



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	APP-0031355, INS-0001992
Premises	Mount Marion Lithium Project SHIRE OF COOLGARDIE Legal description – Mining tenement M15/1000, M15/717, M15/841 and on private land known as Hamptons Lease Area 53, portion of Lot 105 on Deposited Plan 40396, Volume 2668 Folio 420 As defined by the Premises maps attached to the Revised Licence
Date of Report	18 February 2026
Decision	Revised licence granted

**SENIOR ENVIRONMENTAL OFFICER,
GREEN ENERGY**

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

Table of Contents

1. Decision summary	3
2. Scope of assessment	3
2.1 Regulatory framework	3
2.2 Application summary	3
2.2.1 Clearing permit CPS 9866/1 overview	5
2.3 Other relevant approvals	5
2.3.1 Department of Mines, Petroleum and Exploration (DMPE)	5
2.3.2 Department of Planning Lands and Heritage (DPLH)	5
2.4 Geochemistry of reject tailings material	6
2.5 Review of the reject tailings material	8
2.6 DWER initiated amendment	8
3. Risk assessment	8
3.1 Source-pathways and receptors	9
3.1.1 Emissions and controls	9
3.1.2 Receptors	9
3.2 Risk ratings	11
4. Consultation	14
5. Decision	14
6. Conclusion	14
6.1 Summary of amendments	14
References	15
Table 1: Licence Holder controls	9
Table 2: Sensitive human and environmental receptors and distance from prescribed activity	10
Table 3. Risk assessment of potential emissions and discharges from the premises during operation	12
Table 4: Consultation	14
Table 5: Summary of licence amendments	15

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, COOLGARDIE WA 6429.

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges 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 Application summary

On 22 September 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:

- include Waste Dump 07 as an authorised discharge point for coarse reject tailings materials;
- expand the premises boundary to include additional leased area;
- two administrative amendments to conditions 6 and 18.

This amendment is limited only to changes to category 5 activities from the existing licence. No changes to other categories in the licence, category 6, 12, 54, 57, 64, 73 and 85B have been requested by the Licence Holder.

Public Disclosure of Boundary Change Details

The Licence Holder requested an exemption from publishing information relating to the newly leased area associated with the proposed expansion of the premises boundary. The Department has acknowledged and considered this request. However, the proposed boundary amendment is addressed in the Amendment Report, and the revised licence will include an updated premises boundary map without redaction.

There is no provision within the Environmental Protection Act 1986 (WA), associated regulations, or Department of Water and Environmental Regulation (DWER) guidance that allows redaction of boundary change details for publication during the appeal process. Confidentiality provisions apply solely to commercially sensitive information and do not extend to spatial details of premises boundaries.

Under section 102 of the Act, an amended licence and all supporting documentation are subject to statutory rights of appeal and must be made publicly available as part of that process. Consistent with these legislative requirements—and the Act's core principles of transparency and public participation, the relevant documents will be advertised following the granting of this amendment.

Category 5 – addition of Waste Dump 07 to the licence

The Licence Holder proposes to include Waste Dump 07 as an authorised discharge point for

coarse reject tailings under the licence. This amendment includes updates to Condition 1 Table 2 (infrastructure location) and Condition 4 Table 4 (authorised discharge points locations), which relates to category 5 on the licence.

Waste Dump 07 is already approved under the Mining Proposal (Reg ID 129825) and Native Vegetation Clearing Permit (CPS 10840/1) approvals. This request seeks to align the licence with these existing approvals.

Waste Dump 07 comprises the combined footprints of Waste Dump 1, 4 and 5, along with an eastern expansion into tenement M15/841, resulting in a total capacity of approximately 41.31 million loose cubic meters (MLCM).

The current licence authorises to discharge coarse reject tailings to Waste Rock Landforms 1 - 5, subject to operational conditions requiring adequate drainage to contain runoff or stormwater from the landform surface. Tailings deposited on Waste Dump 07 will have the same composition as those currently placed on Waste Rock Landforms 1 to 5.

Premises boundary extension

The Licence Holder has requested an expansion of the premises boundary to align with existing approvals, including Clearing Permit (CPS 10840/1) and Mining Proposal (Reg ID 129825). This expansion involves adding mining tenement M15/841 where Waste Dump 07 will be extended. The Licence Holder has not sought approval to conduct any authorised activities under the licence approved categories, besides the discharge of coarse reject (tailings) materials onto the expansion of Waste Dump 07 (refer to section 2.5), within the freehold lease identified as Hamptons Lease Area 53, being a portion of Lot 105 on Deposited Plan 40396, Volume 2668 Folio 420. Additionally, the Licence Holder have approvals for native vegetation clearing activities under clearing permit CPS 9866/1 and under the Mining Proposal (Reg ID 129825) (refer to section 2.3).

Administrative amendments

Condition 6 – dust suppression area extension

The Licence Holder has requested an extension of the dust suppression area that utilises dewatering effluent, to include Waste Dump 07. An updated map was provided to support the proposed amendment to Condition 6 of the licence.

No additional or previously unidentified environmental receptors were identified within the proposed expansion area encompassing Waste Dump 07. Given that the existing assessed risk profile remains unchanged, the Department supports the extension to the dust suppression area and update of Schedule 1 Figure 4.

Condition 18 - date extension

The Licence Holder requested an extension of the deadline for Condition 18 of the licence, which requires submission of a site-specific report detailing concentration ratios for Ra²²⁶, Ra²²⁸, Pb²¹⁰, gross alpha and gross beta to be submitted by **1 December 2025**. The revised submission date proposed is 30 June 2026.

This condition was introduced in the licence amendment dated 19 September 2019, following identification of a potential radioactivity risk in pit water, which contained boron and uranium concentrations exceeding ANZECC livestock drinking water guidelines. Furthermore, production bore results indicate that radioactivity levels are above the respective ANZECC trigger values, suggesting that the brine also contains elevated radioactivity.

Consequently, the Licence Holder was prohibited from using this water for dust suppression until evidence demonstrates that the water does not pose a high risk.

The Department agrees to extend the deadline for this submission of the report to 30 June 2026, while maintaining the existing condition that this water must not be used for dust suppression until evidence confirms low-risk radioactivity.

2.2.1 Clearing permit CPS 9866/1 overview

Native Vegetation Purpose Clearing permit CPS 9866/1 was granted on 31 August 2023. The purpose of the permit was the expansion of mining operations, located next to the northern area of the premises boundary.

Key conditions in the permit include:

- limiting the maximum clearing to 120 hectares;
- weed control;
- making and avoidance of *Eremophila acutifolia*;
- pre-clearance survey for fauna;
- avoidance of specific area related to Malleefowl and Shield-backed trapdoor spider;
- retaining vegetative material and topsoil, revegetation and rehabilitation

On recent communication, the licence holder requested an amendment to the clearing permit, requesting to remove conditions regarding Shield-backed trapdoor spider as new evidence was found confirming that the spiders found during the biodiversity survey correspond to a different group. Additionally, the licence holder requested to remove *Eremophila acutifolia* from the conditions because this species was delisted (Mineral Resources 2025).

At the time of this assessment, the clearing permit amendment is still under assessment.

2.3 Other relevant approvals

The Department consulted with relevant government agencies regarding the proposed amendment in particularly the boundary extension. The following advice was provided.

2.3.1 Department of Mines, Petroleum and Exploration (DMPE)

The Department of Mines, Petroleum and Exploration (DMPE) confirmed that:

- 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 DMPE has no comment on activities within this parcel and relies on the Department of Water and Environmental Regulation to undertake assessments;
- Mining Proposal Reg ID 129825 assessed and approved the amalgamation of waste Rock Dumps (WRD) 1,4 & 5 into WRD 07, including the footprint expansion into tenement M15/841. Clearing Permit CPS 10840/1 was subsequently approved to accommodate this expansion.
- The disposal of coarse tailings into WRD 07 was assessed with proposed management deemed satisfactory. Tenement conditions have been imposed to ensure compliance with DMPE's environmental objectives.

2.3.2 Department of Planning Lands and Heritage (DPLH)

The Department of Planning Lands and Heritage (DPLH) provided comments on 12 December 2025 advising that the land area is subject to Section 18 Consent for the Mt Marion Lithium Mine Expansion, relating to impacts to the following Aboriginal Registered Sites:

- Richmond 1 (ID 28724)
- QS1 (ID 37161)
- QS 2 (37162)

- QS3 (37163)

The Section 18 consent expires on 31 January 2028.

Additionally, DPLH noted that the subject land includes further Aboriginal Registered Sites:

- Rod's Soak (ID 15748) and
- GC01-A01 (ID 18370), and
- the following Aboriginal heritage places as identified in their records below:

MG24-23 (ID 40859)	MG24-040 (ID 41007)	MG2320_NC02 (ID 40246)
MG24-18 (ID 40857)	Granite Outcrop # 1 (ID	MG24-041 (ID 41008)
MG2317-NC04 (ID 40073)	18595)	MG24-14 (ID 40855)
MG24-039 (ID 41006)	GC01-A02 (ID 18371)	MG2317-NC06 (ID 40068)
GC01-A03 (ID 18372)	Water trees 1 (ID 18368)	MG2409-001 (ID 40806)
MG24-22 (ID 40858)	MG2320_NC03 (ID 40245)	MG24-038 (ID 41005)
MRL23_010 (ID 40610)	MG2317-NC07 40 (ID	Mt Monger 1 (MM#1) (ID
Isolated artefact # 1 (ID	40067)	22053)
18373)	MG24-13 (ID 40854)	MG24-24 (ID 40860)
	MB2317-NC05 (ID 40070)	

The licence amendment is considered an administrative process and does not impact Aboriginal heritage within the subject area. However, it is acknowledged that the amendment will facilitate further development of the area. The Licence Holder is advised to consult with the Department of Planning, Lands and Heritage (DPLH), Aboriginal Heritage Conservation, to obtain guidance, as separate approval under the Aboriginal Heritage Act 1972 will be required.

It is further emphasised that the granting of this licence amendment does not constitute approval under the *Aboriginal Heritage Act 1972*.

Based on the evidence provided by the Licence Holder regarding site occupancy and the assessment of potential emissions associated with the proposed activities, the Department agrees to extend the premises boundary. Nevertheless, the advice provided by DMPE and DPLH should be carefully considered by the Licence Holder prior to and throughout the expansion process.

2.4 Geochemistry of reject tailings material

The disposal of coarse reject tailings within other Waste Rock Landforms was previously assessed by the Department as part of the licence amendment granted on 19 September 2019. The assessment relied on the report "*Mount Marion Project Coarse Rejects Geochemical Assessment*" (Mineral Resources Limited, 2017 and 2024), which determined that the material presents a low environmental risk, attributable to its low sulfur content and its classification as Non-Acid Forming (NAF).

Additional characteristics of the coarse reject material included:

- Significant enrichment of beryllium, bismuth, caesium, rubidium, antimony, selenium, tin, tantalum, tellurium and thallium.
- Slight enrichment of niobium.
- Low concentrations of environmentally significant metals and metalloids including arsenic, selenium, cadmium, copper, chromium, mercury, zinc and lead with most values below the laboratory reporting limits.
- Minor carbon content, consisting predominately of inorganic (carbonate) carbon, with negligible organic or graphitic carbon present.

Leachate testing indicated that the material may potentially generate:

- Alkaline leachate (pH 9.4).
- Moderate soluble alkalinity.
- Low concentrations of soluble calcium and magnesium.
- Sodium as the dominant cation, followed by potassium.
- Chloride as the dominant anion.
- Very low levels of fluoride.

These results indicate that seepage derived from coarse reject material is expected to exhibit low salinity.

An analysis of metals and metalloids solubility in water solubility demonstrated that:

- Water-soluble concentrations of beryllium, caesium, selenium, tantalum and thallium were very low.
- Concentrations of other environmentally significant metals and metalloids—including arsenic, cadmium, chromium, lead, nickel and zinc—were also very low and well below the ANZECC livestock drinking water guidelines.
- Aluminium concentrations exceeded the ANZECC livestock drinking water guideline at a 1:5 extract ratio (21 mg/L compared with a guideline value of 5 mg/L).
- Rubidium concentrations were relatively low.
- Soluble lithium concentrations were low and remained below the ANZECC short-term irrigation guideline.

Collectively, these results indicate that seepage generated by coarse reject material is expected to contain low to very low levels of environmentally significant metals and metalloids, and is therefore unlikely to cause adverse environmental impacts.

Further testing using pH-dependent extraction (US EPA SW-846 Test Method 1313) showed that:

- Amphoteric metals and metalloids, as well as most other elements, were more soluble under acidic conditions. Fluoride exhibited the highest solubility, though still below livestock drinking water guideline values.
- Antimony and tin were the only elements showing increased solubility under strongly alkaline conditions.
- Aluminium exceeded livestock drinking water guideline values only under extreme pH conditions—either highly acidic or highly alkaline.
- Lithium, rubidium and caesium exhibited maximum solubility at extreme pH values; however, lithium remained below irrigation water guideline thresholds. These alkali metals are generally not considered toxic to most organisms at low concentrations due to low biological reactivity

The report concluded that leachable lithium concentrations are unlikely to result in adverse environmental impacts within the saline groundwater receiving environment. It also noted that any risk of plant growth inhibition would be mitigated by avoiding surface expression and salt accumulation from seepage associated with waste landforms.

Overall, seepage from the coarse reject material is expected to be moderately alkaline (pH ~9.4), non-saline, and low in environmentally significant metals and metalloids, and therefore does not represent an environmental risk to groundwater.

2.5 Review of the reject tailings material

The Department previously sought advice from the Contaminated Sites Branch (DWER, 2019), and their recommendations were incorporated into the licence amendment issued on 19 September 2019.

Following their assessment of the report on the coarse reject (tailings) material, the Contaminated Sites Branch identified the following key points:

- Lithium and thallium were identified as the principal environmental constituents of concern, with the potential to leach from coarse-fraction tailings under the geochemical conditions present in soils at the Mount Marion mine site.
- The estimated annual lithium release rate of approximately 4 mg/kg of tailings/year is unlikely to result in adverse impacts where runoff from construction-fill areas is discharged to surrounding vegetation. However, adverse effects on vegetation health may occur if plants were to become directly rooted in the tailings.
- It is likely that similar conclusions apply to thallium, although insufficient information is currently available to quantify its release rate from weathering tailings particles.
- A preliminary risk assessment concluded that the coarse-fraction tailings are suitable for use as construction fill if measures are implemented to maintain material uniformity and prevent direct contact between the fill and natural soils using low-permeability barriers.

Based on the above information, the Department supports the inclusion of Waste Dump 07 in the licence as an authorised discharge point for the disposal of coarse reject (tailings) material.

2.6 DWER initiated amendment

The department consulted with the proponent to include an additional amendment to the licence relating to the dust monitoring plan submitted by the Licence Holder. The Licence Holder agreed to the amendment on 6 February 2026 during the draft consultation period.

The Department assessed the dust monitoring plan provided on 30 October 2025 under application APP-0032147 and advised that compliance with monitoring requirements was demonstrated on 5 February 2026. The management plan includes:

- the location and specifications of monitoring instruments, including calibration, maintenance and operational requirements;
- trigger action response measures and timeframes where dust deposition at sensitive receptors exceeds 40 g/m²/month;
- review of monitoring data and monitoring locations; and
- assessment of data collection efficiency and identification of trends.

As a result, Condition 15 of the licence was updated to be an operational requirement. Figure 6 showing the dust monitoring locations was added, and specifications for crushing and screening dust management were included in Appendix 2.

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 pathways during premises operation which have been considered in this Amendment Report are detailed in Table 1 below. Table 1 also details the proposed control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary.

Table 1: Licence Holder controls

Emission	Sources	Potential pathways	Proposed controls
Dust	Deposition of dry coarse tailings to landforms	Air/windborne pathway	Due to particle size and mineralogy, respirable dust risk is considered low. Current controls in the licence: <ul style="list-style-type: none"> • Dust suppression systems must be used during operation. • Dust suppression systems including water sprays fitted to conveyors, head chutes and stackers must be kept maintained. • Drive in sumps maintained to capture sediment in stormwater runoff. • Implementation of dust monitoring plan as per current licence.
Contaminated storm water from tailings		Direct discharge	Non proposed.
		Overland runoff	Waste rock landforms containing coarse reject tailings must have drainage capable of containing any run-off or stormwater originating from the landform surface.
Seepage		Infiltration from soil to groundwater	Volumes of tailings are recorded and submitted to DWER as part of the AACRs. Locations of deposition are documented using MinRes' Land Activity Permit (LAP) System.

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

Table 2: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Residential Premises	None, the closest one (Woolibar Homestead) is approximately 20 km from beneficiation plant.
Environmental receptors	Distance from prescribed activity
Native vegetation	<p>Priority species within the Prescribed Premises Boundary (Spectrum Ecology, 2024):</p> <ul style="list-style-type: none"> • <i>Ricinocarpos digynus</i> (P1) • <i>Eucalyptus websteriana subsp. norsemanica/websteriana</i> (P1) • <i>Lepidosperma ?sp. Kambalda</i> (P2) • <i>Eucalyptus websteriana subsp. norsemanica/websteriana</i> (P1) and <i>Lepidosperma ?sp. Kambalda</i> (P2) occur approximately 1km north of the WD07 boundary
Fauna	<ul style="list-style-type: none"> • Malleefowl (<i>Leipoa ocellata</i>) - No active mounds were identified within the Waste Dump 07 footprint • Arid Bronze Azure Butterfly (ABAB) (<i>Ogyris petrina</i>) - The closest colony is to the west of the site, situated over 4 km from the Waste Dump 07 footprint • Inland Hairstreak Butterfly (<i>Jalmenus aridus</i>) - There is no known intersection of the Waste Dump 07 footprint with records of the mutualistic ant species • Mygalomorph spiders (<i>Idiopidae</i> sp) - 2.5 km from the Waste Dump 07 proposed footprint (Mineral Resources 2025)
Underlying groundwater	<p>Depth to groundwater within the Premises area ranges from 8 – 60 m BGL.</p> <p>Groundwater from the Paleochannel aquifer is acidic and saline, with an average pH of 3.8 and salinity of 36,400 mg/L.</p> <p>Groundwater from the Fractured Rock aquifer varies from brackish, with an average pH of 7.8 and salinity of 6,800 mg/L, to saline, with a pH of 7.00 and salinity of 44,000 mg/L.</p>
Superficial water	Non-perennial minor watercourse is located approximately 2 km west of the Waste Dump 07 area.
Aboriginal heritage site	<p>There are four DPLH Registered Sites located within the proposed licence amendment area.</p> <p>All four of these DPLH Registered Sites have been salvaged under Section 18 consent.</p> <p>There are three DPLH Lodged Places located within the proposed licence amendment area.</p>

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for those emission sources which are proposed to change and considers 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 3.

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 3. Risk assessment of potential emissions and discharges from the premises during operation

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Operation								
Deposition of dry coarse tailings to landforms	Dust	Pathway: Air/windborne pathway Impact: Accumulation of coarse reject tailings on surrounding vegetation, reducing photosynthesis	Native vegetation Priority flora	Particle size from material reduces dust risk. Current licence conditions refer to Table 1.	C = Slight L = Unlikely Low Risk	Y	Existing conditions in Condition 1	The delegated officer considered the type of dust particle size and that no additional risks to sensitive receptors within the premises have been identified and determined that the risk of dust emissions impacting sensitive receptors to be low. The delegated officer considered that existing dust controls prescribed under the current licence remain adequate to mitigate the risk of excessive dust emissions impacting native vegetation through reduced photosynthesis.
	Contaminated storm water from tailings	Pathway: Direct discharge Impact: Soil and groundwater contamination, affecting vegetation	Native vegetation Priority flora soil	Current Condition 1 in licence, refer to Table 1.	C = Minor L = Unlikely Medium Risk	Y	Existing conditions in Condition 1	The delegated officer reviewed the existing licence controls relating to the management of contaminated stormwater from tailings and determined that the associated risk to sensitive receptors is medium. The delegated officer determined that the existing controls to be sufficient for managing this risk; however, the infrastructure references were updated to include Landforms 1–7

Risk Event					Risk rating ¹	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls	C = consequence L = likelihood			
		<p>Pathway: Overland runoff</p> <p>Impact: surface water exposed to contaminated surface</p> <p>water runoff from landforms, contaminating surface water bodies, contaminating wildlife drinking water bodies</p>	<p>Surface water</p> <p>Native fauna</p>	Current Condition 1 in licence, refer to Table 1.	<p>C = Minor</p> <p>L = Unlikely</p> <p>Medium Risk</p>	Y	Existing conditions in Condition 1	The delegated officer reviewed the existing licence controls relating to the management of contaminated stormwater from tailings and determined that the associated risk to sensitive receptors is medium. The delegated officer determined that the existing controls to be sufficient for managing this risk; however, the infrastructure references were updated to include Landforms 1–7
	Seepage	<p>Pathway: Infiltration from soil to groundwater</p> <p>Impact: elevation of heavy metal and change of groundwater water quality</p>	Groundwater	Material was categorised as NAP and potential seepage is expected to have low concentration of environmentally significant metals and metalloids (refer to section 2.5), refer to Table 1.	<p>C = Moderate</p> <p>L = Possible</p> <p>Medium Risk</p>	Y	Existing conditions in Condition 12	The delegated officer considered the nature of the material (see section 2.5) and the existing licence controls relating to the management of seepage from tailings and determined that the associated risk to sensitive receptors is medium. The delegated officer determined that the existing controls to be sufficient for managing this risk.

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 4 provides a summary of the consultation undertaken by the department.

Table 4: Consultation

Consultation method	Comments received	Department response
Department of Planning, Lands and Heritage (DPLH) advised of proposal on 19 November 2025	DPLH provided comments on 12 December 2025, refer to section 2.3	Please refer to section 2.3
Department of Mines, Petroleum and Exploration (DPME) advised of proposal on 19 November 2025	DPME provided comments on 10 December 2025, refer to section 2.3	Please refer to section 2.3
Licence Holder was provided with a draft amendment on 13 January 2026	Licence Holder provided comments on 6 February 2026, minor condition correction was requested. Requested updated maps were provided. Licence Holder agreed to a DWER initiated amendment to update dust monitoring plan condition after the department approved the proposed plan (Please refer to section 2.6).	Department actioned requested changes and added the DWER initiated amendment on to the Licence and Amendment Report

5. Decision

The Department has assessed all four proposed amendments and determined that the inclusion of Waste Dump 07 as an authorised discharge point, the expansion of the premises boundary, and the extension of the dust suppression area do not introduce any additional environmental risks, with existing controls remaining adequate. The extension of the submission date for the radionuclide concentration report is also supported, subject to the continued restriction on the use of pit water for dust suppression until low-risk radioactivity is demonstrated. Collectively, the amendments align the licence with existing statutory controls, do change the existing risk profile and maintain appropriate environmental protections for sensitive receptors.

The department amended licence regarding the dust monitoring plan which was previously approved. Operational and reporting requirements were added to the licence.

6. 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.

6.1 Summary of amendments

Table 5 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 5: Summary of licence amendments

Condition no.	Proposed amendments
Front page	DWER file number updated Mining tenement added
Condition 1 – Table 2	Updated to reflect changes to the Waste Rock Landforms and across the document
Condition 15	Update of condition from preparing dust monitoring plan to implement dust monitoring plan.
Condition 18	Updated to reflect the extension for the report regarding site-specific concentration ratios for Ra226, Ra228, Pb210, gross alpha and gross beta
Figure 1	Updated to reflect the prescribe premises boundary extension
Figure 2	Updated to reflect the change in the premises boundary
Figure 4	Updated to reflect the expansion of the dust suppression area

References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2019 – Contaminated Sites Branch – Request for advice - *Proposed use of coarse-fraction spodumene tailings for construction material, Mount Marion lithium mine, Goldfields region* – REF: A1791174
3. DWER 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
4. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.
5. Mineral Resources 2017, *Mount Marion Project Coarse Rejects Geochemical Assessment*, Perth, Western Australia.
6. Mineral Resources 2024, *Memorandum - Mount Marion tailings geochemical assay*, West Perth, Western Australia
7. Mineral Resources 2025, *CPS 9866/1 Conditional Amendment* (REF: DWERDT1241958)