



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence number:	L8830/2014/2	Licence file number:	DER2014/001293-2
Licence holder:	Lithco No.2 Pty Ltd		
Trading as:	Lithco No.2		
ACN:	612 726 922		
Registered address:	Level 7, 20 Parkland Road OSBORNE PARK WA 6017		
Reporting period:	01 / 04 / 2024 to 30 / 03 / 2025		

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 at 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
Category 5: Processing or beneficiation of metallic or non-metallic ore	869,707 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.	
Prescribed Premises Category	Actual Part 2 Waste Discharge Quantity
Category 89: Putrescible landfill site	146.92 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:	2	Date(s) of non-compliance:	27/11/2024-30/03/2025
Details of non-compliance:			
Daily inspections of the tailings pipelines, return water lines, process water pond and TSFs have not been completed at the required frequency (daily) since 27 November 2024, when operation of these items of infrastructure ceased.			
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.			
Nil - Operation of the processing infrastructure and subsequent deposition into TSF2 ceased on 27 November 2024.			
Cause (or suspected cause) of non-compliance:			
Rapid reduction of personnel onsite as Bald Hill progressively entered Care and Maintenance commencing 13 November 2024 and formally entering Care and Maintenance on 4 December 2024.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
During Care and Maintenance, the infrastructure is inspected weekly. Daily inspections will restart when operations recommence. All tasks related to Care and Maintenance, including L8033 inspections, have been added to the team's work plan to ensure they are completed during this period.			
Was this non-compliance previously reported to DWER? No			
<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:	01/04/2024-30/03/2025
Details of non-compliance:			
Not all pipelines containing materials were provided with secondary containment sufficient to contain any spill for a period equal to the time between routine inspections.			
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 actual or suspected environmental impact has occurred as a result of the non-compliance. No spills from pipelines have occurred during the reporting period.			
Cause (or suspected cause) of non-compliance:			
This non-compliance is unchanged from the previously submitted 2023/2024 AACR.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Pipelines outside of internally draining areas were inspected on a daily basis, no spills were identified during the reporting period. Review pipelines to determine appropriate controls to be installed. Actions assigned to responsible individual in Task Management Database (INX InForm) to track completion.			
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: 24/04/24	

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:	14	Date(s) of non-compliance:	October and November 2024
Details of non-compliance:			
Process monitoring was not conducted in October and November 2024.			
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 actual or suspected environmental impact has occurred as a result of the non-compliance.			
Cause (or suspected cause) of non-compliance:			
Sampling to execute process monitoring was not conducted due to the accelerated ramp down of operations and demobilisation of personnel in preparation for the commencement of Care and Maintenance and subsequent cessation of tailings deposition on 27 November 2024.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Process monitoring will recommence when operations resume.			
Was this non-compliance previously reported to DWER? No			
Yes, and			
Reported to DWER verbally		Date: / /	
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:	01/04/2024-30/03/2025
Details of non-compliance:			
The standing water level of TSF2MB004 was observed above the 4mbgl limit, as prescribed in Condition 15, throughout the entirety of the reporting period.			
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> <p>No actual or suspected material environmental impact has occurred, or is expected to occur as a result of this non-compliance.</p> <p>Bore TSF2MB04, situated between TSF2 and the Main Waste Dump, has consistently shown a standing water level above 4 mbgl in previous reporting periods. The higher water level is likely influenced by the hydraulic forces between the Main Waste Dump and TSF2. As nearby monitoring bores (TSF2MB001-003) do not show similar trends, suggest the effects are localised.</p>			
Cause (or suspected cause) of non-compliance:			
Extension of Main Waste Dump ‘boxing’ in monitoring bore TSF2MB004 between TSF2 and Main Waste Dump suspected to be causing localised mounding of groundwater.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Suitable alternative seepage recovery infrastructure to be installed upon recommencement of deposition into TSF2 once the site leaves Care and Maintenance. .			
Was this non-compliance previously reported to DWER?			
Yes, and			
Reported to DWER verbally		Date: / /	
Reported to DWER in writing		Date: 24/04/24	

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:	May – Sept & Dec 2024
Details of non-compliance:			
Static dust deposition monitoring frequency not met for May and September 2024 for all monitoring points.			
In December 2024 the monitoring point SDM3 bottle was destroyed in the field and unable to be sampled.			
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 actual or suspected environmental impact has occurred as a result of the non-compliance.			
Dust deposition data was captured for May and September however bottles were not changed at the required monthly frequency. No results of note were observed in the preceding and subsequent months.			
Cause (or suspected cause) of non-compliance:			
Supplier logistics/scheduling issues contributed to the non-compliant sampling frequency.			
The suspected cause of the destroyed bottle is that the dust gauge bottle was inadequately secured to the dust gauge stand.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Dust bottle supply system has been established to accommodate reduced personnel at Bald Hill to facilitate monthly sampling.			
SDM3 dust gauge stand to be modified to improve the security of the bottles.			
Was this non-compliance previously reported to DWER? No			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

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:		24/04/2025	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.