



Compliance Report EP2020/01-001 Finnis Lithium Project BP33 Underground Mine Lithium Developments Grants (NT)



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ACRONYMS

EP Act	Environmental Protection Act				
GLP	Grants Lithium Project				
LDG	Lithium Development Grants (NT)				
NT EPA	Northern Territory Environmental Protection Authority				
OFI	Opportunities for improvements				
OHD	Observation Hill Dam				
RFI	Request for information				
WRD	Waste rock dump				





ENDORSEMENT

I <u>Mike Stone</u> delegate of the Chief Executive Officer endorse that this Compliance Report to be best of my knowledge is true and correct.

SIGNATURE: Meg

DATE: 11/03/2024





1 INTRODUCTION

Core Lithium is an Australian Stock Exchange ASX-listed mining company (ASX: CXO) and the 100% owner of the Finniss Lithium Project, located near Darwin in the Northern Territory (NT). Finniss is a multi-mine operation, focused on the Grants open pit mine and processing site. Core Lithium is currently undertaking a final investment decision of the BP33 underground project, the potential second mine at Finniss.

Lithium Development Grants NT (LDG), a subsidiary of Core Lithium, is the operator of the Grants and BP33 mines. Construction activities have begun at BP33 including land clearing, development of the box cut, water management and auxiliary infrastructure. Activities to date, are discussed further in section 2.

This compliance report (the report) focuses on the BP33 site, which is approved under the *Environmental Protection Act (EP Act)* as Environmental Approval 2020/001-001 (hereby known as environmental approval).

1.1 **Purpose and objective**

LDG engaged EcOz Environmental Consultants (EcOz) to conduct a compliance review of operations at BP33, as per condition 10 of the environmental approval, the approval holder as stated below:

10) within six months of substantial disturbance, obtain from an independent qualified person, a report on compliance with the conditions of this environmental approval.

The intent of the review is to assess compliance with the environmental approval conditions, with the primary objective to identify actual and potential non-compliance and highlight any Opportunities of Improvements (OFIs). As a result, the final version of a report to be submitted to the Northern Territory Environmental Protection Authority (NT EPA).

This report presents the findings on the environmental regulatory compliance of the BP33 from the commencement of operations on 28 July 2023 to the end of January 2024. A site visit was deemed not required at the time of preparing this report, as the site has been transitioned to Care and Maintenance status for the duration of the wet season and the environmental approval conditions were primarily administrative focused on development of environmental management practices.

1.2 Methodology

The following actions were undertaken by EcOz in preparing this report:

- 1. Developed a Commitments Register (Appendix A) that presents the environmental approval conditions.
- 2. Initial assessment of compliance for each condition using the approach outlined in section 3.
- 3. Request for Information (RFI) issued to LDG as identified in the initial screening.
- 4. Draft commitment register provided to LDG during January 2024 for review. The review required LDG to further supply evidence to address gaps for outstanding compliance status and address Opportunities of Improvement's (OFI).
- 5. LDG update and review of Commitments Register. LDG included additional approval documents that had been issued since development of the register.
- 6. Completion of scoring, identification of OFIs and issue of the final report (February 2024).





2 DESCRIPTION OF ACTIVITIES

Construction at BP33 commended on 28 July 2023. The following key activities have been undertaken by LDG to date:

- Establishment of temporary construction contractor office, go-lines, carparking and workshop.
- Excavation of tripod hill, with material used for base construction of pads and other pre-works. Excess material stored temporarily within Waste Rock Dump 2 (WRD2) footprint.
- Clearing, vegetation removal and soil stripping of the disturbance footprint (minor areas of vegetation have remained uncleared).
- Mulching of excess vegetation and placement of mulched material on fence line boundary of mine site.
- Emplacement of topsoil material in topsoil area.
- Water extraction from BP33Old Pit.
- Water extraction from Observation Hill Dam (OHD).
- Construction of haul roads and access tracks.
- Construction of internal drainage infrastructure and clear water drain (north of site).
- Excavation of box cut portal, which included a combination of drill and blasting and by free dig using conventional truck and shovel methods.
- Construction of box cut bund.
- Emplacement of box cut material in Waste Rock Dump 1/ Box cut Stockpile footprint.
- Stabilisation of box cut portal via shotcrete at bench corners.
- Commenced construction of water storage infrastructure and sediment basins, including:
 - o Turkey nest (temporary of construction purposes) (completed)
 - Mine settling dam (Cell 1 and 2) (not completed on hold)
 - o Sediment basin 1 and 2 (completed).
- Application of hydromulch with seed component for stabilisation of cleared areas, including:
 - internal drainage infrastructure (not all)
 - o clean water drain
 - o topsoil stockpile boundary
 - o windrows
 - o go-lines
 - o box cut bund.
- Implementation of site-specific Erosion and Sediment Control Plan (Topo 2023, WRM 2023a) and 2023b).





3 APPROACH

3.1 Development of Compliance Register

The Commitments Register was developed to include all commitments contained within all relevant BP33 approval documents and management plans. The conditions relating specifically to the *EP Act* environmental approval were extracted from the register.

The following details for each condition were then assigned:

- Condition number.
- Phase of operation (Exploration, Design and permitting, Construction, Mining and Processing, Processing only, Closure and Rehabilitation, Post-closure, Ongoing).
- General comments relating to compliance.

3.2 Compliance review scoring system

Scoring of compliance against each environmental approval condition requiring the assessment of available evidence. Examples of evidence include:

- Detailed designs.
- Management plans.
- Email correspondence.
- Surface water and groundwater database.
- Survey measurements of orthophoto data.

To enable a consistent approach to scoring of each commitment, and to clearly highlight compliance issues for LDG, the scoring system provided in Table 3-1 was used.

Score	Description	Example
		A monitoring program has not commenced.No evidence provided.
Partially Compliant	 A condition/commitment contains multiple components, with only some aspects being fulfilled. Where a commitment appears to have been implemented, but the evidence available is not at a high level. Verbal confirmation is provided with no further evidence available. 	 Report completed, however no record of delivery with a time stamp is available to demonstrate submission timing requirement. A Management Plan addresses some aspects of an approval condition, with additional work to be completed in subsequent years. A monitoring program has commenced, however not completely fulfilled.
Fully Compliant	• All components of the commitment have been met and sufficient evidence is available.	• Evidence fulfills all requirements of the condition, was submitted on time, and sufficient evidence for delivery is available (e.g. time-stamped email correspondence).
Not Applicable/ Administrative	• The operator cannot be considered either compliant or non-compliant.	 An approval condition that is administrative in nature (e.g. listing definitions). An approval condition is not relevant to the current phases of mine life being reviewed (i.e. Planned Future Activities).





4 COMPLIANCE WITH EP2020/001-001

Outcomes of the January 2024 compliance review against the environmental approval are summarised below in Table 4-1 and Figure 4-1. Note the review only considers the active commitments relevant to the Design and Permitting, Construction and Ongoing phases. The Ongoing phase related to conditions that were applicable for across multiple phases of the mine life (i.e. construction and mining). Future audits will need to consider the later operational specific phases (Underground Mining, Rehabilitation and Closure and Post Closure). The detailed commitments register, and compliance review is provided at Appendix A.

	Compliance Score Count								
Condition	Fully Compliant	Partially Compliant	Non- Compliant	Not Applicable / Administrative	Planned Future Activity	Total			
1		1				1			
2					5	5			
3	1					1			
4	10	2		1	1	14			
5	1					1			
6	8					8			
7	2					2			
8				1		1			
9	1					1			
10	4				2	6			
11					4	4			
12	1			1		2			
Total	28	3	0	3	12	46			
Percentage	60.9	6.5	0.0	6.5	26.1	100			

Table 4-1. Summary of compliance scores for each condition

A total of 28 conditions were scored as Fully Compliant, and 15 conditions were not yet applicable to the current phase of mining (i.e. were related to Closure and Rehabilitation) or were administrative focused. Overall, the Approval Holder has complied with 93.5% of the conditions of the environmental approval.

The compliance review identified 3 Partially Compliant and 0 Non-Compliant conditions. The Partially Compliant conditions related to:

- 1. the mine site footprint location varying from the environmental approval as the site infrastructure is located south east of an existing track.
- 2. the lack of **total** metal laboratory analysis in the groundwater monitoring program, total metals were analysed for surface water only.
- 3. The WMP does not classify intercepted groundwater or sediment water as mine-affected. There is ambiguity in this interpretation, particularly in this instance as the MWD wall was breached and water discharged directly to drainage line BP1 (bypassing the sediment basins).

All conditions should be reviewed and improved on progressively.





4.1 **Opportunities for improvement**

One opportunities of improvement (OFI) was identified in the Partially Compliant conditions, these are:

- Compliance Score Percentage by Condition number 1 2 Fully Compliant 3 4 **Condition Number** Partially Compliant 5 6 Non-Compliant 7 Not Applicable / 8 Administrative 9 Planned Future Activity 10 11 12 0% 20% 40% 60% 80% 100%
- LDG must undertake monitoring as per the WMP/WDL once issued.

Figure 4-1. Chart presenting compliance score percentage by commitment condition





5 **REFERENCES**

- Topo (2023) *Erosion and Sediment Control Plan BP33 Lithoum Project Core Lithium*, prepared for Lithium Development Grants (NT).
- WRM (2023a) 2023/24 Drainage control and erosion and sediment control audit and wet season drainage plan – Access Road, prepared for Lithium Developments Grants (NT).
- WRM (2023b) 2023/24 wet season drainage plan Site area, prepared for Lithium Developments Grants (NT).





APPENDIX A COMMITMENTS REGISTER

Licence/Approval/Plan	Condition	Condition number	Phase	Evidence - January 2024 compliance	Comment - January 2024 compliance	Compliance Score
NT EPA Environmental Approval EP2020/001-001	 Limitations and extent of action Clearing for mine site - No more than 88 ha of the approved extent Clearing for water pipeline - No more than 0.4 ha of the approved extent Clearing for haul route - No more than 12.5 ha of the approved extent 	Condition 1-1	Design and permitting	Excel spreadsheet with orthophoto imagery and detailed design data from LDG internal surveying system Propeller. Orthophoto data was captured by FYFE via automated drones on 22 December 2023.	The total area of land cleared, as of December 2023, is 64.37 ha. The mine site footprint is different to that proposed in the SER (slightly to the southwest of the original footprint (partially compliant)). The location of some infrastructure built within the footprint has changed. The updated mine design will be provided to DITT as an MMP amendment. No clearing has been undertaken for the water pipeline. Clearing for the haul route has been limited to upgrades of the existing road from the Cox Peninsula Road turnoff to the BP33 mine site, equaling 36 ha.	Partially Compliant
NT EPA Environmental Approval EP2020/001-001	2. Action implementation and closure 2-1. The approval holder must implement the action to meet the following environmental culcomes: 1. The action must be rehabilitated and closed in such a manner that the approval holder can demonstrate that it: a) is physically self to humans and animals	Condition 2-1a	Closure and rehabilitation	N/A		Planned Future Activity
INT EPA Environmental Approval EP2020/001-001	b) is geo-technically stable	Condition 2-1b	Closure and rehabilitation	N/A		Planned Future Activity
EP2020/01-001	c) is non-polluting, non-contaminating	Condition 2-1c	Closure and rehabilitation	N/A		Planned Future Activity
EP2020/001-001 NT EPA Environmental Approval	d) does not cause material environmental harm or significant environmental harm	Condition 2-1d	Closure and rehabilitation	N/A		Planned Future Activity
EP2020/001-001	e) is able to sustain the post-mining land use in the approved Mine Closure Plan required by condition 3	Condition 2-1e	Closure and rehabilitation	N/A		Planned Future Activity
NT EPA Environmental Approval EP2020/001-001	 Mine Closure Plan To demonstrate that the outcomes required by condition 2-1 are achieved, the approval holder must prepare a Mine Closure Plan, before substantial disturbance, that is consistent with contemporary best practice guidance on mine closure. 	Condition 3	Design and permitting	Email submission of MCP by EcOz on behalf of LDG to DITT.	MCP submitted as part of the MMP Authorisation approval by DITT on 11 January 2022, via email.	Fully Compliant
NT EPA Environmental Approval EP2020/001-001	4. Inland waters 4- The approval holder must implement the action to meet the following environmental objective and outcome: (1) Protect the quality and hydrological regimes of groundwater and surface water so that environmental values including ecological health, land uses and the welfare and amenity of people are maintained.	Condition 4-1 (1)	Ongoing	Revised Water Management Plan (WMP) October 2023, Section 6 of the WMP provides a detailed water monitoring plan (surface and groundwater). Groundwater Dependent Ecosystem (GDE) Management Plan prepared by Groundwater Enterprises in May 2022 Prepared by EcO2 in May 2022. Riparian Vegation Monitoring Plan 2022 Prepared by EcO2 in May 2023. Export of groundwater (GW) and surface water (SW) database providing latest rounds of sampling.	Revised Water Management Plan, completed by WRM In October 2023, for early construction works. Trigger Action Response Plans (TARPs) have been developed for each developmental phase of BP33 (construction and operations) and are provided in Appendix B of the WMP. GDE Management Plan Section 3.1, 3.2 and 3.3 includes monitoring requirements for groundwater, vegetation (inparian) and surface water. The groundwater and surface water monitoring is in accordance with the RWMP above. The vegetation (inparian) monitoring is in accordance with the RWM above. The vegetation (inparian) monitoring is in accordance with the RWm above. The vegetation (inparian) monitoring is in accordance with the Rymain Vegetation Monitoring Plan, as described below. Ryparian Vegetation Monitoring Plan requires the commencement of rubstantial disturbance. Eco2C consultants conducted field surveys of riparian vegetation post-dry season 2023 and prepared a Riparian Vegetation Monitoring Plan. GW last sampling round was December 2023 - aligns with WMP. SW last sampling round was Undertaken January 2024 when sustained flows in creek was established for the 23/24 wet season - aligns with WMP.	Fully Compliant
NT EPA Environmental Approval EP2020/001-001	(2) Discharge of any mine-affected water from the action must not cause water quality at the downstream compliance point(s) to exceed the guideline values.	Condition 4-1 (2)	Ongoing	No discharge of mine affected water from BP33 has occurred, as per pers comms P McHugh 01/02/2024 via Email. S.29 nolident outforced (electronic) S.29 nolident nolification - email correspondence S.29 incident nolification - initial notification email Export of groundwater (GW) and surface water (SW) database providing latest rounds of sampling.	No discharge of 'mine-affected wate' as defined in the WMP. Uncontrolled discharge of surface water to environment occurred on 13 and 14 November 2023. UGG classified this water as sediment laden, not mine effected water. As a result LDG was not required to notify DEPWS, however the discharge did result in a section 29 notification under the Mining Management Act. The WMP does not classify intercepted groundwater or sediment water as mine- affected. There is ambiguity in this interpretation, particularly in this instance as the MWO wall was breached and water discharged directly to drainage line BP1 (bypassing the sediment basins). LDG led the investigation and notified DITT of the incident on the 15th November 2023, via email. Records show that this has been the only reportable environmental incident at BP33. Surface water monitoring was undertaken January 2024 on commencement of sustained creek flow. The frequency is in alignment with the VMP, however, monitoring was not completed at BPDS SWG - the nominated complicate point. Several parameters specifically EC, utrivity, TP and TN at BPDS SW2 were above the SSTVs in the VMP/ Vaseb Discarings Licence (VDL) Application. Opportunity for improvement - LDG must undertake monitoring as per the WWP/WUL once issued.	Partially Compliant
NT EPA Environmental Approval EP2020/001-001	4-2 For the purpose of condition 4-1(2) the guideline values are the ANZG default guideline values for slightly to moderately disturbed systems (95% species protection level). Where natural background levels exceed ANZG default guideline values, or default guideline values have not been set by ANZG, site- specific guideline values must be derived in accordance with ANZG.	Condition 4-2	Ongoing	The Water Management Plan (WMP) includes the SSTVs in Section 6.3.5, and Trigger Action Response Plans (TARPs) in Appendix B	Site specific trigger values (SSTVs) have been developed for downstream surface water and groundwater based on long-term baseline ranges. The TARPs include trigger levels based on the SSTVs and the required action/response when the trigger levels are obtained.	Fully Compliant
NT EPA Environmental Approval EP2020/001-001	4-3 The site-specific guideline values required by condition 4-2 must be: (1) derived from baseline data prior to substantial disturbance.	Condition 4-3 (1)	Design and permitting	The WMP includes SSTVs for surface water (Table 6.4) and groundwater (Table 6.6).		Fully Compliant
NT EPA Environmental Approval EP2020/001-001	(2) re-derived at the end of the wet season in any year that discharge of mine affected water to waterways occurs, from the collected baseline and operational water quality dataset. Site-specific quickline values must be derived for the physical and chemical indicators appropriate to the mineralogical properties of mined material and the range of declared beneficial uses, in accordance with ANZG.	Condition 4-3 (2)	Ongoing	NA	Since commencement of substantial disturbance at BP33, an end of wet season is yet to be reached.	Not Applicable/Administrative
NT EPA Environmental Approval EP2020/001-001	4-4 The draft Water Management Plan (Appendix C to the SER) must: (1) be revised by a qualified person and submitted to the CEO for review and approval at least three months before substantial disturbance, and within every 12 months thereafter for the life of the action unless otherwise directed by the CEO in writing, to ensure it is consistent with achievement of the environmental outcomes in conditions 4-3(1) and 4- 1(2).	Condition 4-4 (1)	Design and permitting	Email correspondence LDG and NT EPA.	The June 2023 WMP and Water Balance was provided to the NT EPA on 3 July 2023, via email. The WMP for early construction works was updated by WRM in October 2023. Annual anniversary yet to occur.	Fully Compliant
NT EPA Environmental Approval EP2020/001-001	 4-5 The revised Water Management Plan required by condition 4-4(1) must: (1) provide for the management of potential impacts of the action on waterways, waterbodies and aquifers; and 	Condition 4-5 (1)	Ongoing	Water Management Plan, specifically Section 4.	Section 4 of the WMP provides water management objectives, principles and outlines the water management system to be implemented at BP33 to manage the potential impacts identified in Section 3 (Contaminant Source Study).	Fully Compliant
NT EPA Environmental Approval EP2020/001-001	(2) include detailed baseline data, collected from a baseline study conducted in accordance with ANZG on: (a) surface water flows and quality in waterways and/or waterbodies that could be affected by the action; and (b) groundwater levels, yield and quality in aquifers that could be affected by the action.	Condition 4-5 (2)	Ongoing	Water Management Plan, specifically Section 2 a environmental setting description.	Section 2 of the WMP provides a description of the environmental setting including the local drainage network, background surface and groundwater characteristics. Baseline data was collected for surface water and groundwater at BP33 since 2017.	Fully Compliant

Licence/Approval/Plan	Condition	Condition number	Phase	Evidence - January 2024 compliance	Comment - January 2024 compliance	Compliance Score
NT EPA Environmental Approval EP2020/001-001	(3) define the aspects to be monitored and measured including: (a) determine the locations and methods for monitoring, measurement, analysis and evaluation to ensure valid results, including the downstream compliance point(s); and (b) define when monitoring must be performed, when the results from monitoring must be analysed and evaluated, how monitoring results will be communicated and reported and to whom; and 	Condition 4-5 (3)	Ongoing	Revised Water Management Plan (WMP) October 2023, includes Section 6 and section 4.6 Section 2 of the Riparian Vegetation Monitoring Plan 2022 prepared by ECo2: in May 2022. Waste Discharge Licence (WLD) Application submitted to NT EPA for approval. Export of groundwater (GW) and surface water (SW) database providing latest rounds of sampling.	Section 6 of the WMP provides a detailed water monitoring plan (surface and groundwater). Section 4.5 provides the requirement to apply for a WDL, to allow for monitoring to occur at downstream compliance point for the monitoring of controlled discharge of wastewater. This was submitted to the NT EPA in October 2023, and is pending approval. Section 2 of the Riparian Vegetation Monitoring plan, includes the required monitoring parameters for annual monitoring of riparian vegetation. GW last sampling round was December 2023 - aligns with WMP. Total metals were not collected during the last GW sampling round, only filtered metals. Surface water monitoring was undertaken January 2024 on commencement of sustained creek flow. The frequency is in alignment with the VMP, however, monitoring was only completed at 2 of the 8 receiving environment sites identified in the WMP/WDL Application (SW1 and SW2), BPDS SW6 - the nominated compliance poin twas not monitored. Similarly not all the operational sites were monitored (missed the MWD). Opportunity for improvement - LDG must undertake monitoring as per the WMP/WDL once issued.	Partially Compliant
NT EPA Environmental Approval EP2020/001-001	(4) include quantitative triggers and limits which would be used to initiate investigative and/or adaptive management actions when surface water and/or groundwater monitoring results exceed guideline values or deviate from the predictions outlined in the Referral and the SER and appended documents;	Condition 4-5 (4)	Ongoing	Revised Water Management Plan (WMP) October 2023, SSTVs provided in Table 6.4 (Section 6) for downstream surface water sites and Table 6.6 for groundwater.	Site specific trigger values (SSTVs) have been developed for downstream surface water monitoring and groundwater monitoring based on long-term baseline ranges (since 2017).	Fully Compliant
NT EPA Environmental Approval EP2020/001-001	(5) detail how monitoring exceedances and the outcomes of investigative and/or adaptive management actions would be notified to the CEO.	Condition 4-5 (5)	Ongoing	Water Management Plan 2023 (uncertain if submitted to NT EPA), specifically Appendix B TARPs. Water Management Plan 2022 (Submitted to NT EPA)- superseded, included a TARP specifically for GDE trigger response	WMP 2023 Appendix B TARPs includes actions notify the regulator in accordance with approval and licence conditions, under various scenarios. WMP 2022 Appendix C Section 4.4 TARP for GDE monitoring included notification to be provided in writing to NT EPA CEO If monitoring identifies the total area of GDE loss attributable to the action exceeds 3.6 ha.	Fully Compliant
NT EPA Environmental Approval EP2020/001-001	(6) be implemented for the life of the action.	Condition 4-5 (6)	Ongoing	Export of groundwater (GW) and surface water (SW) database providing latest rounds of sampling.	GW last sampling round was December 2023 - aligns with WMP, previous sampling was undertaken quarterly as per the WMP. SW last sampling round was undertaken January 2024 when sustained flows in creek was established for the 2324 wet season - aligns with WMP. Flows have been sustained at compliance point.	Fully Compliant
NT EPA Environmental Approval EP2020/001-001	4-6 The approval holder must continue to implement the last approved version of the Water Management Plan required by condition 4-4 until the CEO provides written confirmation that a revised version is approved.	Condition 4-6	Ongoing	Email correspondence LDG and NT EPA.	The June 2023 WMP and Water Balance was provided to the NT EPA on 3 July 2023, via email. The WMP for early construction works was updated by WRM in October 2023. Annual anniversary yet to occur.	Fully Compliant
NT EPA Environmental Approval EP2020/001-001	4-7 At the end of the mine life, the approval holder must demonstrate that there has been no measurable adverse change in water quality compared to the pre-mining baseline condition at the downstream compliance point(s) established under condition 4-1(2).	Condition 4-7	Closure and rehabilitation	NA		Planned Future Activity
NT EPA Environmental Approval EP2020/001-001	5. Soil erosion and sediment control 5-1 An Erosion and Sediment Control Plan must be developed by a Certified Professional in Erosion and Sediment Control, in accordance with International Erosion Control Association Australasia (IECA) 2008, Best Practice Erosion and Sediment Control, revised within every 12 months thereafter (or at more frequent Intervals if sile conditions significantly change), and implemented for the life of the action to minimise erosion and the release of sediment to receiving waters and contamination of stormwater.	Condition 5	Ongoing	Site specific ESCPs have been prepared based on the updated mine design by Topo and WRM Topo ESCP was developed by a CPESC.	The Topo ESCP prepared in September 2023 provided a high level ESCP and surface water flow information for the entirety of the BP33 mine site and access road. The WRM drainage plan memos prepared in November 2023 include more detailed ESCP and drainage infrastructure requirements for the mine site and access road to Cox Peninsula road.	Fully Compliant
NT EPA Environmental Approval EP2020/001-001	Groundwater dependent ecceystems (GDE) G-1 The approval holder must implement the action to meet the following environmental outcomes: (1) dentify the presence and extent of, and monitor the impacts of the action on, GDE vegetation within the predicted cone of groundwater drawdown; and	Condition 6-1 (1)	Ongoing	Groundwater Dependent Ecosystem (GDE) Management Plan prepared by Groundwater Enterprises in May 2022. Riparian Vegetation Monitoring Plan 2022 prepared by Eco2 in May 2022. Riparian Vegetation Monitoring Report - post dry-season 2023 prepared by Eco2 in December 2023. Export of groundwater (GW) and surface water (SW) database providing latest rounds of sampling.	Section 2 of the GDE plan includes a Conceptual Ecotydrogeolgical Model which details the presence and start of the GDE based on EG2 baseline information, and Section 3.1.1 the groundwater baseline data. Sections 3.2 and 3.3 provide monitoring requirements for vegetation and surface water. EG22 consultants prepared a Riparian Vegetation Monitoring Plan for LDG for the life of the mine. EG22 Consultants conducted field surveys of riparian vegetation post-dry season 2023 and prepared a Riparian Vegetation Monitoring Plan. GW last sampling round was December 2023 - allings with WHP, previous sampling was undertaken quarterly as per the WMP. SW last sampling round was December 2023 - allings with WMP. Flows have been sustained at compliance point.	Fully Compliant
NT EPA Environmental Approval EP2020/001-001	(2) avoid the loss of no more than 3.6 ha of identified GDE vegetation in 6-1(1).	Condition 6-1 (2)	Ongoing	Riparian Vegetation Monitoring Report - post dry-season 2023 prepared by EcOz in December 2023	Results of the post-dry season 2023 vegetation monitoring (E-C2 2023) stated that there was negligible change in inpairan vegetation health based on the 2023 post dry-season survey compared to the 2022 survey using the Before After /Control Impact (BAC) analysis approach. The riparian study boundary was consistent with the 2022 survey results; 2.5 km long and 150 m wide, with an are of 5 ha.	Fully Compliant
NT EPA Environmental Approval EP2020/001-001	6-2A GDE Management Plan must: (1) be developed by a qualified person and submitted to the CEO for review and approval at least three months before substantial disturbance, and within every 12 months thereafter for the life of the action unless otherwise directed by the CEO in writing, to ensure it is consistent with achievement of the environmental outcomes in conditions 6-1(1) and 6- 1(2); and	Condition 6-2 (1)	Ongoing	Groundwater Dependent Ecosystem (GDE) Management Plan was prepared by two suitably qualified persons at Groundwater Enterprises, in May 2022. EcO2 on behalf of LDG submitted the GDE Management Plan as an attachment to the BP33 WMP.	GDE Management Plan provided to NT EPA on 30 May 2022 via email. Commencement of works was 28 July 2023, review and update submission to NT EPA required prior to 28 July 2024.	Fully Compliant
NT EPA Environmental Approval EP2020/001-001	(2) provide for the collection of baseline data to assess the baseline condition of GDEs that could be affected by the action; and	Condition 6-2(2)	Design and permitting	GDE Management Plan was prepared by two suitably qualified persons at Groundvater Enterprises, IMM 2022 (at a high level - it provides collected groundwater baseline data at Appendix A). Vegetation baseline data collection was suface water baseline data collection was stated as a requirement in section 3.2.1. Revised Water Management Plan (WMP) October 2023, includes Section 6. Riparian Vegetation Monitoring Plan 2022 prepared by EcOz in May 2022 (Section 1.1).	Both documents provide a summary baseline data collected at BP33 to date at the preparation of each plan. Baseline data has been collected from 2019 by EcO2 (now handed to LDG) for groundwater and surface water baseline and as por the GDE Management Plan and in accordance with the approved WMP (Section 6 provides a detailed water monitoring plan (surface and groundwater). The requirement for baseline surface water data in the plan was for all stream flow data to be collected prior to the commencement of use of OHD (undertaken as part of Grants pre-approvals and ongoing) and observed water level drawdown in the compliance monitoring bores (which is assumed to be linked to commencement of the box col excavation works). Additional baseline surveys for dowsfream vegetation (riparian) in the adjacent watercourse were required and undertaken during 2022 to support the implementation of the Riparian Vegetation Monitoring Plan (2022).	Fully Compliant

Licence/Approval/Plan	Condition	Condition number	Phase	Evidence - January 2024 compliance	Comment - January 2024 compliance	Compliance Score
NT EPA Environmental Approval EP2020/001-001	(3) provide for monitoring and management of the impacts of the action on water availability for GDE vegetation within the area of drawdown; and	Condition 6-2(3)		GDE Management Plan was prepared by two suitably qualified persons at Groundwater Enterprises, in May 2022. Riparian Vegetation Monitoring Plan 2022 prepared by EcOz in May 2022.	The GDE Management Plan includes groundwater (Section 3.2), vegetation (Section 3.1), surface water monitoring (Section 3.3) and TARPs (Section 4). Specific riparian vegetation monitoring is detailed in Section 2.	Fully Compliant
NT EPA Environmental Approval EP2020/001-001	(4) define how the presence and extent of GDEs, and impacts of the action on GDEs, would be identified, monitored and measured including; (a) determine the locations and methods for monitoring, measurement, analysis and evaluation to ensure valid results; and (b) define when monitoring must be performed, when the results from monitoring must be analysed and evaluated, how monitoring results will be communicated and reported and to whom, and	Condition 6-2(4)		GDE Management Plan was prepared by two suitably qualified persons at Groundwater Enterprises, in May 2022. Riparian Vegetation Monitoring Plan 2022 prepared by EcOz in May 2022.	The GDE Management Plan includes groundwater (Section 3.2), vegetation (Section 3.1), surface water monitoring (Section 3.3) and TARPs (Section 4). Specific ripartan vegetation monitoring is detailed in Section 2.	Fully Compliant
NT EPA Environmental Approval EP2020/001-001	(5) Include quantitative triggers and limits which would be used to initiate investigative and/or adaptive management actions when: (a) groundwater levels deviate significantly from the predictions outlined in the Finniss Lithium Project BP33 Groundwater Modelling Report, Final Version 3.0, October 2021, prepared by CloudOMS (Appendix B to the SER); and/or (b) GDE vegetation monitoring identifies that the extent of impacts to GDE health exceeds 3.6 ha, which is the extent of potential GDE that occurs within the modelled extent of the groundwater drawdown cone as a result of the action;	Condition 6-2(5)		GDE Management Plan was prepared by two suitably qualified persons at Groundwater Enterprises, in May 2022. Riparian Vegetation Monitoring Plan 2022 prepared by EcOz in May 2022.	The GDE Management Plan provides a TARP (Section 4) for the identification and management of impacts to GDE health. Section 4 of the Rapiran Vegetation Monitoring Plan provides a TARP that incorporates triggers and responses from the surface water monitoring program in the Water management Plan (WRM 2022) and the GDE Management Plan (as above) quantitative triggers and limits and/or adaptive management actions.	Fully Compliant
NT EPA Environmental Approval EP2020/001-001	6-3 The approval holder must continue to implement the last approved version of the GDE Management Plan required by condition 6-2 until the CEO provides written confirmation that a revised version is approved.	Condition 6-3		GDE Management Plan was prepared by two suitably qualified persons at Groundwater Enterprises, in May 2022. Riparian Vegetation Monitoring Plan 2022 prepared by EcOz in May 2022.	The GDE Management Plan has not been revised.	Fully Compliant
NT EPA Environmental Approval EP2020/001-001	6-4 The approval I holder must provide notice in writing to the CEO if GDE monitoring identifies that the total area of GDE loss attributable to the action exceeds 3.6 ha, within seven days of the identification of the exceedance.	Condition 6-4		Riparian Vegetation Monitoring Report - post dry-season 2023 prepared by EcOz in December 2023	No notification required. Results of the post-dry season 2023 vegetation monitoring (EcOz 2023) stated that there was negligible change in riparian vegetation health based on the 2023 post dry-season survey compared to the 2022 survey using the Before After (Control Impact (BACI) analysis approach. The riparian study boundary was consistent with the 2022 survey results; 2.5 km long and 150 m wide, with an area of 5 ha.	Fully Compliant
NT EPA Environmental Approval EP2020/001-001	7. Commencement of action 7-1 This approval expires five years after the date on which it is granted, unless substantial disturbance has occurred on or before that date.	Condition 7-1		NA	Substantial disturbance commenced at BP33 on 28 July 2023.	Fully Compliant
NT EPA Environmental Approval EP2020/001-001	7-2 Within 10 business days of the commencement of the substantial disturbance the approval holder must provide notification in writing to the CEO.	Condition 7-2		Record of delivery of notification to NT EPA of BP33 commencement of works	Notification of substantial disturbance at BP33 to NT EPA on 02 August 2023 via email correspondence.	Fully Compliant
NT EPA Environmental Approval EP2020/001-001	8 Change of contact details 8-11 The approval holder must provide notification in writing to the CEO of any change of its name, physical address or postal address for the serving of notices or other correspondence within 10 business days of such change.	Condition 8-1		NA	No notification required.	Not Applicable/Administrative
NT EPA Environmental Approval EP2020/001-001	9 Submission of documents 9-1 All notices, reports, documents or other correspondence required to be provided to the CEO as a condition of this approval, unless otherwise specified as a condition of this approval, must be provided in electronic form by emailing environmentaleguilation@rt.gov.au.	Condition 9-1		Electronic form submission via email from LDG to environmentalregulation@nt.gov.au.	Example of electronic submission of revised WMP and Water Balance document to the CEO of the NT EPA on 03 July 2023.	Fully Compliant
NT EPA Environmental Approval EP2020/001-001	10 Compliance reporting 10-1 The approval holder must: (1) within six months of substantial disturbance, obtain from an independent qualified person, a report on compliance with the conditions of this environmental approval; and	Condition 10-1(1)	Construction		Purpose of this compliance report.	Fully Compliant
NT EPA Environmental Approval EP2020/001-001	(2) obtain further such reports at regular intervals not exceeding 12 months from the report referred to in condition 10- 1(1); and	Condition 10-1(2)	Ongoing		Post completion of this compliance report, subsequent compliance reports are required not exceeding 12 months of this report.	Planned Future Activity
NT EPA Environmental Approval EP2020/001-001	(3) submit each report to the CEO within 90 days of its completion.	Condition 10-1(3)	Ongoing		Post completion of this compliance report, subsequent compliance reports are required not exceeding 12 months of this report.	Planned Future Activity
NT EPA Environmental Approval EP2020/001-001	 The reports required by conditions 10-1(1) and 10-1(2) must. be endorsed by the approval holder's Chief Executive Officer or a person delegated to sign on the approval holder's Chief Executive Officer's behalf; 	Condition 10-2(1)	Ongoing	2024 Compliance Report	Provided on page iv in this compliance report.	Fully Compliant
NT EPA Environmental Approval EP2020/001-001 NT EPA Environmental Approval	(2) include a statement as to whether the approval holder has complied with the conditions of this approval; and	Condition 10-2(2)	Ongoing	2024 Compliance Report	Included in this compliance report.	Fully Compliant
EP2020/001-001	(3) identify all non-compliances and describe corrective and preventative actions taken.	Condition 10-2(3)	Ongoing	2024 Compliance Report	Section 5 of this compliance report	Fully Compliant
NT EPA Environmental Approval EP2020/001-001	11 Environmental Performance Report 11-1 The approval holder must submit an Environmental Performance Report to the CEO on completion of the mine life.	Condition 11-1	Closure and rehabilitation	NA		Planned Future Activity
NT EPA Environmental Approval EP2020/001-001	11-2 The report required by condition 11-1 must be prepared by an independent qualified person	Condition 11-2	Closure and rehabilitation	NA		Planned Future Activity
NT EPA Environmental Approval EP2020/001-001	11-3 The Environmental Performance Report must report on impacts of the action on the state of the following environmental values: (1) terrestrial ecrosystems; and (2) Internet waters including surface water and groundwater hydrological processes and quality; and (4) community and economy including social impacts, and community and stakeholder engagement; and (5) the whole of environment within the area of influence of the action.	Condition 11-3	Closure and rehabilitation	NA		Planned Future Activity
NT EPA Environmental Approval EP2020/001-001	11-4 The Environmental Performance Report must include: (1) a comparison of the environmental values identified in condition 11-3 at the end of the mine life against the state of each environmental value prior to substantial disturbance; and (2) a comparison of the proteilched impacts of the action as identified in the Referral and SER, and the actual impacts of the action as verified by environmental monitoring data; and (3) an assessment of the cumulative impacts of the action and other actions for which the approval holder is responsible.	Condition 11-4	Closure and rehabilitation	NA		Planned Future Activity
NT EPA Environmental Approval EP2020/001-001	12 Provision of environmental data 12-1 All environmental monitoring data required to be collected or obtained under this environmental approval must be retained by the approval holder for a period of not less than 10 years commencing from the date that the data is collected or obtained.	Condition 12-1	Ongoing	Export of groundwater (GW) and surface water (SW) database providing latest rounds of sampling.	LDG hold all groundwater and surface water monitoring data internally on Esdat a Environmental Data Management System, and can be exported as requested. All other environmental data (i.e. Rapirain Vegetation data) is stored internally on the LDG server by the Environmental Team.	Fully Compliant
NT EPA Environmental Approval EP2020/001-001	12-2 The approval holder must, as and when directed by the CEO, provide any validated environmental data (including sampling design, sampling methodologies, empirical data and derived information products (such as maps)) relevant to the assessment of the action and implementation of this environmental approval, to the CEO in the form and manner, and at the intervals specified, in the direction.	Condition 12-2	Ongoing	NA. No directions from the CEO.		Not Applicable/Administrative





APPENDIX B EVIDENCE REGISTER





Condition number	Evidence required (Y/N)	Description of evidence	
Condition 1-1	Yes	Condition 1-1_Orthophotos	
Condition 2-1a			
Condition 2-1b			
Condition 2-1c	No	N/A	
Condition 2-1d			
Condition 2-1e			
Condition 3	Yes	Condition 3_Email Correspondence submission MCP DITT 11 Jan 23	
Condition 4-1 (1)	Yes	 Water Management Plan (WMP) October 2022 Revised Water Management Plan (WMP) October 2023 Groundwater Dependant Ecosystem (GDE) Management Plan May 2023 Riparian Vegetation Monitoring Plan May 2022 Riparian Vegetation Monitoring Report December 2023 240205 Data export SW database December 23-January 24 240205 Data export GW database December 23-January 24 	
Condition 4-1 (2)	Yes	 Condition 4-1 (2) s29 Incident Notification - Email correspondence Condition 4-1 (2) s29 Incident Notification - Form (completed) Condition 4-1 (2) s29 Incident Notification - Initial notification 240205 Data export SW database December 23-January 24 240205 Data export GW database December 23-January 24 	
Condition 4-2	Yes	 Revised Water Management Plan (WMP) October 2023 Condition 4-1 (2) Email Correspondence - No discharge of mine-effected water 	
Condition 4-3 (1)	Yes	Revised Water Management Plan (WMP) October 2023	
Condition 4-3 (2)	No	N/A	
Condition 4-4 (1)	Yes	 Condition 4-4 (1) Email Correspondence BP33 Final WMP and Water Balance Submission to NTEPA 	
Condition 4-5 (1)	Yes	Revised Water Management Plan (WMP) October 2023	
Condition 4-5 (2)	Yes	Revised Water Management Plan (WMP) October 2023	
Condition 4-5 (3)	Yes	 Revised Water Management Plan (WMP) October 2023 Riparian Vegetation Monitoring Plan May 2022 Condition 4-5 (3) BP33 WDL Application to NT EPA Condition 4-5 (3) WDL Supporting Information (no appendices) 240205 Data export SW database December 23-January 24 240205 Data export GW database December 23-January 24 	
Condition 4-5 (4)	Yes	Revised Water Management Plan (WMP) October 2023	
Condition 4-5 (5)	Yes	 Revised Water Management Plan (WMP) October 2023 Condition 4-5 (5) WMP October 2023 – TARPS Condition 4-5 (5) WMP 2022 - GDE TARPS 	
Condition 4-5 (6)	Yes	 240205 Data export SW database December 23-January 24 240205 Data export GW database December 23-January 24 	
Condition 4-6	Yes	 Condition 4-6 Email correspondence WMP Submission NTEPA July 2023 Condition 4-6 Letter WMP Submission to NTEPA July 2023 	
Condition 4-7	No	N/A	
Condition 5	Yes	 Condition 5_Drainage and ESC – Access road - October 2023 Condition 5_Drainage and ESC - Mine Site - October 2023 	





Condition number	Evidence required (Y/N)	Description of evidence
		Condition 5_LD-ENV-MP-013 BP33 ESCP (VA) 230918
Condition 6-1 (1)	Yes	 Groundwater Dependant Ecosystem (GDE) Management Plan May 2023 Riparian Vegetation Monitoring Plan May 2022 Riparian Vegetation Monitoring Report December 2023 240205 Data export SW database December 23-January 24 240205 Data export GW database December 23-January 24
Condition 6-1 (2)	Yes	Riparian Vegetation Monitoring Report May 2022
Condition 6-2 (1)	Yes	 Groundwater Dependant Ecosystem (GDE) Management Plan May 2023 Condition 6-2 (1) Email submission WMP and GDE Management Plan May 2022 Condition 6-2 (1) Email submission WMP and GDE Management Plan May 2022 follow up
Condition 6-2(2)	Yes	 Groundwater Dependant Ecosystem (GDE) Management Plan May 2023 Riparian Vegetation Monitoring Plan May 2022 Revised Water Management Plan (WMP) October 2023
Condition 6-2(3)	Yes	 Groundwater Dependant Ecosystem (GDE) Management Plan May 2023 Riparian Vegetation Monitoring Plan May 2022
Condition 6-2(4)	Yes	 Groundwater Dependant Ecosystem (GDE) Management Plan May 2023 Riparian Vegetation Monitoring Plan May 2022
Condition 6-2(5)	Yes	 Groundwater Dependant Ecosystem (GDE) Management Plan May 2023 Riparian Vegetation Monitoring Plan May 2022
Condition 6-3	Yes	 Groundwater Dependant Ecosystem (GDE) Management Plan May 2023 Riparian Vegetation Monitoring Plan May 2022
Condition 6-4	Yes	Riparian Vegetation Monitoring Report December 2023
Condition 7-1	No	N/A
Condition 7-2	Yes	 Condition 7-2_Email Correspondence Substantial Disturbance to NT EPA Condition 7-2_Letter Notification of Substantial Disturbance to NT EPA
Condition 8-1	No	N/A
Condition 9-1	Yes	Condition 9-1_WMP and Water Balance Submission to NTEPA
Condition 10-1(1)	No	N/A
Condition 10-1(2)	No	N/A
Condition 10-1(3)	No	N/A
Condition 10-2(1)	Yes	This compliance report
Condition 10-2(2)	Yes	This compliance report
Condition 10-2(3)	Yes	This compliance report (section 5)
Condition 11-1	No	N/A
Condition 11-2	No	N/A
Condition 11-3	No	N/A
Condition 11-4	No	N/A





Condition number	Evidence required (Y/N)	Description of evidence
Condition 12-1	Yes	 240205 Data export SW database December 23-January 24 240205 Data export GW database December 23-January 24
Condition 12-2	No	N/A



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