



## 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](mailto: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:	L8148/2006/4	Licence file number:	DER2014/000374-1
Licence holder name:	Koolan Iron Ore Pty Ltd		
Trading as:	Koolan Iron Ore Pty Ltd		
ACN:	099 455 277		
Registered business address:	First Floor, 2 Kings Park Road WEST PERTH WA 6872		
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 5	2,766,838 t
Category 12	0 t
Category 54	Average of 62 m <sup>3</sup> per day
Category 58	Average of 7,396 t per day (Total of 2,699,740 t)
Category 64	1,005 t

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 6	7,200,898 t

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:	10	Date(s) of non-compliance:	8 February 2025
Details of non-compliance:			
KIO is licensed to discharge a maximum of 130 m <sup>3</sup> of treated effluent per day. The average daily discharge volume for the reporting period was 62m <sup>3</sup> of treated effluent per day, which is well below the licence limit. On 8 February 2025 a total of 132m <sup>3</sup> of treated effluent was discharged, an exceedance of 2m <sup>3</sup> over the Licence limit. This exceedance was reported to DWER via submission of an N1 Form.			
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 actual or suspected environmental impact occurred as result of the very minor additional 2m <sup>3</sup> of treated effluent. As mentioned previously, treated effluent is tested as per Condition 24 of the Licence.			
Cause (or suspected cause) of non-compliance:			
The exceedance on 8 February 2025 occurred as result of two factors: (1) a lightning strike that caused a power outage; and (2) an associated heavy rainfall event. The power outage shutdown the WWTP for a short period of time; however, the input flow to the system continued during this time. Once the system was restarted all the tanks were full. The treatment process then ran for a longer duration due to the backlog of water requiring treatment. Typically, the system does not run with full tanks on a daily basis. Approximately 49mm of rainfall was received at Koolan Island on the 8 February 2025 from a Tropical Low and approximately 53mm occurred in the 7 days prior. Rainwater entered through the open aeration tanks contributing an unknown but large volume of clean water into the treatment system. Both of these factors combined are likely to have resulted in a greater volume of treated water irrigated.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
KIO notes that there were no adverse effects associated with this very minor increase in treated effluent above the maximum volume of 130m <sup>3</sup> /day, therefore no further action was considered necessary. Lightning strikes and rainfall events are not preventable and are difficult to accurately predict, therefore no action can be taken to avoid this occurrence in the future.			
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: N1 from submitted on 11 February	

**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:	15	Date(s) of non-compliance:	25/1/25, 31/1/25, 7/3/25, 6/4/25, 24/5/25, 18/8/25, 21/8/25, 9/10/25, 12/10/25, 13/10/25, 28/10/25
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Details of non-compliance:

A total of ten (10) exceedances of the daily Total Suspended Solids (TSS) limit of 20 mg/L occurred during the reporting period. Of these, six (6) occurred at W1 diffuser and four (4) occurred at W3 diffuser. DWER was notified of the exceedances through submission of quarterly ET1 forms. A summary of the exceedances is shown in the table below.

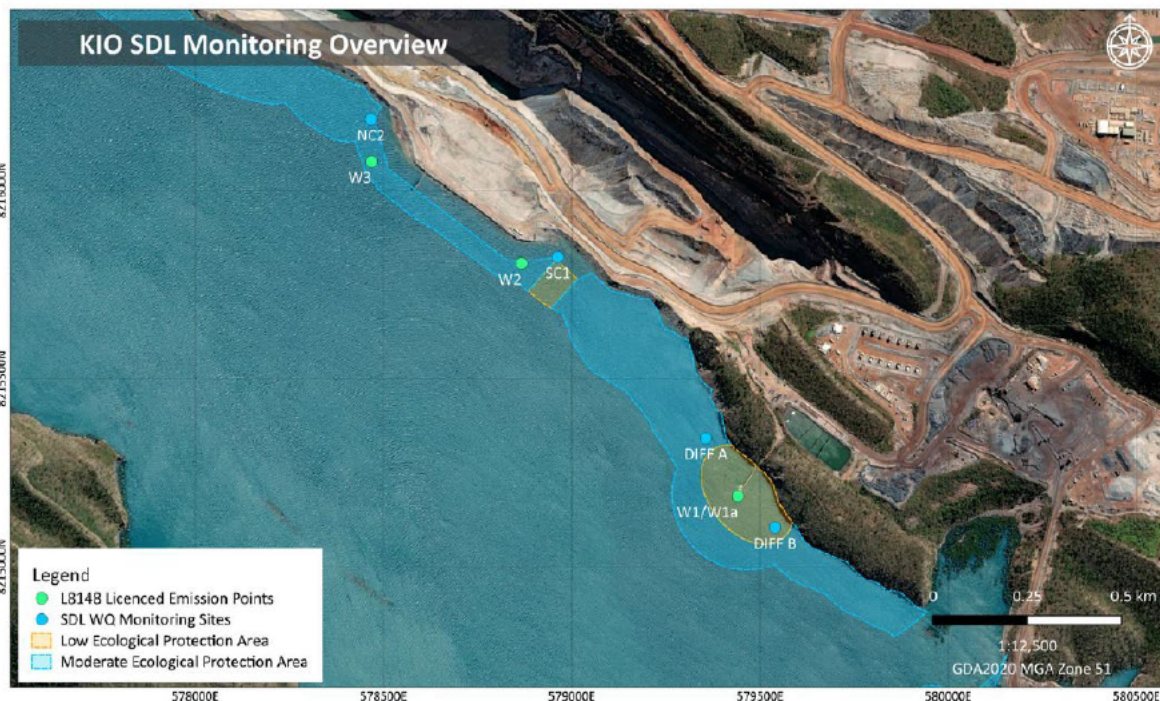
Date	W1 TSS exceedance value (mg/L)		W3 TSS exceedance value (mg/L)	
	First sample	Second Sample	First sample	Second Sample
25/1/25	-	-	28	-
31/1/25	-	-	58	-
7/3/25	28	23	-	-
6/4/25	-	-	25	-
24/5/25	-	-	37	-
18/8/25	27	-	-	-
21/8/25	76	48	-	-
9/10/25	21	22	-	-
12/10/25	26	26	-	-
13/10/25	116	34	-	-
28/10/25	42	26	-	-

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.

The potential effects on marine water quality and benthic producer habitat from occasionally elevated TSS emissions are not considered to be significant, mainly due to the characteristics of the receiving marine environment that is naturally turbid and subject to strong tidal flows each day. Between 4 December 2024 and February 2025, water quality monitoring was undertaken using submersible data logger (SDL's) to monitor for any significant changes to water quality as result of dewatering discharge. The locations of the SDLs and diffusers (W3 and W1/W1a) are shown in Figure 1 (noting that emission point W2 was removed from the Licence during 2025). The results of monitoring conducted by Hydrobiology (2025) indicated that dewatering discharge during this period (in which two exceedances occurred) did not result in a significant decrease in water quality upstream and downstream of outfalls (i.e. W1/W1a and W3). Prior to this event, twice yearly monitoring was undertaken to monitor for changes to water quality from the discharge of dewater. This monitoring, however, is no longer a requirement of the Marine Management Plan based on the previous five years of monitoring which demonstrated that discharge (including exceedances that occurred during these period) did not significantly affect marine water quality.

**Section E – Details of non-compliance with licence condition**



**Figure 1: Location of SDL monitoring Dec 2024-Feb 2025**

Cause (or suspected cause) of non-compliance:

Historical exceedances have occurred during and following rainfall events. However, the exceedances during the reporting period can be attributed to changing geology (i.e. more Elgee siltstone) and operational factors such as sump placement, vehicle/machinery movements in the pit and pump head positions within the Main pit sump.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

Typically, the management actions employed to help reduce TSS levels include:

- ceasing discharge to the ocean allowing the settlement pond to fill (should there be capacity)
- allowing the Main Pit sump to fill (should there be capacity)
- checking placement of sediment booms within the Settlement Pond
- adjusting the position of the pump heads within the sump in Main Pit

It should be noted that mining ceased on the 16 October 2025; however, dewatering continued for the remainder of the reporting period. It is anticipated that dewatering will cease in March 2026 and that Main Pit will be flooded during Q2 or Q3 2026. Future actions to mitigate recurrence of TSS levels exceeding the Licence limits will therefore no longer be relevant.

Was this non-compliance previously reported to DWER?

Yes, and

Reported to DWER verbally

Date: / /

Reported to DWER in writing

Date: Quarterly ET1 forms submitted on: Q1-

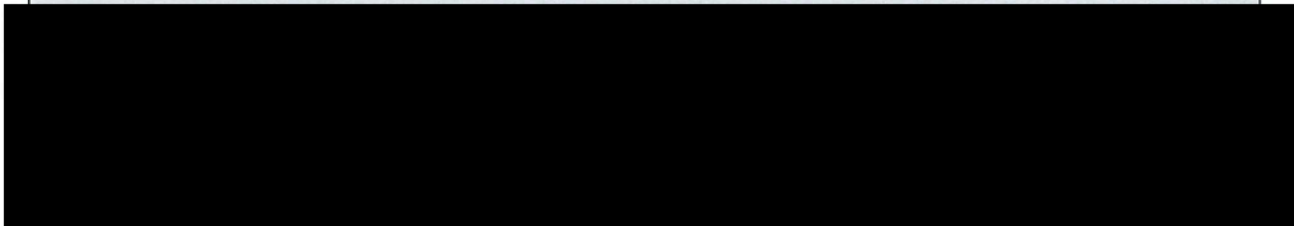
**Section E – Details of non-compliance with licence condition**

	11 Apr 25, Q2- 4 July 25, Q3 - 21 Oct 24 and Q4 – 12 Jan 26
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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:	25.3.2026	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.