



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Once completed, please submit this form either via email to info-der@dwer.wa.gov.au, or to the below postal address:

Department of Water and Environmental Regulation
Locked Bag 33 Cloisters Square
PERTH WA 6850

Section A – Licence Details

Licence number:	8469/2010/02	Licence file number:	DER2014/001110
Licence holder:	Galaxy Lithium Australia Limited		
Trading as:	Galaxy Lithium Australia Limited		
ACN:	130182099		
Registered address:	Level 4 Kintail Road Applecross WA 6153		
Reporting period:	01 / 09 /2017 to 31 /08 /2018		

Section B – Statement of Compliance with Licence Conditions

Did you comply with all of your licence conditions during the reporting period?
(please tick the appropriate box)

☐ Yes – please complete:

- section C;
- section D if required; and
- sign the declaration in Section F.

☒ No – please complete:

- section C;
- section D if required;
- section E; and
- sign the declaration at Section F.

Section C – Statement of Actual Production

Provide the actual production quantity for this reporting period. Supporting documentation is to be attached.

Prescribed Premises Category	Actual Production Quantity
Category 5 – 50,000t or more per year	1,676,087 dmt

Section D – Statement of Actual Part 2 Waste Discharge Quantity

Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.

Prescribed Premises Category	Actual Part 2 Waste Discharge Quantity
Category 5 – 50,000t or more per year	471,351 dmt (813,590 m3)

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	1.2.3	Date(s) of non-compliance:	12/12/2018
Details of non-compliance:			
A light vehicle fitted with a high frequency reversing alarm was identified in Ravensthorpe townsite in the morning prior to commencing work.			
What was the actual (or suspected) environmental impact of the non-compliance?			
NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No increased risk to site environmental values resulted from the non-compliance			
Cause (or suspected cause) of non-compliance:			
A site wide inspection was completed to identify any non-compliant vehicles, which included an inspection of reversing alarms. The vehicle entered site after the site wide inspection was conducted. Galaxy's contractors did not inform their subcontractors of the site requirement for broad band reversing alarms			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The vehicle that was identified in town was found on site and the contractors were made aware of the noncompliance. An Incident report form was completed, and the vehicle was parked up until it was fitted with a broad band frequency reverse alarm.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	1.2.6	Date(s) of non-compliance:	13/03/2018-14/08/2018
Details of non-compliance:			
<p>300mm free board of the TSF was not maintained. This relates to how the material is deposited at the TSF and was identified during an inspection carried out by DMIRS on the 13 March.</p> <p>The tailings beach is in the form of heaps due to deposition of coarse material. As the deposition point is moved evenly around the perimeter, raised areas are created at the upstream side of the embankment, resulting in a beach formed towards the decant as well as a slight beach sloping back towards the perimeter embankment.</p> <p>Although substantial adequate capacity was maintained in the TSF Decant Pond, DMIRS considered that the tails beaching resulted in non-maintenance of the required free board of 300 mm on the TSF, was non-compliant and required remedial action.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No increased risk to site environmental values resulted from the non-compliance.			
Cause (or suspected cause) of non-compliance:			
The material being deposited on the TSF was a different consistency to the material that was originally deposited onto the TSF. The material is coarser and does not run as a liquid but creates a slight beach that slopes back towards the perimeter embankment, leaving areas with less than 300mm freeboard in the areas beaching occurred.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
GLA commenced work on the 14 August 2018 to remove the top dry heaped layer of the TSF to attain the required freeboard. The material is being stored at the Temporary Tailings Stockpile for reprocessing once the processing plant up grades are complete.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	1.2.8	Date(s) of non-compliance:	July-August 2018
Details of non-compliance:			
It was identified in October 2018 that the number of tyres stored at the Waste Tyre Storage Area was in exceedance of the approved total (25) for the Licence Amendment current at the time. 31 tyres were stored at the Waste Tyre Storage Area awaiting disposal.			
What was the actual (or suspected) environmental impact of the non-compliance?			
NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No increased risk to site environmental values resulted from the non-compliance			
Cause (or suspected cause) of non-compliance:			
A break in communication. License conditions for the storage of tyres was not adequately passed onto the contractors.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
In October 2018 once the exceedance was identified a site notice was distributed via email and at all prestart meetings. Communication to other departments included stipulating the licence conditions around the storage and disposal of used tyres on site. The tyre storage area was cordoned off with a sign erected to ensure proper storage is carried out and that no more than 25 tyres were stored at any one time.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	3.4.1, table 3.8.1	Date(s) of non-compliance:	December 2017 and February 2018
Details of non-compliance:			
Analysis of some elements during the February 2018 sampling round was not completed. These included, Al, Sb, B, Ba, Co, Fe, Mn, Mo, Se, Sn, and V. Reporting Units were reported in mg/L and not µg/L for all elements in the December 2017 and February 2018 sampling round.			
What was the actual (or suspected) environmental impact of the non-compliance?			
NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No increased risk to site environmental values resulted from the non-compliance			
Cause (or suspected cause) of non-compliance:			
Change in personnel completing sampling, new personal did not understand the full license requirements of the water sampling program			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Following discussions with DWER, sample reporting units were changed from µg/L to mg/L in the March 2018 License Amendment. An updated quote has been received from ALS to ensure license reporting conditions are met. No increased risk to site environmental values resulted from the non-compliance.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

Section F – Declaration

I / We declare that the information in this Annual Audit Compliance Report is true and correct and is not false or misleading in a material particular¹.

I / We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.

Signature ² :		Signature:	
Name: (printed)	R. H. TRIVETT	Name: (printed)	
Position:	General Manager	Position:	
Date:	31/10/18	Date:	
Seal (if signing under seal):			

¹ It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular.

² AACRs can only be signed by the licence holder or an authorised person with the legal authority to sign on behalf of the licence holder.