



## Annual Audit Compliance Report Form

*Environmental Protection Act 1986, Part V Division 3*

Section A – Licence details			
Licence number:	L6217/1983/15	Licence file number:	2012/007237-7~2
Licence holder name:	Alcoa of Australia Limited		
Trading as:	Alcoa of Australia Limited		
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
<i>*Refer to Attachment 1 for supporting documentation for the below quantities</i>	
Category 46 – Bauxite refinery	██████████ tonnes of refined alumina
Category 52 – Electric Power Generation	650,576MWhr total or average 74.00MW per day of power generated using natural gas
Category 64 – Class II or III putrescible landfill site	968.15 Tonnes to Class II landfill
Category 67 – Fuel burning	41,344kg/hr (natural gas with Sulphur content less than or more than 0.25%)

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
<i>*Refer to Attachment 1 for supporting documentation for the below quantities</i>	
Category 46 - Bauxite refinery	██████████ tonnes of bauxite residue (tailings)

Department of Water and Environmental Regulation

Section E – Details of non-compliance with licence condition			
Condition no:	A23(a)	Date(s) of non-compliance:	4 July, 1 October 2025
Details of non-compliance:			
<p>In accordance with Operating Licence L6217/1983/15, the Wagerup Refinery is required to undertake stack sampling for carbon monoxide (CO) emissions from Calciners 1, 2, 3 and 4. Stack sampling is conducted in accordance with USEPA Method 10, with analyser performance and calibration requirements referenced under USEPA Method 7E, which governs gas concentration analyser performance.</p> <p>Prior to sampling, the gas analyser undergoes span response calibration using a NATA-accredited calibration gas cylinder with a known CO concentration. Under USEPA Method 7E, the calibration span is required to be set above the expected measurable gas concentration so that measured values can be verified within the analyser’s validated linear range.</p> <p>During Quarter 3 and Quarter 4 of 2025, stack sampling on Calciner 2 recorded average CO concentrations of approximately 550 ppm and 750 ppm, respectively. At the time of sampling, the analyser’s upper calibration span was set at Q3 506 ppm and Q4 529ppm, which reflected the highest CO concentration available from the NATA-accredited calibration gas cylinder available to the contractor during the time of testing. As a result, the measured CO concentrations exceeded the upper calibrated span range of the analyser.</p> <p>The analyser used for testing (Testo 350XL) is technically capable of measuring CO concentrations well above the calibration span. Accordingly, the analyser continued to record CO concentrations above the upper span limit during both sampling campaigns. However, under USEPA Method 7E, measured concentrations can only be formally verified within the calibrated span range, as analyser accuracy is confirmed through direct comparison against the known concentration of the calibration gas during span response and drift checks.</p> <p>In accordance with USEPA Method 7E requirements, post-sampling system assessments were undertaken for both Quarter 3 and Quarter 4 to evaluate system bias and calibration drift. The analyser successfully met the acceptance criteria for both bias and drift (within ±3%) for each testing campaign, indicating the analyser remained stable, exhibited no evidence of malfunction or excessive drift, and operated consistently throughout sampling.</p> <p>Notwithstanding the satisfactory post-sampling system assessment results, USEPA Method 7E (Section 3.4) specifies that the calibration span defines the upper limit of the analyser’s validated linear range and that valid run-average concentrations should not exceed this upper limit. As the measured CO concentrations exceeded the calibrated span, this represents a deviation from the calibration requirements of USEPA Method 10, which requires the analyser span to be set such that expected concentrations fall within the calibrated range.</p> <p>Accordingly, CO concentrations recorded above the calibration span are reported as indicative only and are acknowledged as a non-conformance with the calibration criteria of the applicable USEPA methods.</p>			

Department of Water and Environmental Regulation

Section E – Details of non-compliance with licence condition	
<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>The analyser continued to function within acceptable performance criteria, and the elevated readings—though outside the validated calibration range—are considered indicative only. Therefore, the non-compliance did not lead to any material environmental or public health consequences.</p> <p>Dispersion modelling and the 2024 Wagerup Health Risk Assessment (HRA) confirmed that ground-level CO concentrations remained well below the National Environment Protection Measure (NEPM) 8-hour ambient air quality standard of 9 ppm, with all acute and chronic health risk indices (HI values) for CO emissions remaining below thresholds of concern.</p>	
<p>Cause (or suspected cause) of non-compliance:</p>	
<p>The suspected cause of the non-compliance was elevated CO emissions during normal calciner operation that exceeded the analyser’s upper calibration span, resulting in measurements outside the validated range specified by USEPA Method 10.</p>	
<p>Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:</p>	
<p>As part of our sampling activities our emissions monitoring contractor conducts supplementary pre-run checks, and Emission Assessments has been requested to perform post-run trend analyses to determine average gas concentrations and advise on compliance status.</p>	
<p>Was this non-compliance previously reported to DWER?</p>	
<p><input type="checkbox"/> Yes, and</p>	
<p><input type="checkbox"/> Reported to DWER verbally</p>	<p>Date:</p>
<p><input type="checkbox"/> Reported to DWER in writing</p>	<p>Date:</p>

Department of Water and Environmental Regulation

Section E – Details of non-compliance with licence condition			
Condition no:	W2	Date(s) of non-compliance:	01/01/2025
Details of non-compliance:			
<p>10/10/2024 - A detailed site investigation was completed under the contaminated sites regulations on Runoff Collection Pond 1 (ROCP1). The findings of that report indicated that there was a reasonable likelihood that heavily dilute Bayer process material had been discharging via groundwater from a decommissioned pond (ROCP1) into an internal drain into a neighbouring surface water body. Based on the information currently available the report concludes that the discharge poses a low environmental risk. Discharge has occurred as a result of a historical damaged clay liner</p> <p>The license holder shall minimise the release of contaminated water to the environment by providing containment systems to capture any spillages and minimise contact of process liquors to the ground.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p><b>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</b></p>			
Low risk to human health or the environment, provided the site continues to be managed appropriately.			
Cause (or suspected cause) of non-compliance:			
Damage to clay liner at ROCP1.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Continue current BRL management practices and monitor shallow groundwater conditions around ROCP1.</p> <p>Prepare a Site Management Plan including groundwater and surface water monitoring plans. Review and update the risk assessment and management strategies based on future monitoring results.</p> <p>Implement institutional controls such as PPE and management plans for workers in the ROCP1 area.</p> <p>Consider the condition of ROCP1 in any future engineering projects related to the RSAs.</p> <p>Update as communicated to DWER Contaminated lands team September 2025:</p> <ul style="list-style-type: none"> <li>• Development of an SMP Scope Q1 2025 (COMPLETE)</li> <li>• Draft Site Management Plan (SMP) staged across 3 domains including ROCP1, RSAs and Refinery. ROCP1 Q4 2025. RSAs and Refinery H1 2026</li> </ul>			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input checked="" type="checkbox"/> Reported to DWER verbally		Date: 20/01/2025	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 20/01/2025	

Department of Water and Environmental Regulation

Section E – Details of non-compliance with licence condition			
Condition no:	W5	Date(s) of non-compliance:	01/01/2025
Details of non-compliance:			
<p>10/10/2024 - A detailed site investigation was completed under the contaminated sites regulations on Runoff Collection Pond 1 (ROCP1). The findings of that report indicated that there was a reasonable likelihood that heavily dilute Bayer process material had been discharging via groundwater from a decommissioned pond (ROCP1) into an internal drain into a neighbouring surface water body. Based on the information currently available the report concludes that the discharge poses a low environmental risk. Discharge has occurred as a result of a historical damaged clay liner and the discharge point is not the location specified in table 19 referred to in condition W5.</p> <p>Table 19 states that "process water and potentially contaminated stormwater" may only be discharged at the ROWS pond spillway discharge point outlined in Appendix C of the licence.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p><b>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</b></p>			
Low risk to human health or the environment, provided the site continues to be managed appropriately.			
Cause (or suspected cause) of non-compliance:			
Damage to clay liner at ROCP1.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Continue current BRL management practices and monitor shallow groundwater conditions around ROCP1.</p> <p>Prepare a Site Management Plan including groundwater and surface water monitoring plans. Review and update the risk assessment and management strategies based on future monitoring results.</p> <p>Implement institutional controls such as PPE and management plans for workers in the ROCP1 area.</p> <p>Consider the condition of ROCP1 in any future engineering projects related to the RSAs.</p> <p>Update as communicated to DWER Contaminated lands team September 2025:</p> <ul style="list-style-type: none"> <li>• Development of an SMP Scope Q1 2025 (COMPLETE)</li> <li>• Draft Site Management Plan (SMP) staged across 3 domains including ROCP1, RSAs and Refinery. ROCP1 Q4 2025. RSAs and Refinery H1 2026</li> </ul>			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input checked="" type="checkbox"/> Reported to DWER verbally		Date: 20/01/2025	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 20/01/2025	

Department of Water and Environmental Regulation

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.			
Signature <sup>2</sup> :		Signature:	
Name: (printed)		Name: (printed)	
Position:		Position:	
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.