



Application for Licence Amendment

Part V Division 3 of the *Environmental Protection Act 1986*

Licence Number	L9037/2017/1
Licence Holder	Mt Marion Lithium Management Pty Ltd
ACN	666 116 365
File Number	DER2017/000308-1
Premises	Mount Marion Lithium Project Shire of Coolgardie Legal description – Mining tenements M15/1000, M15/717 and on private land known as the Hamptons Lease Areas 52, portion of Lot 105 on Deposited Plan 40396, Volume 2668 Folio 420 Part of Lot 105 on Deposited Plan 40396 Certificate of Title Volume2668 Folio 420 As defined by the Premises maps attached to the Revised Licence
Date of Report	9 September 2025
Decision	Revised licence granted

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an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

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1. Decision summary

Licence L9037/2017/1 is held by Mt Marion Lithium Management Pty Ltd (Licence Holder) for the Mount Marion Lithium Project (the Premises), located at Mining tenement M15/1000, M15/717 and on private land known as Hamptons Lease Area 53, portion of Lot 105 on Deposited Plan 40396, Volume 2668 Folio 420.

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during the operation of the Premises. As a result of this assessment, Revised Licence L9037/2017/1 has been granted.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this Amendment Report, the department has considered and given due regard to its Regulatory Framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

2.2 Amendment summary

On 25 March 2025 the Licence Holder submitted an application to the department to amend Licence L9037/2017/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- Reduction of the Ghost Crab in-pit Tailings Storage Facility (TSF) freeboard from below 6 metres (m) (lowest point of pit crest) to 0.5 m from the crest maximum;
- Increase the footprint of mobile crushing plant area, displayed in Figure 2 of L9037/2017/1; and
- Merge operational requirements 9 and 10 removing the requirement for the dust suppression system on ore sorting infrastructure to operate at all times during the operation.

This amendment is limited only to operational changes to Category 5 activities. The requested amendment does not propose a change to throughput of any category.

2.2.1 Increase to RL of Ghost Crab In-pit Tailing Storage Facility

The Licence Holder is currently authorised to discharge tailing to the Ghost Crab TSF to RL 374, approximately 6m below the lowest crest of the pit; as prescribed under amendment to works approval W5734/2014/1, April 2016. The initial capacity of the Ghost Crab Pit prior to tailings deposition was stated at 7,504,396 m³ with an estimated 6.8 years of capacity at a filling rate of 1.866 Mt per annual period. Subsequent annual tailings volumes have mostly been lower, resulting in a longer lifespan to date.

Under the licence amendment, the Licence Holder is requesting to decrease the freeboard of the TSF to 0.5 m from the pit crest (noting a 5.7m variation in pit crest elevation) increasing tailings deposition by 1.5 million cubic metres and increase the TSF lifespan by approximately 2.5 years.

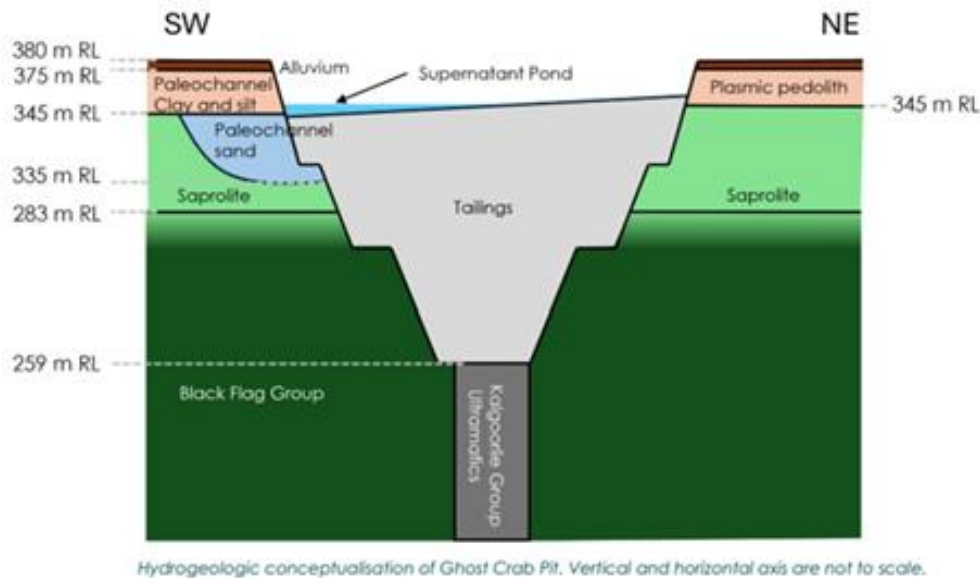
The initial proposal identified local vegetation as the priority receptor in the case of seepage/groundwater mounding and the associated risk to be low due to 35m distance to the water table. However, given the proposed elevated tailings levels, further tailing leachate head pressures were identified and further seepage/mounding assessment was undertaken, including monitoring during progressive deposition. The additional inputs and outputs are summarised in Table 1 as follows:

Table 1: Ghost Crab pit - inputs and outputs

Parameter	Inputs	Outputs
Wet tailings (MT/Annum)	0.85	
RO Brine (ML/Annum)	730	
Pit Dewatering Discharge (ML/Annum)	16	
Tails Decant Recovery (ML/Annum)		946
Seepage (ML/Annum)		44
Evaporation (ML/Annum)		88
Entrainment (ML/Annum)		191

The Licence Holder anticipates that the additional 2.5 years of capacity will support operations until a new pit is mined out to become the next in-pit tailing facility; while decreasing the amount of backfill material required to reach closure final levels and maintaining capacity for a 1 in 100 72-hour ARI rain event. The Licence Holder intends to provide the department with a Works Approval for a new TSF in readiness for the completion of the Ghost Crab Pit.

Historic discharge from the TSF is primarily through evaporation and supernatant pond decant recovery, involving minor seepage into adjacent formations. Seepage and mounding data indicates that the Paleochannel (see Figure 1) is considered an aquifer, all other stratigraphic units are considered aquitards. However, the proposed increase to freeboard and resulting head pressure could result in seepage and mounding within the Pedolith and Saprolite formations.

**Figure 1: Ghost crab pit conceptual plan 1**

Historically, groundwater mounding in the Paleochannel peaked at 5 m (25m BGL), 40 m from the TSF in 2022, this reduced to 0 m within a 130 m zone of influence from the TSF. Deposition

of tailings has caused a 2 m reduction in the 5 m maximum seepage mounding level in the Paleochannel due to retarding and blocking of paleochannel transmissivity by subaqueous tailings material. Water quality analysis indicated the chemical signature from the TSF up to 190m away from the TSF in the paleochannel aquifer.

Predicted mounding due to the requested deposition of tailing to 0.5 m of the crest indicates a maximum of 9 m (21 m BGL) mounding at 50 m from the TSF in the pedolith, assuming that tailings deposition occurs evenly around the perimeter of the pit. Seepage modelling undertaken by the Licence Holder demonstrates that mounding levels around the Ghost Crab Pit are not expected to impact upon deep rooted vegetation. However, in the unlikely event that isolated impacts to deep rooted occur, these impacts, would be confined to areas within 100m of the TSF, covered by clearing permit CPS 10813 and will be reported as disturbance under this approval.

The Licence Holder installed four additional monitoring / seepage recovery bores in November 2024 to facilitate further baseline water level and water quality data, assess any seepage into the alluvium and allow for recovery of seepage through pumping. As constructed details are provided below in Table 2.

Table 2: Construction details – recovery bores

Completed Bore ID	Easting	Northing	Elevation	Date Start	Date Completed	Drilled Depth (Mbgl)	Production Casing Interval	Screen Casing Interval	Screened Lithology
MM24MB37	349883.60	6560526	382.14	19/11/2024	22/11/2024	27	+1 – 21	21 - 27	Clay / Saprolite
MM24MB38	350009	6560623	383.68	22/11/2024	24/11/2024	30	+1 – 24	24 - 30	Clay / Saprolite
MM24MB36	350003	6560633	383.26	16/11/2024	18/11/2024	30	+1 - 23.3	23.3 – 29.3	Clay
MM24MB35	349885	6560516	381.61	13/11/2024	16/11/2024	30	+1 – 22.8	22.8 – 28.8	Clay

The Licence Holder has provided a Trigger Action Response Plan (TARP) to protect groundwater dependent vegetation within the vicinity of the TSF (See Table 3).

Table 3: Trigger Action Response Plan

Monitoring	Trigger for Action	Action
Supernatant pond water level	Supernatant pond contains sufficient water suitable for decant	Recycle water supernatant pond through processing plant (dependent on operational considerations and safe access)
	Supernatant pond becomes too shallow for decant recovery	Cease pumping
Water levels and water quality in pedolith/saprolite monitoring bores MM24MB35, MM24MB36,	Water levels showing shallowing trend from baseline (to be defined) towards 8m BGL or	Investigation of cause (e.g. seepage, rainfall event) including analysis of groundwater and TSF

MM24MB37 and MM24MB38	Water quality measurements show increasing trend in total dissolved solids from baseline (to be defined)	monitoring data Commence preparation for pumping (e.g. sourcing suitable pumps generators pipeline)
	Water levels reach 8m BGL and Water quality measurement at greater than 80% of Ghost Crab Pit supernatant pond field water quality analytes	Pumping from affected seepage recovery bores.
	Water level decreased below 8m	Cease pumping
Visual inspection of vegetation within 300m of GCP TSF	Identification of dead or dying vegetation	Investigate cause of vegetation deaths Analysis of groundwater and TSF monitoring data and vegetation photo monitoring data. Pumping from closest seepage recovery bores for up to one month if groundwater deemed to be cause of vegetation death.

The requested amendment is consistent with the performance criteria set in the Department of Energy, Mining, Industry Regulation and Safety DEMIRS Mining Proposal Reg ID 129825.

The requested amendment will allow the Licence Holder to continue to discharge tailing around the perimeter of the TSF using the existing discharge spigots without altering the existing throughput. The Licence Holder proposes tailing deposition to the levels in Table 4.

Table 4: TSF Deposition Elevations

Discharge point	Crest elevation at Discharge	Maximum Tailings Deposition
Spigot 1	385.5 mRL	385.0 mRL
Spigot 2	386.8 mRL	386.3 mRL
Spigot 3	385.1 mRL	384.6 mRL
Spigot 4	384.0 mRL	383.5 mRL
Spigot 5	383.1 mRL	382.6 mRL
Spigot 6	381.1 mRL	380.6 mRL

2.2.2 Increase footprint of mobile crushing plants

The Licence Holder is currently authorised to carry out mobile crushing and ore sorting in the location indicated in Figure 2. Under the licence amendment the Licence Holder is requesting an additional area for the purpose of mobile crushing and ore sorting, also depicted in Figure 2.

The Licence Holder has been issued with a clearing permit from the department for the proposed additional mobile crushing and ore screen area Clearing Permit Number: CPS 10813/1. CPS 10813 replaces CPS 8632/3 and authorises clearing of an additional 302 ha of native vegetation within a 2,092 ha clearing footprint. CPS 10813 permits clearing for the extent of the requested crushing and screening area and areas further north and west to the northwest of the requested mobile crushing location. The clearing permit identifies priority flora listed by the Department of Biodiversity, Conservation and Attractions within the permit area but notes these were excluded from the proposed clearing area

Under existing controls the Licence Holder is required to maintain bunding around the screening plant and product stockpile area.



Figure 2: Mobile crushing locations

3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk assessments* (DWER 2020).

To establish a Risk Event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises operation which have been considered in this Amendment Report are detailed below. Table 5 also details the proposed control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary.

Table 5: Licence Holder controls

Emission	Sources	Potential pathways	Proposed controls
Dust	Mobile Ore Crushing and Sorting	Air/windborne pathway	<ul style="list-style-type: none"> • Mobile screening plant fitted with shields and covers on transfer points. • Water trucks will be utilised to spray work area, roads and stockpiles during times when the screening plant is operational. • Daily inspection of plant area will include observation of dust assessment and walking of plant site perimeter. • Monitoring of operational and weather conditions to support dust management. • Incident reporting system. • Installation of bunding around the areas where ore is processed to ensure that stormwater passing through these areas do not flow to the surrounding environment. • Selection of processing locations to ensure no interaction with environmental receptors (all works are to be proposed for existing disturbance areas). • Regular inspection of bunded areas to ensure capacity is maintained. • Surface water management infrastructure, as required.
Deposition of tailings into Ghost Crab in-pit TSF	Seepage of tailing water through the base and walls of the TSF impacting vegetation health and contaminating	Tailing and process water impacting groundwater quality and vegetation	<ul style="list-style-type: none"> • Seepage and Mounding Assessment completed, demonstrating potential mounding levels. • Trigger Action Response Plan (TARP) developed. • 4 Seepage recovery/monitoring bores

Emission	Sources	Potential pathways	Proposed controls
	groundwater.	Seepage to soil and groundwater	drilled and operated according to TARP. <ul style="list-style-type: none"> • Use of salt tolerant species during rehabilitation. • Post closure monitoring in accordance with approved MCP (REG ID 129825)
	Discharge of tailings into Ghost Crab TSF		<ul style="list-style-type: none"> • All piping will be constructed in accordance with AS/NZS 2033:2008 "Installation of polyethylene pipe systems". • Tailings pipeline will be contained within appropriately sized bunds, with any potential leaks contained or diverted into the Ghost Crab TSF. • Pipelines will be inspected daily. • Isolation valves, telemetry and flow meters are to be maintained to manufacturers specifications.

3.1.2 Receptors

In accordance with the *Guideline: Risk assessments* (DWER 2020), the Delegated Officer has excluded employees, visitors and contractors of the Licence Holder's from its assessment. Protection of these parties often involves different exposure risks and prevention strategies, and is provided for under other state legislation.

Table 6 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guideline: Environmental siting* (DWER 2020)).

Table 6: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Woolibar Homestead Approximately 20 km from beneficiation plant.	Woolibar Homestead Approximately 20 km from beneficiation plant. The Delegated Officer considers that due to distance there is no likely impact upon these residences, so it is not considered further as a receptor within this assessment.
Aboriginal and other heritage sites	Following the grant of a s18 application in March 2018, the Licence Holder engaged with the relevant stakeholders and undertook a cultural salvage of artefacts from the nominated s18 areas. Within the prescribed premises boundary DPLH Registered sites: 18370 – Artefacts/ Scatter, Quarry 37161 – Quarry 37162 – Quarry 37163 – Quarry. Lodge Heritage Site (18372) is approx. 90m from ore sorting location as part of the expansion, this site is adjacent to an existing haul road.

	Licence Holder states that appropriate buffer applied to the registered sites, ensuring they are not impacted by activities being undertaken within the prescribed premises boundary. Internal site disturbance permit process preventing any unauthorized works within the vicinity of the registered sites.
Environmental receptors	Distance from prescribed activity
Yallari Timber Reserve Greater than 4 km west of the TSF and processing areas of the premises.	Yallari Timber Reserve Greater than 4 km west of the TSF and processing areas of the premises.
Underlying groundwater (non-potable purposes)	<p>Groundwater at the Mt Marion Lithium Mine is within the Goldfields Groundwater Area and includes shallow ephemeral lakes or unconfined aquifers that are saline or hypersaline.</p> <p>The site has recorded groundwater quality with a pH of 6.4 and with Total Dissolved Solids (TDS) concentrations of 30,000 milligrams per litre (mg/L) to 40,000 mg/L.</p> <p>Deeper regional aquifers in the area host hypersaline water quality, typically of 140,000 mg/L TDS (Aquaterra, 2008).</p>
Threatened/Priority Fauna	<p>Colonies of sugar ant which are essential for the survival of the Arid Bronze Azure Butterfly have been identified 250m west of the premises boundary and approximately 1 kilometre west of the requested mobile crushing area.</p> <p>Inland Hairstreak Butterfly (<i>Jalmenus aridus</i>) listed as P1 (BC Act)</p>
Threatened/Priority Flora	<p><i>Eucalyptus websteriana</i> subsp. <i>norsemanica/websteriana</i> (P1) located within and immediately north of the application area</p> <p><i>Ricinocarpos digynus</i> (P1): Located 1.6 km outside the application area</p> <p><i>Lepidosperma</i> sp. Kambalda (A.A. Mitchell 5156) (P2) located within and immediately north of the application area</p> <p><i>Acacia websteri</i> (P1) located 1 km north the application area.</p>
TECs/PECs	<p>No TEC or PEC are mapped within a 50-kilometer radius (CPS 10813/1)</p> <p>The Delegated Officer considers that due to distance there is no likely impact upon these residences, so it is not considered further as a receptor within this assessment.</p>

3.2 Risk ratings

Risk ratings below have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for those emission sources which are proposed to change and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the Licence Holder has proposed mitigation measures/controls (as detailed in Section 3.1), these have been considered when determining the final risk rating. Where the Delegated Officer considers the Licence Holder's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the licence as regulatory controls.

Additional regulatory controls may be imposed where the Licence Holder's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table .

The Revised Licence L9037/2017/1 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. Category 5 activities.

The conditions in the Revised Licence have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

Table 7: Risk assessment of potential emissions and discharges from the Premises operation

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Operation								
Reduction of Ghost Crab in-pit TSF freeboard to 0.5m from the crest	Tailings water from Ghost Crab in-pit TSF	Increased seepage of tailing water through the base and walls of the TSF impacting vegetation health and contaminating groundwater.	Adjacent vegetation Groundwater	Refer to Section 3.1.1	C = Moderate L = Rare Medium Risk	Y	During this amendment the following condition has been update for the increased level of Ghost Crab TSF Condition 1, Table 2, operational requirement 5 and 9 Conditions on existing Licence L9037/2017/1 relating to the operation of Ghost Crab on-pit TSF: Condition 4, 12, 13,14, 16	N/A
		Discharge to land from overtopping of Ghost Crab in-pit TSF	Adjacent Vegetation	Refer to Section 3.1.1	C = Moderate L = Rare Medium Risk	Y	No additional conditions imposed. Condition on existing Licence L9037/2017/1 relating to the operation of Ghost Crab on-pit TSF: Condition 1, Table 2, operation requirement 5 and 9	N/A
Operation of mobile crushing plant with reduced dust suppression management (Category 5)	Dust	Air/windborne pathway causing impacts to the health of vegetation	Vegetation adjacent to mobile processing plant	Refer to Section 3.1.1	C = Moderate L = Rare Medium Risk	N	Condition 1, Table 2, operation requirement 10 and 12. Condition 3, Table 3. Condition 15	The Licence Holder has provided no additional controls for when the dust suppression system will be operated. To prevent dust uplift impacting on nearby vegetation, a condition has been included in the

Licence: L9037/2017/1

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
								licence to specify when the existing dust suppression equipment must be used.
Operation of expanded mobile crushing plant (Category 5)	Dust	Air/windborne pathway causing impacts to the health of vegetation	Priority flora and fauna adjacent to mobile processing plant	Refer to Section 3.1.1	C = Moderate L = Possible Medium Risk	Y	During this amendment the following condition has been updated relating to the dust management system Condition 1, Table 2, operation requirement 10,11, 12 and 20 Conditions on existing Licence L9037/2017/1 relating to dust suppression: Conditions 1, 3, 4, 5, 6 Condition 15	N/A

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the Guideline: Risk assessments (DWER 2020).

Note 2: Proposed Licence Holder's controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

4. Consultation

Table 8 provides a summary of the consultation undertaken by the department.

Table 8: Consultation

Consultation method	Comments received	Department response
Local Government Authority advised of proposal (2 May 2025)	<p>The Shire of Coolgardie replied on 12 June 2025 with the following observations:</p> <ul style="list-style-type: none"> All activities avoid known Aboriginal heritage sites and continue to engage with Traditional Owners as required under the Aboriginal Cultural Heritage Act 2021; Any use of local roads or infrastructure must be managed to prevent damage and ensure public safety, with traffic impacts minimised and appropriate signage provided; environmental management practices are employed where necessary to mitigate potential impacts on the surrounding environment. 	Comments noted
Department of Mines, Industry Regulation and Safety (DMIRS) advised of proposal (2 May 2025)	<p>DMIRS replied on date 20 May 2025 stating that</p> <ul style="list-style-type: none"> Activities on private land known as Hamptons Lease Area 53, portion of Lot 105 on Deposited Plan 40396, Volume 2668 Folio 420; are not regulated by the Mining Act 1978 and DEMIRS has no comment on activities on this parcel of land. The latest relevant Mining Proposal associated with the Mt Marion Lithium Project was submitted by Mineral Resources Pty Ltd and approved on the 26/02/2025 (Reg ID 129825). This Mining Proposal has superseded MP Reg ID 101822. The Mobile crushing and ore sorting activity on above ground and underground ROM pads is approved under MP Reg ID 129825 and consistent with proposed DWER licence amendment. As per MP Reg ID 129825: <i>"Mobile plant to be operated within ROM area, including Mobile Crushing Plant and ore sorting equipment."</i> 	Comments noted

	<ul style="list-style-type: none"> It is DEMIRS expectation that dust mitigation measures utilised on mobile and stationary plant equipment on site will be implemented to ensure that potential dust impacts are minimised. Approval as per MP Reg ID 129825 reference to DWER approval: <i>“Plant and equipment fitted with appropriate emissions controls. Site operated in accordance with L9037/2017/1”</i> DEMIRS have no geotechnical concerns of TSF freeboard being reduced to 0.5m. DEMIRS does expect that the TSF water holding capacity with reduced freeboard, does however accommodate a 1% AEP rain event; as per performance criteria in MP Reg ID 129825. 	
Licence Holder was provided with a first draft amendment on 14 July 2025	Refer to Appendix 1	Refer to Appendix 1
Licence Holder was provided with an updated draft on 28 August 2025	Email on 5 September stating no additional comments and the Licence Holder requested the amendment be issued.	

5. Conclusion

Based on the assessment in this Amendment Report, the Delegated Officer has determined that a Revised Licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

5.1 Summary of amendments

Table 9 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Revised Licence as part of the amendment process.

Table 9: Summary of Licence Amendments

Condition no.	Proposed amendments
Condition 1 Table 2 Operational requirement 5	Change to the level of tailings fill level from 6 metres below pit crest to 0.5 metres from pit crest.
Condition 1 Table 2 Operational requirement 9	Seepage recovery at screened level 8m BGL in the event of mounding to that level within recovery/monitoring bores MM24MB35, MM24MB36, MM24MB37 and MM24MB38.
Condition 1 Table 2 Operational requirement 10	Change to the operation requirement of the dust suppression system.
Condition 1 Table 2 Operational requirement 12	Addition of operational requirement for dust suppression system.
Condition 1 Table 2 Operational requirement 20	Additional dust suppression to ensure dust is not excessive from mobile crushing and screening plant.
Condition 15	Addition of requirement for a Dust Monitoring Plan to determine monitoring equipment locations, any impacts to sensitive receptors and ongoing monitoring requirements.
Schedule 1 Figure 2	Updated figure to reflect expanded mobile crushing area.

References

1. AQ2, 2025, *Verification of Predicted Mounding Below Ghost Crab Inpit TSF at Mt Marion*, Dated 24 February 2025 (EO Reference [DWER-1176098282-212793](#))
2. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
3. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
4. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.
5. DWER 2025, *CPS 10813, Clearing Permit Decision Report*, Dated 25 May 2025
6. Mineral Resources 2024, *Mount Marion tailing geochemical assay*, Dated 10 September 2024 (EO Reference [DWER-1176098282-212794](#))
7. Mineral Resources, 2025a, *Supporting Document L9037/2017/1 Licence Amendment Application Part V Environmental Protection Act 1986, Mt Marion Lithium Management Pty Ltd*, Dated 7 March 2025 (EO Reference [DWER-1176098282-212788](#))
8. Mineral Resources, 2025b, *Seepage and Mounding assessment associated with Ghost Crab Pit TSF, Mt Marion Lithium Mines*, dated 18 March 2025 (EO reference [DWER-1176098282-212792](#))

Appendix 1: Summary of Licence Holder's comments on risk assessment and draft conditions

Condition	Summary of Licence Holder's comment	Department's response
Condition 1, Table 2: Infrastructure and equipment requirements	<p>Draft condition states that dust must not leave the premises.</p> <p>The licence holder states that such a level of performance is not required to protect environmental values, suggesting that outcome based conditions focussing on receptors rather than premises boundary is appropriate, in conjunction with a dust deposition monitoring regime.</p>	Amended operational requirements require no impact to sensitive receptors (priority flora and fauna). Monitoring gauges, a dust management plan and quarterly monitoring are added to the licence to determine future dust management and monitoring controls.
Figure 3: Mobile crushing and ore sorting locations	The licence holder notes the figure labels revised crushing locations as 'proposed' and provides a revised figure with 'approved' amended crushing and screening area.	Revised figure added to amended licence.
Figure 6: Monitoring bores and tailings spigot locations	The licence holder notes spigot locations are not licenced discharge points and their precise location is subject to minor change subject to site infrastructure layout, suggesting they be labelled as 'nominal' locations.	Figure 6 title adjusted accordingly, recognising nominal variation in spigot location.