



Government of **Western Australia**  
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](mailto: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:	L9326/2022/1	Licence file number:	DER2022/000016
Licence holder name:	Covalent Lithium Pty Ltd		
Trading as:			
ACN:	70 623 090 139		
Registered business address:	15 Mason Road Kwinana Beach WA 6167		
Reporting period:	01 / 07 / 2023 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"> <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 in 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.	
Prescribed premises category	Actual production quantity
<b>Category 5 – Processing or beneficiation of metallic or non-metallic ore.</b> 1.2 million tonnes of tailings per annual period into IWL/TSF.	689,716 tonnes within annual period (noting TSF added to licence on 14/02/24 following Time Limited Operations).

## Department of Water and Environmental Regulation

<b>Section D – Statement of actual Part 2 waste discharge quantity</b>	
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>
<b>Category 54 – Sewage facility.</b> 180 cubic metres per day.	Average of 74 cubic metres per day.
<b>Category 64 – Class II or III putrescible landfill site.</b> 700 tonnes per annual period.	397 tonnes within annual period.

## 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:	7	Date(s) of non-compliance:	19/07/2023 16/08/2023 18/09/2023 16/10/2023 19/12/2023 15/01/2024 28/02/2024
Details of non-compliance:			
Discharge emissions to land via the Sprayfields irrigation exceeded the corresponding limits specified within Table 4.			
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.			
No environmental impacts are expected to have resulted from these non-compliances.			
Cause (or suspected cause) of non-compliance:			
<ul style="list-style-type: none"> <li>• Fluctuating cooler temperatures resulting in inefficient biological treatment.</li> <li>• Variable camp capacities during site construction.</li> <li>• Ongoing optimisation of sequential batch reactors.</li> </ul>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Decommissioning of the third SBR unit, as camp numbers not high enough to maintain biological activity within unit. Since decommissioning in February 2024, no results have exceeded the limits in Table 4.			
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 / 09 / 2023 (AACR 2023)	

## Department of Water and Environmental Regulation

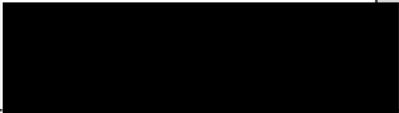
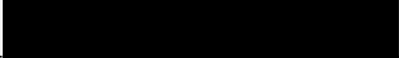
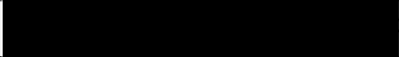
Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	9	Date(s) of non-compliance:	Throughout reporting year and resolved in September 2024.
Details of non-compliance:			
<p>The system does did not have an audible alarm to notify of pH and/or chlorine exceedances, though each SBR unit does have an active visual red screen alert which notifies when parameters are outside programmed range.</p> <p>The automated alarms within the control system have been installed as of September 2024.</p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
There is no actual or suspected environmental impact from this non-compliance.			
Cause (or suspected cause) of non-compliance:			
Delay in procurement of alarm as incorrectly interpreted by operations as not a mandatory requirement.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Alarms with automated alerts are in place as of September 2024.			
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 / 09 / 2023 (AACR 2023)	

## 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:	23	Date(s) of non-compliance:	February 2024 – June 2024
Details of non-compliance:			
The required data in condition 23 is captured monthly, though no water balance developed or water balance review is carried out on a monthly basis.			
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 from this non-compliance.			
Cause (or suspected cause) of non-compliance:			
This is the Project's first year of IWL/TSF operations and there is ongoing development of end of month procedures to optimise operations.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Monthly water balance will be added to end of month processes.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date:    /    /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 19 / 09 / 2023 (AACR 2023)	

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 <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:	19/9/2024   8:18 AM AWST	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.