



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:	L4328/1989/10	Licence file number:	DER2013/001044-1
Licence holder name:	MARBL Lithium Operations Pty Ltd		
Trading as:	MARBL Lithium Operations Pty Ltd		
ACN:	637 077 608		
Registered business address:	20 Walters Drive, Osborne Park, WA 6017		
Reporting period:	01/07/2021 to 30/06/2022		

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
Category 5: Processing or beneficiation of metallic or nonmetallic ore	284,048 tonnes
Category 52: electric power generation	Average: 2 MW Peak: 8 MW
Category 54: sewage facility	64 m ³ /day
Category 85B: Water desalination plant	0.101 GL
Category 89: Putrescible landfill site	327.05 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 5: Processing or beneficiation of metallic or nonmetallic ore (Tailings)	194,474 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:	1.3.1 & 2.2.3	Date(s) of non-compliance:	May – June 2022
Details of non-compliance:			
<p>Condition 1.31, Table 1.3.1, requires that the RO brine be stored in Fines Bin Tank/ Reject Water Tank/ Mining Tank/ Haulage Tank for ultimate disposal of the diluted RO Brine to land via dust suppression.</p> <p>Condition 2.2.3 requires that dilute RO wastewater, as specified in Condition 1.3.1, is used for dust suppression on pre-disturbed locations throughout the prescribed premises including haul roads, access roads, ROM pads and waste dumps associated with the mine and crushing plant and construction areas.</p> <p>During May and June 2022, 51,565 kL of RO brine was directed to Cassiterite Pit instead of to land via dust suppression.</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>			
<p>No actual or suspected environmental impact is likely to have occurred as a result of directing RO brine to the Cassiterite Pit. Hydrogeological assessments of the Pit shows the Cassiterite Pit is a groundwater sink and outflows from the pit are unlikely. The RO brine exhibits good water quality characteristics in-line with <i>ANZECC, 2000 – Livestock drinking water quality guidelines</i>, with the exception of Fluoride which was reported above the guideline level of 2.0mg/L with concentrations of 4.0mg/L and 3.7mg/L reported monitoring events in May and June 2022, respectively.</p>			
Cause (or suspected cause) of non-compliance:			
<p>RO brine was directed to the Cassiterite Pit during the reporting period (May and June) due to the primary water storage tank onsite (the Mining Tank) being unfit for use due to a structural defect. With the Mining Tank off-line, the site's capacity to temporary store RO brine was diminished. RO Brine was redirected to the Cassiterite Pit when RO brine generation exceeded the volume of water able to be discharged via the onsite water carts for the purpose of dust suppression.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>A replacement 600kL Mining Tank was sourced, and installation was completed in October 2022. The Mining Tanks has a high-level sensor and alarm system to alert Project personnel the tank is reaching capacity. The new tank also has a high discharge fill rate to enable fast water cart filling. With the Mining Tank reinstated and the additional controls in place, the likelihood of future discharges of RO Brine to the Cassiterite Pit is significantly reduced. MRL are currently preparing a Licence Amendment Application seeking approval to release RO Brine to various onsite mine voids to provide additional management options in the event RO Brine production exceeds dust suppression requirements.</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:	3.3.1	Date(s) of non-compliance:	December 2021
Details of non-compliance:			
Condition 3.3.1, Table 3.3.1, requires that the waste water discharged from the Haulage Tank be sampled (spot sample) on a monthly frequency.			
The Haulage Tank wastewater discharge was not sampled in December 2021.			
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 Environmental Impact			
Cause (or suspected cause) of non-compliance:			
The timing of sampling the Haulage Tank in December coincided with laboratory shutdowns over the Christmas break period which resulted analysis not be undertaken.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Monthly sampling and analysis of the Haulage Tank recommenced in January 2022 as per Licence conditions.			
Future December monitoring dates have been adjusted to account for laboratory shutdown periods.			
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:	3.4.1	Date(s) of non-compliance:	Q3 FY 2022 Q4 FY 2022
Details of non-compliance:			
<p>Condition 3.4.1, Table 3.4.1, requires that WWTF4 is monitored monthly for Standing water level and Quarterly for in-field and NATA laboratory tested water quality.</p> <p>WWTF4 was not sampled for Standing water level between January – June 2022, and water quality samples were not obtained for the same period (Q3 FY 2022 and Q4 FY 2022).</p>			
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 Environmental impact.			
Cause (or suspected cause) of non-compliance:			
A regional fire (caused by a lightning storm) in December 2022 melted the casing and capping of bore WWTF4 restricting access for sampling and measuring SWLs.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
In July 2022 the casing of WWTF4 was repaired and sampling re-commenced.			
No further action required.			
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:	4.1.2 and 4.2	Date(s) of non-compliance:	28 October 2022
Details of non-compliance:			
<p>Condition 4.1.2 and 4.2 require the Annual Audit Compliance Report (AACR) and Annual environmental Report (AER) to be submitted 120 days after the Anniversary Date of the Licence (30 June).</p> <p>The AACR and AER were not submitted on 28 October 2022.</p>			
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 Environmental Impact – Administrative			
Cause (or suspected cause) of non-compliance:			
MARBL internal delays triggered a delay with the AACR and AER submission to DWER.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
An email notification was sent to DWER on 28 October 2022. (Ticket Number 0039347).			
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: 28 / 10 / 2022	

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:	
		Name: (printed)	
Position:	General Manager - Wodgina	Position:	
Date:	07/11/2022	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.