facility (TANPF) has a production capacity of 350,000 tonnes per annum (TPA) or 915 tonnes per day (TPD) of Technical Ammonium Nitrate (TAN). The facility comprises three (3) major process units, each producing a separate product in the manufacturing process:

1. Nitric Acid Plant to convert ammonia and atmospheric air into nitric acid (NA). The NA unit has a capacity of 760 TPD as 100% weight. The main feedstock, ammonia, is delivered from the adjacent ammonia plant.
2. Ammonium Nitrate (AN) Solution Plant to convert ammonia and NA into AN solution. This AN wet section has a capacity of 965 TPD in balance with NA production capacity.
3. TAN Prilling Plant to convert AN solution into TAN prills (final product). This is a dry section for production of TAN prills (0.7 and 0.8 kg/l density) with a capacity of 915 TPD. Surplus AN solution is sold as liquid.

The facility also has storage, loading and transport facilities, including an incoming liquid ammonia pipeline, bulk and bagged TAN storage, bulk loading system, bagging unit and truck loading.

1.3 Current Status

During the reporting period (8th of July 2021- 7th of July 2022) the Nitric Acid plant operated between the 8th of July 2021 (start of reporting period) to the 11th of September, 15th of September to the 3rd of December, 16th of December to the 17th of March 2022, 3rd of April to the 25th of May, 30th of May to the 1st of June, 3rd of June to the 5th of July and the 6th to the 8th of July (end of reporting period). The AN solution and Prill plant (U31/32) operated for a similar timeframe.

1.4 CAP

The CAP has recently been reviewed and has been submitted for approval in situ with this CAR. This CAR follows the revised CAP as it incorporates the Condition 5 variations issued on the 24th December 2019.



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2 Methodology

Yara undertook an internal assessment of compliance against MS870 using the following checklists:

- the DWER (formerly OEPA) audit table for MS870; and
- audit tables prepared by Sustainability in previous third-party audits for each management plan or procedure required under MS870.

The assessment was performed at the TANPF and involved reviewing documents and records, a site inspection and interviews with YPN's personnel where applicable.

2.1 Terminology

The "status" field of the audit table describes the implementation of actions and compliance with MS870. Although the Chief Executive Officer of DWER makes the final determination of compliance, it is necessary to update this field each reporting period, as the project progresses. DWER has prepared updated guidance related to the preparation of compliance audits, including generic expressions that are used to identify the status of each action (Table 1).

Table 1: Compliance Status Terms

Status	Status Abbreviation	Description
Compliant	C	Implementation of the proposal has been carried out in accordance with requirements of the audit element.
Completed	CLD	A requirement with a finite period of application has been satisfactorily completed.
Not required at this stage	NR	The requirements of the audit element were not triggered during the reporting period.
Potentially non-compliant	PNC	Possible or likely failure to meet the requirements of the audit element.
Non-compliant	NC	Implementation of the proposal has not been carried out in accordance with requirements of the audit element.
In process	IP	Where an audit element requires a management or monitoring plan be submitted to the DWER or another government agency for approval, that submission has been made and no further information or changes have been requested by the DWER or the other government agency and assessment by the DWER or other government agency for approval is still pending.

Source: Adapted from Section 2.8 of DWER's Post Assessment Guideline (PAG 1) Preparing an Audit Table



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3 Compliance

3.1 Statement of Compliance

The results of the audit of MS870 are shown in the DWER Audit Table (Appendix 1). A total of 37 items were audited.

The audit found the following:

- 18 elements were found to be compliant;
- 9 elements were found to be completed;
- 8 elements were found to be not required at this stage; and
- 1 element was assessed as being non-compliant
- 1 element was assessed as being potentially non-compliant.

As per the “DWER Statement of Compliance Guidelines”, each non-compliance and potential non-compliance is presented in the “Post Assessment Form 2” format in Section 3.2.

3.1.1 Proposal and Proponent Details

Proposal Title	<i>Technical Ammonium Nitrate Production Facility, Burrup Peninsula</i>
Statement Number	<i>Statement Number 870</i>
Proponent Name	<i>Yara Pilbara Nitrates Pty Ltd</i>
Proponent's Australian Company Number (where relevant)	<i>127 391 422</i>

3.1.2 Statement of Compliance Details

Reporting Period	<i>8 July 2021 to 7 July 2022</i>						
Implementation phase(s) during reporting period (please tick ✓ relevant phase(s))							
Pre-construction	<input type="checkbox"/>	Construction	<input type="checkbox"/>	Operation	<input checked="" type="checkbox"/>	Decommissioning	<input type="checkbox"/>
Audit Table for Statement addressed in this Statement of Compliance is provided at:						<i>Appendix 1</i>	
Were all implementation conditions and/or procedures of the Statement complied with within the reporting period? (please tick ✓ the appropriate box)							
No	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>				



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3.2 Details of Non-Compliance or Potential Non-Compliance

3.2.1 NC #1

Which implementation condition or procedure was non-compliant or potentially non-compliant?	
870:M2-2	
Was the implementation condition or procedure non-compliant or potentially non-compliant?	
Non-compliant	
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?	
N/A	
Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Reported to OEPA verbally Date _____ <input checked="" type="checkbox"/> Reported to OEPA in writing Date 19/08/2022	<input type="checkbox"/> No
What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?	
Proponent address changed on the 20th of June 2022. Notification to the CEO occurred on the 17th of August; 58 days after the change. Notification is outside of the required reporting period (within 30 days). Administrative non-compliance, no impact associated.	
What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)	
N/A	
What was the cause(s) of the non-compliance or potential non-compliance?	
Administrative, human error.	
What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance?	
N/A	
What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?	
N/A	
Please provide information/documentation collected and recorded in relation to this implementation condition or procedure: <ul style="list-style-type: none">• in the reporting period addressed in this Statement of Compliance; and• as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance. (the above information may be provided as an attachment to this Statement of Compliance)	



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3.2.2 PNC #2

Which implementation condition or procedure was non-compliant or potentially non-compliant?	
1121:M5-12 (previously Condition 870:5-2) Air Quality: The proponent shall continue to implement the current approved version of the Air Quality Management Plan (Doc Ref: 0086269, February 2013) until notified by the CEO under condition 5-4 that the revised Air Quality Management Plan meets the requirements of condition 5-2 and condition 5-3.	
Was the implementation condition or procedure non-compliant or potentially non-compliant?	
Potentially non-compliant	
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?	
NA	
Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Reported to OEPA verbally Date _____ <input checked="" type="checkbox"/> Reported to OEPA in writing Date 06/10/2017	<input type="checkbox"/> No
What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?	
For the reporting period 8 July 2021 to 7 July 2022 air quality monitoring was not implemented as noted in the TANPF Air Quality Management Plan (AQMP) Doc. No. 0086269 February 2013 (as approved by the CEO DWER). However, air quality monitoring was undertaken during the assessment period as outlined below.	
What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)	
NA	
What was the cause(s) of the non-compliance or potential non-compliance?	



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The transition from construction phase (completed in February 2016) for the TANPF to commissioning/operation of the TANPF required a change in the air quality monitoring (AQMP) being undertaken in order to monitor operational outputs. As noted in the 2017- 2021 CAR's for this condition a request for variation to the required implementation of the AQMP was approved by OEPA on 22 December 2016, with the intention that post construction air quality monitoring would be carried out as described within the "Operational Monitoring" section in the approved Plan.

At the same time the operating licence was in process and there was a requirement to include AQMP as part of the Operational Environmental Management Plan (OEMP). Air quality monitoring has subsequently been implemented in line with the Air Quality Management arrangements approved by Department of Climate Change, Energy, the Environment and Water (DCCEEW, previously DoEE) as part of the OEMP.

In November 2018, the DWER advised Yara Pilbara Nitrates Pty Ltd that it would need to undertake a comparison analysis of the AQMP and the OEMP to determine whether the air quality monitoring requirements and objectives of the AQMP were met by the monitoring undertaken in accordance with the DAWE approved OEMP and submit a report on the analysis by 10 January 2019.

In January 2019, Yara Pilbara Nitrates Pty Ltd submitted the required report to the DWER and indicated that the air quality monitoring requirements and objectives of the AQMP were met by the monitoring undertaken in accordance with the OEMP. The report also recommended that the AQMP be revoked and that Yara Pilbara Nitrates Pty Ltd should request the CEO of the DWER to approve the implementation of the OEMP which was updated in June 2018 to reflect the amended version of Licence L7997/2002/11.

In April 2019, Yara Pilbara Nitrates Pty Ltd advised the DWER that it would submit the updated OEMP once it has been approved by the DCCEEW and requested that it approves the implementation of the OEMP's air quality management measures. However, due to Licence Appeals, Section 46 inquiry and the issue of the new YPN licence L9223-2019-1 (on the 20th of April 2020), the updated OEMP has not been submitted to DCCEEW.

As a result of the Section 46 enquiry into Condition 5 of MS870, revised conditions were issued on the 24th of December 2019 (refer to Statement No.1121). These revised conditions stipulate the requirement of a revised AQMP being submitted to DWER by the 23rd of December 2020. Once approved this revised AQMP will then be implemented and will supersede the current AQMP.

What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance?

The revised AQMP was submitted on the 23rd of December 2020. Comments on the revised AQMP were received from the EPASD on the 5th of August 2021. Yara resubmitted the revised AQMP on the 26th of November 2021. Further correspondence from EPASD was then received on the 29th of March 2022. Yara has submitted another revision of the AQMP and are currently waiting for further correspondence. Once approved the revised AQMP will be implemented and will supersede the current AQMP (Doc Ref: 0086269, February 2013).

Once this occurs Condition 1121:M5-12 will no longer be applicable and will be closed out resolving this potential non-compliance.



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What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?

Monitoring has continued since issue of the Operating Licence with the monitoring reports against compliance with the OEMP (and AQMP) submitted to the DCCEEW on 6th October 2018, 4th of October 2019, 4th of October 2020 and 4th of October 2021. This year's EPBC ACR will be submitted by the 6th of October 2022.

Please provide information/documentation collected and recorded in relation to this implementation condition or procedure:

- in the reporting period addressed in this Statement of Compliance; and
- as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance.

(the above information may be provided as an attachment to this Statement of Compliance)



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4 Conclusion

YPN has been found to be compliant with all conditions of MS870, except condition M2-2 and M5-12, which was assessed as being non-compliant and potentially non-compliant (respectively).

YPN's Perth office (Proponent Address) having changed on the 20th of June 2022. Notification to the CEO occurred on the 17th of August; 58 days after the change and outside of the required reporting period (30 days).

Air quality monitoring has been conducted in accordance with arrangements approved by DCCEE (previously DoEE) under EPBC Act approval for the project. A comparison analysis of the AQMP and the OEMP submitted to the DWER in January 2019 indicated that the air quality requirements and objectives of the AQMP were met by the monitoring undertaken in accordance with the OEMP. However, a potential non-compliance has been identified as the implementation of the OEMP in place of the AQMP to meet air quality monitoring requirements has not been formally approved by the CEO of the DWER.

YPN submitted a revised AQMP to DWER. Once the revised AQMP has been approved this will resolve this potential non-compliance.



Appendix 1 – DWER Audit Table

NOTES

- Phases that apply in this table = **Pre-Construction, Construction, Pre-Commissioning, Operation, Decommissioning, Overall (several phases).**
- This audit table is a summary of the requirements applying to this Project. Refer to MS870 issued under Part IV of the *EP Act* for details/precise wording of audit elements.
- Code prefixes: M = Minister's condition and P = Proponent's commitment.
- Abbreviations: Min Env = Minister for the Environment;
- Compliance Status: C = Compliant, CLD = Completed, NR = Not required at this stage, PNC = Potentially non-compliant, NC = Non-compliant. Please note the terms NA = Not Audited and VR = Verification Required are only for OEPA use. IP = In Process may only be used by the proponent in circumstances outlined in Section 2.8 of the *Post Assessment Guideline for Preparing an Audit Table*.
- Acronyms list: YPN = Yara Pilbara Nitrates Pty Ltd; CAR = Compliance Assessment Report; DWER = Department of Water and Environmental Regulation; CEO = Chief Executive Officer of DWER; N/A = not applicable; OEPA = Office of the Environmental Protection Authority (now DWER); DEP = Department of Environmental Protection (now DWER); DEPWRC = Department of Environmental Protection Water and Rivers Commission (now DWER); FESA = Fire and Emergency Services Authority of Western Australia.

Table 2: MS870 DWER Audit Table

Audit Code	Subject	Requirement (extracted directly from MS870)	How	Evidence	Phase	Timeframe	Status	Further Information
Ministerial Statement 870 Conditions								
870:M1-1	Proposal Implementation	The proponent shall implement the proposal as documented and described in schedule 1 of this statement subject to the conditions and procedures of this statement.	Proposal to be implemented in accordance with Schedule 1 of Statement No. 870 (updated as Attachment 2 of MS870), including the key proposal characteristics.	Ministerial Statement 870 (as amended) (Attachment 2 - 07/06/2017) [1] Appendix 2.	Overall	Ongoing	C	There has been no change to the extent of the development envelope or the disturbance footprint during the reporting period. Both remain within the delineation coordinates confirmed by DWER in Attachment 2 of MS870 [1]. The TAN Plant was fully compliant with Schedule 1 during the reporting period, with exception to CO ₂ emissions. CO ₂ emissions were higher than the authorised extent due to a higher fuel consumption than what was anticipated for normal operations. YPN proposes that Schedule 1 is still being complied with as the Total Greenhouse Gas Emissions are significantly less than the authorised extent. The actual emissions in 2020-21 approximately 80,000 t CO ₂ -e less than the authorised extent. Refer to Appendix 2 for comparison of actual vs. authorised extent and 2021/22 NGERS submission by the 30 th of October 2022.
870:M2-1	Proponent Nomination and Contact Details	The proponent for the time being nominated by the Minister for Environment under sections 38(6) or 38(7) of the Environmental Protection Act 1986 is responsible for the implementation of the proposal.	Provide written notification including the details of the name and address of the new proponent.	Ministerial Statement 870 (as amended) (Attachment 2 - 07/06/2017) [1]	Overall	Ongoing	C	The proponent Yara Pilbara Nitrates Pty Ltd, as noted in Attachment 1 (9 July 2013) and Attachment 2 (7 June 2017) of MS870 has not changed during the reporting period.
870:M2-2	Proponent Nomination and Contact Details	The proponent shall notify the Chief Executive Officer of the Office of the Environmental Protection Authority (CEO) of any change of the name and address of the proponent for the serving of notices or other correspondence within 30 days of such change.	Provide written notification to the CEO of any change in proponent details.	Ministerial Statement 870 (as amended) (Attachment 2 - 07/06/2017) [1] 250-200-LET-YPF-0038 [17]	Overall	Within 30 days of such change	NC	Proponent address changed on the 20 th of June 2022. Notification to the CEO occurred on the 17 th of August; 58 days after the change. Notification is outside of the required reporting period.
870:M3-1	Time Limit of Authorisation	The authorization to implement the proposal provided for in this statement shall lapse and be void five years after the date of this statement if the proposal to which this statement relates is not substantially commenced.	Provide written notification to the CEO that the proposal has been substantially commenced within 5 years of the date of MS870.	N/A	Overall	Before 7 July 2016	CLD	Noted as closed (CLD) in the DWER Compliance Audit Report 1379 (Ref: CA01-2013-0018-) dated 21 September 2017.



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Audit Code	Subject	Requirement (extracted directly from MS870)	How	Evidence	Phase	Timeframe	Status	Further Information
870:M3-2	Time Limit of Authorisation	The proponent shall provide the CEO with written evidence which demonstrates that the proposal has substantially commenced on or before the expiration of five years from the date of this statement.	Provide written notification to the CEO that the proposal has been substantially commenced within 5 years of the date of MS870.	N/A	Overall	Before 7 July 2016	CLD	Noted as closed (CLD) in the DWER Compliance Audit Report 1379 (Ref: CA01-2013-0018-) dated 21 September 2017.
870:M4-1	Compliance Reporting	The proponent shall prepare and maintain a compliance assessment plan to the satisfaction of the CEO.	Prepare and maintain a Compliance Assessment Plan (CAP) and an audit table in accordance with the 'Post Assessment Guideline for Preparing an Audit Table'. Written correspondence to/from CEO.	Yara Pilbara Nitrates Compliance Assessment Plan Ministerial Statement 870 Technical Ammonia Nitrate Plant Rev. 02 (Ref: 250-200-CAR-YPN-0001) [2] Ministerial Statement 870 (as amended) (09/07/2013 and 07/06/2017) [1]	Overall	Ongoing	C	The CAP is currently under review and is waiting for approval. This revision incorporates the Condition 5 variations issued on the 24 th of December 2019. This CAR includes the most up to date conditions.
870:M4-2	Compliance Reporting	The proponent shall submit to the CEO the compliance assessment plan required by condition 4-1 at least 6 months prior to the first compliance report required by condition 4-6, or prior to implementation, whichever is sooner. The compliance assessment plan shall indicate: 1. the frequency of compliance reporting; 2. the approach and timing of compliance assessments; 3. the retention of compliance assessments; 4. the method of reporting of potential non-compliances and corrective actions taken; 5. the table of contents of compliance assessment reports; and 6. public availability of compliance assessment reports.	Submit the CAP to CEO. The CAP includes: 1. frequency of CAR, 2. approach and timing of compliance assessments, 3. retention of compliance assessments, 4. methods of reporting non-compliances and corrective actions reporting, 5. Table of contents of CAR and 6. Public availability of CAR.	Approved CAP. CAR's available on proponent's website.	Pre-construction	Six (6) months prior to the first CAR by condition 4-6 (by 8 April 2012) or prior to implementation, whichever is sooner	CLD	Noted as closed (CLD) in the DWER Compliance Audit Report 1379 (Ref: CA01-2013-0018-) dated 21 September 2017.
870:M4-3	Compliance Reporting	The proponent shall assess compliance with conditions in accordance with the compliance assessment plan required by condition 4-1.	Undertake assessment according to the approved CAP.	2021 CAR Submission [19] Previous CAR's uploaded on to website.	Overall	CAR annually by 8 October	C	Compliance has been assessed annually, as evidenced by annual CARs: <ul style="list-style-type: none"> TAN Plant MS870 Compliance Assessment Report 2012 TAN Plant MS870 Compliance Assessment Report 2013 TAN Plant MS870 Compliance Assessment Report 2014 TAN Plant MS870 Compliance Assessment Report 2015 TAN Plant MS870 Compliance Assessment Report 2016 TAN Plant MS870 Compliance Assessment Report 2017 TAN Plant MS870 Compliance Assessment Report 2018 TAN Plant MS870 Compliance Assessment Report 2019 TAN Plant MS870 Compliance Assessment Report 2020 TAN Plant MS870 Compliance Assessment Report 2021 All CARs are publicly available via the link noted in response to M4-4 below.



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Audit Code	Subject	Requirement (extracted directly from MS870)	How	Evidence	Phase	Timeframe	Status	Further Information
870:M4-4	Compliance Reporting	The proponent shall retain reports of all compliance assessments described in the compliance assessment plan required by condition 4-1 and shall make those reports available when requested by the CEO.	Retain electronic Compliance Assessment Reports for the life of the Project, maintained as per PROPOSAL's Document Control Management System requirements being retrieved if required.	CAR and records available at the request of CEO.	Overall	When required by CEO	C	Annual CARs are retained by YPN and are publicly available online via the link below: https://www.yara.com.au/about-yara/about-yara-australia/pilbara/yara-pilbara-nitrates/
870:M4-5	Compliance Reporting	The proponent shall advise the CEO of any potential non-compliance within seven days of that non-compliance being known.	Notify in writing.	CAR	Overall	Within 7 days of non-compliance being known	C	One non-compliance occurred during the reporting period refer to Condition 2-2. This non-compliance was reported to the CEO on the 19 th of August 2022, 2 days after the detection of the non-compliance. The PNC against M5-12; previously covered in condition M5-2 that was reported in the 2019 CAR. The revised AQMP submitted on the 23 rd of December 2020 will make condition M5-12 no longer applicable and therefore resolve this potential non-compliance once approval has been given by DWER.
870:M4-6	Compliance Reporting	The proponent shall submit to the CEO the first compliance assessment report fifteen months from the date of issue of this Statement addressing the twelve-month period from the date of issue of this Statement and then annually from the date of submission of the first compliance report. The compliance assessment report shall: 1. be endorsed by the proponent's Managing Director or a person delegated to sign on the Managing Director's behalf; 2. include a statement as to whether the proponent has complied with the conditions; 3. identify all potential non-compliances and describe corrective and preventative actions taken; 4. be made publicly available in accordance with the approved compliance assessment plan; and 5. indicate any proposed changes to the compliance assessment plan required by Condition 4-1.	Submit the CAR to CEO in accordance with CAP. The CAR shall: 1. be endorsed by the proponent's Managing Director or a person delegated; 2. include a statement of compliance with conditions; 3. identify all potential non-compliances and describe corrective measures; 4. Be made publicly available; and 5. Proposed changes.	2021 CAR Submission [19] Previous CAR's uploaded on to proponent's website.	Overall	The first CAR due to be submitted 8 October 2012. Then, annually on or before 8 October each year.	C	CARs have been submitted annually to the CEO since the initial CAR in October 2012 as noted in response to M4-3 above. During the reporting period CAR 2021 was submitted to the CEO (DWER) on the 4 th October 2021. In accordance with M4-6 CARs: 1. are endorsed by the YPN Plant Manager; 2. include a statement of compliance; 3. identify all potential non-compliances; 4. are retained by YPN and are publicly available on the company website (see M4-4); 5. indicate any proposed changes to the CAP.
1121:M5-1	Air Quality	The proponent shall manage the implementation of the proposal to meet the following objectives: 1. minimise air emissions from the proposal to assist in the maintenance of regional air quality in accordance with applicable air quality standards including, but not limited to, the National Environment Protection (Ambient Air Quality) Measure (NEPM) so that the environmental values of human health and amenity are protected; and 2. minimise air emissions from the proposal as far as practicable to assist in minimising the	Adopt and implement EFMA - Best Available Techniques for Pollution Prevention and Control in the European Fertilizer Industry, Booklet No. 6 of 8: Production of Ammonium Nitrate and Calcium Ammonium Nitrate, 2000 (EFMA, 2000b) from the Common Stack (other sources) for the AN Plant. DWER have incorporated stack emission concentration figures in the Licence that commensurate with the use of best practice pollution control technology. Air Dispersion Modelling Study. Written correspondence.	CAR Air Quality Report Operational Environmental Management Plan [9]	Overall	Ongoing	C	Following a site visit to the TANPF by DWER in March 2018, the Director General of DWER confirmed in correspondence to the Minister for Environment that 'contemporary best practice pollution control technology has been incorporated into the TANPF'. (DWERME0135/18) Stack test results (Attachment 7) and CEMS data (Attachment 8) from the 8 July 2021 to 7 July 2022 operational period are below DWER licence limits.



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		risk of adverse impacts to rock art on Murujuga.						The licence limits in L9223-2019-1 are set to reflect the use of best practice pollution control technology (Attachments 7 and 8).
1121:M5-2	Air Quality	<p>Within twelve (12) months of the date of this Statement, unless otherwise agreed by the CEO, the proponent shall prepare and submit to the CEO a revised Air Quality Management Plan that describes how the proponent will meet the following objectives:</p> <ol style="list-style-type: none"> 1. minimise air emissions from the proposal to assist in the maintenance of regional air quality in accordance with applicable air quality standards including, but not limited to, the NEPM so that the environmental values of human health and amenity are protected; and 2. minimise air emissions from the proposal as far as practicable to assist in minimising the risk of adverse impacts to rock art on Murujuga 	<p>Submit revised AQMP to Department by the 24th of December 2020.</p> <p>The AQMP shall: 1. address approaches to minimise air emissions from the proposal to help maintain regional air quality standards; and 2. address approaches to minimise air emissions from the proposal to minimise the risk of adverse impacts to rock art in Murujuga.</p>	<p>AQMP Submission Email, 23rd of December 2020 [15] EPASD AQMP Response, 5th of August 2021 [16] DWER Response- 29th March 2022 [18]</p>	Overall	24 th of December 2020	C	The revised AQMP was submitted on the 23 rd of December 2020. Comments on the revised AQMP were received from the EPASD on the 5 th of August 2021. Yara resubmitted the revised AQMP on the 26 th of November 2021. Further correspondence from EPASD was then received on the 29 th of March 2022. Yara has submitted another revision of the AQMP and are currently waiting for further correspondence. Once approved the revised AQMP will be implemented and will supersede the current AQMP.
1121:M5-3	Air Quality	<p>The revised Air Quality Management Plan must:</p> <ol style="list-style-type: none"> 1. specify the expected air emissions for the proposal based on the current air pollution control technology selection and plant design for the proposal; 2. include a comparison of the expected air emissions for the proposal against international industry best practice for technical ammonia nitrate production facilities; 3. include a comparison of the current air pollution control technology selection and plant design for the proposal against international industry best practice for technical ammonia nitrate production facilities; 4. include provisions for monitoring of on-site meteorological conditions including wind speed/ direction, temperature, and rainfall rate to enable the data that are collected to be available for use in the forthcoming investigations associated with the Murujuga Rock Art Monitoring Program, with annual reporting to the CEO; and 5. identify and describe the measure that the proponent will implement to minimise air emissions, including the adoption of advances in air pollution control technology and process management, and specify: <ol style="list-style-type: none"> a) the timeframe within which each measure will be implemented; and b) the means to determine the effectiveness of each measure in minimising air emissions. 	<p>Submit revised AQMP to Department by the 24th of December 2020.</p> <p>The AQMP shall: 1. specify the expected air emissions for the proposal based on the current air pollution control technology selection and plant design; 2. compare the expected air emissions for the proposal against international industry best practice; 3. compare the current air pollution control technology selection and plant design for the proposal against international industry best practice; 4. explain provisions for monitoring of on-site meteorological conditions including wind speed/ direction, temperature, and rainfall rate. Report annually to CEO; and 5. describe the measure that the proponent will implement to minimise air emissions, including the adoption of advances in air pollution control technology and process management, and specify: timeframes which each measure will be implemented; and the means to determine the effectiveness of each measure in minimising air emissions.</p>	<p>AQMP Submission Email, 23rd of December 2020 [15] EPASD AQMP Response, 5th of August 2021 [16] DWER Response- 29th March 2022 [18]</p>	Overall	24 th of December 2020	C	The revised AQMP was submitted on the 23 rd of December 2020. Comments on the revised AQMP were received from the EPASD on the 5 th of August 2021. Yara resubmitted the revised AQMP on the 26 th of November 2021. Further correspondence from EPASD was then received on the 29 th of March 2022. Yara has submitted another revision of the AQMP and are currently waiting for further correspondence. Once approved the revised AQMP will be implemented and will supersede the current AQMP.
1121:M5-4	Air Quality	After receiving notice in writing from the CEO that the revised Air Quality Management Plan, or any subsequent revision of that plan, satisfies the requirements of condition 5-2 and condition 5-3, the proponent shall:	<p>Approval of AQMP received from the Department.</p> <p>The AQMP shall then: 1. commence implementation of the revised AQMP; and 2.</p>	<p>AQMP Submission Email, 23rd of December 2020 [15] EPASD AQMP Response, 5th of August 2021 [16]</p>	Overall	After approval of revised AQMP	NR	Revised AQMP has not been approved during reporting period.



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		1. commence implementation of the approved revised Air Quality Management Plan; and 2. continue to implement the approved revised Air Quality Management Plan, or any subsequent revision, including the measures identified under condition 5-3(5), for the remainder of the life of the proposal.	continue to implement approved revised AQMP or any subsequent revisions for the remainder of the life of the approval.	DWER Response- 29th March 2022 [18]				
1121:M5-5	Air Quality	Should monitoring of air emissions from the proposal indicate that the objectives of condition 5-2 are not being met, the proponent shall: 1. report the non-compliance in writing to the CEO within seven (7) days of the non-compliance being identified; 2. investigate to determine the cause of the non-compliance 3. provide a report to the CEO within ninety (90) days of the non-compliance being reported as required by condition 5-5(1). The report shall include: a) the cause of the non-compliance; b) the findings of the investigation required by condition 5-5(2); c) details of revised and/or additional management actions to be implemented to prevent non-compliance; and d) relevant changes to proposal activities.	If Condition 5-2 is not met then the proponent shall: 1. report the non-compliance to the CEO within seven (7) days of the non-compliance; 2. investigate to determine the non-compliance; and 3. report to the CEO within ninety (90) days of the non-compliance being reported	AQMP Submission Email, 23rd of December 2020 [15] EPASD AQMP Response, 5th of August 2021 [16] DWER Response- 29th March 2022 [18]	Overall	After approval of revised AQMP	NR	Revised AQMP has not been approved during reporting period.
1121:M5-6	Air Quality	The proponent shall, for information only, provide the CEO with copies of all reports and data relating to ambient air quality monitoring and rock art condition/integrity monitoring required under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 within one (1) month of their provision to the Commonwealth Government.	Upload all ambient air monitoring and rock art monitoring reports to the Yara Pilbara web site within one (1) month of submission to the Commonwealth Government.	All (ambient air quality monitoring and rock art monitoring) reports are publicly available at the following location: https://www.yara.com.au/about-yara/about-yara-australia/pilbara/yara-pilbara-nitrates/	Overall	Within one (1) month of provision to the Commonwealth Government	C	All ambient air quality monitoring and rock art monitoring reports are immediately available upon submission to the Commonwealth Government on the Yara Pilbara Nitrates webpage.
1121:M5-7	Air Quality	The proponent may review and revise the Air Quality Management Plan or any subsequent approved revisions.	Revise and approve AQMP's.	AQMP Submission Email, 23rd of December 2020 [15] EPASD AQMP Response, 5th of August 2021 [16] DWER Response- 29th March 2022 [18]	Overall	Ongoing	C	The revised AQMP was submitted on the 23rd of December 2020. Comments on the revised AQMP were received from the EPASD on the 5th of August 2021. Yara resubmitted the revised AQMP on the 26th of November 2021. Further correspondence from EPASD was then received on the 29th of March 2022. Yara has submitted another revision of the AQMP and are currently waiting for further correspondence. Once approval of the revised AQMP has been received any further revisions will be submitted to the CEO for approval.
1121:M5-8	Air Quality	The proponent shall review and revise the Air Quality Management Plan or any subsequent approved revisions every four (4) years, or as and when directed by the CEO.	Review AQMP every four years or when directed by CEO.	N/A	Overall	Every four (4) years after approval of revised AQMP or when directed by the CEO	NR	The AQMP is currently under review. Once approval has been given by the Department the AQMP will be reviewed every four years or when directed by the CEO.



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1121:M5-9	Air Quality	Any proposed revision of the Air Quality Management Plan must be submitted to the CEO for approval.	Submit proposed revisions of AQMP to CEO for approval.	N/A	Overall	After approval of revised AQMP	NR	The AQMP is currently under review. Any further revisions of AQMP once approval has been made must be submitted to CEO for approval.
1121:M5-10	Air Quality	The proponent shall implement the latest version of the Air Quality Management Plan which the CEO has confirmed by notice in writing satisfies the requirements of condition 5-2 and condition 5-3.	Implement revised AQMP	N/A	Overall	After approval of revised AQMP	NR	The AQMP is currently under review. Implementation of AQMP to be addressed in the next CAR.
1121:M5-11	Air Quality	The proponent shall make publicly available for the remainder of the life of the proposal in a manner approved by the CEO: 1. the approved Air Quality Management Plan, or any subsequently approved revision, within one (1) month of the relevant plan being approved by the CEO; and 2. the reports referred to in condition 5-3(4) and condition 5-6 and associated data, within one (1) month of the relevant report being submitted to the CEO.	Publish on YPN web page:1. approved AQMP and any revisions within one (1) month of approval; and 2. on-site meteorological conditions, ambient air quality monitoring and rock art monitoring reports within one (1) month of relevant report being submitted to the CEO.	Ambient air quality monitoring and rock art monitoring published to: https://www.yara.com.au/about-yara/about-yara-australia/pilbara/yara-pilbara-nitrates/	Overall	Ongoing	C	The AQMP is currently under review. Publication and submission of AQMP and meteorological data to occur within one (1) month of revised AQMP approval. Ambient air quality monitoring and rock art monitoring reports are publicly available on YPN web page.
1121:M5-12	Air Quality	The proponent shall continue to implement the current approved version of the Air quality Management Plan (Doc Ref: 0086269, February 2013) until notified by the CEO under condition 5-4 that the revised Air Quality Management Plan meets the requirements of condition 5-2 and condition 5-3.	Prepared Construction/Operation Air Quality Management Plan (AQMP) for Minister approval. Implement the AQMP Plan. Written correspondence.	Air Quality Management Plan (AQMP) Doc. No. 0086269 February 2013	Overall	Interim until approval of revised AQMP	PNC/NC	For the reporting period 8 July 2021 to 7 July 2022 air quality monitoring was not implemented as noted in the TANPF Air Quality Management Plan (AQMP) Doc. No. 0086269 February 2013 (as approved by the CEO DWER). It was however implemented in accordance with arrangements approved by DoEE under EPBC Act approval for the project. A comparison analysis of the AQMP and the OEMP submitted to the DWER in January 2019 indicated that the air quality requirements and objectives of the AQMP were met by the monitoring undertaken in accordance with the OEMP. However, a potential non-compliance has been identified as the implementation of the OEMP in place of the AQMP to meet air quality monitoring requirements has not been formally approved by the CEO of the DWER. The AQMP is currently under review. Once the revised AQMP has been approved this condition will no longer be applicable.
870:M6-1	Rehabilitation	The proponent shall undertake rehabilitation to achieve the following outcomes: 1. The project area shall be non-polluting and shall be constructed so that its final shape, stability, surface drainage, resistance to erosion and ability to support local native vegetation are comparable to natural landforms within the local area, as demonstrated by a methodology acceptable to the CEO; 2. Native vegetation areas disturbed through implementation of the proposal, shall be progressively rehabilitated with vegetation composed of Plant species native to the	Prepare a Construction Terrestrial Vegetation and Flora Management (CTVFM) Plan for MINISTER approval. Implement the CTVFM Plan. Prepare a Construction Weed Management (CWM) Plan for MINISTER approval. Implement the CWM Plan. Written correspondence.	CAR. Operational Environmental Management Plan [9] Copy of Environmental Inspection checklist (completed) [11]	Overall	Ongoing	C	There has been no change in circumstances with regard to rehabilitation, and there has been no progressive rehabilitation required as all areas related to establishing the TANPF remain in use. With the completion of construction and transition into operations, an Operational Environmental Management Plan has been prepared that includes an objective to minimise adverse impacts to vegetation communities with performance targets related to not introducing any new species of weeds to the TANPF and not spreading any existing



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		<p>Burrup Peninsula from propagating material of local provenance (as agreed by the CEO in consultation with the DEC);</p> <p>3. Areas not currently supporting native vegetation shall be rehabilitated to the original land use or a use approved by the CEO;</p> <p>4. The percentage cover of living vegetation in all rehabilitation areas shall be comparable with that of nearby undisturbed land as demonstrated by a methodology acceptable to the CEO;</p> <p>5. No new species of weeds (including both declared weeds and environmental weeds) shall be introduced into the area as a result of the implementation of the proposal; and</p> <p>6. The coverage of weeds (including both declared weeds and environmental weeds) within the rehabilitation areas shall not exceed that identified in baseline monitoring undertaken prior to the commencement of operations, or exceed that existent on comparable, nearby land which has not been disturbed during implementation of the proposal.</p>						<p>weeds within the TANPF (refer to Section 14.2.3 of Attachment 9).</p> <p>Weeds are monitored as part of the routine environmental inspections (refer to Attachment 11). The reported presence of weeds triggers weed spraying as a control, as noted in the attached environmental inspection checklist (question 18).</p>
870:M6-2	Rehabilitation	Rehabilitation activities shall continue until such time as the requirements of condition 6-1 are demonstrated by inspections and reports to have been met for a minimum of five years, to the satisfaction of the CEO on advice of the DEC.	<p>CAR.</p> <p>Operational Environmental Management Plan [9]</p> <p>Written Correspondence.</p>	N/A	Post-decommissioning	Until such time as the requirements of condition 6-1 are demonstrated by inspections and reports to have been met for a minimum of five years.	NR	There has been no change in circumstances with regard to rehabilitation, and there has been no progressive rehabilitation required as all areas related to establishing the TANPF remain in use.
870:M7-1	Fauna	The proponent shall employ such structures and apparatus as are necessary and agreed by the DEC to deter birds from entering the contaminated water pond, clean water pond, and sewage wastewater treatment station evaporation pond	<p>Employ structures and apparatus to deter birds from entering the contaminated and clean ponds.</p> <p>Seek advice from DEC.</p>	<p>CAR.</p> <p>Bird deterrent methodology – as agreed by DPaW [12] [13]</p> <p>Copy of Environmental Inspection checklist (completed) [11]</p>	Overall	Ongoing	C	<p>Bird deterrent systems have previously been assessed by Department of Parks and Wildlife (now DBCA) and the preferred option agreed for implementation (Attachment 12 - DBCA Approved Bird Deterrent Systems and Attachment 13 - Approval Correspondence).</p> <p>All ponds during the reporting period had bird deterrent wires in place at approximate 5m spacings as per configuration agreed with DBCA.</p>
870:M7-2	Fauna	<p>During construction of the TAN Plant the proponent shall ensure that the following requirements are met:</p> <p>1. Fauna refuges are to be placed in the trenches and other construction related voids at intervals not exceeding 50 metres;</p> <p>2. The proponent shall employ at least two “fauna-clearing people” that are appropriately licensed by the DEC to remove fauna from the trenches and other construction related voids;</p> <p>3. Inspection and clearing of fauna from trenches and other construction related voids by fauna clearing people shall occur at least</p>	<p>Implement the Construction Terrestrial Fauna Management (CTFM) Plan for MINISTER approval.</p> <p>Report on Fauna Found.</p>	N/A	Pre-construction Construction	Ongoing Fauna Found Report Within 14 days	CLD	As noted in previous CAR (2018), construction was completed in February 2016, well outside this reporting period. No further construction works have been conducted during this reporting period that resulted in excavation of trenches or construction-related voids.



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		<p>twice daily and not more than half an hour prior to backfilling of trenches and other construction related voids, with the first daily inspection and clearing to be completed no later than 3.5 hours after sunrise, and the second inspection and clearing to undertaken daily between the hours of 3:00 pm and 6:00 pm;</p> <p>4. In the event of rainfall, the proponent shall, following the clearing of fauna from the trenches and other construction related voids, pump out any pooled water in the open trenches and other construction related voids (with the exception of groundwater) and discharge it via a mesh (to dissipate energy) to adjacent vegetated area, having regard for the DEC's draft guideline on the treatment and management of acid sulphate soils and water in acid sulphate soil landscapes (DEC, 2009) and any subsequent revisions; and</p> <p>5. Within 14 days following completion of the construction activities requiring the use of open trenches and other construction related voids, the proponent shall provide a report on fauna found, both dead and alive, within the TAN Plant site boundary to the CEO.</p>						
870:M8-1	Groundwater	The proponent shall undertake detailed hydrogeological studies commencing at least 12 months prior to the commencement of construction to quantify groundwater quality, groundwater flow directions, and the depth to groundwater beneath the TAN Plant site and in surrounding areas.	Undertake Hydrogeological Studies.	N/A	Pre-construction	Ongoing	CLD	Noted as closed (CLD) in the DWER Compliance Audit Report 1379 (Ref: CA01-2013-0018-) dated 21 September 2017.
870:M8-2	Groundwater	The proponent shall develop appropriate management measures for dewatering to the satisfaction of the CEO on advice of the DEC and the Department of Water in the event that the information gathered from the hydrogeological studies required by condition 8-1 indicates that dewatering would be required during construction	Prepare the Construction Water Quality Management Plan for MINISTER approval, including if required, dewatering management. Written correspondence.	N/A	Pre-construction	Ongoing	CLD	As noted in the previous CAR (2017), construction was completed February 2016 and no construction activities required dewatering. There have been no further construction activities which would require groundwater dewatering.
870:M8-3	Groundwater	The proponent shall design, construct, and locate groundwater monitoring bores to the satisfaction of the CEO on advice of the DEC and the Department of Water, having regard for the outcomes of the hydrogeological studies required by condition 8-1 and the Department of Water's Water Quality Protection Note 30 on Groundwater Monitoring Bores.	Written correspondence.	CAR. Groundwater monitoring report [4] [6]	Overall	After outcomes of the hydrogeological studies	CLD	MW1 – MW5 have been installed on the TANPF site as approved by DWER. Monitoring of MW1 – MW5 is ongoing as per M8-4 below with reporting to DWER 6 monthly, refer to M8-4 below.
870:M8-4	Groundwater	The proponent shall sample/monitor all groundwater bores required by Condition 8-3 every six months and shall set groundwater monitoring trigger values at a value of 10% above the baseline contaminant concentrations obtained from the	Implement Environmental Monitoring Procedure.	CAR. Groundwater monitoring reports and letters [3] [4] [5] [6]	Overall	Every six months	C	During the reporting period groundwater monitoring was conducted twice, in September 2021 and March 2022. Both sets of results were compared to the groundwater monitoring trigger values and were reported to DWER in accordance with Condition M8-5.



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		hydrogeological studies required by condition 8-1.						The 9 th and 14 th September 2021 sampling results were received on 28 th and 29 th of September 2021 and reported to DWER on 6 th of October 2021 (Attachments 3 and 4). The 10 th and 17 th of March 2022 sampling results were received on 25 th and 31 st of March and reported to DWER on 7 th of April 2022 (Attachments 5 and 6).
870:M8-5	Groundwater	In the event that monitoring required by Condition 8-4 indicates an exceedance of trigger levels: 1. The proponent shall report such findings to the CEO within 7 days of the exceedance being identified; 2. The proponent shall provide evidence which allows determination of the cause of the exceedance; 3. If determined by the CEO to be project attributable, the proponent shall submit actions to be taken to address the exceedance within 7 days of the determination being made to the CEO; 4. The proponent shall implement actions to address the exceedance and shall continue until such time as the CEO determines that the remedial actions may cease; and 5. The proponent shall submit bi-annually, or at a frequency defined to the satisfaction of the CEO, the results of monitoring required by condition 8-4 to the CEO, until such time as the CEO determines that reporting may cease.	Implement Environmental Monitoring Procedure. Written correspondence.	CAR. Groundwater monitoring report, records [4] [6] A copy of correspondence to CEO advising of any exceedance [3] [5] A copy of correspondence to Auditor submitting Detailed Site Investigation (DSI) [14]	Overall	Within 7 days of the exceedance being identified. Monitoring results biannually, or a frequency defined by CEO	C	See Condition M8-4 above. The reports provided to DWER contain the relevant information required by MS8-4 including: - Details of groundwater monitoring results including exceedances - Evidence which allows determination of the cause of exceedance (reference to unplanned release events reported under Section 72 of the EP Act) As mentioned in previous CAR's, known unplanned releases were reported to DWER under Section 72 of the <i>Environmental Protection Act 1986</i> (31 March and 21 July 2017). The site was reported by Yara to DWER as a Known or Suspected Contaminated Site via submission of Form 1, on the 16 th October 2018. On 7 th December 2018 DWER classified the site as 'potentially contaminated- investigation required', and in this listing requested that a Contaminated Sites Auditor be engaged, and Detailed Site Investigation (DSI) be completed. To date, YPN have taken the following actions in response to this issue: <ul style="list-style-type: none"> Completed a Tier 1 Risk Assessment, Tier 2 Risk Assessment and a Hydrogeological Conceptual Site Model (in accordance with DWER 19 June and 7 December 2017); Undertaken an expanded groundwater monitoring program including the installation of additional bores; Completed an extensive repair project, with a focus on potential source mitigation in areas where groundwater contamination is known or likely; Engaged contaminated sites auditor, JBS&G; Engaged Golders to undertake further investigation, modelling and assessment (in accordance with DWER guidelines), including completion of: <ul style="list-style-type: none"> Preliminary Site Investigation (PSI) and Detailed Site Investigation (DSI); Preliminary Ecological Risk Assessment (PERA) and Detailed Ecological Risk Assessment (DERA); and



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								<ul style="list-style-type: none"> Site Management Plan (SMP), Sampling Analyses Quality Plan (SAQP) and the Remedial Action Plan (RAP); and Selected the preferred remedial options, completed detailed engineering design, submitted licence approvals for the onsite remedial infrastructure and extraction of groundwater (Works Approval, 26D and 5C) and have recently received Works Approval W6339.
870:M8-6	Groundwater	The proponent shall make the monitoring reports required by condition 8-5(5) publicly available in a manner approved by the CEO.	Monitoring reports publicly available as approved by CEO.	Link to publicly available reports.	Overall	Biannually, or a frequency defined by CEO	C	Groundwater Monitoring Reports for the monitoring period are publicly available at the following location: https://www.yara.com.au/about-yara/about-yara-australia/pilbara/yara-pilbara-nitrates/
870:M9-1	Acid Sulphate Soils	The proponent shall undertake intrusive acid sulphate soils investigations prior to the commencement of construction.	Undertake intrusive acid sulphate investigations.	Acid Sulphate Investigation Report.	Pre-construction	Ongoing	CLD	Noted as closed (CLD) in the DWER Compliance Audit Report 1379 (Ref: CA01-2013-0018-) dated 21 September 2017.
870:M9-2	Acid Sulphate Soils	In the event that acid sulphate soils are disturbed during construction of the TAN Plant, the proponent shall treat and manage acid sulphate soils in accordance with the requirements of the DEC's draft guideline on the treatment and management of acid sulphate soils and water in acid sulphate soil landscapes (DEC, 2009) and any subsequent revisions.	Preparation of Acid Sulphate Soils (ASS) Management Plan, if required.	ASS Reports.	Construction	After ASS are disturbed	NR	Noted as not required (NR) in the DWER Compliance Audit Report 1379 (Ref: CA01-2013-0018-) dated 21 September 2017 Circumstances have not changed during this reporting period, and no acid sulphate soils have been disturbed.
870:M10-1	Decommissioning	Prior to undertaking ground-disturbing activities, the proponent shall: 1. describe the rationale for the siting and design of Plant and infrastructure as relevant to environmental protection; 2. prepare a conceptual plan of the final landform at closure; 3. prepare a plan for a care and maintenance phase; and 4. prepare an initial plan for the management of noxious materials following closure.	Preparation of Decommissioning Plan.	Decommissioning Report.	De-commissioning	Prior to undertaking ground-disturbing activities	CLD	Noted as closed (CLD) in the DWER Compliance Audit Report 1379 (Ref: CA01-2013-0018-) dated 21 September 2017.
870:M10-2	Decommissioning	At least six months prior to the anticipated date of closure, the proponent shall meet the following decommissioning criteria: 1. removal or, if agreed in writing by the appropriate regulatory authority, retention of Plant and infrastructure agreed in consultation with relevant stakeholders; and 2. identification of contaminated areas, including provision of evidence of notification and proposed management measures to relevant statutory authorities. Note: Closure is defined as production has ceased and, Plant and infrastructure removed, and contaminated areas remediated.	Implementation of Decommissioning Plan.	Decommissioning reports. A copy of correspondence.	De-commissioning	At least six months prior to date of closure	NR	The TAN Plant is anticipated to operate for a period in excess of 20 years.



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Appendix 2 – Schedule 1 Compliance Assessment

Schedule 1 of MS870 describes the key proposal characteristics of the approved TANPF, outlines the authorised extent of production, and delineates the authorised development envelope and disturbance footprint associated with construction of the plant. The Schedule has been amended via a Section 45C change to the proposal on 7 June 2017. Modifications made to the Compliance Assessment of Key Characteristics Table (as shown in Table 5) were:

- decrease the development envelope (area of project lease) from 79 to 48.77 hectares (ha);
- decrease the disturbance footprint from 35 to 33.11 ha;
- remove bagged and bulk TAN storage capacity; and
- update figures 1 and 2 and delineation coordinates.

Condition M1-1 of MS870 requires that the TAN Plant shall be implemented as documented and described in Schedule 1 of MS870. Table 5 documents the assessment of compliance against the key characteristics of the TAN Plant.

Table 3: Compliance Assessment of Schedule 1

Requirement		Status	Further Information
The proponent shall implement the proposal as documented and described in schedule 1 of this statement subject to the conditions and procedures of this statement.		C	The TANPF has been implemented in accordance with all elements of Schedule 1.
Element	Authorised Extent		
General			
Technical ammonium nitrate production facility (TANPF) capacity	350,000 tonnes of technical ammonium nitrate (TAN) per annum.	C	YPN produced 265,364 tonnes of TAN during the 2021-22 financial year.
Development Envelope	48.77 ha	C	Development envelope area revised to reflect the actual finished boundary of the TANPF. No further disturbance of lease has occurred.
Disturbance Footprint	33.11 ha	C	Disturbance footprint revised to reflect the final area disturbed within the development envelope, i.e. 33.11 ha. No further disturbance of lease has occurred.
Main Process Units			
Nitric acid Plant	Capacity – 760 tonnes per day.	C	NA Plant produced 219,187 tonnes for the 2021-22 financial year, averaging 600 tonnes per day.



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Requirement		Status	Further Information
Ammonium nitrate solution Plant	Capacity – 965 tonnes per day.	C	Ammonium Nitrate Solution plant produced 276,934 tonnes of ANsol during the 2021-22 financial year, averaging 759 tonnes per day.
TAN prilling Plant	Capacity – 915 tonnes per day.	C	TAN Plant produced 265,364 tonnes of TAN during the 2021-22 financial year, averaging 727 tonnes per day.
Storage, loading, and transport			
Liquid ammonia pipeline between the TAN Plant and the adjacent YARA Pilbara Fertilisers Pty Ltd (YPFPL)	710 meters long.	C	Existing pipeline unchanged during reporting period.
Wastewater discharge pipeline	Connecting the TAN Plant to the Water Corporation facility	C	Pipeline unchanged. YPF now licensed (L9224-2019-1, issued 24 th of April 2020) to receive wastewater from YPN before discharge to Water Corporation facility.
Outputs			
Nitrogen oxides (NO _x)	Up to 135 t/yr. Nitric acid Plant stack - up to 4.2 g/s. Nitric acid plant storage tanks - Vents A & B - up to 0.04 g/s each vent.	C	Site- 33.554 t/yr (2021-22 NPI) Nitric Acid Plant Stack- 0.72 g/s Nitric Acid Plant Storage Tanks- negligible emissions intermittent discharge
Nitrous oxide (N ₂ O)	Up to 163.7 t/yr, 5.5 g/s.	C	2021-22 NGERS due for submission at the end of October. 2020-21 emissions: 12.55 t/yr, 0.398 g/s
Carbon monoxide (CO)	Up to 41 t/yr, 1.3 g/s.	C	Site- 4.043 t/yr, 0.1 g/s (2021-22 NPI)
Methane (CH ₄)	Up to 17.8 t/yr, 0.6 g/s.	C	Negligible assumed 0
Ammonia (NH ₃)	Ammonium nitrate prilling plant “common stack” - Refer to Condition 5. Nitric acid Plant stack - up to 0.02 g/s.	C	Ammonia Nitrate Prilling Plant- 0.20 g/s Nitric Acid Plant Stack- 0.0007 g/s
Particulate matter [as total suspended particulates (TSP)]	Ammonium nitrate prilling plant “common stack” - Refer to Condition 5.	C	Ammonia Nitrate Prilling Plant- 0.03 g/s



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Requirement		Status	Further Information
Sulphur dioxide (SO ₂)	Trace.	C	Trace amount of SO ₂
Carbon dioxide (CO ₂) [produced]	Up to 532.6 t/yr, 17.8 g/s.	NC	<p>2021-22 NGERS due for submission at the end of October. 2020-21 emissions: 730 t/yr, 23.15 g/s</p> <p>Diesel consumption is higher than anticipated. The major source of CO₂ is from combustion engines (i.e. vehicles, plant and equipment). Diesel consumption is approximately 250-300 kL per year during normal operations equating to approximately 700-800 tons of CO₂ produced per year.</p> <p>Total greenhouse gas emissions are significantly under the authorised extent for tonnes of CO₂-e per year. Emitting approximately 80,000 t less than the authorised extent. The higher CO₂ emissions not causing a significant increase in the total greenhouse gas emissions.</p>
Total greenhouse gas emissions	Approximately 84,451 tonnes of CO ₂ -e per year.	C	<p>2021-22 NGERS due for submission at the end of October. 2020-21 emissions: 4,470 t CO₂-e/yr</p>
Greenhouse gas intensity	Approximately 0.241 tonnes of CO ₂ -e per tonne of TAN.	C	<p>2021-22 NGERS due for submission at the end of October. 2020-21 emissions: 0.019 t CO₂-e/yr per tonne of TAN</p>
Solid waste	Up to 120 kilograms per day (organic matter from the off-specification prills).	C	Approximately 5.8 kg/day



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Appendix 3 – Register of Documents and Records Reviewed

- [1] MS870 Technical Ammonium Nitrate Production Facility (6 July 2011), Attachment 2 to Ministerial Statement 870 (7 June 2017) and Condition 5 variations (24 December 2020)
- [2] Yara Pilbara Nitrates Compliance Assessment Plan Ministerial Statement 870 Technical Ammonia Nitrate Plant Revision (Ref: 250-200-CAR-YPN-0001 Rev 2) - Email submission 10th of January 2019
- [3] Transmittal from YPN to DWER submitting groundwater monitoring results September 2021 (6th October 2021)
- [4] Report of Examination (Groundwater monitoring) from ChemCentre (received 28th and 29th September 2021)
- [5] Transmittal from YPN to DWER submitting groundwater monitoring results March 2022 (7th April 2022)
- [6] Report of Examination (Groundwater monitoring) from ChemCentre (received 25th and 31st March 2022)
- [7] Ektimo Emission Testing Report- Common Stack 21st September 2021, 3rd December 2021, 10th March 2022 and 14th July 2022 and Nitric Acid Stack RATA Testing 21st September 2021 and 10th March 2022.
- [8] Nitric Acid Stack CEMS Data for operating period between the 8th of July 2021 and 7th of July 2022
- [9] YARA 650-200-PLN-YPN-0001 Operations Environmental Management Plan
- [10] YARA Technical Ammonium Nitrate (TAN) Plant – Burrup Peninsula – Weed Survey (September 2017)
- [11] Environmental Inspection Form
- [12] YARA Bird Deterrent Systems Assessment Report
- [13] Email Correspondence - DPAW Bird Deterrent System approval 25th June 2015
- [14] YPN Letter to Auditor DSI Submission, 25th June 2019
- [15] AQMP Submission Email, 23rd of December 2020
- [16] EPASD AQMP Response, 5th of August 2021
- [17] 250-200-LET-YPF-0038 Change of Proponent Address
- [18] DWER Letter- AQMP Response 29th of March 2022
- [19] 2021 CAR Submission Email