

Department of Water and Environmental Regulation

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, 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:	L4247/1991/13	Licence file number:	2012/0071641
Licence holder name:	Talison Lithium Australia Pty Ltd		
Trading as:			
ACN:	139 401 308		
Registered business address:	Level 15, 216 St Georges Terrace, PERTH WA 6000. Locked Bag 40, Cloister Square, PERTH WA 6850		
Reporting period:	01/07/202 to 30/06/2024		

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 in 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
5	5,363,961 tonnes beneficiated

Department of Water and Environmental Regulation

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
5	3,980,536 tonnes of tailings deposited

Department of Water and Environmental Regulation

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:	1	Date(s) of non-compliance:	Periodically between 12/12/2022 to 30/06/2023
Details of non-compliance:			
Freeboard infrastructure requirements were not met in Clear Water Dam (CWD) and Southampton Dam (SD).			
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 actual environmental impact of the non-compliance has been assessed as negligible, noting that there have been no overflow events from CWD or SD for the reporting period.			
Cause (or suspected cause) of non-compliance:			
Maintaining freeboard requirements in all dams at all times is not practical and does not allow for the complexity and operational flexibility required to distribute water throughout the mine water circuit (MWC). To manage water quality and availability, at times water levels of an individual dam exceed freeboard. At these times, Talison endeavors to ensure sufficient capacity is available elsewhere in the MWC to prevent overtopping.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Corrective actions taken to avoid overflow from SD were to transfer water to the MWC to reduce water levels to below the freeboard. The normal operating water level in the CWD is higher than the calculated freeboard level, and water levels in CWD were maintained above the calculated freeboard level for the duration of the period. CWD water levels are maintained at the normal operating level to improve the quality and reliability of feed water into the processing plants and Water Treatment Plant (WTP). CWD is designed to safely overflow into Austins Dam (AD). No overflow occurred from CWD to AD during the period. Talison proposed to change this condition in the August 2024 amendment to the Licence.</p> <p>Talison has a project planned to monitor the overflow from CWD, with completion scheduled for 30 June 2025. Talison intends to propose a change to this condition in a future Licence amendment</p>			
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: September 2023 in the AER and AACR	

Department of Water and Environmental Regulation

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:	8	Date(s) of non-compliance:	Since 12/12/2022 amendment
Details of non-compliance:			
Visual inspections of freeboard at CWD, AD, SD, and Cowan Brook Dam (CBD) conducted at a weekly frequency, instead of the daily frequency required by Table 5.			
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 actual environmental impact of the non-compliance has been assessed as negligible, noting that there have been no overflow events from CWD, AD, SD and CBD for the reporting period. Routine inspections have otherwise been conducted in accordance with Condition 8 at weekly frequency.			
Cause (or suspected cause) of non-compliance:			
Formal daily visual inspections of water level staff gauges are not practical, due to the number of water dams and the travel time between each dam staff gauge. Daily inspections are also considered to be unnecessary as water levels within the dams are not so dynamic as to warrant daily inspections except during low-frequency high rainfall events when water levels are at or approaching freeboard.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
No adverse effects were observed, and the dams did not overtop. Weekly visual inspections of the CWD, AD, SD, and CBD were conducted for the duration of the period otherwise in accordance with Condition 8. Talison will propose to change this condition in a future amendment to the Licence.			
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: September 2023 in the AER and AACR	

Department of Water and Environmental Regulation

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:	9	Date(s) of non-compliance:	2023/2024 Reporting Period
---------------	---	----------------------------	----------------------------

Details of non-compliance:

Talison has not installed the Continuous Australian Standard (AS) PM10 Monitor North, the Meteorological Station (Greenbushes), or the PM10 high-volume sampler as required by Condition 9, at the specified infrastructure location within the designated timeframe.

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.

No environmental impact has resulted from this non-compliance. All monitoring was completed as required but at alternative locations to that specified in condition 9.

As per the Map Below:

- Meteorological data was collected from the Meteorological Station (Premises) for the entire reporting period
- Continuous PM10 (North) data was collected from a trailer-mounted unit at the temporary location from the due date of November 30, 2023, until 20 December 2023
- On December 20, 2023, the trailer mounted Continuous PM10 (North) was moved to a location compliant with condition 9 and remained there for the remainder of the reporting period
- The PM10 High volume sampler was located at the temporary location for the entire reporting period.



Department of Water and Environmental Regulation

Section E – Details of non-compliance with licence condition	
Cause (or suspected cause) of non-compliance:	
<p>Talison was unable to obtain approval from the Department of Education (DOE) for permanent installation of the Continuous AS PM10 Monitor North, the Meteorological Station (Greenbushes), or the PM10 high-volume sampler at the location specified by DWER in Table 6 and illustrated in Figure 5 of Schedule 1 of the Licence. Approval was given for a trailer-mounted unit to be located at the compliant location on December 20, 2023.</p>	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>The following actions were taken to mitigate the adverse impacts of non-compliance</p> <ul style="list-style-type: none"> • Meteorological data was collected from the Meteorological Station (Premises) for the entire reporting period • Continuous PM10 (North) data was collected from a trailer-mounted unit at the temporary location from the due date of November 30, 2023, until 20 December 2023 • On December 20, 2023, the trailer-mounted Continuous PM10 (North) was moved to a location compliant with condition 9 and remained there for the remainder of the reporting period • The PM10 volume sampler was located at the temporary location for the entire reporting period. <p>In addition, Talison also conducted ongoing negotiations with DOE to obtain construction approval for the monitoring equipment</p>	
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: 30 November 2023, REFL11DM22ENV 2023 (notification that unable to comply with timeline specified by condition 9). Also 11 January 2024, L01CM05ENV 2024 (notification that Continuous PM10 (North) moved to compliant location)

Department of Water and Environmental Regulation

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:	12	Date(s) of non-compliance:	2023/2024 Reporting Period
Details of non-compliance:			
<p>The operations at Tailings Storage Facility #1 (TSF1) did not comply with the requirements specified in Table 7, row 1 of the Licence. Specifically: The total excavation area exceeded the maximum allowable limit of 9 hectares (ha), with an excavation area of approximately 40ha during the reporting period. TSF1 was not stripped and progressively mined in 100 square metres (m²) grid blocks, with only two 100m² blocks active at any time, as required by condition 12. Instead, the mining operation deviated from the prescribed method.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
There was no environmental impact as a result of this non-compliance.			
Cause (or suspected cause) of non-compliance:			
Adhering to the 9ha maximum active excavation area and the requirement for stripping and progressive mining in 100m ² grid blocks was not feasible due to ground stability issues and plant feed requirements, which necessitated mining in multiple areas.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>To mitigate potential dust lift-off, the focus instead has been on applying dust suppressants.</p> <p>The operational requirement for TSF1 to be stripped and progressively mined in 100 square meter (m²) grid blocks, with a maximum of two 100 m² blocks active at any time, was changed in the most recent licence amendment. The updated condition now specifies that TSF1 be stripped and progressively mined in 1-hectare (ha) grid blocks, with only two 1 ha blocks active at any time.</p>			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date:	

Department of Water and Environmental Regulation

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:	20	Date(s) of non-compliance:	July to September 2023
Details of non-compliance:			
Blanks and replicates were not routinely collected according to AS/NZS 5667.1 standards during spot sampling conducted between July and September 2023, as required by Condition 20.			
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 has been no actual environmental impact of the non-compliance.			
Cause (or suspected cause) of non-compliance:			
At the time of the non-compliance, monitoring procedures were under review and development and did not specify the requirement for duplicates to be taken during surface water sampling.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
A comprehensive review and update of all key water monitoring procedures was completed during the reporting period. The updated procedures now include clear guidance on program management in accordance with relevant Australian Standards, including the requirement for collecting field blanks.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date:	

Department of Water and Environmental Regulation

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:	28	Date(s) of non-compliance:	2023/2024 Reporting Period
---------------	----	----------------------------	----------------------------

Details of non-compliance:

Talison was unable to complete the following air quality monitoring testing as per the methodologies described in Table 13 in condition 28, which utilised the PM10 high volume sampler.

Parameter	Unit	Averaging period	Frequency	Method
Metals listed in Schedule 4		24 hours	Sample collected every sixth day for a period of 12 months, commencing 1 December 2023. Sampler time clock set from midnight to midnight.	AS/NZS 3580.9.6
Particle size distribution (down to a fraction of $\leq 10\mu\text{m}$ and $\leq 4\mu\text{m}$) and aspect ratio	% per sieve size (mm)	Spot sample	One off sampling event, collected in December 2023	AS 4863.1-2000
Airborne asbestos fibre count	Fibres/mL		One sample per month, for a period of 12 months, commencing 1 December 2023.	NOHSC:3003
Respirable crystalline silica	Size weighted respirable fraction (%w/w) down to a fraction of $\leq 4\mu\text{m}$.			X-Ray Diffraction (XRD) alpha-quartz (NIOSH7500)

After conferring with NATA-approved laboratories that conduct the above analysis, the following issues were identified

- Talison was unable to source a NATA-accredited laboratory that could provide analysis of Niobium and Zirconium, as required by schedule 4. These two elements were still analysed and reported for information purposes.
- Talison was advised by the analysing laboratory that the mass of retained dust on a PM10 high-volume air sample filter paper provides an insufficient sample to perform this analysis with confidence, and this was noted with the results reported. Aspect ratio was performed using a Scanning Electron Microscope feature analysis, and not by AS 4863.1-2000 / ISO 13320.
- Condition 28 specifies the use of NOHSC:3003 for analysis of Airborne asbestos fibre count. While this is the appropriate standard methodology for the measurement of airborne asbestos fibre, use of a PM10 high-volume sampler is not the correct sampling platform referred to by the standard.
- The methodology stated in L4247 Condition 28 for determining Respirable crystalline silica, NIOSH7500, is an occupational health measurement methodology and is intended to be measured using occupational health sampling equipment and filters, rather than a High Volume PM10 Sampler

Department of Water and Environmental Regulation

Section E – Details of non-compliance with licence condition

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.

No environmental impact has resulted from this non-compliance. All monitoring was completed as required, but utilizing the appropriate, recognised alternative methodologies

These methodologies are noted in the table below.

Monitoring point reference, as shown in Figure 5 of Schedule 1	Parameter	Unit	Averaging period	Frequency	Method
PM10 high-volume sampler	Metals listed in Schedule 4		24 hours	Sample collected every sixth day for a period of 12 months, commencing 1 December 2023. Sampler time clock set from midnight to midnight.	Sampling as per AS/NZS 3580.9.6 Analysis via adapted version of NIOSH 7301/7303.
	Particle size distribution (down to a fraction of $\leq 10\mu\text{m}$ and $\leq 4\mu\text{m}$) and aspect ratio	% per sieve size (mm)	Spot sample	One off sampling event, collected in December 2023	Scanning Electron Microscope feature analysis
	Airborne asbestos fibre count	Fibres/mL		One sample per month, for a period of 12 months, commencing 1 February 2024.	NOHSC:3003
	Respirable crystalline silica	Size weighted respirable fraction (%w/w) down to a fraction of $\leq 4\mu\text{m}$.			X-Ray Diffraction (XRD) alpha-quartz (NIOSH7500)

Cause (or suspected cause) of non-compliance:

The analysis methodologies in Condition 28 were reviewed by 3rd party NATA approved laboratory and deemed to be incorrectly assigned to the monitoring parameters required

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

In consultation with a 3rd party NATA approved laboratory, the following methodologies were utilised.

Monitoring point reference, as shown in Figure 5 of Schedule 1	Parameter	Unit	Averaging period	Frequency	Method
PM10 high-volume sampler	Metals listed in Schedule 4		24 hours	Sample collected every sixth day for a period of 12 months, commencing	Sampling as per AS/NZS 3580.9.6 Analysis via adapted

Department of Water and Environmental Regulation

Section E – Details of non-compliance with licence condition					
				1 December 2023. Sampler time clock set from midnight to midnight.	version of NIOSH 7301/7303.
	Particle size distribution (down to a fraction of $\leq 10\mu\text{m}$ and $\leq 4\mu\text{m}$) and aspect ratio	% per sieve size (mm)	Spot sample	One off sampling event, collected in December 2023	Scanning Electron Microscope feature analysis
	Airborne asbestos fibre count	Fibres/mL		One sample per month, for a period of 12 months, commencing 1 February 2024.	NOHSC:3003
	Respirable crystalline silica	Size weighted respirable fraction (%w/w) down to a fraction of $\leq 4\mu\text{m}$.			X-Ray Diffraction (XRD) alpha-quartz (NIOSH7500)
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: 4 June 2024, L05CM12ENV 2024		

Department of Water and Environmental Regulation

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:	29	Date(s) of non-compliance:	2023/2024 Reporting Period
---------------	----	----------------------------	----------------------------

Details of non-compliance:

Talison was unable to install the Meteorological Station (Greenbushes) at the specified infrastructure location within the designated timeframe.

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.

No environmental impact has resulted from this non-compliance. All monitoring was completed as required but at alternative locations to that specified in condition 29.

As per the Map Below:

Meteorological data was only collected from the Meteorological Station (Premises) for the entire reporting period



Cause (or suspected cause) of non-compliance:

Talison was unable to obtain approval from the Department of Education (DOE) for the permanent installation of the Meteorological Station (Greenbushes) at the location specified by DWER in Table 6 and illustrated in Figure 5 of Schedule 1 of the Licence.

Department of Water and Environmental Regulation

Section E – Details of non-compliance with licence condition	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>The following actions were taken to mitigate the adverse impacts of the non-compliance</p> <ul style="list-style-type: none"> • Meteorological data was collected from the Meteorological Station (Premises) for the entire reporting period <p>In addition, Talison also conducted ongoing negotiations with DOE to obtain construction approval for the monitoring equipment</p>	
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: Date: 30 November 2023, REFL11DM22ENV 2023 (notification that unable to comply with timeline specified by condition 9)

Department of Water and Environmental Regulation

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.			
Signature ² :		Signature:	
Name: (printed)		Name: (printed)	
Position:		Position:	
Date:	27/9/2024	Date:	
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.