



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

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

Department of Water and Environmental Regulation
Locked Bag 33 Cloisters Square
PERTH WA 6850

Section A – Licence Details			
Licence number:	L8918/2015/1	Licence file number:	INS-0001927
Licence holder:	Keysbrook Leucoxene Pty Ltd		
Trading as:			
ACN:	137 091 297		
Registered address:	1 Alumina Rd, 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 at 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
6 Mine Dewatering	665,988 tonnes (Includes rainfall capture)
8 Mineral sands mining or processing	2,475,793 dry tonnes

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
6 Mine Dewatering	665,988 tonnes (Includes rainfall capture)

Section D – Statement of Actual Part 2 Waste Discharge Quantity			
8 Mineral sands mining or processing – Tailings		2,475,793 dry tonnes	
Section E.1 – 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:	Condition 8	Date(s) of non-compliance:	3/08/2025
Details of non-compliance:			
Licence discharge volume exceeded - Of the 665,988m ³ discharged between May – October, 139,055m ³ was contributed from mine dewatering and groundwater abstraction.			
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.			
There is unlikely to be significant environmental impact due to the volume of water entering the catchment from the surrounding environment diluting TSS levels downstream. 487,703m ³ of water discharged consists of captured rainfall that would otherwise naturally flow into the catchment.			
Cause (or suspected cause) of non-compliance:			
According to Bureau of Meteorology (BOM) rainfall data for 2025 at Cloon (station 9242, located 4.9 km away), 860 mm of rain was recorded during 2025. Rehabilitation activities were ongoing in Lot 57 and Lot 63 and not fully complete to allow diversion around the operation. Rainfall collected from disturbed or partially rehabilitated areas was directed to the process water ponds.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Rehabilitating disturbed land continues to be a focus prior to winter, therefore reducing rainfall catchment requirements. During the 2024/2025 rehabilitation season, 176 hectares of rehabilitation were completed.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input checked="" type="checkbox"/> Reported to DWER verbally		Date: 04/ 09 / 2025	

Section E.1 – Details of Non-Compliance with Licence Condition	
<input type="checkbox"/> Reported to DWER in writing	Date:

Section E.2 – Details of Non-Compliance with Licence Condition
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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:	9	Date(s) of non-compliance:	Various dates between 23/06/2025 - 30/10/2025
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Details of non-compliance:

Process water quality discharge limits exceeded – Total Suspended Solids
Full details can be found in the AER

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.

There is unlikely to be significant environmental impact due to the volume of water entering the catchment from the surrounding environment diluting discharged water.

Cause (or suspected cause) of non-compliance:

The 2025 winter was particularly wet (860mm), with the site experiencing several months of extreme rainfall often receiving excessive volumes (<25) in short periods of time. Although increased storage areas were implemented prior to winter, the site remained at capacity requiring continued discharge through W1 to minimise risk of water release outside licensed discharge points. Intense rainfall events often result in spikes in TSS levels due to the rate of surface water capture. Discharge is minimised where possible during rainfall events. A review of rainfall data confirmed the exceedances were often a result of heavy rainfall events and the continuation of rainfall thereafter as described in notifications to Envirowatch.

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

- To assist with the ongoing management of water quality Doral will:
- Reduce the volume of water in the water circuit prior to large rainfall events to allow maximum capture of elevated TSS prior to discharge being required.
 - Trial various recirculating options within the water circuit to allow increased settling time prior to transfer to the process water dam.
 - Trial different coagulants to ensure efficient suspended solids removal.
 - As per Condition 30 of the L8918 Licence amended on the 22nd of December 2025, Doral will conduct an investigation into upgrading the process water circuit infrastructure to increase storage capacity and / or water retention time. This report will be submitted to the CEO prior to May 1st 2026.

Was this non-compliance previously reported to DWER?

Yes, and

<input type="checkbox"/> Reported to DWER verbally	Date: / /
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Section E.2 – Details of Non-Compliance with Licence Condition	
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: Each event within 7 days of becoming aware

Section E.3 – 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:	Condition 24 (2025 Licence amendment)	Date(s) of non-compliance:	23-24/12/2025
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Details of non-compliance:

On the 23rd and 24th of December the dust trigger and limits were exceeded for PM10 and TSP Exceedance data can be found in the AER.

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.

It is unlikely that the dust event caused significant environmental impacts. Exceedances were likely caused by wind gusts creating short dust spikes.

Cause (or suspected cause) of non-compliance:

At the time of exceedance easterly wind speeds remained consistent at approximately 30km/hr with gusts up to 60km/hr from the evening of 23 December, persisting throughout most of the 24th December contributing to the elevated dust levels. The dust monitor is located directly west of site in Lot 700.

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

- Doral continue to implement mitigation measures as per the Air Quality and Dust Management Plan such as:
- Use of weather forecasting to refine short term mine planning and associated activities
 - Suspension, or modification, of field mining operations
 - Prioritising Rehabilitation of open ground
 - Operation of two (2) x 40,000 L Moxy water carts continuously across active and exposed areas to maintain adequate surface moisture and suppress dust generation.
 - Surface stabilisation via:
 - o Dispersing clay fines mixture to create a crust on the surface
 - o Glu-on dust suppression (further Gluon to be applied this week)
 - o Sowing of a ‘dust crop’ comprising of rye grass mix to open areas of profiled tails sand as an interim measure prior to the replacement of topsoil
 - Irrigation of crops to ensure sufficient growth and root structure

Section E.3 – Details of Non-Compliance with Licence Condition	
<ul style="list-style-type: none"> • Implementation of a proactive consultation and communication to inform residents of proposed mining activities in proximity to their dwellings and/or to respond to complaints efficiently • Establishment of standard practices to minimise dust generation. These practices reflect the risk of potential dust impacts on residents including their proximity to active mining • Monitoring of wind speed and direction, TSP and PM10 dust emissions from mining activities at selected boundary locations as well as at other locations within the Project area in order to identify and mitigate. • Restricting of mine vehicle speeds when wind speeds are in excess of 23km/hr 	
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: 31/12/2025

Section E.4 – 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:	Condition 8	Date(s) of non-compliance:	22/09/2026
Details of non-compliance:			
Process water (rainfall capture and tails return water) was released through a bund wall. As a result, water was released from the site onto neighboring pastoral land.			
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.			
Environmental impacts are expected to be minimal as tested water returned water quality within discharge limits. Comprehensive upstream and downstream water quality testing was conducted and further details can be found in the AER.			
Cause (or suspected cause) of non-compliance:			
The 2025 winter has observed intense rainfall events which contributed to elevated TSS, Doral have retained larger volumes of water onsite than previous years to allow residence time to assist TSS management. The tails void water level rose overnight compromising the bund wall on the night of the water release.			

Section E.4 – Details of Non-Compliance with Licence Condition	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
An investigation including DWER Officers was conducted following the incident. Additional staff training has been conducted to ensure routine overnight inspections are continued. Water level gauges (staff gauges) have been installed on tails voids.	
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: 22/09/2025

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 ¹ .			
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.