Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence number:	L4328/1989/10	Licence file number:	DER2013/001044-1
Licence holder:	MARBL Lithium Operations Pty Ltd		
Trading as:	MARBL Lithium Operations Pty Ltd		
ACN:	637 077 608		
Registered address:	20 Walters Drive, Osborne Park, WA 6017		
Reporting period:	01/07/2023 **to** 30/06/2024		

Section B – Statement of Compliance with Licence Conditions
Did you comply with all of your licence conditions during the reporting period? (please tick the appropriate box)
☐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: Processing or Beneficiation of metallic or non-metallic ore Assessed capacity – 8,750,000 tonnes	3,488,591 Tonnes
Category 52: Electric Power Generation Assessed capacity – 64 MW gas power station	Average: 16 MW Peak: 25.4 MW
Category 54: Sewage Facility Design capacity – 210 cubic metres per day	34 m^3/day
Category 57: Used tyre storage. Design capacity – 500 tyres	2000 LV/HV Tyres
Category 85B: Water desalination plant Design capacity – 0.82 gigalitres per annual period	0.78 GL
Category 89: Putrescible Landfill Design capacity – 3,650 tonnes per annual period	2,862.24 Tonnes

Section D – Statement of Actual Part 2 Waste Discharge Quantity	
Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.	
Prescribed Premises Category	**Actual Part 2 Waste Discharge Quantity**
Category 5: Processing or Beneficiation of metallic or non-metallic ore	Dry Stack Tailings to EWL: 1,211,233m^3 81.5% Solids @ SG2.7g/cm^3 2,901,509 Tonnes Wet Tailings to TSF3e: 221,852m^3 39.5% Solids @ SG2.7g/cm^3 370,826 Tonnes
Category 85B: Water desalination plant	RO Brine to Cassiterite Pit: 133,793m^3 (0.134 GL) RO Brine diluted for use as dust suppression: 646,207m^3 (0.646 GL)

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:	Condition 3; Table 2 Condition 17	Date(s) of non-compliance:	1 July 2023 to 14 February 2024
Details of non-compliance:			
Condition 3 (Table 2) - Reverse Osmosis (RO) brine to be stored in Fines Bin Tank/ Reject Water Tank/ Mining Tank/ Haulage Tank for ultimate disposal of the diluted RO brine to land via dust suppression within disturbed areas and vegetation avoided. From July 2023 to February 2024 28,192kL of RO brine was discharged to Cassiterite Pit via an overflow pipeline instead of to land via dust suppression.			
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 actual or suspected environmental impact is likely to have occurred as a result of directing RO brine into the Cassiterite Pit. Hydrogeological assessments show the Cassiterite Pit is a groundwater sink and outflows from the pit are unlikely. RO brine water quality results are within the Australian and New Zealand Guidelines (ANZG, 2018) – *Livestock drinking water guidelines*, except Fluoride. Fluoride was reported above the guideline level of 2.0 mg/L 11 times, with concentrations ranging from 1.1 mg/L to 2.8 mg/L between July 2023 and June 2024			
Cause (or suspected cause) of non-compliance:			
The RO brine was redirected to the Cassiterite Pit via an overflow pipeline when RO brine production exceeded the capacity of water that could be utilised for dust suppression activities via the onsite water carts on previously disturbed areas. This was exacerbated further by a reduced capacity to undertake dust suppression activities during rain events.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Actions to increase the capacity to discharge RO Brine produced: • Water cart fleet increased by ~65%. Actions to identify alternative disposal: • Cassiterite Pit - In September 2023, Mineral Resources submitted a LLA for L4328/1989/10, which included the option to dispose of RO reject water into Cassiterite Pit to allow for alternative disposal options onsite. This amendment was approved on 14 February 2024.			
Was this non-compliance previously reported to DWER?			
☒ Yes, and			
☐ Reported to DWER verbally		Date: / /	
☒ Reported to DWER in writing		Date: 30/10/2022	

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:	Condition 3; Table 2	Date(s) of non-compliance:	1 July 2023 – 30 June 2024
Details of non-compliance:			
Condition 3 (Table 2) - The total quantity of used whole tyres stored must not exceed more than 500 tyres at any one time. During the reporting period, the quantity of used whole tyres stores has exceeded the approved quantity of 500 tyres at any one time. As last audited, an estimated 2000 tyres (both light vehicle and heavy vehicle) were stored in the approved used tyre storage areas.			
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 actual or suspected environmental impact has occurred. All tyres are located in approved storage areas on previously disturbed grounds.			
Cause (or suspected cause) of non-compliance:			
A temporary storage area is used prior to disposal to the EWL to allow for multiple tyre disposal cells to be constructed within each lift of the EWL. The number of tyres in the storage areas was not adequately tracked against the development of the EWL to ensure the storage limit was not exceeded.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
• A waste tyre tracking process is being implemented to ensure the storage limit of 500 used tyres is not exceeded. Currently, this consists of weekly drone flights over the tyre bay laydown area, the next stage is to establish an ongoing inventory of used light vehicle tyres. • Subsequently, all light vehicle and light truck tyres were sent offsite for recycling. In total 681 tyres were sent offsite between 18/06/2024 and 27/06/2024. • A total of 38 heavy vehicle tyres were buried in the waste dump as per Condition 3, Table 2 of the Licence. • As the EWL waste dump expands new tyre cells will become available to bury used tyres. • A Licence Amendment Application was submitted to DWER on 3 May 2024, approved 16 September 2024. ○ Increase to the number of waste tyres disposed of to the EWL tyre disposal area from 500 to 950 tonnes per annual period			
Was this non-compliance previously reported to DWER?			
☒ Yes, and			
☐ Reported to DWER verbally		Date: / /	
☒ Reported to DWER in writing		Date: 28/10/2023	

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:	Condition 3, Table 2	Date(s) of non-compliance:	1 July 2023 – 30 June 2024
Details of non-compliance:			
The amount of waste sent to landfill during the reporting period totalled 2,862 tonnes, exceeding the annual throughput limit of 1,650 tonnes. Condition 3, Table 2: *'No more than 1,650 tonnes of waste must be disposed of at the putrescible landfill per annual period.'*			
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.			
There is no actual or suspected material environmental impact of the non-compliance.			
Cause (or suspected cause) of non-compliance:			
The suspected exceedance is most likely attributed to an increased number of personnel on site as a result of mining ramp up and planned construction activities for project expansion.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
A Licence Amendment Application was submitted to DWER on 3 May 2024, approved 16 September 2024. It included the following: • Increase of the waste disposal throughput capacity from 3,650 tonnes to 9,450 tonnes per annual period • Increase to the capacity of waste disposed into the Landfill from 1,650 to 7,000 tonnes per annual period • Increase to the number of waste tyres disposed of to the EWL tyre disposal area from 500 to 950 tonnes per annual period • Removal of Category 89 and inclusion of Category 64			
Was this non-compliance previously reported to DWER?			
No			
☐ Reported to DWER verbally		Date: / /	
☐ 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:	Condition 7	Date(s) of non-compliance:	1 July 2023 – 30 June 2024
Details of non-compliance:			
The Licence holder must ensure that windblown waste is contained within the putrescible landfill area and that windblown waste is returned to the tipping area on at least a monthly basis. During multiple weekly landfill inspections, windblown waste has been identified outside of the designated landfill area. Often this had not been returned to the tipping face before the next inspection.			
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.			
There is no actual or suspected material environmental impact of the non-compliance			
Cause (or suspected cause) of non-compliance:			
In the previous reporting period shade cloth attached to the perimeter fence was damaged during bushfires. The subsequent replacement shade cloth installation has failed, and has torn from the fence during periods of high winds, allowing minor amounts of waste to be blown outside of the approved landfill area.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Windblown waste identified outside of the facility has since been collected and disposed of within the landfill cells. This facility is at end-of-life, with minimal remaining capacity. A new landfill as detailed in the latest approved LAA and Mining Act Mining Proposal is currently under construction, completion is anticipated for Q1 CY2025 . Appropriate fencing is being sourced, using chain-link fencing over the previously installed wire mesh. The chain-link fencing has a smaller aperture compared to the wire-mesh fencing, which will mitigate against waste leaving the landfill site, even under windy conditions. Reinstatement of the shade cloth has been actioned in the MinRes incident management system, INX InControl, as an outcome of environmental inspections at the landfill site.			
Was this non-compliance previously reported to DWER?			
☒ Yes, and			
☐ Reported to DWER verbally		Date: / /	
☒ Reported to DWER in writing		Date: 28/10/2023	

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:	Condition 18	Date(s) of non-compliance:	01/07/2023 – 2/02/2024

Details of non-compliance:

The Licence Holder must ensure that only diluted RO wastewater, as specified in condition 3, is used for dust suppression on pre-disturbed locations throughout the prescribed premises including haul roads, access roads, ROM pads and waste dumps associated with the mine and crushing plant and construction areas.

On 6 October 2023, it was identified that water within Tinstone Pit was being used for dust suppression. A standpipe was used to extract water from Tinstone Pit to supply the mine's fleet of watercarts for dust suppression, understood to have commenced from 18 Oct 2022. The use of water from Tinstone Pit had ceased from 7 Oct 2023, until a fire in the process plant (November 2023) resulted in the loss of RO brine available for dust suppression.

Investigations identified a total of approximately 245 million litres of water sourced from Tinstone Pit had been used for dust suppression between 18 Oct 2022 and 02 Feb 2024 on pre-disturbed locations throughout the prescribed premises including haul roads, ROM pads, mine pits and waste dumps associated with the mine.

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.

Investigations indicate that the environmental risk is low considering the following:

- Areas where dust suppression has occurred are operational in nature, highly modified and generally devoid of vegetation; this limits the ecological values requiring consideration.
- Dust suppression activities are not carried out on topsoil stockpiles or any areas of native vegetation. There is activity on roads and cleared areas adjacent to topsoil, and there could have been some itinerant spray onto the stockpile batters, which would only impact a minor percentage of the entire stockpile.
- Contamination of groundwater would be more likely where there was sustained discharge into a preferential pathway that links to groundwater, which would not have occurred in this instance due to the likely return of localised groundwater towards Cassiterite Pit and due to the spatially broad scale of the discharge via dust suppression.
- There is potential for impact to surface water from off-tenement flow of rainfall runoff that could be impacted by the previous discharge of the acidic Tinstone Pit water and/or subsequent salt precipitation. Due to the highly evaporative nature of the region, net infiltration of the dust suppression water is low.
- Surface precipitates may have formed in the time after discharge, including various aluminium and iron oxides, hydroxides and sulphates. Typical rehabilitation activities include the following for a disturbed and cleared landscape: (a) Reprofiling, (b) Pull-back of windowed topsoil, (c) Surface ripping and (d) Vegetation planting. Activities (a) – (c) will blend the salty precipitates into the surface soils and reduce exposure of the salts to the surface.

Due to the evaporative nature of the region, infiltration into the upper reaches of the EWL, which is the main storage of potentially acid-forming (PAF) waste material, will be limited and the risk of acid mine drainage migration beyond the EWL footprint remains low.

Cause (or suspected cause) of non-compliance:	
During beneficiation plant maintenance shutdowns, there is no production of RO brine for dust suppression. Water was sourced from Tinstone Pit to meet operational water demands, whilst also maintaining the maximum operating pit freeboard relative level. In November 2023 a fire occurred in the process plant, subsequently shutting down the RO plant. During the investigation and during the rebuilding period, RO brine wasn't available for use for dust suppression. At this time the standpipe was yet to be decommissioned.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
From 8 – 11 March 2024, during a planned maintenance shutdown at the beneficiation plant, raw water pipelines were plumbed into the existing Reverse Osmosis (RO) brine tank. This will allow raw water abstracted from the Wodgina borefields under section 5C of the *Rights in Water and Irrigation Act 1914* (GWL154570(20)) to be used for dust suppression during beneficiation plant shutdowns when RO brine is not being produced. 17 March 2024, the standpipe pipe, associated pipelines and pump located at Tinstone Pit were removed to ensure water could not be accessed for the purposes of dust suppression or any other activity.	
Was this non-compliance previously reported to DWER?	
☒ Yes, and	
☐ Reported to DWER verbally	Date: / /
☒ Reported to DWER in writing	Date: 27/10/2023
Reported to DWER under s72 of the Environmental Protection Act 1986.	

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:	Condition 18	Date(s) of non-compliance:	1 July 2023 to 30 June 2024
Details of non-compliance:			
Condition 18 - The Licence Holder must ensure that only diluted RO wastewater, as specified in condition 3, is used for dust suppression on pre-disturbed locations throughout the prescribed premises including haul roads, access roads, ROM pads and waste dumps associated with the mine and crushing plant and construction areas. In the reporting year, water sourced from Wodgina Pit was used for dust suppression. A standpipe was used to extract water from the Wodgina Pit to supply drill rigs and Light Vehicles for dust suppression activities on pre-disturbed ground at locations throughout the prescribed premises. The volume of water sourced from Wodgina Pit for dust suppression is unknown.			
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.			
There is no actual or suspected environmental impact of the non-compliance. Geochemically, the Wodgina Pit does not contain materials capable of generating acid and/or metalliferous drainage, including neutral drainage and saline drainage (as detailed in Mining Proposal REG ID 122942, *Section 4.4.2 – Wodgina Pit*). Water sources into Wodgina Pit include naturally fed groundwater, stormwater run-off, raw water overflow from the break tank, TSF2 and TSF3 seepage water from the recovery bores and direct rainfall. Wodgina Pit was sampled up until December 2023 before the levels fell too low to safely access sample points. The data available from July 2023 to December 2023 showed, on average, a pH of 8.4 and electrical conductivity levels on average of 3,457 µS/cm. Results also showed slightly elevated concentrations of analytes in sulphate and fluoride in comparison to the Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2018 (ANZG2018) – Livestock Drinking Water Guidelines. Due to inaccessibility of Wodgina Pit for direct sampling, water quality was analysed from the haulage tank, which contains a mix of water from the Wodgina Pit and RO brine, to provide an indicative sample for the Wodgina Pit water. From December 2023 to September 2024, a review of monitoring results showed an average water pH of 7.8 and electrical conductivity levels of 3949,4 µS/cm, on average. Notably, sulphate concentrations were slightly higher compared to those recommended by the Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2018 (ANZG 2018), for livestock drinking water.			
Cause (or suspected cause) of non-compliance:			
Access to RO brine for the purposes of dust suppression was only available within active pit areas. This standpipe was established to ensure safe access to water for dust suppression for vehicles/operators outside of the restricted active pit area.			

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
The direct line from Wodgina Pit to the standpipe was disconnected in August 2024. A RO brine line has been plumbed in.	
Was this non-compliance previously reported to DWER?	
☒ Yes, and	
☐ Reported to DWER verbally	Date: / /
☒ Reported to DWER in writing	Date: 30/10/ 2023

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:	Condition 26, Table 11	Date(s) of non-compliance:	February 2024
Details of non-compliance:			
The licence holder must undertake the monitoring specified in Table 11 according to the specifications in that table. The February sample for the Haulage Tank was collected in the beginning of Mar 2024. This sample wasn't analysed as per Table 11 requirements, omitting Silicon, Caesium, Chromium, Cobalt, Thallium, Tin, Tungsten and Bromide.			
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.			
There is no actual or suspected environmental impact of the non-compliance. Subsequent monitoring events for the Haulage Tank did not indicate change or evidence of potential environmental impact from operations.			
Cause (or suspected cause) of non-compliance:			
Human error, the incorrect Chain of Custody form was used during dispatch of the samples from Wodgina Mine Site to the laboratory in Perth.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The incorrect Chain of Custody has been removed from the relevant MinRes system.			
Was this non-compliance previously reported to DWER?			
No			
☐ Reported to DWER verbally		Date: / /	
☐ 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:	Condition 27, Table 12	Date(s) of non-compliance:	August 2023 – May 2024
Details of non-compliance:			
The licence holder must conduct a groundwater monitoring program in accordance with the requirements specified in Table 12 and record the results of all monitoring activity conducted under that program. TSF1 was sampled in September instead of August 2023 TDNE6: • Standing water level for August 2023 was collected at the beginning of September 2023 • No sample was collected in August 2023 as per the quarterly requirement • No sample was collected in May 2024 due to scheduled works at the bore to convert it in production bore. Decant Water: • No sample was collected in August 2023 as per monthly requirement • February 2024 sample was collected in March 2024 TSF3 EXT RB1, TSF3cB, TSF3c: • No sample collected in Q3 and Q4.			
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.			
There is no actual or suspected environmental impact of the non-compliance.			
Cause (or suspected cause) of non-compliance:			
TSF1 falls within a newly demarcated restricted heritage area. Permission is being sought to facilitate ongoing compliance monitoring requirements. TDNE6: • A misinterpretation of the license amendment in July 2023 lead to missed standing water level and sample in August 2023 • The bore was in the process of being converted into a production bore in May 2024. It was partially equipped, and therefore a sample could not be taken TSF3 EXT RB1, TSF3cB, TSF3c monthly standing water levels and water quality samples in Q3 and Q4 were missed due to misinterpretation of the license amendment in February 2024 (Q3) TSF3 EXT MB continued to be monitored throughout the reporting period. This bore was to be replaced by TSF3 EXT RB1 in the February 2024 licence amendment. TSF3 EXT MB has provided water quality and SWL data analogous to what would be expected in TSF3 EXT RB1. It is understood that the Q3 – Q4 data gap (quarterly water quality and SWL) is limited to bores TSF3cB, and TSF3c.			

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
The Wodgina Environmental Monitoring Schedule was audited and updated to reflect the latest updated licence amendment at the time of the incident (14 February 2024).	
Was this non-compliance previously reported to DWER?	
☐ No	
☐ Reported to DWER verbally	Date: / /
☐ 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:	Condition 27, Table 12 Condition 28 Table 13 Condition 27, Table 12	Date(s) of non-compliance:	1 July 2023 to August 2023
Details of non-compliance:			
The licence holder must undertake the monitoring specified in Table 12 according to the specifications in that table EWL23RMB003 and EWL23RMB004 weren't sampled in February 2024 as per the quarterly schedule.			
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.			
There is no actual or suspected environmental impact of the non-compliance			
Cause (or suspected cause) of non-compliance:			
EWL23RMB003 and EWL23RMB004 weren't sampled in February 2024 as per the quarterly schedule due to temporary access limitations during expansion works.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
EWL23RMB003 and EWL23RMB004 Q3 FY23 samples were not collected, sampling resumed as per schedule in Q4. Subsequent samples did not indicate any material changes in groundwater quality.			
Was this non-compliance previously reported to DWER?			
No			
☐ Reported to DWER verbally		Date: / /	
☐ 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:	Condition 10, Table 5	Date(s) of non-compliance:	14 February 2024 to 30 June 2024
Details of non-compliance:			
The Licence Holder must design, construct, and install groundwater monitoring wells in accordance with the requirements specified in Table 5. The following four (4) bores have not been constructed prior to the progressive expansion of the Eastern Waste Landform (EWL) within the timeframe specified in the Licence: EWL5YMB001 EWL5YMB002 EWL5YMB003 EWL5YMB004			
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.			
There is no actual or suspected environmental impact of the non-compliance			
Cause (or suspected cause) of non-compliance:			
Construction of the relevant bores was unable to commence due to the project lacking the necessary secondary approvals, specifically a Native Vegetation Clearing Permit (NVCP).			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
NVCP 10346 was received 29 July 2024. The construction and commissioning of these bores is in process, with completion expected for January 2025.			
Was this non-compliance previously reported to DWER?			
No			
☐ Reported to DWER verbally		Date: / /	
☐ 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 particular[1]. I/We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.		
Signature[2]:	[redacted]	Signature:
Name: (printed		Name: (printed)
Position:		Position:
Date:		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.