



## Annual Audit Compliance Report Form

*Environmental Protection Act 1986, Part V*

Section A – Licence Details			
Licence number:	L8830/2014/2	Licence file number:	DER2014/001293
Licence holder:	Lithco No.2 Pty Ltd		
Trading as:	Lithco No.2		
ACN:	612 726 922		
Registered address:	20 Walters Drive, Osborne Park, 6017		
Reporting period:	01/04/2023 to 31/03/2024		

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"><li>• section C;</li><li>• section D if required; and</li><li>• sign the declaration in Section F.</li></ul>
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none"><li>• section C;</li><li>• section D if required;</li><li>• section E; and</li><li>• sign the declaration at Section F.</li></ul>

Section C – Statement of Actual Production	
Provide the actual production quantity for this reporting period. Supporting documentation is to be attached.	
<b>Prescribed Premises Category</b>	<b>Actual Production Quantity</b>
Category 5	1,535,890 wet metric tonnes

Section D – Statement of Actual Part 2 Waste Discharge Quantity	
Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.	
<b>Prescribed Premises Category</b>	<b>Actual Part 2 Waste Discharge Quantity</b>
Category 89	237 tonnes

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:	Category 5	Date(s) of non-compliance:	31/03/2024
Details of non-compliance:			
Exceeded assessed Category 5 throughput rate of 1,500,000t by 35,890 wet metric tonnes.			
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
There is no actual (or suspected) environmental impact of the non-compliance. Minor exceedance of throughput resulting in no additional operational impacts to the environment.			
Cause (or suspected cause) of non-compliance:			
Lack of understating within the production team of throughput limit and no system in place to provide warning that an exceedance is likely.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Monthly tracking of production figures against category 5 to identify future risk of exceedance. Actions assigned to key personnel in Task Management Database (INX InControl) to periodically forecast production rate and inform site if throughput is likely to exceed limit.			
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:    /    /	

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:	01-04-2023 to 30-09-2023
Details of non-compliance:			
Not all pipelines have sufficient containment to capture a spill occurring between routine inspections or automatic cutoff mechanisms installed.			
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
There is no actual (or suspected) environmental impact of the non-compliance. No spills from pipelines outside of contained areas have occurred during the reporting period.			
Cause (or suspected cause) of non-compliance:			
Lack of understanding around licence requirements during construction of infrastructure.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Review pipelines to determine appropriate controls to be installed. Actions assigned to responsible individual in Task Management Database (INX InControl) to track completion. V Drains to be included in daily pipeline inspections.			
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: / /	

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:	15	Date(s) of non-compliance:	01-04-2023 to 30-09-2023
Details of non-compliance:			
Failure to monitor static dust gauges between April and September 2023 for all static dust gauges (SDM01, SDM02, SDM03, SDM04)			
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
The actual (or suspected) environmental impact of the non-compliance is considered to be low. Low vegetation coverage across site results in a high natural dust load resulting in a vegetation community adapted to dusty conditions. Increases in dust due to operational activities is unlikely to have a significant effect on the vegetation community.			
Cause (or suspected cause) of non-compliance:			
Insufficient scheduling of environmental monitoring requirements causing tasks to be missed and lack of sufficient resourcing to complete monitoring tasks within planned timeframes.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Responsibility for environmental monitoring assigned to full time environment personnel on site since Lithco was acquired by Mineral Resources in November 2023. Environmental monitoring tasks assigned and tracked using task management system (INX Inform).			
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:    /    /	

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:	15	Date(s) of non-compliance:	01-04-2023 to 30-09-2023
Details of non-compliance:			
Failure to conduct first three quarterly groundwater quality monitoring events for bores GMB02, GBM03, GMB04 and failure to conduct first two quarterly groundwater quality monitoring events for bores BHWB002, Cotters Bore, TSF2MB01, TSF2MB02, TSF2MB03, and TSF2MB04.			
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
The actual (or suspected) environmental impact of the non-compliance is considered to be low. Data collected in later quarters does not show a significant departure from historical values suggesting no new impacts to groundwater quality during the reporting period.			
Cause (or suspected cause) of non-compliance:			
Insufficient scheduling of environmental monitoring requirements causing tasks to be missed and lack of sufficient resources to complete monitoring tasks within planned timeframes.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Responsibility for environmental monitoring assigned to full time environment personnel on site since Lithco was acquired by Mineral Resources in November 2023. Environmental monitoring tasks assigned and tracked using task management system (INX Inform			
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: / /	




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:	15	Date(s) of non-compliance:	21/12/2023
Details of non-compliance:			
Fourth quarterly monitoring event for reporting period conducted outside of quarterly period of 01/03/2024 – 30/03/2024 as per definition prescribed in definitions table.			
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
None – Monitoring still conducted in alignment with condition 11 (quarterly monitoring is undertaken at least 45 days apart) and event occurred a short duration (9 days) prior to the 01/02/2024)			
Cause (or suspected cause) of non-compliance:			
Lack of understanding of definition of quarterly period resulted in sample being taken early.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Monitoring tasks in Environmental Compliance Database (INX Inform) updated to clearly define period in which tasks are to be completed.			
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: / /	

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:	15	Date(s) of non-compliance:	01-04-2023 to 31-03-2024
Details of non-compliance:			
Exceedance of licence limit for standing water level in monitoring bore TSF2MB04 for the entire year. A Licence limit of 4 mbgl was set, with measurements of 2.9mbgl in Q1, 2.47mbgl in Q2, 2.78mbgl in Q3, and 2.44mbgl in Q4 all exceeding this.			
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
The actual (or suspected) environmental impact of the non-compliance is considered to be low. The bore is located between TSF2 and an extension of the central waste dump. Monitoring bores on the exterior of the facility adjacent to natural vegetation have not shown a similar impact suggesting the effect is localized and possibly related to hydraulic forces from the TSF and waste dump.			
Cause (or suspected cause) of non-compliance:			
Localised mounding of groundwater possibly due to hydraulic forces from the waste dump extension and the TSF.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
An assessment of all monitoring bores to be conducted by hydrogeologists during 2024 with the intention of installing additional bores and amending the licence to include them. In the interim TSFMB04 has had a sump installed and the bore is operated in line with the groundwater recovery plan provided to the Department when the issue was first identified during 2022.			
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: 06/06/2023, 14/08/2023, 24/09/2023	

## 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<sup>1</sup>. I/We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.

Signature <sup>2</sup> :		Signature:	
Name: (printed)		Name: (printed)	
Position:		Position:	
Date:	24/04/2024.	Date:	
Seal (if signing under seal):			

<sup>1</sup> 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.

<sup>2</sup> 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.