



Compliance Report EP2020/01-001

Lithium Project BP33

Lithium Developments (Grants NT)

Level 9 /2 Mill St
Perth WA 6000

Prepared by:

SLR Consulting Australia

SLR Project No.: 620.042116.00001

23 June 2025

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Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
1.0	5 May 2025	J. Woodworth	P. Turyn	J. Woodworth
2.0	23 June 2025	J. Woodworth	P. Turyn	J. Woodworth
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Basis of Report

This report has been prepared by SLR Consulting Australia (SLR) with all reasonable skill, care and diligence, and taking account of the timescale and resources allocated to it by agreement with Lithium Developments (Grants NT) (the Client). Information reported herein is based on the interpretation of data collected, which has been accepted in good faith as being accurate and valid.


This report is for the exclusive use of the Client. No warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from SLR.

SLR disclaims any responsibility to the Client and others in respect of any matters outside the agreed scope of the work.



Endorsement

I James Bruce delegate of the Chief Executive Officer endorse that this Compliance Report is, to the best of my knowledge, true and correct

A handwritten signature in black ink that reads "J Bruce". The signature is written in a cursive style with a long horizontal stroke at the end.

Signature:

Date: 23 June 2025



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1.0 Introduction

1.1 Background

Core Lithium is the owner of the Finniss Lithium Project, located near Darwin in the Northern Territory (NT). The Finniss Lithium Project is a multi-mine operation, focused on the Grants open pit mine and processing site. Core Lithium's subsidiary company Lithium Developments (Grants NT) Pty Ltd, here-in referred to as Lithium Developments, is the operator of the Grants and BP33 mines.

Lithium Developments proposes to construct and operate an underground lithium mine (BP33) on Mineral Leases (ML) ML32346 and MLN16 located on the Cox Peninsula approximately 27 km south of Darwin, 2.5 km south-west of the Cox Peninsula Road and approximately 3.5 km south-east of the Grants site (part of the Finniss Lithium Project).

Construction activities began at BP33 including land clearing, development of the box cut, water management and auxiliary infrastructure. The project will involve underground mining of ore and trucking to the Grants processing plant via a 7.5 km purpose-built haul road. However, activities ceased in December 2023 and the BP33 Project was placed in Care and Maintenance on the 31 May 2024.

This compliance report (the Report) prepared by SLR Consulting focuses on the Environmental Approval EP2020/001-001 (EP2020/01-001) dated 26 April 2022 and issued under the *Environment Protection Act 2019* (EP Act) for activities conducted at the BP33 site during 2024/2025. The Report will be submitted to the Northern Territory Environment Protection Authority (NT EPA) upon finalisation.

1.2 Objective

Dr Jill Woodworth as an NT EPA approved Independent Reviewer was engaged by Lithium Developments to conduct a compliance review of operations at BP33, as per condition 10 of EP2020/01-001:

Condition 10-1

- (1) within six months of substantial disturbance, obtain from an independent qualified person, a report on compliance with the conditions of this environmental approval.*
- (2) Obtain further such reports at regular intervals not exceeding 12 months from the report referred to in Condition 10-1(1).*

Condition 10-2

The reports required by conditions 10-1(1) and 10-1(2) must:

- (1) 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;*
- (2) Include a statement as to whether the approval holder has complied with the conditions of this approval; and*
- (3) Identify all non-compliances and describe corrective and preventative actions taken.*

The review will assess Lithium Developments' compliance with EP2020/01-001 conditions to identify compliance, non-compliance and potential non-compliance for each condition. Any Opportunities for Improvements (OFIs) will be identified.

This report presents the findings on the environmental regulatory compliance of the BP33 for the conditions listed in EP2020/01-001 from February 2024 to the end of March 2025. A



Compliance Assessment Report (CAR) was prepared for the first six months of the approved action in March 2024, however, it was not prepared by an approved independent qualified person. Therefore, where information from provides context, this information from the commencement of operations on 28 July 2023 has also been included in this CAR.

A site visit was not conducted at the time of preparing this report. The site has been in Care and Maintenance status since May 2024 and for the duration of the 2024/25 wet season. During this time the Environmental Approval conditions were primarily administrative with a focus on the development of environmental management practices, particularly water quality monitoring.



2.0 Site Activities

As activities related to mining ceased at the site in December 2023, this section has been included to provide context for activities that have been subsequently conducted.

The Authorisation for BP33 was issued on 20th April 2023 by the Minister for Mining and Industry, and was conditional on the submission of WMP and WRD design detail acceptable to the Department and approval of same. This was completed on the 11th and 12th of July 2023 respectively. Construction commenced in a staged manner from receipt of authorisation in April. **Table 1** shows the approved designs, Plans and associated activities to that date.

Table 1 Approved Designs, Plans and Associated Activities

Condition Reference	Deliverable	Regulator Approval Status	Regulator Reference	Date
Detailed Designs	Revised Site Layout	Approved	Acceptance Letter: 36:DITT2022/00121-0003-0047	10 July 2023
	WRD 1 Design	Approved	Acceptance Letter: 36:DITT2022/00121-0016-0016	22 September 2023
	Box Cut Design	Approved	Acceptance Letter: 36:DITT2022/00121-0016-0018	18 July 2023
	Haul / Access Road Design	Approved	Acceptance Letter: 36:DITT2022/00121-0016-0020	1 August 2023
Management Plans	WRD / PAF WRD1 Management Plan	Approved	Acceptance Letter: 36:DITT2022/00121-0016-0016	22 September 2023
	Erosion and Sediment Control Plan	Approved	Acceptance Letter 36:DITT2022/00121-0003-0044	29 June 2023
	Water Management Plan / Water Balance Stage 1 Activities	Approved	Acceptance Letter: 36:DITT2022/00121-0016-0007	30 June 2023

To meet the approved plans listed above the following key activities were undertaken by Lithium Developments in a staged approach in 2023 (EcOz 2024). The site ceased activities in December 2023.

2.1 2023 Activities (EcOz 2024)

- 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 BP33 Old 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:
 - Turkey nest (temporary of construction purposes) (completed)
 - Mine settling dam (Cell 1 and 2) (not completed – on hold)
 - Sediment basin 1 and 2 (completed).
- Application of hydromulch with seed component for stabilisation of cleared areas.
- Implementation of site-specific Erosion and Sediment Control Plan (Topo 2023, WRM 2023a and 2023b).

2.2 2024 Activities

Activities undertaken at BP33 under the Care and Maintenance Plan comprise of the maintenance of sediment and erosion control structures, including desilting of the forebays of Sediment Basins 1 and 2, as well as desilting the site drainage network and minor erosion repairs in October 2024.



3.0 Methodology

3.1 Development of Compliance Register

The Compliance Register was developed to include all conditions contained in EP2020/01-001 for the development of the Lithium Developments BP33 underground lithium mine on ML32346, ML32074 and ML Northern 16. EP2020/01-001 conditions have priority over all other environmental requirements that may be listed in the Referral (Core Lithium 2020), SER (Core Lithium 2021) Mine Management Plan (MMP) or other Management Plans.

The Compliance Register contains all information relating to the assessment of the site activities against EP2020/01-001 conditions. The Compliance Register is located in **Appendix A** and consists of the following information:

- All conditions listed in EP2020/01-001
- Conditions numbered according to those in EP2020/01-001
- The phase of operation (Exploration, Design and permitting, Construction, Mining and Processing, Processing only, Closure and Rehabilitation, Post-closure, Ongoing).
- Evidence of compliance
- Comments on compliance
- Compliance score
- Compliance scoring system.

Each Environmental Approval condition was assessed and scored against the available evidence which included the following documents provided by Lithium Developments:

- Survey measurements of orthophoto data showing clearing, roads, fencing, sediment Basins, topsoil stockpile, WRDs and drainage. (EcOz 17 January 2024)
- *Mine Closure Plan*. (Lithium Developments May 2024)
- *Mine Care and Maintenance Management Plan*. (Core Lithium May 2024)
- *Water Management Plan. Report Number 1727-24-D2* (WRM April 2025)
- *Erosion and Sediment Control Plan*. (Topo May 2024)
- *Groundwater Dependent Ecosystem Management Plan*. (Groundwater Enterprises and RDM Hydro March 2024)
- *Riparian Vegetation Monitoring Plan*. (EcOz May 2022)
- *Riparian Vegetation Monitoring December 2023*. (EcOz December 2023)
- *Riparian Vegetation Monitoring Post-dry Season 2024*. (EcOz January 2025)
- Letter- Notification of Substantial Disturbance August 2023
- *Water Balance Modelling Report*. (WRM June 2023)
- Waste Discharge Licence WDL253
- *WDL253 Monitoring Report 2024-2025* (Lithium Developments February 2025).
- Environmental Approval EP2020/001-001
- Surface water and Groundwater databases 2024-2025.



3.2 Scoring System

SLR adopted a scoring system that was developed by EcOz (2024) to maintain a consistent approach to scoring of each commitment. This scoring system was designed to highlight compliance issues for Lithium Developments. The scoring system is provided in **Table 2**.

Table 2 Compliance Scoring System (EcOz 2024)

Score	Description	Example
Non-Compliant	No evidence available to demonstrate implementation or progress towards achieving the commitment.	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).



4.0 Compliance with EP2020/01-001

Outcomes of the June 2025 compliance review against EP2020/01-001 are summarised below in **Table 3**.

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 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**.

Table 3 shows the summary of the compliance scores from the compliance register in **Appendix A**. Nine partial conformances were recorded and two non-conformances.

4.1 Opportunities for Improvement

4.2 2024 Compliance Report

The 2024 Compliance Report (EcOz 2024) identified one opportunity for improvement:

- To undertake water quality monitoring to meet the requirements of the WDL and WMP.

Lithium Developments attempted to conduct monitoring to meet the requirements of WDL253 and the WMP as evidenced in the *WDL253 Monitoring Report 2024-2025* prepared by Core Lithium in February 2025. However, several monitoring locations were unable to be safely accessed and insufficient data was obtained to determine if the SSTVs were met at the compliance point SW6. Lithium Developments have obtained access to SW6 with the use of an ATV.

4.3 2025 Compliance Report

Six of the partial conformances relate to the submission and approval of management plans. Lithium Developments should ensure that all documentation relating to the Environmental Conditions are emailed to the DLPE Environmental Regulation Division. The non-conformances relate to the use of unapproved management plans, plans that have been revised within the 12 month period but not approved by the DLPE Environmental Regulation Division.

Actions required to meet these partial conformances and non-conformances are listed in **Table 3**.



Table 3 Compliance Scores Summary

Condition	Fully Compliant	Partially Compliant	Non-Compliant	Not Applicable / Administrative	Planned Future Activity	Actions
1-1						
2-1						
3-1						
4-1(1)						
4-1(2)						Ensure that Compliance Point (SW6) monitoring occurs to meet WDL requirements.
4-2						
4-3 (1)						
4-3(2)						Revise SSTVs for DO, pH, turbidity and iron.
4-4						Submit 2025 Care and Maintenance WMP to DLPE Environmental Regulation Division for approval.
4-5 (1-5)						
4-5 (6)						Ensure that Compliance Point (SW6) monitoring occurs to meet WDL requirements.
4-6						Request approval from the DLPE Environmental Regulation Division for the 2025 WMP.
4-7						
5-1						Revise the ESCP in 2025.
6-1						
6-2 (1)						Revise 2024 GDE Management Plan and submit to DLPE Environmental Regulation Division for approval prior to the 2025 monitoring program.
6-2 (2-5)						
6-2(6)						Revise 2024 GDE Management Plan and include method for notification of CEO and submit to DLPE Environmental Regulation Division for approval prior to the 2025 monitoring program.
6-3						Revise 2024 GDE Management Plan and submit to DLPE Environmental Regulation Division for approval prior to the 2025 monitoring program.
6-4						
7-1						
7-2						



Condition	Fully Compliant	Partially Compliant	Non-Compliant	Not Applicable / Administrative	Planned Future Activity	Actions
8-1						
9-1						Ensure that all information relating to the Approval Conditions are sent to the DLPE Environmental Regulation Division.
10-1(1)						2025 CAR to be completed by approved independent qualified person.
10-1(2-3)						
10-2						
11-1						
11-2						
11-3						
11-4						
12-1						
12-2						



5.0 References

Core Lithium. 2020. Referral Supporting Documents. July 2021. <https://ntepa.nt.gov.au/your-business/public-registers/environmental-impact-assessments-register/completed-assessments/register/finniss-lithium-project-bp33-underground-mine>

Core Lithium. 2021. Supplementary Environmental Report. November 2021. <https://ntepa.nt.gov.au/your-business/public-registers/environmental-impact-assessments-register/completed-assessments/register/finniss-lithium-project-bp33-underground-mine>

EcOz. 2024. Compliance Report EP2020/01-001 Finniss Lithium Project BP33 Underground Mine. March 2024.

Northern Territory Government. 2022. Environmental Approval Number: EP2020/001-001.

Topo. 2023. Erosion and Sediment Control Plan Version B. BP33 Lithium Project – Core Lithium.

WRM. 2023a. BP33 Underground Mine Water Management Plan Version C6. 23 October 2023

WRM. 2023b. BP33 Underground Mine Water Management Plan Version C7. 27 October 2023

WRM. 2024. BP33 Underground Mine Water Management Plan Version C4. 31 May 2024





Appendix A Compliance Register

Compliance Report EP2020/01-001

Lithium Project BP33

Lithium Developments (Grants NT)

SLR Project No.: 620.042116.00001

23 June 2025

Appendix A Compliance Register - Environmental Approval EP2020/001-001 for Core Lithium Ltd BP33

Number	Condition	Phase	Evidence April 2025 Compliance	Comment - April 2025 Compliance	Compliance Score
1	Limitations and extent of action	Design and permitting	Excel spreadsheet (24/01/2024) 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 when activities ceased. No clearing had been undertaken for the water pipeline. Clearing for the haul route had been limited to upgrades of the existing road from the Cox Peninsula Road turnoff to the BP33 mine site, equalling 3.6 ha.	Fully Compliant
1-1	When implementing the action, the approval holder must ensure the action does not exceed the following extent: - 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				
2	Action implementation and closure	Closure and rehabilitation	N/A		Planned future activity
2-1	The approval holder must implement the action to meet the following environmental outcomes: 1. The action must be rehabilitated and closed in such a manner that the approval holder can demonstrate that it: a) is physically safe to humans and animals b) is geo-technically stable c) is non-polluting, non-contaminating d) does not cause material environmental harm or significant environmental harm e) is able to sustain the post-mining land use in the approved Mine Closure Plan required by condition 3				
3	Mine Closure Plan	Design and permitting	The Mine Closure Plan (2022) was submitted as part of the MMP Authorisation approval by DITT on 11 January 2022, via email. Prior to substantial disturbance at the site. The Mine Closure Plan was updated May 2024 MCP	The 2024 Mine Closure Plan contains updated information to ensure that Lithium Developments will meet Condition 2-1.	Fully Compliant
3-1	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.				
4	Inland waters	On-going	Water Management Plan (WMP) April 2025, 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 and updated in March 2024. Riparian Vegetation Monitoring Plan 2022 prepared by EcOz in May 2022. Riparian Vegetation Monitoring Report - post dry-season 2023 prepared by EcOz in December 2023. Riparian Vegetation Monitoring Report - post dry-season 2024 prepared by EcOz in December 2024. WDL253 Monitoring Report 2024-2025 prepared by Core Lithium February 2025.	Water Management Plan, completed by WRM in April 2025, for Care and Maintenance. Trigger Action Response Plans (TARPs) have been developed for each developmental phase of BP33 (construction and operations) and are provided in Appendix A of the WMP. GDE Management Plan Section 3.1, 3.2 and 3.3 includes monitoring requirements for groundwater, vegetation (riparian) and surface water. The groundwater and surface water monitoring to be undertaken in accordance with the WMP (2023). The vegetation (riparian) monitoring is in accordance with the Riparian Vegetation Monitoring Plan (2022), as described below. Riparian Vegetation Monitoring Plan required the commencement of riparian monitoring post-dry season after the commencement of substantial disturbance. This was conducted by EcOz Consultants in November 2023.	Fully Compliant
4-1	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.				

Number	Condition	Phase	Evidence April 2025 Compliance	Comment - April 2025 Compliance	Compliance Score
	(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.		<p>WDL253 Monitoring Report 2024-2025 prepared by Core Lithium February 2025.</p> <p>Surface water monitoring results monthly sampling February 2024 – February 2025</p> <p>Groundwater monitoring results biannual sampling March 2024 – September 2024</p>	<p>The post-dry season 2024 monitoring was conducted in November 2024. Both the 2023 and 2024 results were compared to the 2022 baseline survey. No changes were detected in 2023 or 2024.</p> <p>No discharge of 'mine-affected water' as defined in the WMP occurred during the 2024/25 wet season.</p> <p>Surface water monitoring was undertaken monthly for 9 February 2024 to 9 February 2025 and reported in the WDL253 Monitoring Report 2024-2025.</p> <p>Non-conformances against monthly surface water monitoring requirements under Appendix 5 of WDL253 were recorded and relate to monthly surface water monitoring not being achieved at sites SW3, compliance site SW6, SW7 and SW8.</p> <p>The compliance site SW6 was not able to be sampled on a monthly basis due to access issues. However, telemetry enables continuous monitoring of water level, pH, electrical conductivity (EC) and temperature (Appendix D, WDL Monitoring Report). The pH ranged from 5.65 to 6.89 and the EC ranged from 9.8 to 66 µS/cm during the 2024 – 2025 monitoring period. These results were below the SSTVs for all of the monitoring period.</p> <p>SW6 was sampled in February 2025 and all analytes were below their respective SSTVs. Insufficient data is available to confirm that the SSTVs were not exceeded during the entire monitoring period.</p> <p>Action: Ensure that Compliance Point (SW6) monitoring occurs to meet WDL requirements.</p>	<p>Partially Compliant</p>
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.	On-going	Table 6-4 in the Water Management Plan (WRM 2025) has SSTVs for analytes that naturally exceed ANZG default guidelines.	<p>Table 6-4 shows that the 80% percentile of background data following ANZG (2018) guidelines for the derivation of SSTVs.</p> <p>The summary of water quality data is provided in Appendix A has been used to derive SSTVs for:</p> <ul style="list-style-type: none"> • Total Nitrogen • Total Phosphorous • pH • Turbidity • Dissolved Aluminium 	Fully Compliant

Number	Condition	Phase	Evidence April 2025 Compliance	Comment - April 2025 Compliance	Compliance Score
				<ul style="list-style-type: none"> Dissolved Iron 	
4-3	The site-specific guideline values required by condition 4-2 must be: (1) derived from baseline data prior to substantial disturbance.	Design and permitting	Table 6-4 in the Water Management Plan (WRM 2025) has SSTVs for analytes that naturally exceed ANZG default guidelines.	Site specific trigger values (SSTVs) have been developed for downstream surface water and groundwater based on long-term baseline ranges.	Fully Compliant
	(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 guideline 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.	On-going	WDL253 Monitoring Report 2024-2025 prepared by Core Lithium February 2025. Water Management Plan (WRM April 2025) Surface water monitoring results monthly sampling February 2024 – February 2025	SSTVs were not rederived after the 2024-2025 monitoring program as there was no active discharge of mine-affected water during the 2024-2025 wet season. The majority of analytes were recorded below the SSTV and below the limit of reporting in the 2024-2025 monitoring program. However, the SSTVs for DO, pH, turbidity and iron should be rederived with the inclusion of the upstream data from the 2024-2025 monitoring program for these analytes. Action: Revise SSTVs for DO, pH, turbidity and iron.	Partially Compliant
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).	Design and permitting	The Water Management Plan (WMP) was revised by a qualified person. The WMP was submitted to Lithium Developments in June 2023 and approved by the CEO in June 2023. Acceptance Letter: 36:DITT2022/00121-0016-0007 The revised Operational WMP for May 2024 is located here: https://ntepa.nt.gov.au/_data/assets/pdf_file/0006/1128381/appendix-d-grants-water-management-plan.pdf It was submitted to DLPE for approval on 10 July 2024, however, approval was not received. The Care and Maintenance WMP was developed by WRM and was finalised in April 2025. The 2025 WMP was submitted to the DLPE Mining Division has yet to be submitted to the DLPE Environmental Regulation Division for approval. The Care and Maintenance WMP is located here: BP33 Underground Mine	The WMP has been revised on an annual basis (2023, May 2024, April 2025). The 2023 approved WMP was revised in May 2024 and submitted for approval by DLPE. (Approval not received) The site was placed in Care and maintenance in May 2024 and a Care and Maintenance WMP developed by WRM in April 2025. Action: Submit 2025 Care and Maintenance WMP to DLPE Environmental Regulation Division for approval.	Partially Compliant
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	On-going	WMP Appendix A Surface Water Trigger Action Response Plans (WRM April 2025)	Appendix A of the Care and Maintenance WMP (April 2025) provides management actions when potential impacts (triggers) are identified in all phases and all domains.	Fully Compliant
	(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.		WMP Section 2.4 Local Drainage Networks WMP Section 2.7 Groundwater Characteristics WMP Section 3.5 Site Background Surface Water Quality WMP Section 3.6 Site Background Groundwater Quality	WMP Section 2.4 Local Drainage Networks: Drainage Line BP1 Drainage Line BP1 discharge and water level Unnamed Tributary of the charlotte River Drainage Line BP2	Fully Compliant

Number	Condition	Phase	Evidence April 2025 Compliance	Comment - April 2025 Compliance	Compliance Score
				Overland Flow Path WMP Section 2.7 Groundwater Characteristics: Aquifer geology Hydraulic conductivity Groundwater levels Groundwater flows and recharge	
	(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		WMP Section 6 Water Quality Monitoring Plan WMP Section 6.3 Surface Water Monitoring Program WMP Section 6.4 Groundwater Monitoring Program	Section 6 includes all aspects of surface water quality monitoring: Parameters measured Monitoring sites including compliance site Sampling frequency Sampling methods Surface water flow gauging Assessment criteria	Fully Compliant
	(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;		WMP Section 6 SSTVs provided in Table 6.4 for downstream surface water sites and Table 6.6 for groundwater. Adaptive Management Actions for exceedances: WMP Appendix A	Site specific trigger values (SSTVs) have been developed for downstream surface water monitoring and groundwater monitoring based on long-term baseline ranges (since 2017). Trigger Action Response Plans for surface water and groundwater: WMP Appendix A	Fully Compliant
	(5) detail how monitoring exceedances and the outcomes of investigative and/or adaptive management actions would be notified to the CEO.		WMP Appendix A. There is information on when the regulator is to be notified.	WMP 2025 Appendix A TARPs includes actions notify the regulator in accordance with approval and licence conditions, under various scenarios.	Fully Compliant
	(6) be implemented for the life of the action.		WDL253 Monitoring Report 2024-2025 prepared by Core Lithium February 2025. Annual reporting of surface and groundwater monitoring. Export of groundwater (GW) and surface water (SW) database providing latest rounds of sampling. The revised Operational WMP for May 2024 (WRM 2024) is located here: https://ntepa.nt.gov.au/_data/assets/pdf_file/0006/1128381/appendix-d-grants-water-management-plan.pdf	Surface water and groundwater databases observed _ Surface water monitoring results monthly sampling February 2024 – February 2025 Groundwater monitoring results biannual sampling March 2024 – September 2024 The WMP has been developed to meet the requirements of the WDL and non-conformances against monthly surface water monitoring requirements were recorded and relate to monthly surface water monitoring not being achieved at sites SW3, compliance site SW6, SW7 and SW8. Wet season access issues to SW6 have been resolved via the utilisation of an ATV since February 2025. Action: Ensure that Compliance Point (SW6) monitoring occurs to meet WDL requirements.	Partially Compliant

Number	Condition	Phase	Evidence April 2025 Compliance	Comment - April 2025 Compliance	Compliance Score
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.	On-going	WDL253 Monitoring Report 2024-2025 prepared by Core Lithium February 2025. Export of groundwater (GW) and surface water (SW) database providing latest rounds of sampling. The revised Operational WMP for May 2024 (WRM 2024) is located here: https://ntepa.nt.gov.au/_data/assets/pdf_file/0006/1128381/appendix-d-grants-water-management-plan.pdf The Care and Maintenance WMP was developed by WRM and was finalised in April 2025. The 2025 WMP was submitted to the DLPE Mining Division has yet to be submitted to the DLPE Environmental Regulation Division for approval.	The 2024-2025 monitoring program was conducted under the WRM (2024) WMP. Which had been submitted for approval in 2024, but not approved by DLPE Environmental Regulation Division. The 2025-2026 monitoring program will be conducted under the WRM (2025) Care and Maintenance WMP once it is approved by the DLPE Environmental Regulation Division. Action: Request approval from the DLPE Environmental Regulation Division for the 2025 WMP.	Non-Compliant
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).	Closure and rehabilitation	N/A		Planned future activity
5.	Soil erosion and sediment control	On-going	Site specific ESCPs have been prepared based on the updated mine design by Topo (2024) Topo ESCP was developed by a CPESC. Terry Clark CPESC No. 6089 WDL253 Monitoring Report 2024-2025 prepared by Core Lithium February 2025.	The Topo ESCP prepared in September 2023 and updated within 12 months in May 2024 which includes more detailed ESCP and drainage infrastructure requirements for the mine site and access road to Cox Peninsula road. The Document provides a comprehensive ESCP and surface water flow information for the entirety of the BP33 mine site and access road. The document is compliant with Approval Condition 5-1. However, erosion has been observed on site and Core has committed to improve and maintain ESC infrastructure to ensure ongoing effectiveness and reduce sediment release to the environment. Action: Revise the ESCP in 2025.	Partially Compliant
6.	Groundwater dependent ecosystems (GDE)	On-going	Groundwater Dependent Ecosystem (GDE) Management Plan prepared by Groundwater Enterprises in May 2022 and updated March 2024. Riparian Vegetation Monitoring Plan 2022 prepared by EcOz in May 2022. Riparian Vegetation Monitoring Report - post dry-season 2023 prepared by EcOz in December 2023. Riparian Vegetation Monitoring Report - post dry-season 2024 prepared by EcOz in December 2024.	Monitoring conducted: Baseline 2022 2023 post-dry season 2024 post-dry season	Fully Compliant
6-1	The approval holder must implement the action to meet the following environmental outcomes: (1) identify the presence and extent of, and monitor the impacts of the action on, GDE vegetation within the predicted cone of groundwater drawdown; and (2) avoid the loss of no more than 3.6 ha of identified GDE vegetation in 6-1(1).		Riparian Vegetation Monitoring Report - post dry-season 2023 prepared by EcOz in December 2023. Riparian Vegetation Monitoring Report - post dry-season 2024 prepared by EcOz in December 2024.	The 2024 Riparian Vegetation Monitoring Report (EcOZ 2024) states that "...there was negligible change in riparian vegetation health observed in the 2024 post-dry season monitoring program when compared to the 2022 baseline survey using a BACI analysis approach."	Fully Compliant
6-2	A 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	Design and permitting	A GDE Management Plan was developed by two suitably qualified persons at RDM Hydro Pty Ltd and Groundwater Enterprises Pty Ltd.	GDE Management Plan provided to NT EPA on 30 May 2022 via email.	Partially Compliant

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	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		Ryan Morris (RDM Hydro): Ryan is a hydrogeologist with 18 years project experience in mining and natural resources Simon Fulton (Groundwater Enterprises): Simon is a hydrogeologist with over twelve years experience working in the groundwater and natural resource areas.	The GDE Management Plan was updated in May 2024. The 2024 GDE Management Plan was submitted to the DLPE for approval on 10 July 2024. No communication from DLPE was received regarding approval. The post dry-season 2024 monitoring was conducted under this plan. Action: Revise 2024 GDE Management Plan and submit to DLPE Environmental Regulation Division for approval prior to the 2025 monitoring program.	
	(2) provide for the collection of baseline data to assess the baseline condition of GDEs that could be affected by the action; and		Section 3 in the GDE Management Plan states the requirements for baseline monitoring. Groundwater Surface Water Vegetation: GDE Extent, GDE Health	Baseline monitoring conducted by EcOz (2019) <i>Mangrove and Riparian Vegetation Assessment, Grants Lithium Project</i> . Report prepared for Core Lithium Limited by EcOz Environmental Consultants Pty Ltd, October 2019, Darwin	Fully Compliant
	(3) provide for monitoring and management of the impacts of the action on water availability for GDE vegetation within the area of drawdown; and		GDE Management Plan was prepared by two suitably qualified persons at Groundwater Enterprises, in May 2022 and updated in 2024. 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 and Section 4 Performance and Triggers in the Riparian Monitoring Plan.	Fully Compliant
	(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		GDE Management Plan was prepared by two suitably qualified persons at Groundwater Enterprises, in May 2022 and updated in 2024. Riparian Vegetation Monitoring Plan 2022 prepared by EcOz in May 2022.	The DGE Management Plan (2024) provides the following sections to meet this condition: Section 3.1 Groundwater Monitoring Section 3.2 Vegetation Monitoring Section 3.3 Surface Water Monitoring Section 5 Reporting and Reviews	Fully Compliant
	(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 Finnis Lithium Project BP33 Groundwater Modelling Report, Final Version 3.0, October 2021, prepared by CloudGMS (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;		GDE Management Plan Section 4 Triggers and Response Actions provides the triggers for management actions to ensure that any loss of GDE vegetation from mine activities is less than 3.6 ha.	Section 4 lists the triggers for the management actions. Section 4.1 Lists the management actions required to mitigate the potential impacts Figure 5 shows the triggers (groundwater levels) and actions required and notification schedule. Section 4 of the Riparian Vegetation Monitoring Plan also provides a TARP that incorporates triggers and responses from the surface water monitoring program in the Water management Plan (WRM 2024) and the GDE Management Plan (as above) quantitative triggers and limits and/or adaptive management actions.	Fully Compliant
	(6) detail how monitoring exceedances and the outcomes of investigative and/or adaptive management actions would be notified to the CEO.		GDE Management Plan Section 4. Figure 5. Trigger Action Response Plan. Section 5. Reporting and Reviews	Section 4 states that trigger points for notifying the administering authority CEO are identified in red within TARP (Figure 5). The figure states when the CEO will be notified but not how.	Partially Compliant

Number	Condition	Phase	Evidence April 2025 Compliance	Comment - April 2025 Compliance	Compliance Score
				Action: Revise 2024 GDE Management Plan and include method for notification of CEO and submit to DLPE Environmental Regulation Division for approval prior to the 2025 monitoring program.	
	(7) be implemented for the life of the action.		2024 GDE Management Plan Riparian Vegetation Monitoring Report - post dry-season 2023 prepared by EcOz in December 2023. Riparian Vegetation Monitoring Report - post dry-season 2024 prepared by EcOz in December 2024.	On-going monitoring is conducted according to the 2024 GDE Management Plan. 2025 monitoring is scheduled for November 2025	Fully Compliant
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.		The 2024 GDE Management Plan is being implemented.	The 2024 GDE Management Plan was submitted to the DLPE for approval on 10 July 2024. No communication from DLPE was received regarding approval. Action: Revise 2024 GDE Management Plan and submit to DLPE Environmental Regulation Division for approval prior to the 2025 monitoring program.	Non-Compliant
6-4	The approval 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.		Riparian Vegetation Monitoring Report - post dry-season 2024 prepared by EcOz in December 2024.	No notification required. Results of the post-dry season 2024 vegetation monitoring (EcOz 2024) stated that there was negligible change in riparian vegetation health based on the 2023 post dry-season survey compared to the 2022 baseline survey using the Before After /Control Impact (BACI) analysis approach. The riparian study boundary was consistent with the 2022 baseline survey results; 2.5 km long and 150 m wide, with an area of 5 ha.	Fully Compliant
7.	Commencement of action		NA	Substantial disturbance commenced at BP33 on 28 July 2023 and ceased on 18 December 2023. The site went into Care and Maintenance in May 2024.	Fully Compliant
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.				
7-2	Within 10 business days of the commencement of the substantial disturbance the approval holder must provide notification in writing to the CEO.		Record of delivery of email and letter 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
8	Change of contact details		NA	No notification required	Not Applicable / Administrative
8-1	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.				
9	Submission of documents		Electronic form submission via email from Lithium Developments to environmentalregulation@nt.gov.au .	Not all documentation has been submitted to the DLPE Environmental Regulation Division, some documents have been submitted to the Mining Division. Action: Ensure that all information relating to the Approval Conditions are sent to the DLPE Environmental Regulation Division.	Partially Compliant
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 environmentalregulation@nt.gov.au .				
10	Compliance reporting	Construction			Partially Compliant

Number	Condition	Phase	Evidence April 2025 Compliance	Comment - April 2025 Compliance	Compliance Score
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		The 2024 Compliance Report was not prepared by an approved suitably qualified person: Compliance Report submitted March 2024 (EcOz 2024) Compiled by C. Jones.	Compliance Report submitted March 2024 (EcOz 2024) Compiled by C. Jones. Submission timing was compliant. Action: 2025 CAR to be completed by approved independent qualified person.	
	(2) obtain further such reports at regular intervals not exceeding 12 months from the report referred to in condition 10- 1(1); and	On-going	Compliance Report April 2025 compiled by an independent qualified person: Dr Jill Woodworth In April 2025 Lithium Developments requested an extension for submission until COB 5 May 2025. This was approved by email on the 10 April 2025.	Approval for the extension of the 2025 CAR received.	Fully Compliant
	(3) submit each report to the CEO within 90 days of its completion.		The 2025 CAR submitted on 5 May 2025 within 90 days of completion	Submission date calculated as 9 June 2025	Full Compliant
10-2	The reports required by conditions 10-1(1) and 10-1(2) must: (1) 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;		2025 Compliance Report	Provided on Page ii of this report	Fully Compliant
	(2) include a statement as to whether the approval holder has complied with the conditions of this approval; and		2025 Compliance Report	Provided on Page 6 of this report	Fully Compliant
	(3) identify all non-compliances and describe corrective and preventative actions taken.		2025 Compliance Report	Included in Section 4 of this report	Fully Compliant
11	Environmental Performance Report	Closure and rehabilitation	NA		Planned Future Activity
11-1	The approval holder must submit an Environmental Performance Report to the CEO on completion of the mine life.				
11-2	The report required by condition 11-1 must be prepared by an independent qualified person		NA		Planned Future Activity
11-3	The Environmental Performance Report must report on impacts of the action on the state of the following environmental values: (1) terrestrial environmental quality; and (2) terrestrial ecosystems; and (3) inland 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.		NA		Planned Future Activity
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 predicted 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.		NA		Planned Future Activity
12	Provision of environmental data	On-going	Export of groundwater (GW) and surface water (SW) database providing latest rounds of sampling.	Lithium Developments hold all groundwater and surface water monitoring data internally on Esdat (an Environmental Data Management System), and can be exported as requested.	Fully Compliant
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.		Surface water monitoring results monthly sampling February 2024 – February 2025 Groundwater monitoring results biannual sampling March 2024 – September 2024		

Number	Condition	Phase	Evidence April 2025 Compliance	Comment - April 2025 Compliance	Compliance Score
				All other environmental data (i.e. Riparian Vegetation data) is stored internally on the Lithium Developments server by the Environmental Team.	
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.		NA. No directions from the CEO.		Not Applicable/Administrative



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