

Doral

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Table of Contents

1. INTRODUCTION 4

1.1 Proponent 4

1.2 Purpose and Structure 4

1.3 Reporting Period 5

2. RESULTS AND DISCUSSION 6

2.1 Inspections and maintenance performed..... 6

2.2 Inspections and maintenance performed (waste processing)..... 16

2.3 Waste inputs and outputs at the premises presented in table format..... 18

2.4 Tabulated and/or graphical summary of the process monitoring data 18

2.5 Wastewater 21

2.6 Ambient Groundwater Monitoring 33

2.6.1 Ambient groundwater level limits 33

2.6.2 Ambient groundwater levels and quality analysis..... 34

2.7 Licence limit exceedances..... 35

2.8 Complaints investigations and responses 35

2.9 Pollution control equipment failures 35

3. CONCLUDING REMARKS 35

Tables

Table 1: Environmental Report Requirements.....4
Table 2: Prescribed Premises Reporting Periods6
Table 3: Inspections and Maintenance Requirements with Implementation Details7
Table 4: Inspections and Maintenance Requirements with Reporting Details 16
Table 5: Treated Wastewater Discharge Limits..... 18
Table 6: Process Monitoring Results..... 19

Figures

Figure 1: Daily Treated Sewage Irrigation Volumes (kL)..... 21
Figure 2: Monthly Cumulative Treated Sewage Irrigation Volumes (kL) 22
Figure 3: Monthly Total Nitrogen Loads 23
Figure 4: Monthly Total Phosphorus Loads 24
Figure 5: Monthly Total BOD Loads **Error! Bookmark not defined.**
Figure 6: Monthly Total Nitrogen Loads 26
Figure 7: Total Phosphorus Loads..... 27
Figure 8: Biological Oxygen Demand..... 28
Figure 9: Total Suspended Solids 29
Figure 10: pH Laboratory Results 30
Figure 11: Residual Free Chlorine Results 31
Figure 12: E Coli Laboratory Results 32

Appendices

APPENDIX A: Annual Audit Compliance Report Form 37

1. INTRODUCTION

1.1 Proponent

The Coburn Mineral Sands Project (the Project) was previously owned and operated by Strandline Resources which went into Administration in February 2025. Following this it entered into care and maintenance on the 6th June 2025 and at this time the majority of employees were made redundant and only select employees were retained for the care and maintenance period.

On the 15th December 2025, ownership of the subsidiary company operating the site Coburn Resources Pty Ltd (Coburn) was transferred to Iwatani Australia Pty Ltd (Iwatani) and became a wholly owned subsidiary of Iwatani Australia Pty Ltd.

Doral Mineral Sands Pty Ltd (Doral), also a wholly owned subsidiary of Iwatani Australia Pty Ltd has operated successfully within the South West of Western Australia since 2002 and provides the functional mine operational management for the site.

1.2 Purpose and Structure

This Annual Audit Compliance Report (AACR) addresses compliance of the Coburn Mineral Sand Project with condition 33 set out in Licence No L9373/2303/1 published 19 November 2024.

Condition 33 requires an annual environmental report for the conditions listed in Table 14. For reporting purposes, a duplicate of Table 14 is reproduced below as Table 1:

Table 1: Environmental Report Requirements

Condition	Requirement¹
1 and 10	<i>(a) A summary of inspections and maintenance performed to address the requirements of Table 1 and 5.</i>
9, 10 and 18	<i>(a) A summary of the waste inputs and outputs at the premises presented in table format.</i>
21	<i>(a) Tabulated and/or graphical summary of the process monitoring data</i>
22	<i>(a) volume (in m3 or kL) of treated sewage applied daily to each irrigation area, and monthly cumulative volumes; (b) A tabulated summary of results, as well as all raw data provided in an accompanying Microsoft Excel spreadsheet digital document/file (or a compatible equivalent digital document/file), with all results being clearly referenced to laboratory certificates of analysis;</i>

	<p><i>(c) monthly and annual loadings of nitrogen, phosphorus and BOD applied to the spray field, including an explanation of the basis for determining loading rates;</i></p> <p><i>(d) an interpretive summary and assessment of results against previous monitoring results and relevant limits within the licence; and</i></p> <p><i>(e) trend graphs to provide a graphical representation of historical results and to support the interpretive summary</i></p>
23	<p><i>(a) A tabulated summary of results, as well as all raw data provided in an accompanying Microsoft Excel spreadsheet digital document/file (or a compatible equivalent digital document/file), with all results being clearly referenced to laboratory certificates of analysis;</i></p> <p><i>(b) an interpretive summary and assessment of results against previous monitoring results and relevant limits within the licence;</i></p> <p><i>(c) trend graphs to provide a graphical representation of historical results and to support the interpretive summary; and</i></p> <p><i>(d) standing water levels across the mining area for the final quarter of the annual period to be provided graphically in a contour map format, overlaying a recent aerial photograph, with contours measured in metres below ground level (mbgl).</i></p>
24	<p><i>(a) a discussion of any exceedances of any limit that occurred during the annual period, and any action taken.</i></p>
29	<p><i>(a) A summary of complaints received, and any action taken to investigate or respond to any complaint.</i></p>
-	<p><i>(a) A summary of any failure or malfunction of any pollution control equipment and any environmental incidents that have occurred during the annual period, including any actions taken.</i></p>

1.3 Reporting Period

Reporting of compliance for this AACR incorporates a 12-month audit period from 1 January 2025 to 31 December 2025. The submission date for the AACR is 1 March annually.

This reporting period is from the 1st of January 2025 to 31st of December 2025, however, as Strandline entered Voluntary Administration at the end of February (21st) 2025, with mining officially ending on June the 6th 2025, data provided until the end of the year is based from available data and the most accurate calculations and as outlined below in Table 2. From 6th June 2025 the large majority of Strandline employees were made redundant with only select staff maintained to manage the site under care and maintenance.

Table 2: Prescribed Premises Reporting Periods

Prescribed premises category description (Schedule 1, Environmental Protection Regulations 1987)	Assessed design capacity	Reporting period
Category 8: Mineral sands mining or processing: premises on which mineral sands ore is mined, screened, separated or otherwise processed.	23.4 million tonnes per annual period	1 May to 31 Dec 2025
Category 52: Electric power generation: premises (other than premises within category 53 or an emergency or standby power generating plant) on which electrical power is generated using a fuel	20 MW	1 May to 31 Dec 2025
Category 85: Sewage facility	75 m3 per day	1 Jan to 31 Dec 2025
Category 85B: Water desalination plant: premises at which salt is extracted from water if wastewater is discharged onto land or into waters (other than marine waters)	0.62 GL per annual period	1 May to 31 Dec 2025
Category 89: Putrescible landfill site	2,700 tonnes per annual period	1 Jan to 31 Dec 2025

2. RESULTS AND DISCUSSION

The requirements of table 14 in condition 33 of L9373/2023/1 are presented and discussed throughout this section of the AACR.

2.1 Inspections and maintenance performed

With regards to Table 1 of L9373/2023/1, the inspections and maintenance requirements performed for the 5 different types of infrastructure and equipment are outlined below in Table 3:

Table 3: Inspections and Maintenance Requirements with Implementation Details

Wastewater Treatment Plant		
Infrastructure and equipment	Inspection and Maintenance requirement	Inspection and Maintenance implementation details
Aluminium sulphate tank and dosing system	<p>(a) Sufficient volume of aluminium sulphate solution must be maintained to achieve an average influent dosage rate of 10 L/d; and</p> <p>(b) Aluminium sulphate must be stored in a manner that prevents chemical degradation prior to use.</p>	Daily inspections were completed by maintenance staff to check levels of aluminium sulphate solution. When needed, dosing containers were replaced with stocks stored nearby in a designated shipping container.
<p>Primary treatment tanks:</p> <ul style="list-style-type: none"> - Anaerobic Tank 1; - Anaerobic Tank 2; and - Anaerobic Tank 3. 	<p>(a) Sludge level and volume within each tank must be determined at least bi-monthly; and</p> <p>(b) Zabel filters within Anaerobic Tank 3 must be inspected and cleaned at least bi-monthly to ensure that:</p> <ul style="list-style-type: none"> (i) excess sludge build up does not occur around the filters; and (ii) sludge is prevented from bypassing the filters and entering downstream system components. 	<p>Sludge levels were monitored by Coburn staff in 2025 and during care and maintenance however records were not available to be reported.</p> <p>Following change of ownership of the site, a renewed contractor service provider MAK Water has conducted preliminary audits in Jan/Feb 2026 and will maintain the Primary treatment tanks to ensure compliance.</p>

Wastewater Treatment Plant		
Infrastructure and equipment	Inspection and Maintenance requirement	Inspection and Maintenance implementation details
<p>Flow balance tanks:</p> <ul style="list-style-type: none"> - Emergency Storage Tank 1; and - Emergency Storage Tank 2. 	<p>(a) Level sensors and pumps must be maintained within Emergency Storage Tank 2.</p>	<p>Level sensors and pumps in the emergency storage tank 2 were inspected and maintained by Coburn staff as required.</p>
<p>Secondary treatment tanks:</p> <ul style="list-style-type: none"> - Aerobic Tank 1; - Aerobic Tank 2; - Aerobic Tank 3; - Aerobic Tank 4; and - Aerobic Tank 5. 	<p>(a) Spray nozzles must be inspected for blockages at least bi-monthly and cleaned where required</p>	<p>Spray nozzles were monitored by Coburn staff in 2025 and during care and maintenance as part of general site inspection.</p>
<p>Splitter pump station</p>	<p>(a) Level sensors, pumps and associated telemetry systems must be maintained so that:</p> <ul style="list-style-type: none"> (i) 80% of effluent flows are recirculated to Anaerobic Tank 1; and 	<p>The splitter pump station sensors, pumps and alarm systems were maintained by Coburn maintenance department as required.</p> <p>Following change of ownership of the site, a renewed contractor service provider MAK Water has conducted preliminary audits in Jan/Feb 2026 and will maintain the system to ensure compliance</p>

Wastewater Treatment Plant

Infrastructure and equipment	Inspection and Maintenance requirement	Inspection and Maintenance implementation details
	(ii) high level alarms and pump systems are activated to prevent containment loss.	
Irrigation storage tanks : - Irrigation Tank 1; and - Irrigation Tank 2.	Level sensors and associated telemetry systems must be maintained within Irrigation Tank 2 to ensure that: (i) Treated wastewater is continually output to the chlorine disinfection system if levels within the tank are above 10%; and (ii) High level alarms and connecting pump systems are activated to prevent containment loss.	The irrigation storage tanks sensors, pumps and alarm systems were maintained by Coburn maintenance department as required. Following change of ownership of the site, a renewed contractor service provider MAK Water has conducted preliminary audits in Jan/Feb 2026 and will maintain the system to ensure compliance
Chlorine disinfection system	(a) Sufficient volume of sodium hypochlorite must be maintained to ensure continual chlorine dosing occurs during operation; and	The sodium hypochlorite dosing drum level is inspected regularly by the Coburn maintenance team. If required, a replacement drum is installed.

Wastewater Treatment Plant		
Infrastructure and equipment	Inspection and Maintenance requirement	Inspection and Maintenance implementation details
	(b) Sodium hypochlorite must be stored in a manner that prevents chemical degradation prior to use.	A designated shipping container located next to the WWTP is used for storage of all sodium hypochlorite drums.
Final discharge pump	(a) Pump activation levels must be set to achieve a chlorine contact time of at least 30 minutes within Irrigation Tank 2.	Following change of ownership of the site, a renewed contractor service provider MAK Water has conducted preliminary audits in Jan/Feb 2026 and will maintain the system to ensure compliance
Spray field	(a) Must be fenced to exclude stock and public access to the irrigation area; (b) Livestock must not be permitted to graze the irrigation area; (c) Vegetative cover must be maintained over the irrigation area; (d) Sprinklers must be maintained to ensure no blockages and allow even and effective spray production; (e) Sprinklers must have a minimum spray radius of 15 metres; and	Spray field is fenced, Livestock is not able to graze the irrigation area, Vegetative cover is maintained, Sprinklers are periodically inspected and have a minimum spray radius of 15m, Infrastructure is inspected periodically for maintenance requirements.

Wastewater Treatment Plant

Infrastructure and equipment	Inspection and Maintenance requirement	Inspection and Maintenance implementation details
	(f) Fencing, pipelines and sprinklers must be inspected for blockages, leaks or maintenance requirements at least fortnightly.	
Filter clean-down station	(a) A high-pressure hose that provides sufficient water pressure to rinse and clean the zabel filters must be provided; and (b) Hardstand, bunding and drainage to containment must be maintained to prevent the release of washwater and solids to the environment.	The self-contained filter clean down station was installed by Coburn Resources in late 2023. Any liquid collected in the station is pumped back to the WWTP

Processing facilities		
Infrastructure and equipment	Inspection and Maintenance requirement	Inspection and Maintenance implementation details
Wet Concentrator Plant (WCP)	NA	NA
WCP process water and settlement ponds	(a) Maintained with a 1.0mm HDPE liner (b) Maintained with a 300mm freeboard (c) Undertake daily freeboard inspections	The 1.0mm HDPE liner remained in place. Freeboard of 300mm was maintained. Daily freeboard inspections were completed.
Mineral Separation Plant (MSP)	NA	NA
MSP process water pond	(a) Maintained with a 1.0mm HDPE liner (b) Maintained with a 300mm freeboard (c) Undertake daily freeboard inspections	The 1.0mm HDPE liner remained in place. Freeboard of 300mm was maintained. Daily freeboard inspections were completed.
Pipelines containing ore, overburden, tailings, process water or saline water	(a) Constructed with: (i) Automatic cut-outs in the event of a pipe failure; or (ii) Secondary containment sufficient to contain any spill for a period equal to the time between routine inspections; or (iii) Telemetry and flow meters to allow the detection of leaks and failures.	Telemetry and flow meters are installed where necessary.

Processing facilities

Infrastructure and equipment	Inspection and Maintenance requirement	Inspection and Maintenance implementation details
	(b) Undertake daily inspections for visual integrity	The mine services department conducted daily inspections of all live pipelines.
Cyclone stackers	NA	NA

Site services and mining equipment

Infrastructure and equipment	Inspection and Maintenance requirement	Inspection and Maintenance implementation details
Reverse osmosis desalination plant	(a) Effluent to be discharged to lined process water pond only	Brine effluent from the RO plant was only discharged to the lined process water pond during the reporting period.
9 x 2 MW gas generator units		NA
LNG facility with 3 x 368kL storage tanks		NA
Diesel storage 1 x 110kL tank and 3 x 66kL tanks	(a) Hydrocarbons to be stored within bunding (b) Spill kits to be available	Diesel storage tanks are self-bunded. Spill kits are available

	(c) Undertake routine inspections for visual integrity	Routine inspections are completed by staff from the stores department when levels are dipped.
Grasshopper conveyors	(a) Undertake daily inspections for visible dust	NA – grasshopper conveyors were not established during the reporting period.

Tailings and process water management infrastructure

Infrastructure and equipment	Inspection and Maintenance requirement	Inspection and Maintenance implementation details
Solar Drying Ponds	<ul style="list-style-type: none"> (a) Operated with a maximum operating pond level with 500 mm freeboard plus capacity for a 1:100 year 72 hour rainfall event (b) Height of embankment walls not to exceed 5.5 m (c) Decant ponds to be maintained with a 0.5 mm HDPE lining (d) Decant water to be pumped back to the WCP process water pond, WCP settlement pond or the MSP process water pond (e) Not to exceed 40 hectares in area (f) Undertake daily freeboard inspections 	<p>During the reporting period decant weir levels ensured adequate freeboard capacity was maintained.</p> <p>Embankment walls were not constructed higher than 5.5m.</p> <p>The decant pond has a HDPE liner installed.</p> <p>Decant water was pumped back to the WCP process water pond or the WCP settlement pond.</p> <p>Solar Drying Pond areas did not exceed 40ha.</p> <p>Inspections during care and maintenance were conducted less frequently due to the ponds being dry.</p>

Tailings and process water management infrastructure

Infrastructure and equipment	Inspection and Maintenance requirement	Inspection and Maintenance implementation details
In-pit Settlement Ponds	<ul style="list-style-type: none"> (a) Must be located entirely within mined out voids (b) Must be constructed on top of deposited tailings material (c) Pond level to be maintained at least 500 mm below the lowest height of the pit crest 	All three requirements regarding in-pit settlement ponds were maintained during the reporting period including care and maintenance.
Mine voids where tailings or process water is being discharged	<ul style="list-style-type: none"> (a) A freeboard of at least 500 mm below the lowest height of the pit crest to be maintained 	NA
West Pit Extended Integrated Waste Landform Containment Facility	<ul style="list-style-type: none"> (a) A freeboard of at least 1.25 m below the lowest height of the embankment crest to be maintained. (b) Inspections to be carried out at least 4 times per day when operating to check for freeboard, seepage and visual integrity. (c) Decant return pumping capacity of at least 1,220m³ per hour to be maintained at all times (d) The decant pond operating size must not exceed 20% of the available beach area 	This facility was not constructed prior to or during the reporting period.

2.2 Inspections and maintenance performed (waste processing)

With regards to Table 5 of L9373/2023/1, the inspections and maintenance requirements performed for the 4 different waste types are outlined below in Table 4:

Table 4: Inspections and Maintenance Requirements with Reporting Details

Waste type	Processes	Process limits and/or specifications	Reporting details
Sewage	Physical, chemical and biological treatment	(a) No more than 75 m ³ per day shall be treated through the WWTP.	Daily inflow volumes at the WWTP ranged between 2 m ³ to 37m ³ per day in 2025.
Grit and screenings	Temporary storage prior to removal offsite or landfilling	(a) Once removed from the WWTP the waste must be stored in an impermeable receptacle or container located on a hardstand area: and	No grit or screenings were temporarily stored on-site during the reporting period.
Sewage sludge		(b) Must be: <ul style="list-style-type: none"> - Dried prior to landfilling; or - Removed from the premises by a licenced controlled waste carrier. 	Minor volumes of sewage sludge were removed by Freemans licenced controlled waste carrier during the reporting period for disposal off-site to a licenced facility. During care and maintenance no sludge was required to be removed
Treated wastewater	Disinfection and disposal via irrigation	(a) Must have a chlorine contact time of at least 30 minutes prior to irrigation; (b) Only disinfected, treated wastewater	Systems is designed to ensure 30 minutes of contact, MAK Water audit and ongoing maintenance shall ensure ongoing compliance. Spray field is designed to now allow runoff or spray drift

Waste type	Processes	Process limits and/or specifications	Reporting details
		<p>from Irrigation Tank 2 shall be irrigated;</p> <p>(c) Irrigation generated runoff, spray drift or discharge must not occur beyond the boundary of the spray field;</p> <p>(d) Irrigation must not occur on land that is waterlogged;</p> <p>(e) Irrigation must not be undertaken immediately prior to, during or after a rainfall event; and</p> <p>(f) Wastewater must be evenly distributed over the irrigation area so that no ponding or pooling occurs.</p>	<p>beyond the boundary of the spray field.</p> <p>The spray field is located on deep sands. Waterlogging does not occur.</p> <p>Irrigation occurs according to pre-set levels in the irrigation tank. Irrigation could occur at any time during when the pre-set levels have been reached.</p> <p>Wastewater was evenly distributed over the irrigation area. No ponding or pooling was observed.</p>
Inert Waste Type 1	Receipt, handling and disposal via landfilling	(a) Must not be landfilled within 3m from the edge of the boundary fencing surrounding the putrescible landfill; and	<p>Landfill facility was commissioned in Jan 2025 and operated till care and maintenance with 2195.6 tonnes of landfill.</p> <p>No chemicals or treated timber and pallets were disposed</p>
Inert Waste Type 2		(b) Chemically treated timber and pallets must not be landfilled.	
Putrescible waste			

2.3 Waste inputs and outputs at the premises presented in table format

With regards to condition 9, for sewage waste, the WWTP accepted a total of 5,754 m³ over the reporting period, with a corresponding range of 2 - 37 m³ per day. As stated above under section 2.2, Coburn Resources began using the landfill facility in early January during the reporting period. Skip bins were also still used with waste transported to Carnarvon using MKB Industries licenced contractor until care and maintenance in June 2025.

With regards to condition 10, this information has already been supplied above under section 2.2.

With regards to condition 18, all treated sewage generated by the WWTP was only discharged to the 20 x sprinklers located with the spray field area. Table 5 below shows the range of treated wastewater loads and effluent quality results from samples collected during the reporting period.

Table 5: Treated Wastewater Discharge Limits

Emission	Discharge point	Parameter	Concentration limit	Loading limit	Results
Treated sewage	20 x sprinklers located within the spray field	Total Nitrogen	-	180 kg/ha/yr	16.5 kg/ha/yr
		Total phosphorus	-	20 kg/ha/yr	1.8 kg/ha/yr
		BOD	-	30 kg/ha/day	0.02* kg/ha/day
		TSS	30 mg/L		<5-32 mg/L
		pH	6.5-8.5		7.31-8.16
		Residual free chlorine	0.2-2 mg/L		<0.01*-0.76 mg/L
		<i>E.coli</i>	1,000 CFU or MPN/100ml		<1 – 18,000* CFU/100 ml

*These items are explained further in s2.7.

2.4 Tabulated and/or graphical summary of the process monitoring data

A summary of the process monitoring data required by condition 21 (table 10) of L9373/2023/1 is shown below in Table 6:

Table 6: Process Monitoring Results

Condition 21 - Process Monitoring January 2025 to December 2025

L9373/2023/1
Annual Audit Compliance Report (2025)
Condition 21 - Process Monitoring

Date	Processing of ore				Tailings: Deposition										Evap	Process water discharge		Process water returned to the processing plant					
	Volume of ore processed		Volume of HMC Produced		Volume and location of tailings deposition (sand and clay waste / no water component)				Estimate of volume of water in tailings (no sand and clay component)	Volume of decant water recovered from each IWLCF						Additional volume of decant water recovered by water carts (for dust suppression)	Estimate of the volume of seepage from tailings	Volume of water evaporated from IWLCFs and SDPs	Volume of process water discharged to SDPs	Volume of process water discharged to in-pit settlement ponds	Volume of process water returned to the processing plant	Total dissolved solids	
	t (wet)	m ³	t (dry)	m ³	EPF	EPC	WPA	Total		EPF	EPC	WPA	West Pit Extended	Total									
Jan-25	1,620,453	1,012,787	12,029	5,230	782,166	500,746	0	743,059	475,710	1,525,225	376,456	1,152,219	65,585	275,785	341,370	14,810	579,830	-	150,478	-	557,519		
Feb-25	1,526,892	854,308	14,312	6,483	732,704	469,081	0	636,070	445,627	1,428,774	314,708	1,073,356	66,612	193,647	260,259	14,225	632,449	-	105,269	-	432,681		
Mar-25	1,685,581	1,053,488	15,664	6,810	819,646	524,741	0	778,664	498,504	1,598,310	1,023,246	1,227,895	20,854	370,680	391,534	15,680	688,302	-	124,382	-	523,913		
Apr-25	1,606,768	1,004,230	14,974	6,510	0	768,629	432,080	730,199	467,477	1,498,828	959,557	1,141,873	6,718	210,600	217,318	13,490	735,680	-	175,385	-	392,703		
May-25	1,573,310	983,319	12,360	5,374	0	768,546	432,027	730,119	467,426	1,498,665	959,453	1,150,384	27,605	165,630	193,235	14,116	699,533	-	243,499	-	436,734		
Jun-25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-	-	-	-	
Jul-25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-	-	-	-	
Aug-25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-	-	-	-	
Sep-25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-	-	-	-	
Oct-25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-	-	-	-	
Nov-25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-	-	-	-	
Dec-25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-	-	-	-	
Total	8,813,818	5,888,131	69,939	29,488	2,334,516	1,494,569	1,537,175	994,187	3,678,111	2,354,745	7,549,892	4,833,428	5,751,726	153,851	34,323	1,858,712	165,630	1,483,716	72,321	3,335,854	-	2,343,558	

Note:

t (wet) Volume of ore processed: Density 1.6

t (dry) Volume of ore produced: Density 2.3

t (tails) Volume of tails deposited: Density (average) 1.6

- No data

Text Additional data provided (to Table 10 licence requirements)

Text Notes

Text Minor non compliance with licence requirements

Text Facility Not in Action

Number of flow meters were not sufficient to allow all IWLCFs to be measured separately, although the total water recovered is accurate for the site. Additional flow meters were installed in August 2024.

Volume based on total water cart loads from two locations across the active mine area, including Central

Does not account for water loss due to evaporation and is therefore a maximum estimate.

Refer to condition 40 requirements and timelines

Some key explanatory notes for Table 6 are provided below for further clarification, as well as summarised in the results table.

- The volume of ore processed in m³ has been calculated from the density (1.6) of wet tonnes.
- The volume of HMC produced in m³ has been calculated from the density (2.3) of dry tonnes.
- The volume and location of tailings deposition in m³ has been calculated from the density (1.6) of wet tonnes of tailings. Noting that this volume is the sand and clay component only (excludes water).
- The estimate of volume of water in tailings in m³ is reported as the water component only (excludes sand and clay).
- The volume of decant water recovered from each IWLCF has been recorded from flow meters in m³. Where there is data gaps, the number of flow meters were not sufficient to allow all IWLCF's to be measured separately, although the total water recovered is accurate for the site.
- An estimate of the volume of seepage from tailings in m³ does not account for water loss due to evaporation and is therefore not included in this report.
- The volume of water evaporated from IWLCFs and SDPs will be reported in future reporting years, based on condition 40 investigation requirements and timeframes.
- The volume of water returned to the processing plant in has been recorded from flow meters in m³, as per licence requirements.
- Total dissolved solids in mg/L has been monitored as per licence requirements.

2.5 Wastewater

With regards to the reporting requirements for condition 22, the following section outlines results from data collected during the reporting period.

(a) *“Volume (in m3 or kl) of treated sewage applied daily to each irrigation area, and monthly cumulative volumes.”*

Daily volumes of treated sewage applied to the irrigation areas are seen below in Figure 1.

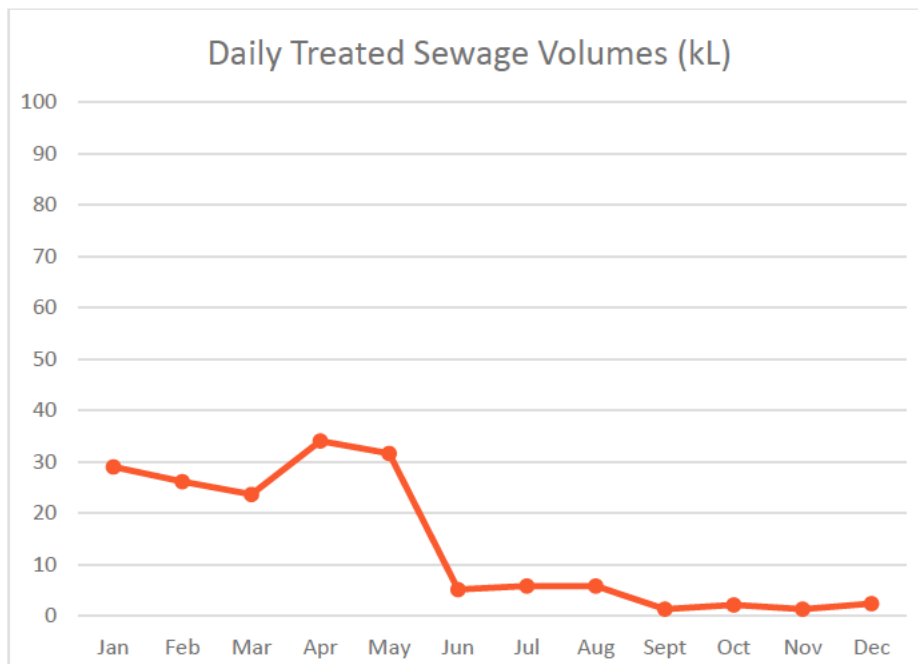


Figure 1: Daily Treated Sewage Irrigation Volumes (kL)

Monthly cumulative volumes of treated sewage applied to the irrigation areas are presented in Figure 2 below.

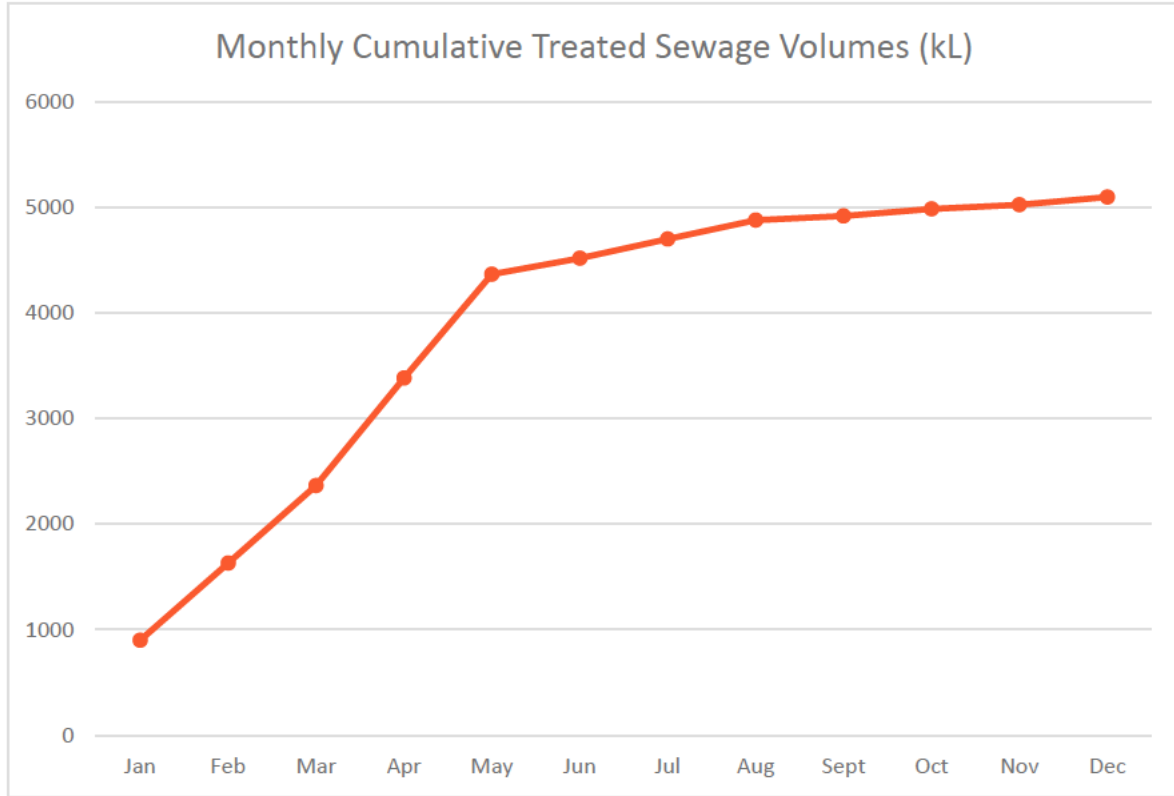


Figure 2: Monthly Cumulative Treated Sewage Irrigation Volumes (kL)

Tabulated summaries of results, as well as raw data are supplied in attachment A.

- (a) *monthly and annual loadings of nitrogen, phosphorus and BOD applied to the spray field, including an explanation of the basis for determining loading rates*

Total Nitrogen loadings

As stated above in Table 5, the annual total nitrogen loading applied to the spray field was 16.5 kg/ha/yr. This was averaged over the 7 months where samples were collected, noting the site was in care and maintenance from early June to the end of the year. The corresponding monthly loadings are illustrated below in Figure 3.

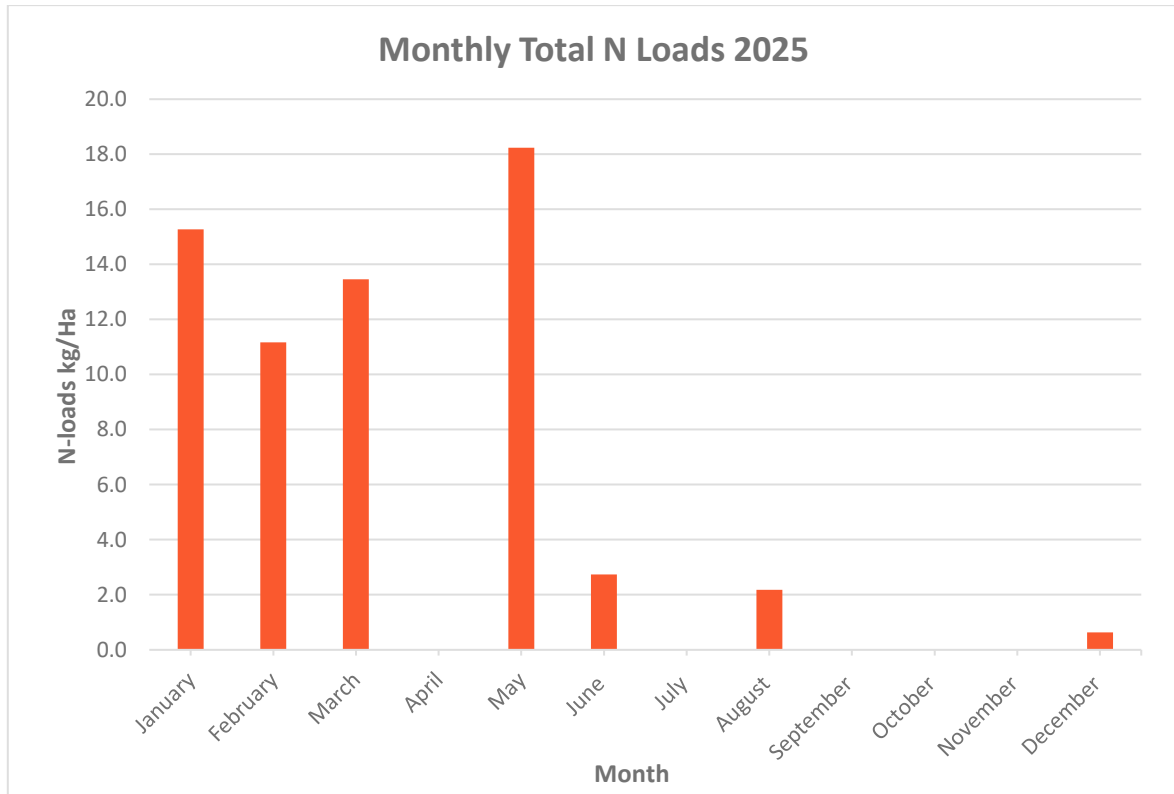


Figure 3: Monthly Total Nitrogen Loads

Total Phosphorus loadings

As stated above in Table 5, the annual total phosphorus loading applied to the spray field was approximately 1.82 kg/ha/yr. The corresponding monthly loadings are illustrated below in Figure 4.

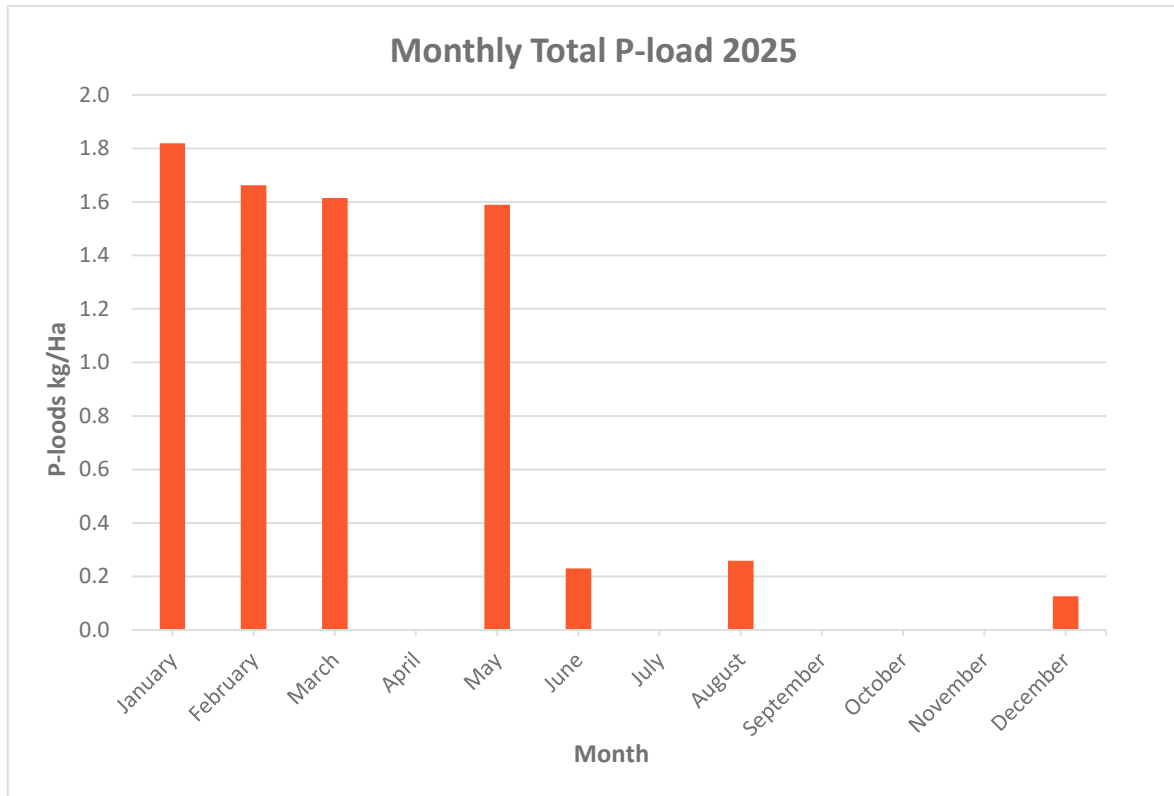


Figure 4: Monthly Total Phosphorus Loads

BOD loadings

As stated above in Table 5, the annual BOD loading applied to the spray field was 0.019 kg/ha/day. The corresponding monthly loadings are illustrated below in Figure 5.

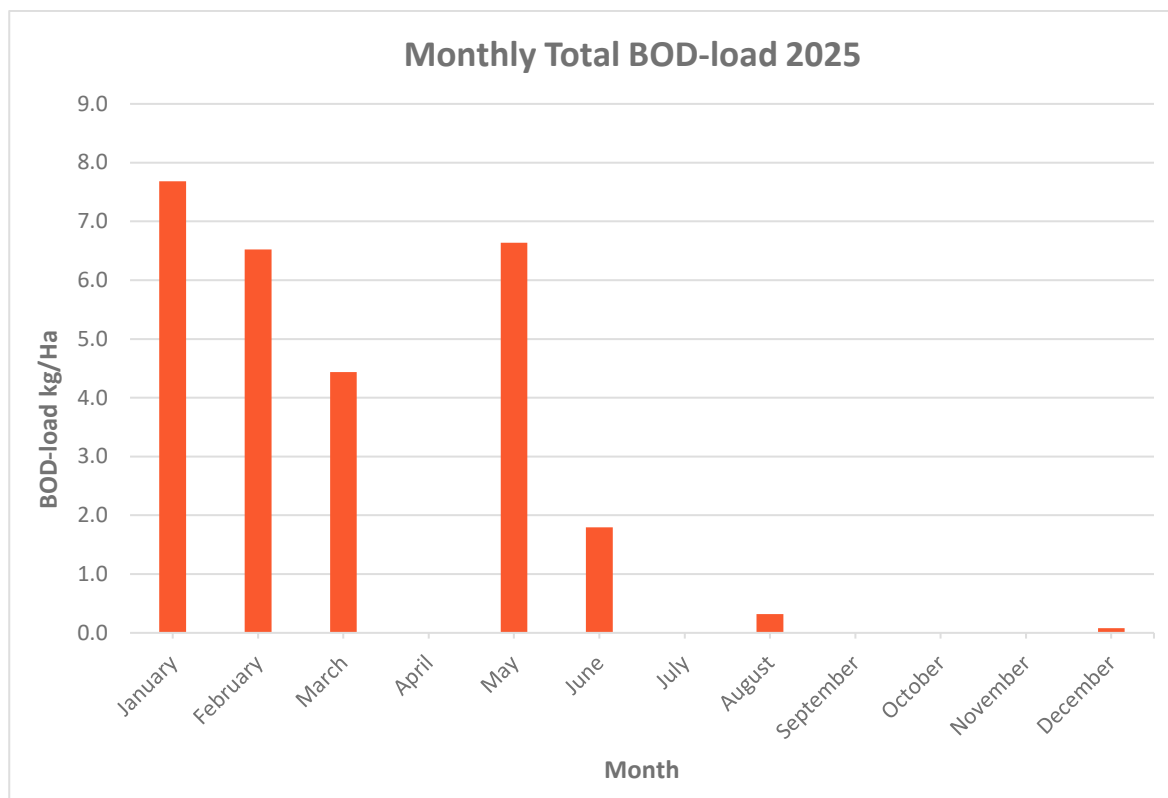


Figure 5: Monthly Total BOD Loads

All load estimates were calculated using monthly flow meter measurements (kL) from the final treated sewage flow meter located downstream of pump 7 in the WWTP control room. These total monthly flow rates were then converted to an equivalent value in L/month. Monthly lab sample results from ALS laboratories were then converted from mg/L into a kg/L equivalent. Multiplying L/month by kg/L generated a monthly value in kg/month. This final value was then divided by the area of the spray field (2.8ha) to generate a loading value in kg/ha/month.

For total nitrogen, total phosphorus and BOD, Table 7 of the licence states annual loading limits, not concentration limits.

With regards to total nitrogen, it was estimated that the irrigation spray field received an annual total load of 16.5 kg/ha/yr. This represents 9.1% of the licence loading limit (180 kg/ha/yr). Total N sample results ranged between 23.9 – 52.2 mg/L as illustrated below in Figure 6. Note missing laboratory analysis data in from April, July and September to November occurred as a result of Strandline Resources entering voluntary administration in late February 2025.

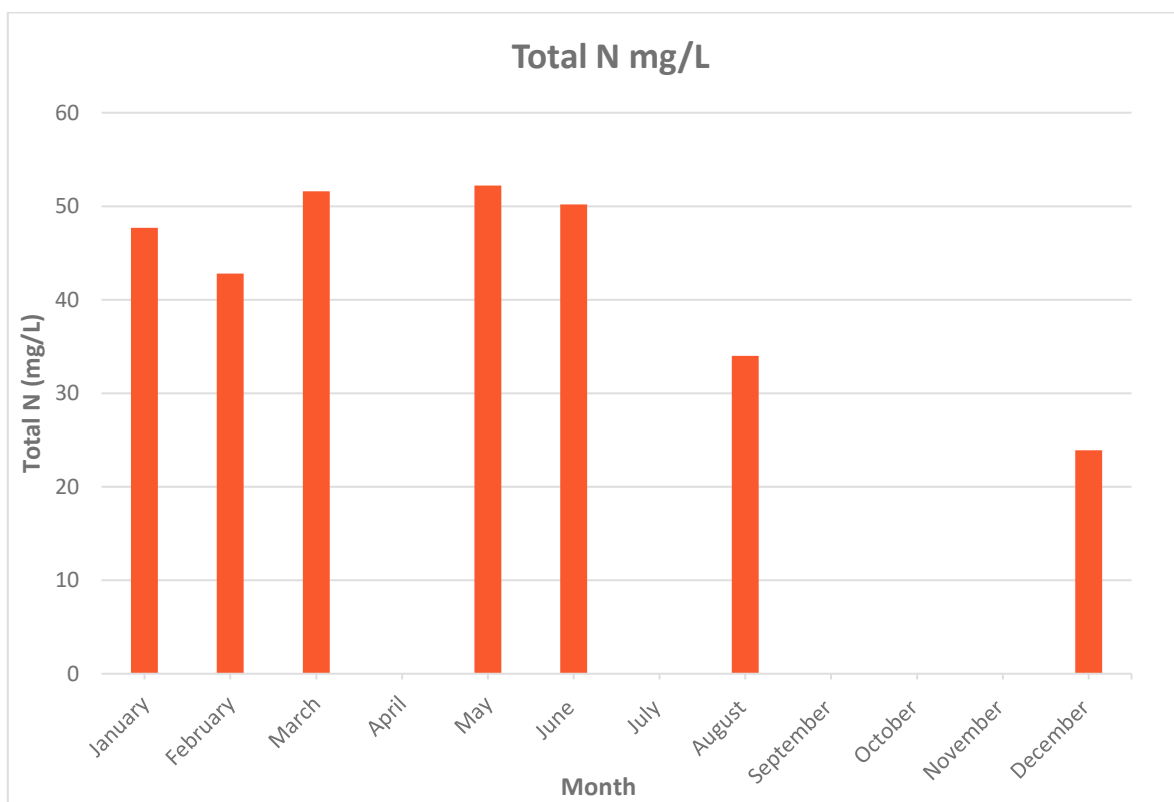


Figure 6: Monthly Total Nitrogen Loads

With regards to total phosphorous, it was estimated that the irrigation spray field received an annual total load of 1.82kg/ha/yr. This represents 9.1% of the licence loading limit (20 kg/ha/yr). Total P sample results ranged between 4.04 – 6.37mg/L as illustrated below in Figure 7.

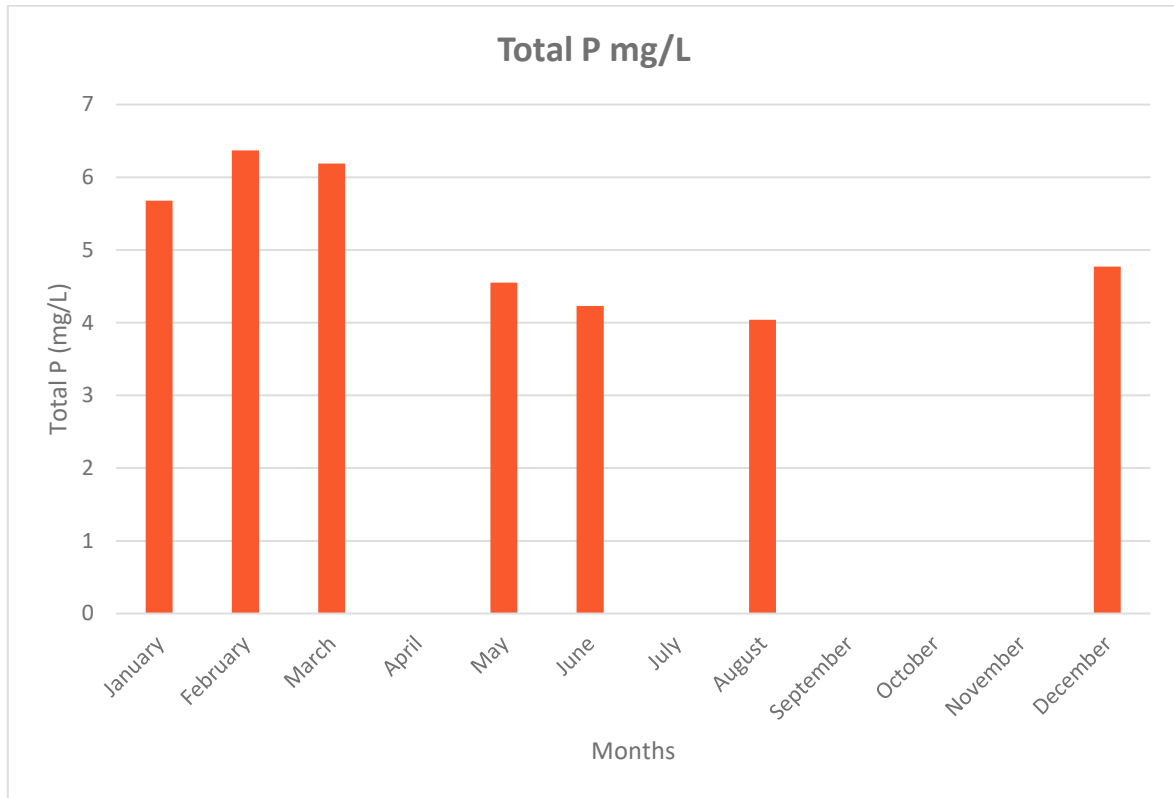


Figure 7: Total Phosphorus Loads

With regards to BOD, it was estimated that the irrigation spray field received an average daily load of 0.019 kg/ha/day. This represents 0.06% of the licence loading limit (30 kg/ha/day). BOD sample results ranged between 3 and 33 mg/L as illustrated below in Figure 8.

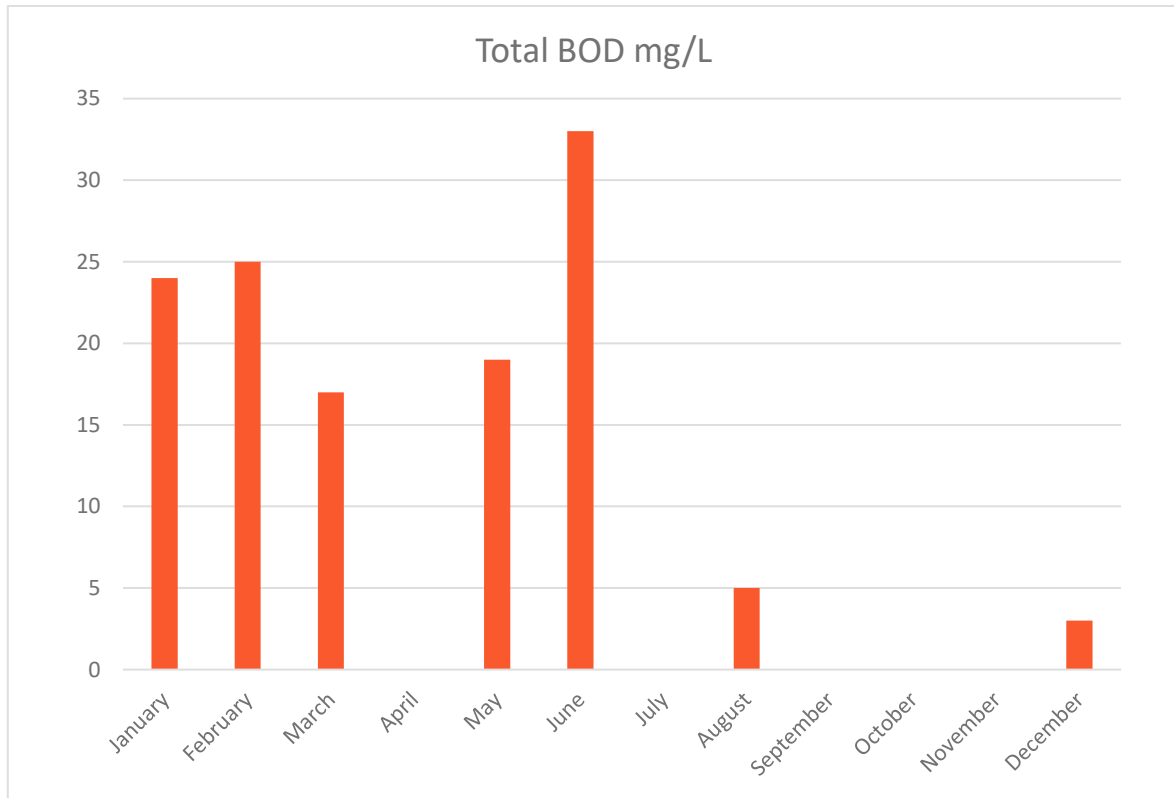


Figure 8: Biological Oxygen Demand

For TSS, pH, residual free chlorine and *E.coli*, table 7 of the licence lists concentration limits. Monitoring results during the reporting period are discussed below in relation to each relevant limit.

With regard to Total Suspended Solids (TSS), laboratory results from samples collected during the reporting period ranged between <5-32 mg/L as illustrated in Figure 9. Only the February result was above the licence limit of 30 mg/L with a value of 32mg/L.

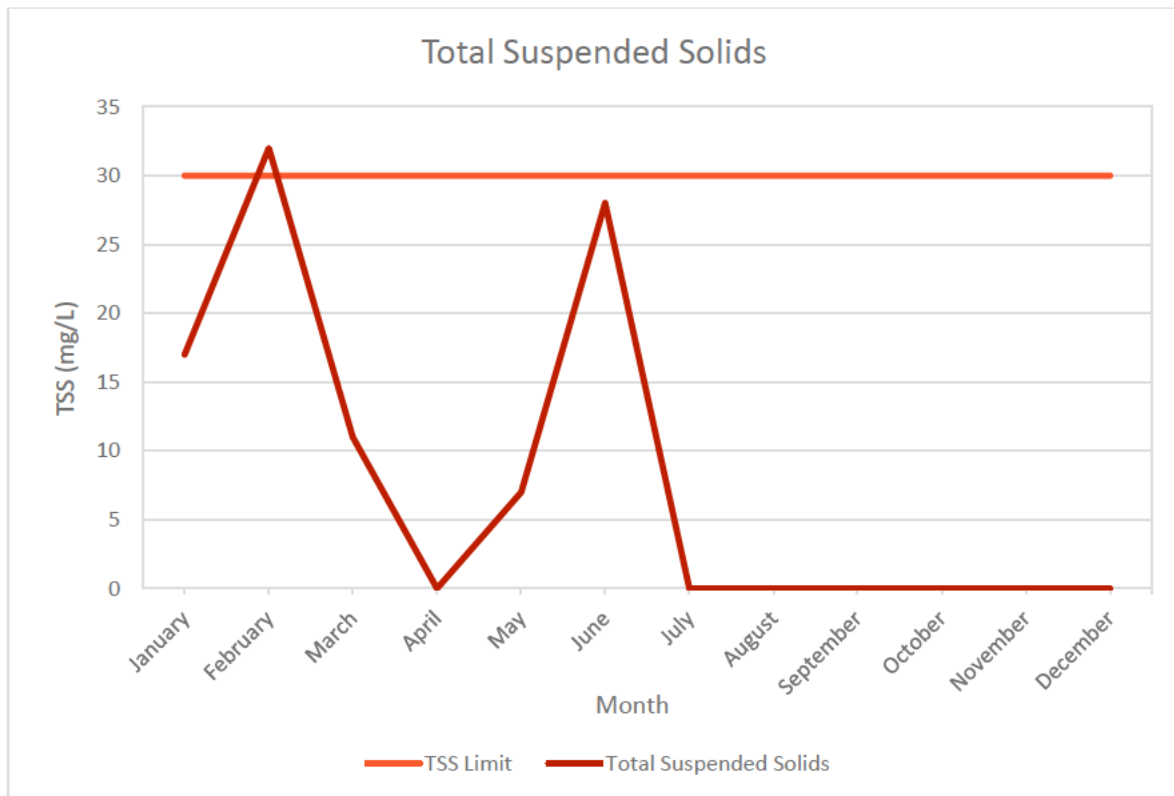


Figure 9: Total Suspended Solids

With regard to pH, laboratory results from samples collected during the reporting period ranged between 7.31-8.16 mg/L as illustrated in Figure 10. All samples collected were between the licence limits of 6.5-8.5. Zero results reflect non-monitored months, where volumes were too low for discharge during period of care and maintenance.

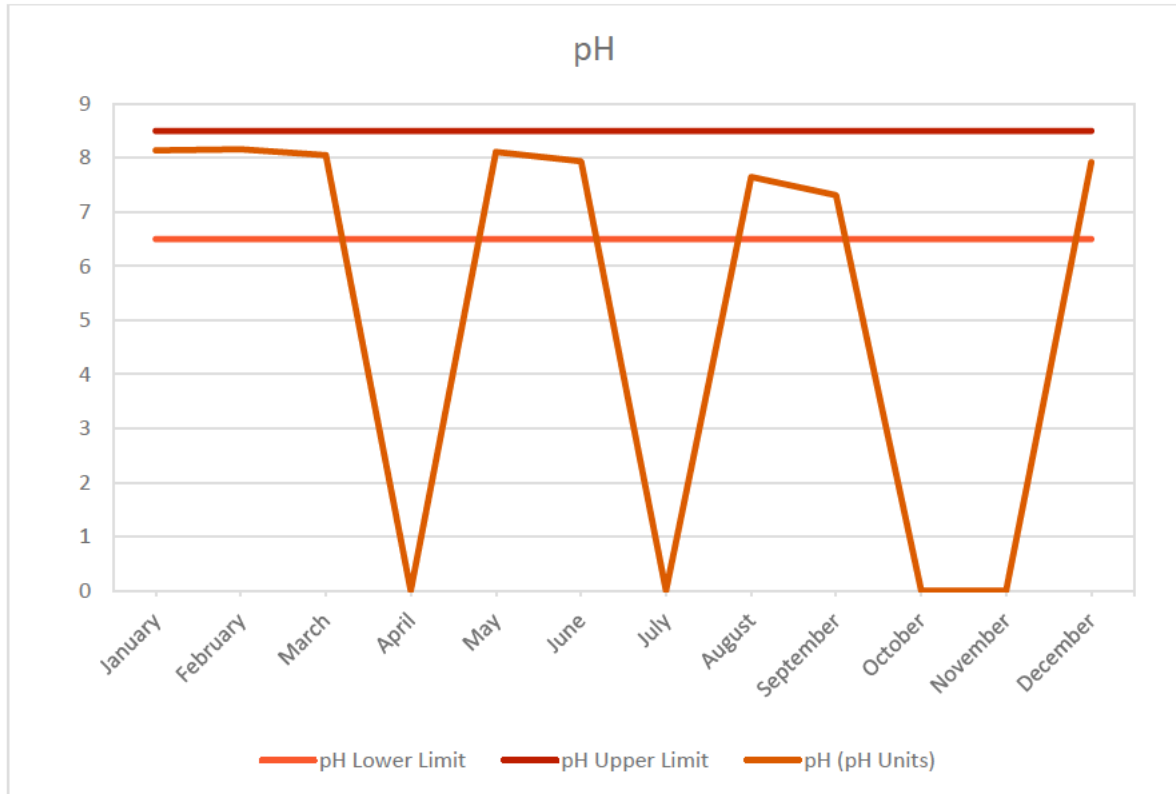


Figure 10: pH Laboratory Results

2025 ANNUAL AUDIT COMPLIANCE REPORT – SUPPORTING DOCUMENT – L9373/2303/1

With regard to residual free chlorine, laboratory results from samples collected during the reporting period ranged between ,0.01 – 1.7 mg/L as illustrated in Figure 11. Some difficulty has remained retrieving the sample, and samples obtained not entirely representative of the true recirculated chlorine levels. Moving forward, MAK Water has been commissioned to undertake regular maintenance on the WWTP and this will assist with maintaining CL levels and re-circulation prior to sampling.

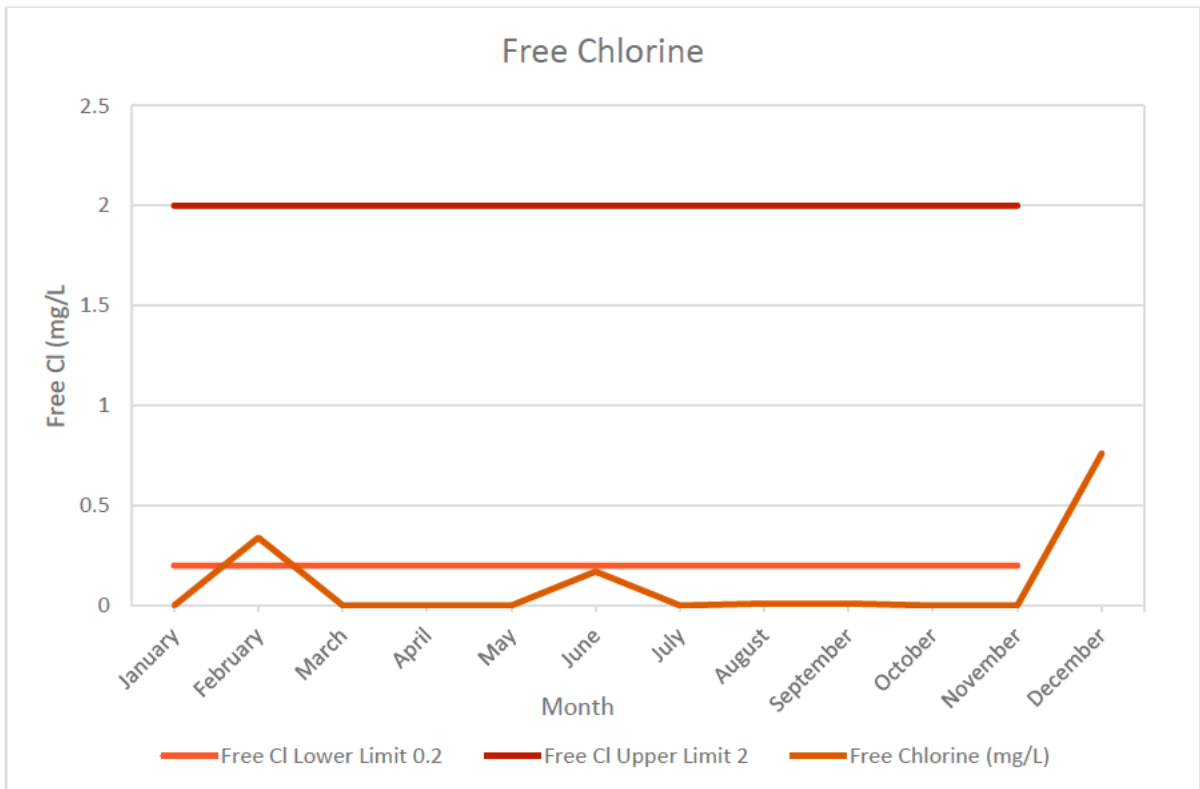


Figure 11: Residual Free Chlorine Results

2025 ANNUAL AUDIT COMPLIANCE REPORT – SUPPORTING DOCUMENT – L9373/2303/1

With regard to *E.coli*, laboratory results from samples collected during the reporting period ranged between <1 -18,000 CFU/100ml as illustrated in Figure 12. Four of the monthly samples collected were above the limit of 1000 CFU/100ml. Recent January 2026 results indicate a considerable reduction in *E. coli* with a result of 59 CFU/100ml. As mentioned, intervention and management by MAK Water in early 2026 should result in lower *E.coli* values over future assessments.

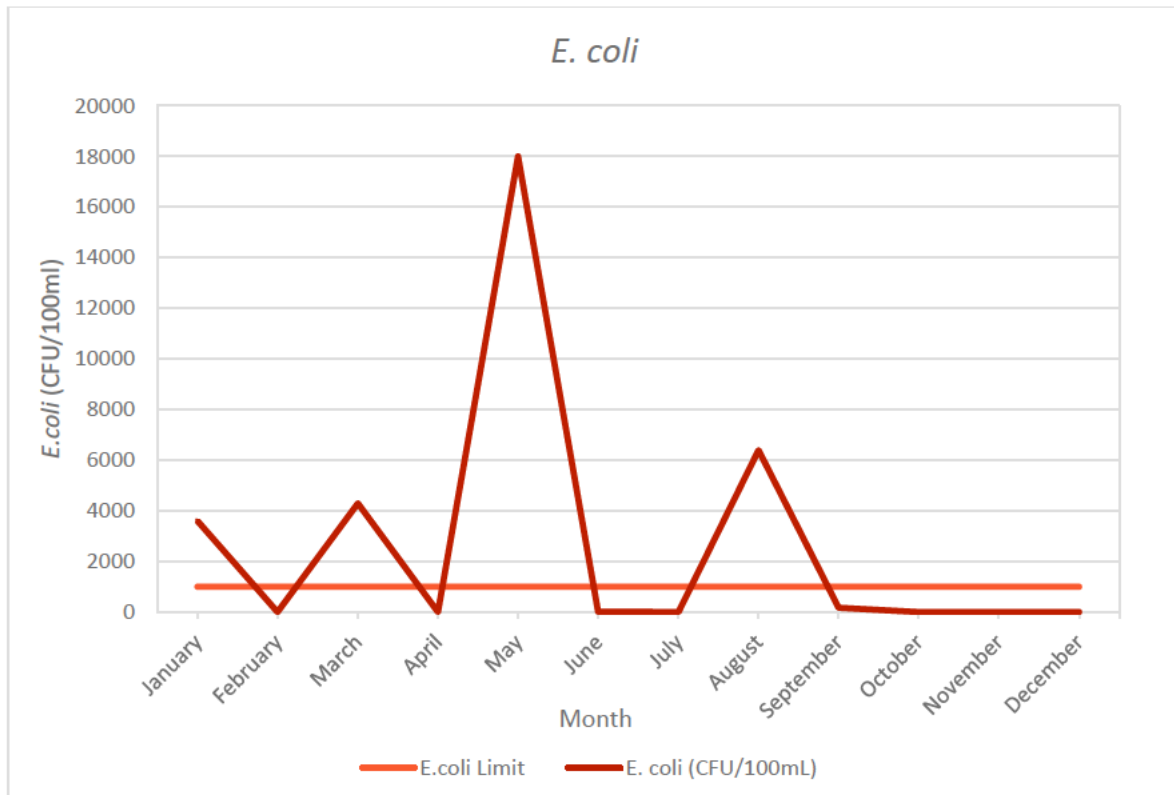


Figure 12: E Coli Laboratory Results

2.6 Ambient Groundwater Monitoring

Due to the transfer of ownership of the site at the end of the reporting period (15th December 2025) as discussed through this report, the collation and analysis of the groundwater monitoring data is still underway and in preparation of the Annual Groundwater Monitoring Summary Report as required by the approved Groundwater Mounding Management Plan.

2.6.1 Ambient groundwater level limits

A summary of the monitored ambient groundwater levels with respect to Table 13 of L9373/2023/1 is below noting that several monthly monitoring sessions were missed during the reporting period. Results show that from 50-67% of monthly sampling, no ambient groundwater levels exceeded the limit of 5mbgl;

Monitoring Location	Parameter	Limit (mbgl)	% of sampling months	Minimum (mbgl)	Maximum (mbgl)	Mean (mbgl)
MMB9	SWL	5 mbgl	58	23	25	24
MMB14	SWL	5 mbgl	58	29	32	30
MMB17	SWL	5 mbgl	67	22	27	25
MMB20	SWL	5 mbgl	58	29	32	31
MMB20R	SWL	5 mbgl	Not	Drilled	In	2025
MMB29	SWL	5 mbgl	50	34	40	39
MMB30	SWL	5 mbgl	50	15	15	15
MMB101	SWL	5 mbgl	50	Dry	Dry	Dry
MMB103	SWL	5 mbgl	50	Dry	Dry	Dry
MMB105	SWL	5 mbgl	50	Dry	Dry	Dry
MMB106	SWL	5 mbgl	50	Dry	Dry	Dry

2.6.2 Ambient groundwater levels and quality analysis

An in-depth analysis and reporting is required in the form of the Annual Groundwater Monitoring Summary Report as required under the Groundwater Mounding and Management Plan (Ministerial Statement 723, Condition 7).

This report is due by the 31st March 2026 and is presently undergoing preparation by a contract hydrogeologist, and as such Coburn will provide an addendum to this report using this data and analysis information.

With reference to Table 14 of the licence, conditions 23 and 24 will be addressed in this addendum.

2.7 Licence limit exceedances

During the reporting period, the following licence limit exceedances occurred in relation to treated wastewater discharge limits:

- a) Monthly Monitoring of the WWTP was not maintained during the 2025 Annual Reporting Period. The period of Voluntary Administration experienced by Strandline as of the 21st February 2025 resulted in limited Monthly monitoring post 6th June when the Coburn Mine Site went into Care and Maintenance. The lower volumes processed at the WWTP didn't allow for regular sampling as the system couldn't recirculate until tank volumes had built up. This impacted the September sample as insufficient quantities were available for analysis resulting in no N, P or BOD loadings results.
- b) WWTP Total Suspended Solids for the February sampling resulted in a value of 32 mg/L. 2mg/l higher than the concentration limit (30mg/L). This may be attributed to the recirculation of pump 6 not running long enough to steadily mix the chloring and settle the waste within the main tanks prior to being pumped to the sprinkler farm.
- c) The *E.coli* limit of 1,000 CFU/100 ml was exceeded on several occasions during the reporting period. The highest result was obtained in May 2025 with 18,000CFU/100 ml. The May assessment value may be attributed to incorrect sampling of the system, whereby enough time was not given to running the WWTP recirculation (Pump 6) prior to sampling. This was further supported by the low Cl result obtained in the sample (<0.01 mg/l).
- d) The lower limit of the residual free chlorine limit (0.2 mg/L) was not achieved on several occasions during the reporting period. Some difficulty has remained retrieving the sample, with the samples obtained not entirely representative of the true recirculated chlorine levels. The system requires recirculating longer to obtain better results. In 2026, Makwater has been commissioned to undertake regular maintenance on the WWTP and this will assist with maintaining CL levels and re-circulation prior to sampling.

No further licence limit exceedances were observed during the reporting period.

2.8 Complaints investigations and responses

No complaints were received from any members of the public during the reporting period.

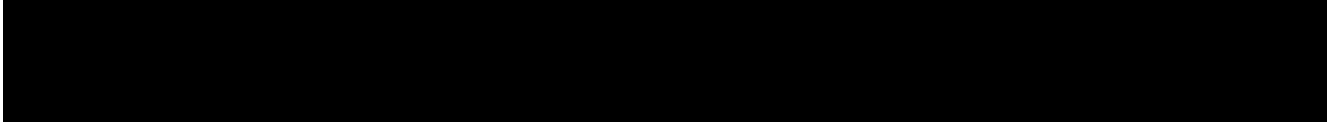
2.9 Pollution control equipment failures

A review of all environmental incidents logged on the Strandline INX system during 2025 throughout the reporting period did not identify any failure or malfunction of pollution control equipment. Fauna strikes and minor hydrocarbon spills made up the majority of environmental incidents during the reporting period.

3. CONCLUDING REMARKS

Coburn Resources submits this Annual Environmental Report and AACR to meet the reporting requirements of Condition 33 of L9373/2023/1, noting that a supplementary addendum will be provided to DWER by the

31st March 2026 to satisfy Conditions 23 of the licence with respect to the hydrogeological analysis of the Ambient groundwater and water quality results.



APPENDIX A

ANNUAL AUDIT COMPLIANCE REPORT FORM



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V Division 3

Once completed, please submit this form either via email to info@dwer.wa.gov.au, or to the below postal address:

Department of Water and Environmental Regulation
Locked Bag 10
Joondalup DC WA 6919

Section A – Licence details			
Licence number:	L9373/2023/1	Licence file number:	DER2022/000583
Licence holder name:	Coburn Resources Pty Ltd		
Trading as:	Coburn Resources Pty Ltd		
ACN:	165 036 537		
Registered business address:	1 Alumina Road, East Rockingham WA 6168		
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">• section C;• section D (if required); and• sign the declaration in Section F.
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none">• section C;• section D (if required);• section E; and• sign the declaration in Section F.

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 8: Mineral sands mining or processing: premises on which mineral sands ore is mined, screened, separated or otherwise processed.	For the period 1 January – 31 Dec 2025, 8,013,010 t (wet) ore processed at WSP to generate 69,939 t (dry) of HMC. All details are listed in section 2.4 of the supporting document.
Category 52: Electric power generation: premises (other than premises within category 53 or an emergency or standby power generating plant) on which electrical power is generated using a fuel	For the period 1 January – 31 Dec 2025, 23,040 MW of power was produced from the gas generators, with an average daily power generation ranging from 0.1 – 6.43 MW/hr.

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 85: Sewage facility	For the period 1 January – 31 Dec 2025, the WWTP received 5,754 m ³ of wastewater, with an average daily inflow ranging from 2 - 37 m ³ /day.
Category 85B: Water desalination plant: premises at which salt is extracted from water if wastewater is discharged onto land or into waters (other than marine waters)	For the period 1 January – 31 Dec 2025, 0.117 GL of potable water was produced by the desalination plant.
Category 89: Putrescible landfill site	For the period 1 January – 31 Dec 2025, approximately 2195.6 tonnes of waste was taken to the Coburn landfill site.

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
Category 8: Mineral sands mining or processing: premises on which mineral sands ore is mined, screened, separated or otherwise processed.	For the period 1 January – 31 Dec 2025, 7,549,802 t (wet) tails were discharged to all combined locations. All details are listed in s2.4 of the supporting document.
Category 52: Electric power generation: premises (other than premises within category 53 or an emergency or standby power generating plant) on which electrical power is generated using a fuel	N/A
Category 85: Sewage facility	For the period 1 January – 31 Dec 2025, the WWTP discharged 5,098 m ³ of wastewater to the irrigation spray field. Attachment A in the supporting document contains flow meter values.
Category 85B: Water desalination plant: premises at which salt is extracted from water if wastewater is discharged onto land or into waters (other than marine waters)	For the period 1 January – 31 Dec 2025, 0.168 GL of brine was discharged to the lined MSP process water pond.
Category 89: Putrescible landfill site	For the period 1 January – 31 Dec 2025, mainly between 1/1/2025 and 10/6/2025, the landfill site received approximately 2195.6 tonnes of waste that was compacted in situ. It comprised approximately 2,583m ³ .

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:	18	Date(s) of non-compliance:	31/12/2025
Details of non-compliance:			
Monthly Monitoring of the WWTP was not maintained following the site entering care and maintenance during the 2025 Annual Reporting Period			
What was the actual (or suspected) environmental impact of the non-compliance?			
NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No environmental impact from the non-compliance.			
Cause (or suspected cause) of non-compliance:			
The period of Voluntary Administration experienced by Strandline as of the 21 st February 2025 resulted in limited Monthly monitoring post 6 th June when the Coburn Mine Site went into Care and Maintenance. The lower volumes processed at the WWTP didn't allow for regular sampling as the system couldn't recirculate until tank volumes had built up. This impacted the September sample as insufficient quantities were available for analysis resulting in no N, P or BOD loading results.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Monthly Monitoring has commenced from the start of January 2026 with results already indicating lower values, due to more effective sampling efforts and available volumes.			
Was this non-compliance previously reported to DWER?			
X No, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
x Reported to DWER in writing		Date: 27/02/2026	

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:	18	Date(s) of non-compliance:	31/12/2025
Details of non-compliance:			
WWTP Total Suspended Solids for the February sampling resulted in a value of 32 mg/L. 2mg/l higher than the concentration limit (30mg/L).			

Section E – Details of non-compliance with licence condition	
What was the actual (or suspected) environmental impact of the non-compliance? NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.	
No environmental impact from the non-compliance.	
Cause (or suspected cause) of non-compliance:	
This may be attributed to the recirculation of pump 6 not running long enough to steadily mix the chloring and settle the waste within the main tanks prior to being pumped to the sprinkler farm.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
MAK Water has been commissioned in Jan/Feb 2026 to undertake regular maintenance on the WWTP and this will assist with maintaining CL levels and re-circulation prior to sampling.	
Was this non-compliance previously reported to DWER?	
X No, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
x Reported to DWER in writing	Date: 27/02/2026

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:	18	Date(s) of non-compliance:	31/12/2025
Details of non-compliance:			
The <i>E.coli</i> limit of 1,000 CFU/100 ml was exceeded on several occasions during the reporting period. The highest result was obtained in May 2025 with 18,000CFU/100 ml.			
What was the actual (or suspected) environmental impact of the non-compliance? NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No environmental impact from the non-compliance.			
Cause (or suspected cause) of non-compliance:			
The May assessment value may be attributed to incorrect sampling of the system, whereby enough time was not given to running the WWTP recirculation (Pump 6) prior to sampling. This was further supported by the low Cl result obtained in the sample (<0.01 mg/l).			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the			

Section E – Details of non-compliance with licence condition	
non-compliance:	
In 2026, MAK Water has been commissioned to undertake regular maintenance on the WWTP and this will assist with maintaining CL levels and re-circulation prior to sampling.	
Was this non-compliance previously reported to DWER?	
X No, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 27/02/2026

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:	18	Date(s) of non-compliance:	31/12/2025
Details of non-compliance:			
The lower limit of the residual free chlorine limit (0.2 mg/L) was not achieved on several occasions during the reporting period.			
What was the actual (or suspected) environmental impact of the non-compliance?			
NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No environmental impact from the non-compliance.			
Cause (or suspected cause) of non-compliance:			
Some difficulty has remained retrieving the sample, with the samples obtained not entirely representative of the true recirculated chlorine levels. The system requires recirculating longer to obtain better results.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
In 2026, MAK Water has been commissioned to undertake regular maintenance on the WWTP and this will assist with maintaining CL levels and re-circulation prior to sampling.			
Was this non-compliance previously reported to DWER?			
x No, and			
<input type="checkbox"/> Reported to DWER verbally	Date: / /		
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 27/02/2026		

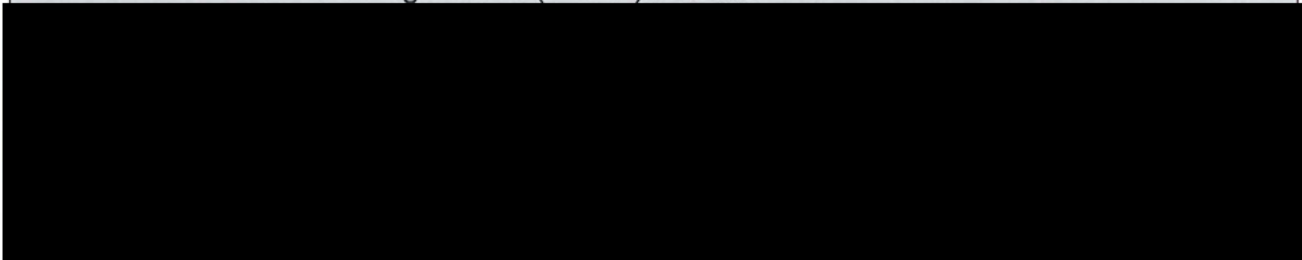
Section E – Details of non-compliance with licence condition

Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.

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 particular¹.

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



Date:	27/02/2026	Date:	27/02/2026
Seal (if signing under seal):			

¹ 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.

² 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.