



## Annual Audit Compliance Report Form

*Environmental Protection Act 1986, Part V Division 3*

Section A – Licence details			
Licence number:	L6465/1989/10	Licence file number:	2010/007470-1~1
Licence holder name:	Alcoa of Australia Limited		
Trading as:			
ACN:	004 879 298		
Registered business address:	Level 2, 235 St Georges Terrace, PERTH WA 6000		
Reporting period:	01 / 01 / 2025 to 31 / 12 / 2025		

Section B – Statement of compliance with licence conditions
Did you comply with all of your licence conditions during the reporting period? (please tick the appropriate box)
<input type="checkbox"/> Yes – please complete: <ul style="list-style-type: none"> <li>• section C;</li> <li>• section D (if required); and</li> <li>• sign the declaration in Section F.</li> </ul>
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none"> <li>• section C;</li> <li>• section D (if required);</li> <li>• section E; and</li> <li>• sign the declaration in Section F.</li> </ul>

Section C – Statement of actual production	
Provide the actual production quantity for this reporting period. Supporting documentation is to be attached.	
Prescribed premises category	Actual production quantity
Category 05 - Processing or beneficiation of metallic or non-metallic ore	11,185,382 tonnes of bauxite crushed.

Section D – Statement of actual Part 2 waste discharge quantity	
Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.	
Prescribed premises category	Actual Part 2 waste discharge quantity
NA	NA

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Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	1	Date(s) of non-compliance:	31/12/2025
Details of non-compliance:			
<p>Table 1 of Condition 1 requires Alcoa to implement Noise mitigation infrastructure and works at Arundel by 31 December 2025 (Noise Mitigation Works). The Noise Mitigation Works have been partially completed. The gaps between acoustic panels at the Arundel Transfer Station have been sealed; however, the 2.5km enclosure around 371 conveyor was not installed by 31 December 2025 due date.</p> <p>A licence amendment to remove the Noise Mitigation Works from Table 1, Condition 1 of the licence was submitted on 1 October 2025. The amended licence was granted on 11 February 2026.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
No known (or suspected) environmental impact.			
Cause (or suspected cause) of non-compliance:			
Licence amendment application was not submitted early enough to allow removal of requirement prior to 31 December 2025.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Nil – no adverse effects. Requirement has now been removed from the licence and as such no further action is required.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 01/10/2025	

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Section E – Details of non-compliance with licence condition			
Condition no:	4	Date(s) of non-compliance:	01/01/2025 – 31/01/2025
Details of non-compliance:			
<p>Daily inspections of the PFAS Treatment Unit (PTU) are required during Environmental Commissioning. Daily inspections of the PTU were completed by the contractor during the early stages of environmental commissioning. However, once the level sensors, high level alarms and interlocks within the PLC were all confirmed to be operating as expected, the PTU was operated remotely in auto mode meaning that personnel were not always present on site to undertake the daily inspections. On days the PTU was operated when personnel were not present on site, integrity and freeboard checks were undertaken remotely. In total, 18 days were identified throughout environmental commissioning where the PTU was being operated remotely.</p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
<p>No known (or suspected) environmental impact.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Contractor unaware of condition to undertake daily inspections for the entirety of Environmental Commissioning activities due to inadequate communication regarding the requirement to the contractor.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Nil – no adverse effects. This is not an ongoing operational requirement under Condition 12, Table 6 of the Licence and as such no further action is required.</p>			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 30/05/2025	

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Section E – Details of non-compliance with licence condition			
Condition no:	19	Date(s) of non-compliance:	11/03/2025 – 21/03/2025
Details of non-compliance:			
<p>Whilst reviewing the PFAS Treatment Unit (PTU) discharge release rates on 3 April 2025, it was identified that one of Alcoa’s flowmeters was recording incorrectly and the results during the period 11/03/2025 to 21/03/2025 therefore cannot be verified with certainty. This was reported within 7 days of becoming aware of the potential non-compliance in accordance with Condition 31 of the Licence.</p> <p>During commissioning activities Alcoa identified a discrepancy between the two flowmeters installed on the McKnoes Brook discharge pipeline (one manufactured by Bermad and one by Magflow). After investigations, including modifications to the Magflow flowmeter in accordance with manufacturer’s instructions, Alcoa concluded the cause of the discrepancy between the two flowmeters on the McKnoes Brook discharge pipeline was likely due to the incorrect application of the Bermad flowmeter in an open-ended pipeline resulting in inflated volumes being recorded.</p> <p>In summary, the investigations showed the overall error percentage of the Magflow flowmeter over the total 6-hour duration of flow measurements was 1%. This aligns to the manufacturer’s specifications of ±2%. In contrast, the overall error percentage on the Bermad flowmeter over the total 6-hour duration of flow measurements was 37%. As such, Alcoa will be using the Magflow flowmeter for compliance purposes moving forwards. The Bermad meter will be removed.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
No known (or suspected) environmental impact. Alcoa suspects that actual discharge release rates were in accordance with Condition 19 and Table 9 of the Licence.			
Cause (or suspected cause) of non-compliance:			
Discrepancy between Bermad flowmeter and Magflow flowmeter preventing the functionality of programmed interlocks.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Based on the assessment detailed above, Alcoa will use the Magflow flowmeter for compliance purposes moving forwards.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 10 / 04 / 2024	

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Section E – Details of non-compliance with licence condition			
Condition no:	25	Date(s) of non-compliance:	1/01/2025 – 31/03/2025
Details of non-compliance:			
Throughout 2024, the analysis of Perfluoro-1-octanesulfonamidoacetic acid (FOSAA) could not be conducted as laboratories in Australia were unable to complete the assessment. In October 2024, the Licence was amended to permit the use of non-NATA accredited analytical methods for this compound. Despite this amendment, one laboratory engaged for monthly wastewater sampling remained unable to complete FOSAA analysis until late March 2025. Consequently, FOSAA analysis was not performed on OS3 monthly samples from January to March. FOSAA analysis commenced for all monthly wastewater samples beginning in April.			
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No known (or suspected) environmental impact.			
Cause (or suspected cause) of non-compliance:			
Laboratory was unable to complete analysis.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
All laboratories used by Alcoa for analysis can now perform FOSAA analysis.			
Was this non-compliance previously reported to DWER? Not applicable.			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date:	

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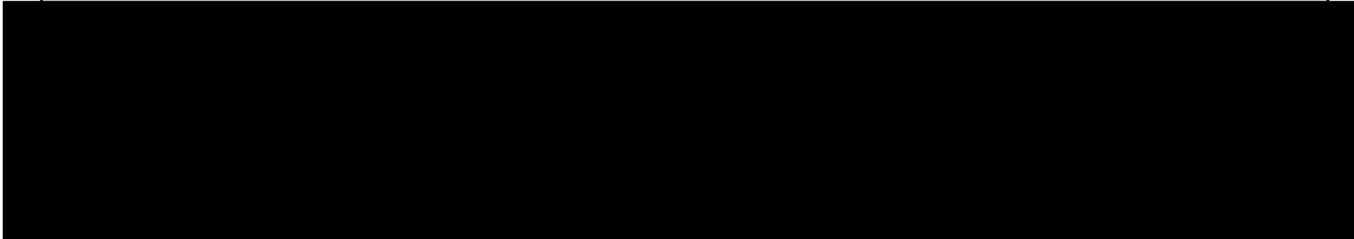
Section E – Details of non-compliance with licence condition			
Condition no:	29	Date(s) of non-compliance:	01/01/2025 – 31/12/2025
Details of non-compliance:			
<p>Surface water sampling at the “discharge” monitoring point for McKnoes Brook was not conducted during 2025. This was initially due to uncertainty regarding the correct monitoring location, followed by concerns about safe access. The dense vegetation posed increased risks, including falling branches, tripping hazards, and challenges in transporting monitoring equipment to the site. In addition, monitoring at T2 was unable to be completed in June 2025 due to safe access concerns associated with dangerous trees and high potential for falling branches.</p> <p>Groundwater monitoring at BH11 was not undertaken from August to November due to the bore having a broken PVC tube.</p> <p>FOSAA analysis could not be performed initially because Australian labs lacked capability. The licence was amended in October 2024 to permit non-NATA methods, but one lab remained unable to analyse FOSAA until March 2025. As a result, the Q1 sample from T3 was missing FOSAA analysis; all other quarterly samples in 2025 were analysed as per licence requirements.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
No known (or suspected) environmental impact.			
Cause (or suspected cause) of non-compliance:			
Various as described above.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
No adverse effects. Safe access to monitoring locations is being arranged to ensure compliance in 2026. BH11 has been re-drilled. All laboratories used by Alcoa are now able to analyse for FOSAA.			
Was this non-compliance previously reported to DWER? Not applicable.			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date:	

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**Section F – Declaration**

I / We declare that the information in this Annual Audit Compliance Report is true and correct and is not false or misleading in a material particular<sup>1</sup>.

I / We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation’s (DWER) website.



Date:	29-Mar-2026	Date:	
Seal (if signing under seal):			

<sup>1</sup> It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular.

<sup>2</sup> AACRs can only be signed by the licence holder or an authorised person with the legal authority to sign on behalf of the licence holder.