Alcoa Point Henry Environmental Action Notice Status Report 1 December 2025



1. Introduction

- With the completion and submission to the Environment Protection Authority Victoria (EPA) of the
 Environmental Site Assessment (31 October 2019) for the Pt Henry site, Alcoa's key objective is to
 complete an environmental audit report for the site prepared in accordance with section 53X of the
 Environment Protection Act 1970 (VIC) and consistent with the EPA approved audit scope by 1
 December 2027.
- Alcoa will ensure compliance to the requirements of the Environmental Action Notice EAN-00003154 (Notice) as issued to the location by the EPA on 25 October 2022. The Notice requires the submission of six-monthly reports updating the EPA on how the clean-up and ongoing management of the premises has been or is likely to be achieved to comply with the Notice requirements. In the event of identifying any imminent risk to human health or the environment, Alcoa must notify the EPA and advise what measures have been put in place to respond to such risks.

2. Environmental Performance

No environmental non-compliance incidents identified during the period.

3. Identified Imminent Risks

No imminent risks to human health or the environment identified during the period.

4. Recent Activities

- As part of the Industrial Site Hot Spot remediation activity, the remaining impacted soils on the former
 industrial site were recovered, transported and placed in the Moolap Landfill containment cell, compliant
 with the requirements set out in the Moolap Landfill Operating Licence. The soils in the open excavations
 were sampled and analysed to confirm validation was achieved, with the works conducted in accordance
 with the Hot Spot Remediation Work Plan and the Solid Media Management Remediation Action Plan.
- Soil data collated from seven (7) Hot Spot remediation areas was reported in the first of the soil quality Validation Reports for the Industrial Site, as developed by Alcoa's environmental consultants, with work now underway to finalise the draft ready for Auditor review. A second soil Validation Report focussed on the former Rolling Mill (Area G) is being finalised in preparation for Auditor review, with the development of a third report for Hot Spot Areas B and D relating to the former reclamation pad area and ore bridge has commenced, post the completion of the remediation works and soil validation being achieved.
- A Supplemental Soil Boron Investigation memo was developed to provide an overview of the results to characterise ecological risk related to boron in soil. The memo set out the distribution and proportion of bioavailable forms of boron in Site soils and derived a site-specific risk-based ecological screening criteria for total recoverable boron. The memo was reviewed by the EPA appointed Auditor, the document updated in response to receiving the auditor's feedback and a final review by the Auditor concluded that all comments had been sufficiently addressed.
- The second half of the 2025 Groundwater Monitoring Event commenced in late November, covering the Industrial Site, the Original Point Henry Landfill Site and the Moolap Landfill. The field work is expected to be completed by mid-December 2025, with analysis of the groundwater samples and reporting to follow.
- Works to recover the small remaining area of impacted soil at the CPL Landfill were completed and the
 recovered impacted soil was placed in the Moolap Landfill. The interim CPL Landfill Validation report,
 reflective of the works completed in 2024 was revised to include the most recent soil validation data and
 submitted to the Auditor for review. Auditor comments were reviewed and addressed, with the revised
 Validation report currently with the auditor for review. With all waste removed and validation achieved,

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the remediated CPL area was backfilled to match surrounding grade and hydroseeded with native wallaby grass seed to re-establish vegetation.

- Following a response to EPA's request for information, the Authority completed its assessment of the Alcoa Development Licence Exemption application for the remediation works and capping of the Original Point Henry Landfill (Old SPL/ Salt Dross and General Refuse Landfill). On June 30 2025, the Development Licence Exemption was issued to Alcoa by EPA Victoria.
- The draft Original Point Henry Landfill Remediation Action Plan was developed, reviewed by Alcoa and the EPA appointed Auditor. Auditor comments are currently being addressed and the RAP revised.
- Removal of the north pond liner and soil validation works at the Hays Road site were completed.
 Accordingly, the Hays Road Validation Report and the Hays Road Stockpile and Surface Soil Re-Use Suitability Report were developed, reviewed by Alcoa and submitted the auditor for review. All auditor comments were closed out to the satisfaction of the auditor.
- In preparation for the soil remediation works, the Hays Road Work Plan under the Solid Media
 Management Remediation Action Plan, was developed by Alcoa's environmental consultants, and
 reviewed by the Auditor. Remediation works for selenium and chloride impacted soils are significantly
 progressed.
- The 2024 Groundwater Interpretative Memos for the site were reviewed by Alcoa. Auditor comments were
 received on the Original Point Henry Landfill and Site Wide Gauging Report, and are currently being
 addressed.
- To support the long-term management of the backfilled materials underlying the Carbon Bakes area, the
 Carbon Bake and Courtyard Retention Backfill Memo was developed, consolidating all the relevant
 information in support of the future development of the Environmental Management Plan. The memo was
 reviewed by Alcoa and submitted to the auditor for review.
- Planning for a small number of discreet remediation tasks on the Farmlands zone progressed with a site inspection conducted to inform remediation options.
- Engagement with Council and other relevant stakeholders and authorities continued in parallel with council's planning department review of Alcoa's planning permit and Marine and Coastal Act (MACA) consent applications for the proposed remediation works in the eastern foreshore Constructed Wetlands and Original Point Henry Landfill. Council sought a number of clarifications on Alcoa's permit application, which Alcoa is continuing to address and close out.
- Re-vegetation works on Cells 1 to 6 at the Moolap Landfill site were completed in line with the growing season for the selected pasture grass species sown on the cap. 100% vegetation coverage of the cap has now been achieved.

5. Planned Activities: 1 December 2025 - 30 May 2026

- Continued recovery and transport of impacted soils peripheral to the former industrial site as part of the Hot Spot remediation works. The recovered soils will be managed either by appropriate re-use in less sensitive areas of the site or placed in the Moolap Landfill, compliant with the requirements set out in the Operating Licence. As Hot Spot areas on the Industrial Site are completed, the soil quality Validation Reports will be developed by Alcoa's environmental consultants, ready for Auditor review.
- Submission of the LNAPL Report and the Rolling Mill area Validation report, inclusive of the QA/QC data for Auditor review.
- Continued engagement with Council and other relevant stakeholders and authorities in parallel with council's planning department review of Alcoa's planning and MACA consent applications for the proposed remediation works in the eastern foreshore Constructed Wetlands and Original Point Henry

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Landfill. It is anticipated that works will commence by the end of 2026 (as they need to be completed during the summer period to minimise rainfall impacts), subject to regulatory approval and timeframes.

- Auditor verification of the Original Point Henry Landfill Remediation Action Plan (RAP) is expected to be received in early 2026. The RAP will then be submitted to EPA Victoria, as required by the Environmental Action Notice.
- Auditor review of the remaining 2024 Groundwater Interpretative Reports will be completed with the
 reporting of the November 2025 Groundwater Monitoring Event expected early in 2026. Development of
 the 2025 Groundwater Interpretative memos will be completed with Auditor review expected to have
 commenced.
- Finalisation of remediation works and development of the Site Condition report for Hays Road detailing the soil and groundwater quality for the area for Auditor review.
- Remediation works on small number of discreet areas of the Farmlands zone will be completed.
- Discussions with the EPA Victoria and the EPA appointed Auditor are expected to continue on the
 applicability of the Notice, and the auditing approach for the vast majority of the Farmlands zone and the
 Grasslands / Wetlands zone. Both areas have not been used as part of Alcoa's operations and are
 considered low risk in terms of future land use.

6. Community Engagement

- A community update was provided to the Alcoa Pt Henry Community Advisory Board database in October 2025 and was published on the <u>Alcoa website</u>. Another update is planned for June 2026.
- Alcoa continued to brief government agencies and key stakeholders on the status of onsite activities.
- A copy of this report will be published on the <u>Alcoa website</u>.

7. Contact

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