



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:	L9037/2017/1	Licence file number:	DER2017/000308
Licence holder name:	Mt Marion Lithium Management Pty Ltd		
Trading as:	Mt Marion Lithium Management Pty Ltd		
ACN:	666 116 365		
Registered business address:	[REDACTED]		
Reporting period:	01/01/2024 to 31/12/2024		

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)

- ☐ Yes – please complete:
- section C;
 - section D (if required); and
 - sign the declaration in Section F.
- ☒ No – please complete:
- 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
Category 5: Processing or beneficiation of metallic or non-metallic ores	3,199,431 wet metric tonnes
Category 6: Mine dewatering	76,284 tonnes
Category 12: Screening etc. of material	0 tonnes
Category 54: Sewage facility, 100m ³ or more per day	83.03 m ³ / day
Category 57: Used tyre storage (general)	155 tyres
Category 64: Class II putrescible landfill	1,286 tonnes

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 73: Bulk storage of chemicals etc.	LNG = 480kL Tank Farm A (4 x 49.25 kL tanks) Tank farm B (3 x 49.25 kL tanks) Diesel = 884 kL Tank Farm C (3 x 110 kL tanks) Tank Farm D (3 x 57 kL + 1 x 53 kL tanks)
Category 85b: Water desalination plant	0.00797 GL

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 5: Processing or beneficiation of metallic or non-metallic ores	Coarse Rejects (to Waste Dumps) – 1,803,287 Tonnes Fine Rejects (to Ghost Crab in-pit TSF) – 819,631 tonnes
Category 6: Dewatering	76,284 tonnes
Category 85b: Water desalination plant	0.00797 GL

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 (Table 2 Requirement 14)	Date(s) of non-compliance:	October 2024
Details of non-compliance:			
Daily pipeline inspections were not completed during October, as specified in Table 2: Infrastructure and equipment requirements.			
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 - non-compliance was administrative.			
Cause (or suspected cause) of non-compliance:			
Handover of responsibilities from one team to another.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Briefing provided to new site team.			
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:	Condition 4	Date(s) of non-compliance:	28/03/2024, 19/05/2024, 27/08/2024
Details of non-compliance:			
Use of coarse reject (tailings) for construction purposes outside of approved areas.			
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			
Cause (or suspected cause) of non-compliance:			
Limited awareness of the coarse reject (tailings) approved disposal location within the Mining Team, due to several changes in staff during the reporting period.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Briefings to site leadership team, notices in prominent locations (eg crib room and at truck load-out point).			
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: 19/04/2024, 18/06/2024, 10/09/2024	

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:	Condition 1 (Table 2 Requirement 4)	Date(s) of non-compliance:	28/07/2024
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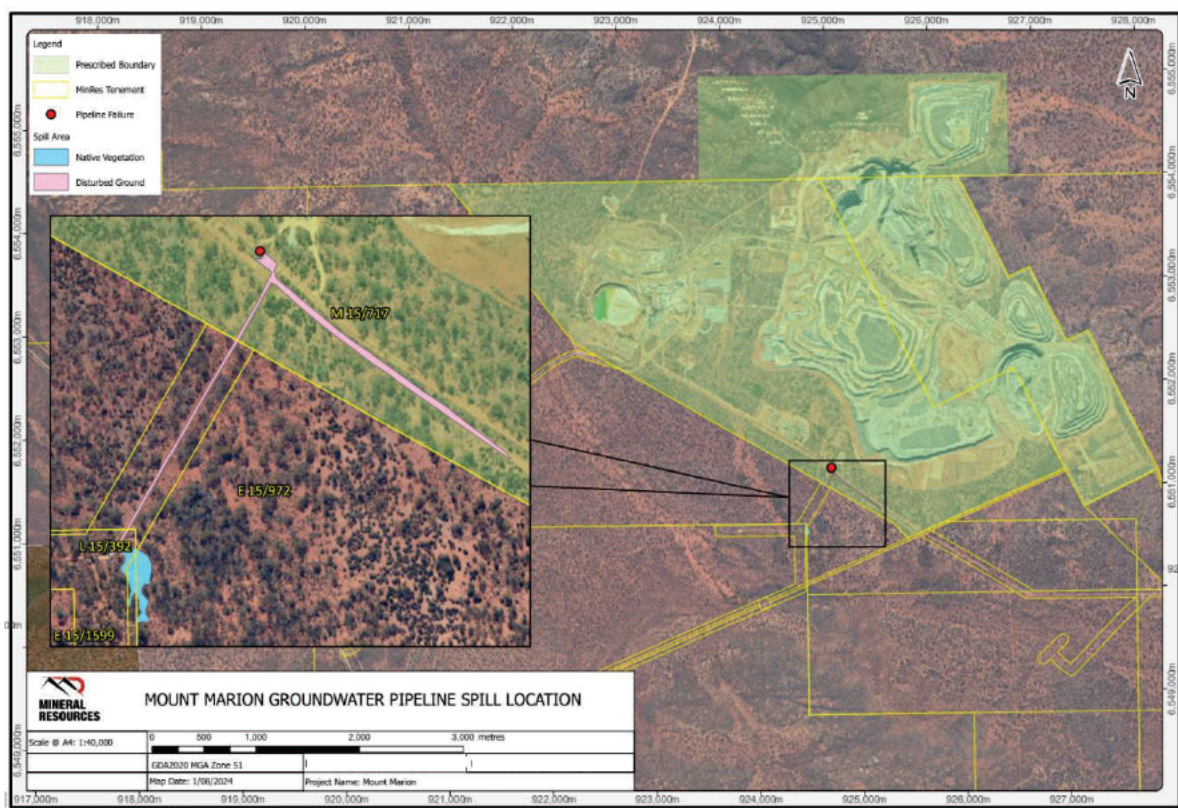
Details of non-compliance:

Failure of groundwater pipeline and secondary containment resulting in spill of approximately 1,000,000 litres of groundwater.

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.

Minor vegetation health decline at v-drain infrastructure, within the Prescribed Premises boundary, where observations of leaf browning and leaf drop were recorded for several medium-sized eucalypt trees. Minor evidence of salt crusting at the discharge location to undisturbed vegetation. No evidence of vegetation health impacts were observed outside the extent of pre-disturbed ground.



Cause (or suspected cause) of non-compliance:

Failure of a rubber flange gasket.

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:	
<ul style="list-style-type: none"> - Repair damage to v-drain - Audit groundwater pipelines for further works required - Install new isolation valves - Additional regular maintenance requirements – annual gasket inspection/replacement 	
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: 05/08/2024

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:	Condition 8 (Table 5)	Date(s) of non-compliance:	13/02/2024, 13/08/2024, 05/11/2024
Details of non-compliance:			
Treated wastewater effluent discharged to the irrigation sprayfield was not within the parameters in Column 2 of Table 5, specifically Biological Oxygen Demand (BOD), Total Suspended Solids (TSS), Total Nitrogen (Total N), and pH.			
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.			
Cause (or suspected cause) of non-compliance:			
Age of the SAF Unit 1 and inflow quality from the kitchen grease traps when cleaned. Efforts to control treated effluent quality were ineffective. The SBR Units 2 & 3 are understood to have been impacted similarly by the inflow quality variability following the kitchen grease trap cleaning.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The SAF Unit 1 was shut down (in December 2024), The newer and improved SBR Units 2 and 3 are sufficient to treat the total volume of wastewater produced by the reduced camp personnel numbers observed in the latter half of the reporting period.			
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:	Condition 12	Date(s) of non-compliance:	01/01/24 – 31/12/24
Details of non-compliance:			
<p>Monthly data was not collected for water used for dust suppression from the PB10 Standpipe, as no flowmeter was installed on the infrastructure when the Standpipe was commissioned.</p> <p>Monthly flowmeter data was not collected for dewater used for dust suppression, sourced from the Central Pit sump. An estimation based on standpipe generator run-times (140kL/hr) was utilised to derive a volume.</p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
Nil			
Cause (or suspected cause) of non-compliance:			
Failure to install the PB10 Standpipe flowmeter and Central Pit dewatering flowmeter.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>A flowmeter was installed on the PB10 Standpipe on 12/02/2025.</p> <p>The Central Pit dewatering flowmeter is scheduled for install no later than 31/05/2025.</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: / /	

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:	Condition 18	Date(s) of non-compliance:	01/12/2024
Details of non-compliance:			
Soil monitoring plan not submitted by 1 December 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.			
Nil - non-compliance was administrative.			
Cause (or suspected cause) of non-compliance:			
While significant progress on the soil monitoring plan had been achieved by 1 December 2024, additional time was required to complete a final revision of the monitoring locations and methodology to ensure alignment with the relevant guidelines.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The soil monitoring plan as required in Condition 18 of the Licence was submitted to DWER on 31 December 2024.			
Condition a one-off requirement so no risk of recurrence.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: 29/11/2024	

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 particular¹.

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:		28/03/2025	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.