

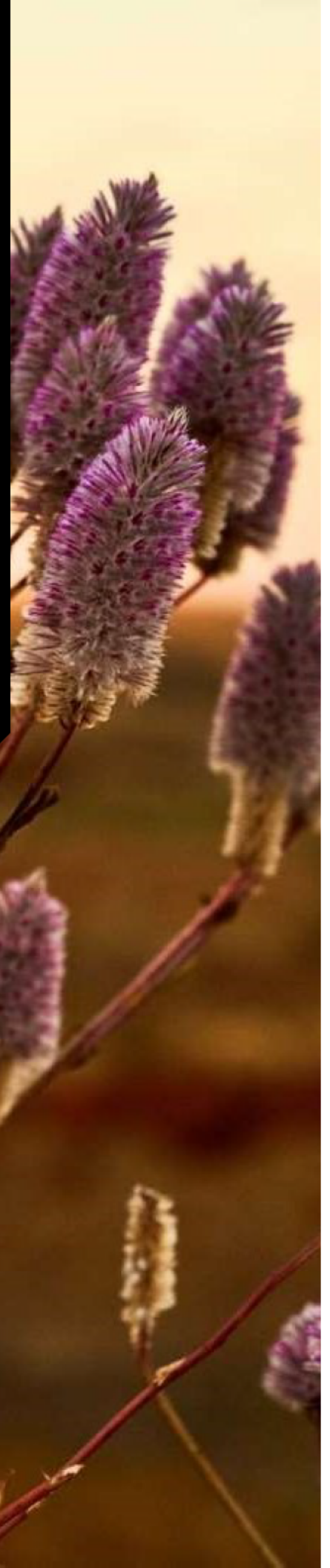


# BALD HILL LITHIUM PROJECT

## ANNUAL ENVIRONMENTAL REPORT 2025-2026

**L8830/2014/2**

28/04/2026 VERSION 0



## DOCUMENT INFORMATION



### **Acknowledgement of Country**

MinRes is committed to reconciliation and recognises and respects the significance of Aboriginal and Torres Strait Islander peoples' communities, cultures, and histories. MinRes acknowledges and respects Aboriginal and Torres Strait Islander peoples as the traditional custodians of the land.

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**Appendices**

**Appendix A** ..... Annual Audit of Compliance Report  
**Appendix B** Groundwater Monitoring Results

# 1. OVERVIEW

The Bald Hill Lithium Project (the **Project**) operates under Prescribed Premise Licence L8830/2014/2 (referred herein as the **Licence**), which is administered by the Department of Water and Environmental Regulation (DWER) under Part V of the *Environmental Protection Act 1986* (EP Act).

The Licence was originally issued to Lithco No.2 (**Lithco**) Pty Ltd on 29 October 2015, with the most recent amendment to the Licence granted on 11 November 2022. On 1 November 2023, Mineral Resources Limited (**MinRes**) acquired the Bald Hill Lithium Project, with Lithco now a wholly owned subsidiary of MinRes.

The Licence currently includes Categories 5 (Processing or beneficiation of metallic or non-metallic ore) and 89 (Putrescible landfill site), which allows for a total production capacity per annum of 1.5 million tonnes and 250 tonnes, respectively.

A location map indicating the Licence Prescribed Premises Boundary is provided in **Figure 1**.

This Annual Environmental Report (AER) addresses Condition 19 of the Licence, which requires the submission of an annual environmental report to the CEO within 28 calendar days after the end of the Annual Period.

This AER submission is for the period **1 April 2025 to 31 March 2026** (referred herein as the **Annual Period**), with a summary of the Conditions addressed provided in **Table 1**.

The Project remained in Care and Maintenance (C&M) for the entire Annual Period, with no mining or processing activities occurring.

**Table 1: L8830 Environmental Reporting Requirements**

Condition	Requirement	AER Reference
-	Summary of any failure or malfunction of any pollution control equipment and any environmental incidents that have occurred during the annual period and any action taken.	Section 8
-	Actual annual production rates for Category 5 and Category 89	Section 2
Condition 7	A summary of all monthly water balances over operational TSFs	Section 3
Condition 14 (Table 6)	Process monitoring: volumes of tailings deposited into the TSF; volumes of water recovered from the TSF. Boron, barium, fluoride, lithium, manganese, nickel, thallium, thorium, tin, and uranium in tailings.	Section 4
Condition 15 (Table 7)	Static dust deposition: Total Suspended Particulate (TSP), Low volume dust sampling – TSP, PM <sub>10</sub> , gross alpha activity	Section 5
Condition 15 (Table 8)	Groundwater monitoring: Total Dissolved Solids (TDS); Al, Ba, Ca, Cr, Co, Cu, F, Pb, Li, Mn, Hg, Mo, Ni, P, Se, Ta, Tl, Th, Se, U, Va, Zn, 226-Ra, 228-Ra, gross-a, gross-b.	Section 6 Appendix B
	Limit exceedances (SWL)	Section 6.1.1
Condition 17	Compliance (Annual Audit Compliance Report (AACR))	Appendix A
Condition 18	Complaints summary	Section 7
Condition 20	Provide (a) any relevant process, production or operational data required by the Conditions and (b) an assessment of the information contained within the report against previous monitoring results and Licence limits.	Section 2 - 6

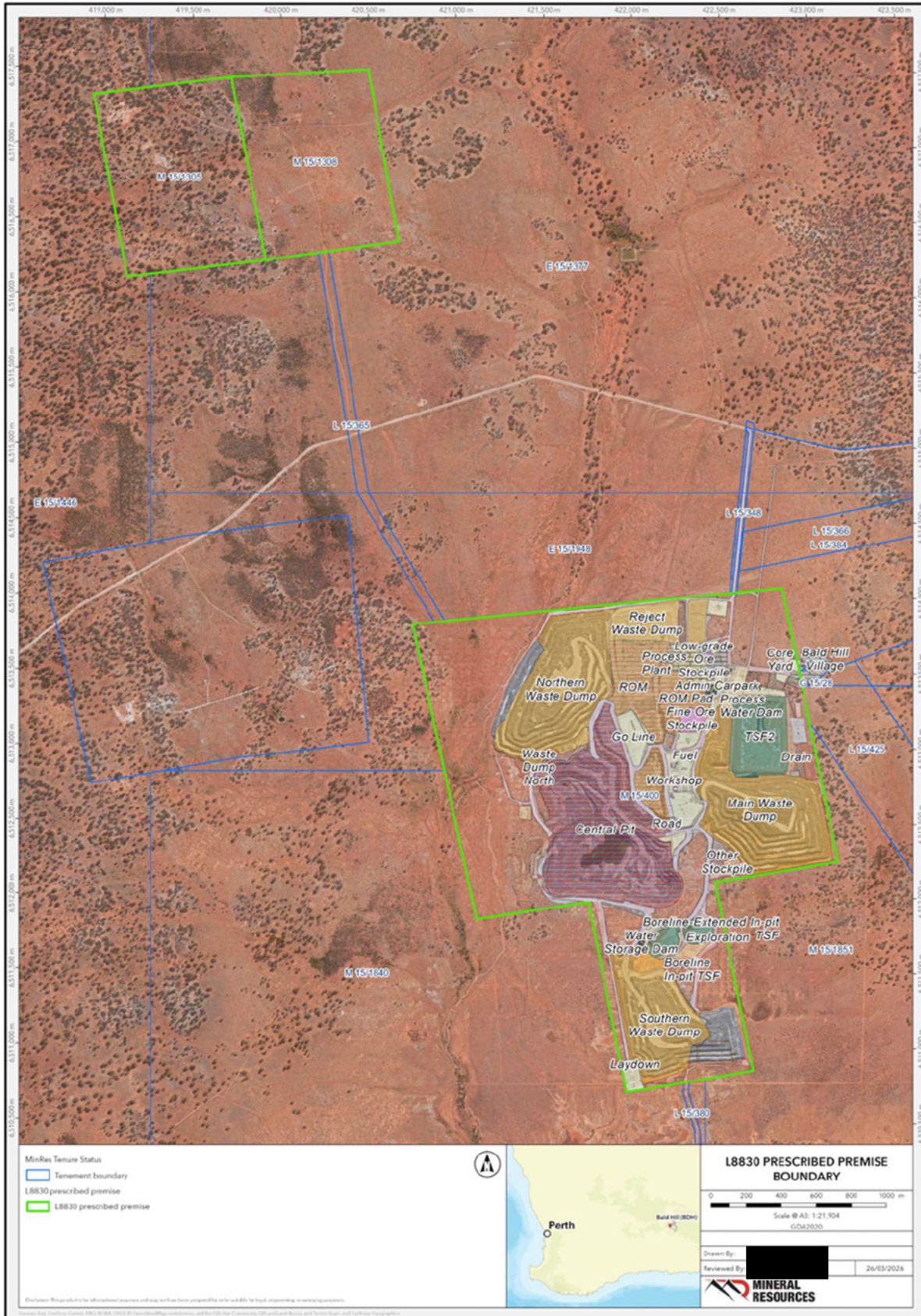


Figure 1: Bald Hill Monitoring Site Location Map

## 2. LICENCE CATEGORY PRODUCTION RATES

A summary of annual production rates for the Licence Categories for the Annual Period and the previous 2024-2025 period is provided in **Table 2**. As indicated in **Section 1**, the Project remained in C&M for the duration of the Annual Period.

Putrescible waste has been estimated utilising the total persons on site at an assumed rate of 1.25 tonnes per person per annum, which the National Waste Report 2024 lists for commercial, industrial, and secondary production, such as mining and minerals processing (Blue Environment Pty Ltd, 2025).

**Table 2: Annual Period Category Production Rates**

Category ID	Description	Approved Capacity	Annual Period		
			2024-2025	2025-2026	Variation
5	Processing or beneficiation of metallic or non-metallic ore	1.5 million tonnes/ annum	869,707	0.00	-869,707
89	Putrescible landfill site	250 tonnes/ annum	147	7.5	-139.5

### 3. TSF2 WATER BALANCE

Condition 7 of the Licence requires a summary of the monthly water balance for all operational<sup>1</sup> TSFs during an Annual Period. As indicated in **Section 1**, the Project remained in C&M during the Annual Period, with TSF2 non-operational.

Upon recommencement of operations, a monthly water balance will be tracked detailing the volume of tailings deposited to TSF2, decant water and seepage recovered, and seepage lost from the facility.

During the Annual period, a review of TSF2 seepage recovery data was completed. The review concluded that the facility's current seepage recovery bore's (TSF2MB04) performance was sub-optimal based on previously recorded recovery volumes. Consequently, MinRes propose improvements to TSF2 seepage recovery infrastructure, with further information provided in **Section 6.2.1**.

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<sup>1</sup> Operational TSF – defined as when a TSF actively receives tailings (waste) material generated by a processing plant.

## 4. PROCESS MONITORING

Condition 14 (Table 6) of the Licence requires a summary of process monitoring parameters over an Annual Period. As indicated in **Section 1**, the Project remained in C&M during the entire Annual period, with TSF2 non-operational.

As indicated in **Section 3**, a review of TSF2 seepage data has been completed, with proposed improvements to the TSF2 seepage recovery infrastructure described further in Section 6.2.1.

## 5. AMBIENT AIR QUALITY MONITORING

Condition 15 (Table 7) of the Licence requires a summary of results for the Project's four (4) dust deposition gauge (DDG) monitoring sites over an Annual Period. A summary of results for the Annual Period and the previous 2024-2025 period is provided in Section 5.1, below.

A location map for the Project's ambient air quality monitoring sites is shown in **Figure 2**.



Figure 2: Dust Deposition Gauge Monitoring Site Location Map

## 5.1 ANALYSIS OF RESULTS

### 5.1.1 Sampling Frequency

Condition 15 (Table 7) of the Licence requires the four (4) DDG monitoring sites to be sampled monthly over the Annual Period. As shown in **Table 3**, the overall sample frequency rate for the Annual Period (75%) improved when compared to the previous 2024-2025 period (71%).

**Table 3: DDG Sampling Completion Summary**

ID	Frequency	Samples Required (#)	Samples Collected (#)		Completion Rate (%)	
			2024-2025	2025-2026	2024-2025	2025-2026
SDM1	Monthly	12	9	9	75	75
SDM2			9	9	75	75
SDM3			7	9	58	75
SDM4			9	9	75	75
<b>Total</b>			<b>34</b>	<b>36</b>	<b>71%</b>	<b>75%</b>

#### 5.1.1.1 Non-compliance

Monthly sampling events for April 2025 to July 2025 were not collected due to logistical issues experienced during the C&M period, which resulted in replacement DDG bottles not being installed (reported in **Appendix A - Annual Audit of Compliance Report**).

Due to logistical challenges with the Project being in Care and Maintenance, a delivery of sample bottles scheduled for February 2025 was delayed until July 2025, ergo dust deposition gauge bottles were unable to be changed out between March and June 2025.

To ensure that there remained a continuity of monitoring, the bottles deployed in February 2025 remained *in situ* until July 2025, and resulting data was adjusted accordingly to determine the g/m<sup>2</sup>/month particulate levels.

As the bottles continued to collect samples during this period, it can be confirmed that the DDG results (Insoluble Solids) remained at extremely low concentrations during the Annual Period; the maximum Insoluble Solids concentration recorded was 2.40 g/m<sup>2</sup>/month at SDM2 in February 2026, with the average remaining below 4.0 g/m<sup>2</sup>/month for all DDGs.

The overall sampling frequency rate was 75% for the Annual Period and monthly DDG analysis, resumed in July 2025.

Surplus replacement DDG sample bottles are now stored on site to ensure 100% sampling frequency is achieved.

No environmental impact resulted from this non-compliance. Results are presented in **Section 5.1.1.1**.

### 5.1.2 Insoluble Solids Concentrations

Condition 15, Table 7 of the Licence requires monthly monitoring of total suspended particulates at the four (4) DDG monitoring sites over an Annual Period.

For the purpose of this AER, Insoluble Solids (g/m<sup>2</sup>/month) have been used as the measure for this Condition, as the Licence requires the use of static dust deposition gauges, and the Method of Reference (AS/NZS 3580.10.1) describes the methodology for the sampling of particulate matter

that is deposited from the atmosphere (hence, Soluble Matter concentrations for each monitoring site have not been provided).

Notable observations include:

- The maximum Insoluble Solids concentration recorded for the Annual Period was 2.40 g/m<sup>2</sup>/month at SDM2 in February 2026. SDM2 also recorded the second highest's concentration of 2.20 g/m<sup>2</sup>/month in August 2025 (Table 4 / Figure 3).
  - The dominant wind direction in the Eastern Goldfields region during the summer months (December – February) are typically from the East to South-east, indicating background (non-operational) sources as likely contributors to concentrations recorded at SDM2.
- The average monthly Insoluble Solids concentration for the Annual Period ranged from 0.34 g/m<sup>2</sup>/month (SDM4) to 1.18 g/m<sup>2</sup>/month (SDM2) (Table 4).
- All monthly Insoluble Solids concentration results for the Annual Period were below 4.0 g/m<sup>2</sup>/month (Table 4 / Figure 3)<sup>2</sup>.
  - During the previous 2024-2025 period, a total of three (3) events occurred where Insoluble Solids concentrations exceeded 4.0 g/m<sup>2</sup>/month, namely: SDM3 (5.50 g/m<sup>2</sup>/month - June 2024); SDM2 (5.7 g/m<sup>2</sup>/month – September 2024); SDM4 (6.80 g/m<sup>2</sup>/month – September 2024) (Table 4 / Figure 3).
  - Although Insoluble Solids concentrations in the previous 2024-2025 period were slightly elevated compared to the 2025-2026 Annual Period, the average monthly concentration remained below the trigger limit, ranging from 1.16 g/m<sup>2</sup>/month (SDM1) to 2.10 g/m<sup>2</sup>/month (SDM2) (Table 4).

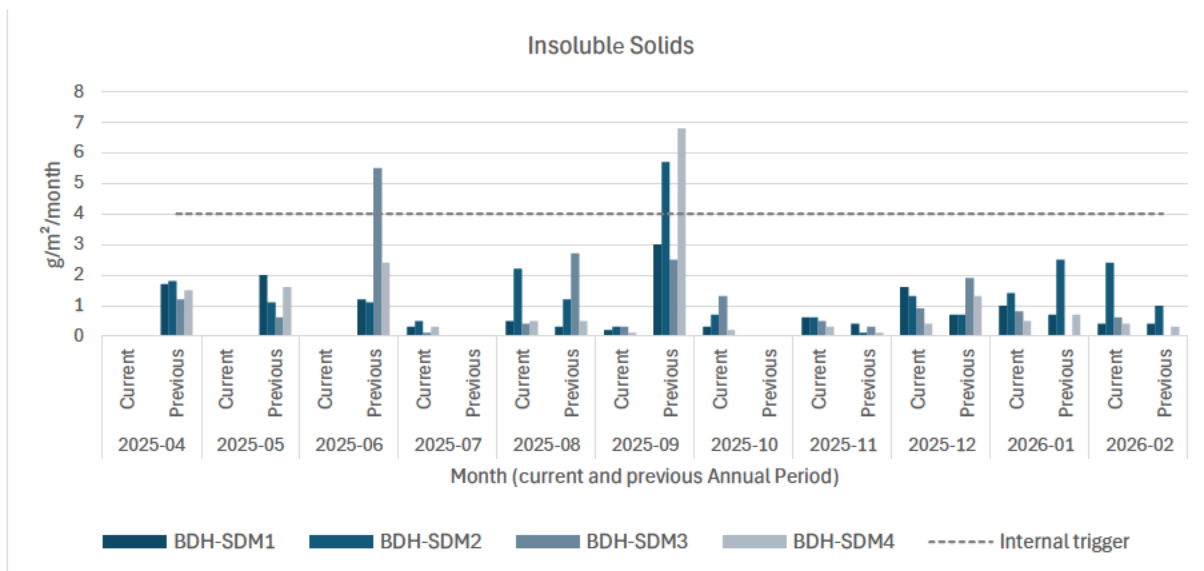


Figure 3: Insoluble Solids DDG results for the current and previous reporting period.

<sup>2</sup> Although no limit has been specified for particulates in the Licence, an internal trigger limit of 4.0 g/m<sup>2</sup>/month is utilised, which is considered the standard operational trigger used to assist in the management of dust impacts.

Table 4: DDG Insoluble Solids Results (April 2024 – March 2026)

Parameters <sup>3</sup>	SDM1		SDM2		SDM3		SDM4	
	2024-2025	2025-2026	2024-2025	2025-2026	2024-2025	2025-2026	2024-2025	2025-2026
April	1.70	- <sup>4</sup>	1.80	- <sup>4</sup>	1.20	- <sup>4</sup>	1.50	- <sup>4</sup>
May	2.00	- <sup>4</sup>	1.10	- <sup>4</sup>	0.60	- <sup>4</sup>	1.60	- <sup>4</sup>
June	1.20	- <sup>4</sup>	1.10	- <sup>4</sup>	<b>5.50</b>	- <sup>4</sup>	2.40	- <sup>4</sup>
July	- <sup>4</sup>	0.30	- <sup>4</sup>	0.50	- <sup>4</sup>	0.10	- <sup>4</sup>	0.30
August	0.30	0.50	1.20	2.20	2.70	0.40	0.50	0.50
September	3.00	0.20	<b>5.70</b>	0.30	2.50	0.30	<b>6.80</b>	0.10
October	- <sup>4</sup>	0.30	- <sup>4</sup>	0.70	- <sup>4</sup>	1.30	- <sup>4</sup>	0.20
November	0.40	0.60	0.10	0.60	0.30	0.50	0.10	0.30
December	0.70	1.60	0.70	1.30	1.90	0.90	1.30	0.40
January	0.70	1.00	2.50	1.40	- <sup>4</sup>	0.80	0.70	0.50
February	0.40	0.40	1.00	2.40	- <sup>4</sup>	0.60	0.30	0.40
March	-	NR <sup>5</sup>	-	NR <sup>5</sup>	-	NR <sup>5</sup>	-	NR <sup>5</sup>
<b>Maximum</b>	3.00	1.60	5.71	2.40	5.51	1.30	6.80	0.50
<b>2<sup>nd</sup> Highest</b>	2.00	1.00	2.50	2.20	2.70	0.90	2.40	0.50
<b>Average</b>	1.16	0.61	1.69	1.18	2.10	0.61	1.69	0.34

<sup>3</sup> All analysis parameters reported as g/m<sup>2</sup>/month.<sup>4</sup> Missed sampling event.<sup>5</sup> Results not received at the time of this AER submission.

## 5.2 MANAGEMENT ACTIONS

Management actions proposed to improve the Project's ambient air quality monitoring program include:

- Ensure consumables for monitoring are audited and adequately stocked (additional DDG bottles have been stored on site to mitigate disruptions in scheduled deliveries).
- Review the location of the DDGs.
- Assess a potential location for a control site to establish background dust levels.

## 6. AMBIENT GROUNDWATER MONITORING

During the Annual period, groundwater monitoring was completed in accordance with Condition 10 and 15 of the Licence. The location of the Project's groundwater monitoring sites is provided in **Figure 4**.

An analysis of groundwater monitoring results, including identified variations to monitoring requirements described in Condition 15 of the Licence for the Annual Period is provided in **Section 6.1**. Monitoring data for the Annual Period is provided in **Appendix B**.

Groundwater laboratory data recorded for the Annual Period has not been compared to the previous 2023-2024 period due to the Project remaining in C&M (i.e. non-operational).

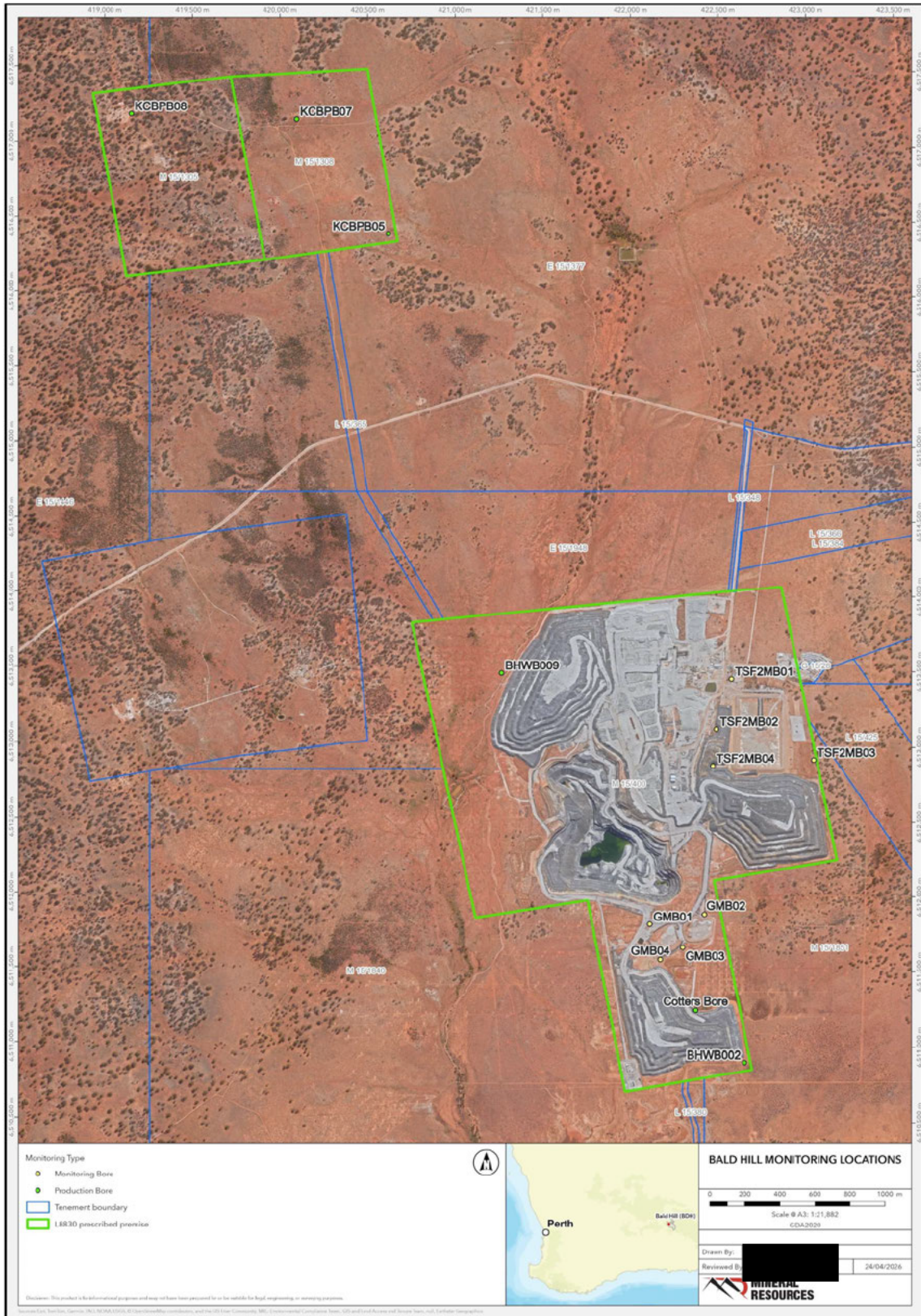


Figure 4: Groundwater Monitoring Site Location Map

## 6.1 ANALYSIS OF RESULTS

### 6.1.1 Standing Water Level

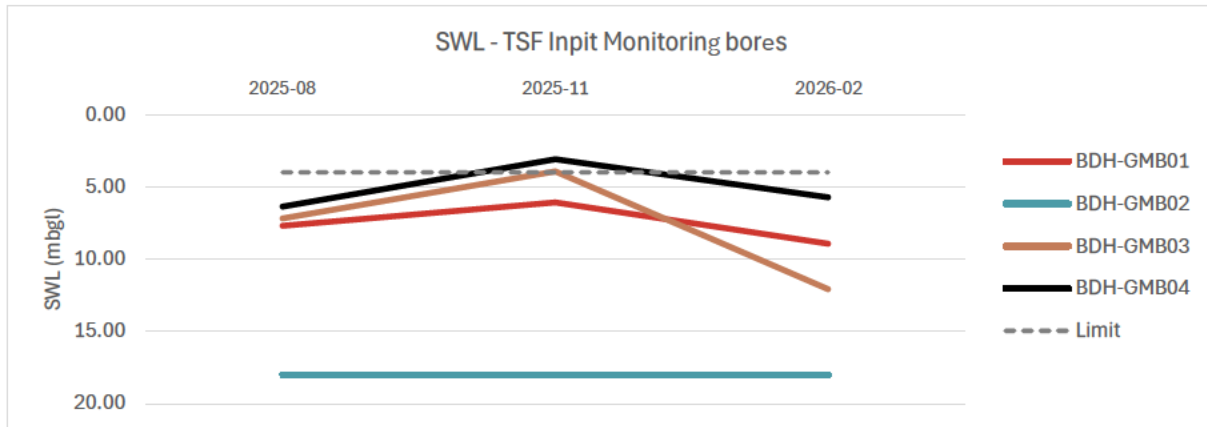
Condition 15 (Table 8) of the Licence requires quarterly Standing Water Levels (SWL) to be measured quarterly, however, **only during operations**.

Notable observations over the Annual Period include:

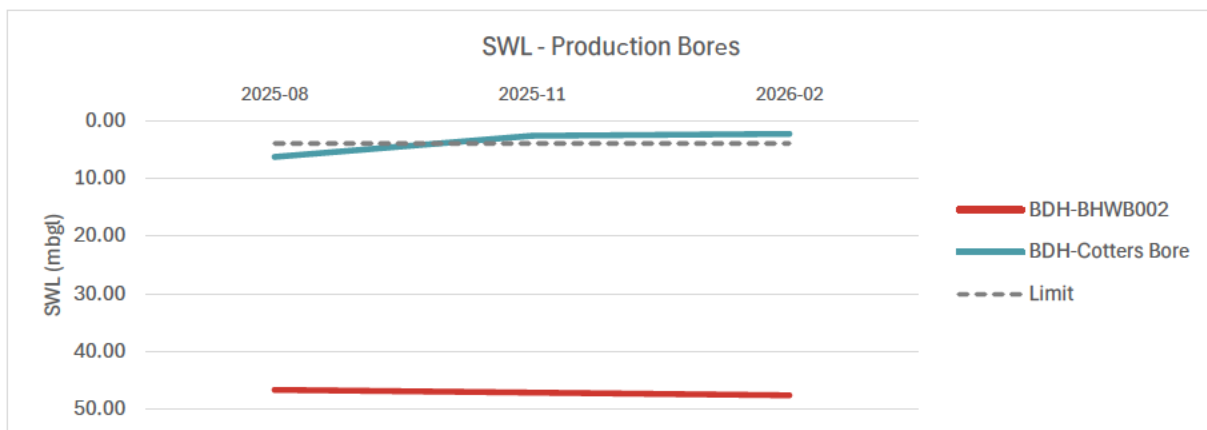
- No quarterly SWL data was recorded for May 2025 due to a broken dipper instrument (**Table 5**).
- A total of four (4) of the nine (9) monitoring sites recorded SWLs above the Licence Limit of 4 mbgl (**Table 5**).
  - GMB03 and GMB04 recorded SWL results above the Licence Limit in November 2025 and February 2026 (**Figure 5**). These monitoring bores are located south of the Boreline and Boreline Extension in-pit TSFs. It is considered that the increase in SWL is related to increased standing water within the nearby Central Pit, with upcoming hydrogeological modelling (RA-450-7450) to inform the Project in terms of cause, impacts and mitigation actions required. Water levels will continue to be monitored and evaluated on a monthly basis.
  - Cotters Bore recorded SWLs above the Licence Limit in November 2025 and February 2026, with this rise attributed to rebound of natural surface levels following a significant decrease in abstraction rates during the C&M period. Water levels will continue to be monitored and evaluated on a monthly basis (**Figure 6**).
  - TSF2MB04 recorded SWL results above the Licence Limit in August 2025 and November 2025 (**Figure 7**). The elevated SWL for TSF2MB04 is attributed partially to its location at the toe of the Main Waste Rock Dump, receiving incidental rainfall from the dump embankment to the bore area. As indicated in Section 3, MinRes propose the relocation of TSF2MB04 due to current location and design constraints, with further details provided in **Section 6.2.1**.
- TSF2MB02 demonstrated a similar trend to TSFMB004 across the reporting period, attributed to close proximity between the two bores, both waste rock dump and TSF (**Figure 7**). TSFMB01 and TSFMB02, located to the west of the TSF, recorded more stable SWLs during the reporting period.
- GMB02 (located at the Boreline TSF) remained dry (18.01 mbgl) for the duration of the Annual Period (**Figure 5**).

**Table 5: Ambient Groundwater Monitoring – SWL**

Bore	May 2025	Aug 2025	Nov 2025	Feb 2026	Min
	SWL (mbgl)				
BHWB002	- <sup>6</sup>	46.63	- <sup>7</sup>	45.10	45.10
Cotters Bore	- <sup>6</sup>	6.30	<b>2.70</b>	<b>2.34</b>	2.34
GMB01	- <sup>6</sup>	7.70	6.10	6.13	6.10
GMB02	- <sup>6</sup>	18.01 <sup>8</sup>	18.01 <sup>8</sup>	18.01 <sup>8</sup>	18.01
GMB03	- <sup>6</sup>	7.19	<b>3.93</b>	<b>3.77</b>	3.77
GMB04	- <sup>6</sup>	6.37	<b>3.09</b>	<b>2.97</b>	2.97
TSF2MB01	- <sup>6</sup>	13.69	15.64	16.40	13.69
TSF2MB02	- <sup>6</sup>	6.08	8.16	9.07	6.08
TSF2MB03	- <sup>6</sup>	20.68	20.21	20.31	20.21
TSF2MB04	- <sup>6</sup>	<b>3.17</b>	<b>3.99</b>	4.96	3.17



**Figure 5: Standing Water Levels – InPit Monitoring Bores**



**Figure 6: Standing Water Levels – Production Bores**

<sup>6</sup> Water dipper broken.

<sup>7</sup> No dip tube. Bore not used for 6 months.

<sup>8</sup> Dry.

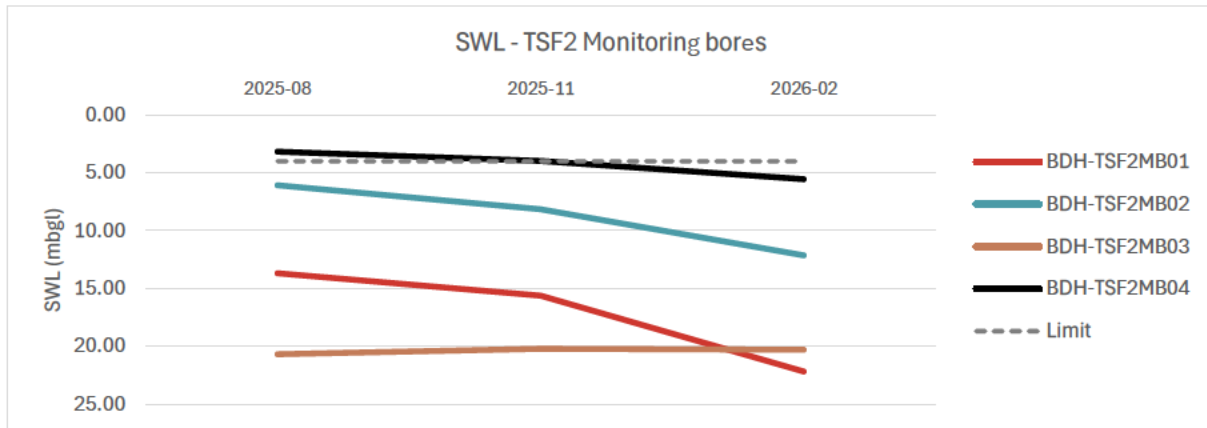


Figure 7: Standing Water Levels – TSF2 Monitoring Bores

### 6.1.2 Field Water Quality Results

Condition 15, Table 8 of the Licence requires quarterly field pH to be undertaken during operations. As previously noted in **Section 1**, the Project remained in C&M during this Annual Period.

Notable observations include:

- The average pH value for the Project’s monitoring sites ranged from 5.2 (Cotters Bore) to 7.6 (GMB03) indicates the Project water quality to be moderately acidic/ slightly alkaline, which is typical for this region of WA (**Table 6**).
- No pH readings were taken for GMB02 as the bore is dry (refer to **Section 6.1.1**).
- A minimum pH value of 2.2 was recorded at Cotters Bore in May 2025. Based on comparison to other monitoring results from this bore, this result is considered an anomaly potentially resulting from inadequate purging prior to sampling (**Figure 9**).
- A maximum pH value of 8.2 was recorded at GMB03 in November 2025 (**Figure 8**).
- The average pH value for the four (4) TSF2 monitoring bores ranged from 6.2 pH (TSF2MB01) to 7.2 pH (TSF2MB04) (**Figure 10**).

Table 6: Ambient Groundwater Monitoring – pH

Site ID	May-25	Aug-25	Nov-25	Feb-26	Min	Max	Average
	pH units				pH units		
BHWB002	6.3	7.6	<sup>9</sup>	6.7	6.3	7.6	6.9
Cotters Bore	2.2	4.4	7.5	6.8	2.2	7.5	5.2
GMB01	6.7	7.2	7.4	7.7	6.7	7.7	7.3
GMB03	6.9	7.8	8.2	7.5	6.9	8.2	7.6
GMB04	6.5	7.0	7.3	7.4	6.5	7.4	7.0
TSF2MB01	6.6	6.6	6.7	5.1	5.1	6.7	6.2
TSF2MB02	7.3	6.8	7.3	3.8	3.8	7.3	6.3
TSF2MB03	6.3	6.5	6.3	7.9	6.3	7.9	6.7
TSF2MB04	7.0	6.9	6.9	7.8	6.9	7.8	7.2

<sup>9</sup> No dip tube. Bore not used for 6 months.

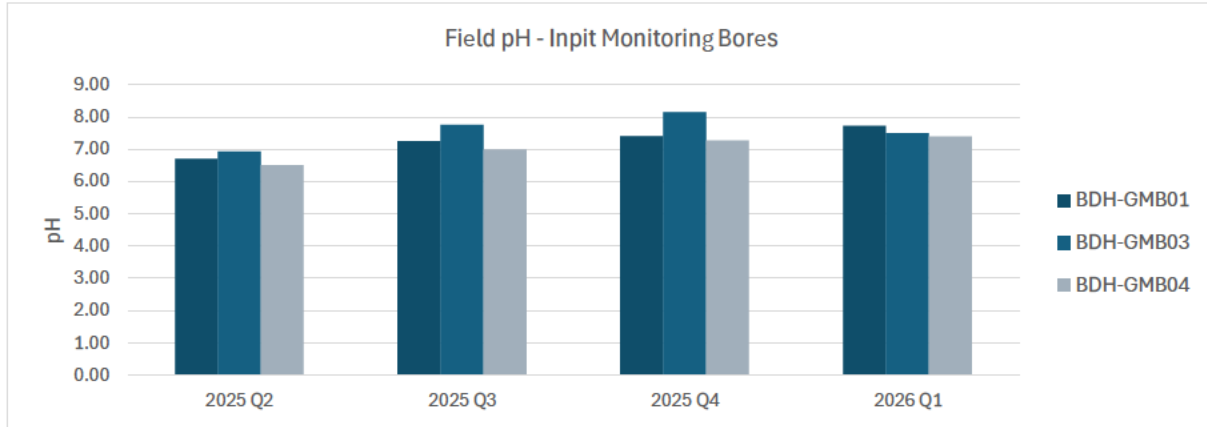


Figure 8: Field Water Quality (pH) – Inpit Monitoring Bores

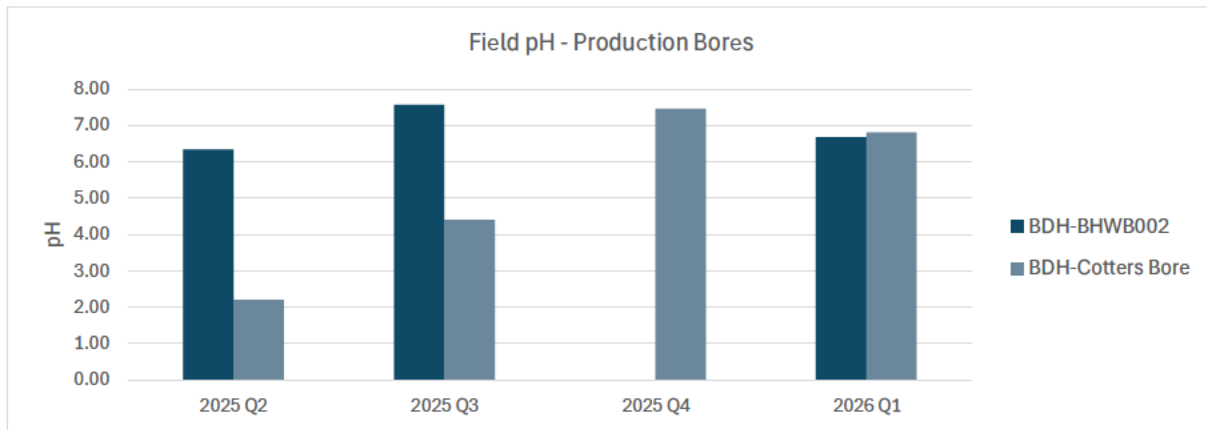


Figure 9: Field Water Quality (pH) – Production Bores

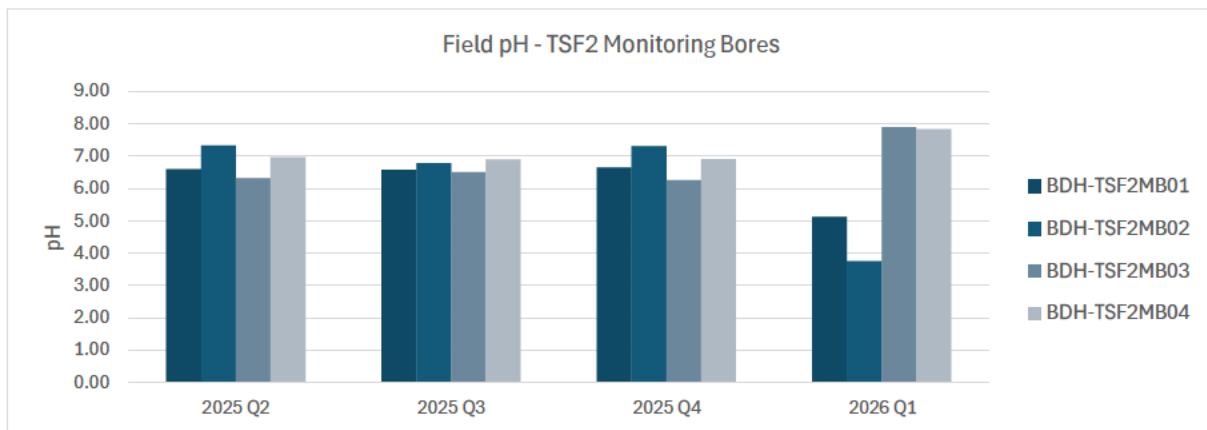


Figure 10: Field Water Quality (pH) – TSF2 Monitoring Bores

### 6.1.3 Laboratory Water Quality Results

Condition 15, Table 8 of the Licence requires quarterly analysis of specific physicochemical parameters via NATA accredited facility as well as biannual analysis for radionuclides, specifically Radium isotopes.

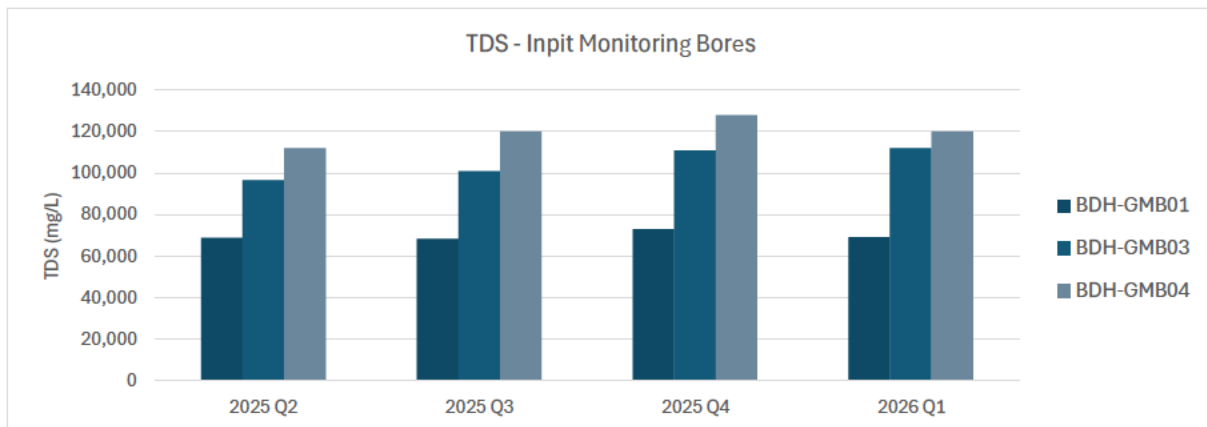
A summary of all groundwater laboratory results is provided in **Appendix B**. All measured parameters remained generally consistent over the Annual Period, with both Total Dissolved Solids and Lithium concentrations typical of the groundwater environment of the Project.

**Total Dissolved Solids (TDS)**

- The average TDS concentration across the monitoring sites ranged from 49,425 mg/L (TSF2MB03) to 189,000 mg/L (BHWB002), indicating groundwater to be hypersaline (**Error! Reference source not found.**).
- TDS concentrations for the Project's three (3) MBs recorded a maximum of 128,000 mg/L (GMB04) and a minimum of 68,400 mg/L over the Annual Period (**Figure 11**).
- TDS concentrations for the Project's two (2) PBs recorded a maximum of 192,000 mg/L (BHWB002) and a minimum of 122,000 mg/L (Cotters Bore) over the Annual Period (**Figure 12**).
- TDS concentrations for the Project's four (4) TSF2 MBs recorded a maximum of 129,000 mg/L (TSF2MB04) and a minimum of 46,200 mg/L (TSF2MB03) over the Annual Period (**Error! Reference source not found.**).

**Table 7: Ambient Groundwater Monitoring – TDS**

Site ID	May-25	Aug-25	Nov-25	Feb-26	Max	Min	Average
	mg/L				mg/L		
BHWB002	185,000	192,000	- <sup>10</sup>	190,000	192,000	185,000	189,000
Cotters Bore	122,000	122,000	124,000	130,000	130,000	122,000	124,500
GMB01	68,900	68,400	73,000	69,200	73,000	68,400	69,875
GMB03	96,700	101,000	111,000	112,000	112,000	96,700	105,175
GMB04	112,000	120,000	128,000	120,000	128,000	112,000	120,000
TSF2MB01	108,000	106,000	108,000	97,700	108,000	97,700	104,925
TSF2MB02	108,000	122,000	127,000	115,000	127,000	108,000	118,000
TSF2MB03	49,800	51,700	50,000	46,200	51,700	46,200	49,425
TSF2MB04	126,000	129,000	119,000	125,000	129,000	119,000	124,750



**Figure 11: Laboratory Water Quality (TDS) – Inpit Monitoring Bores**

<sup>10</sup> No dip tube. Bore not used for 6 months.

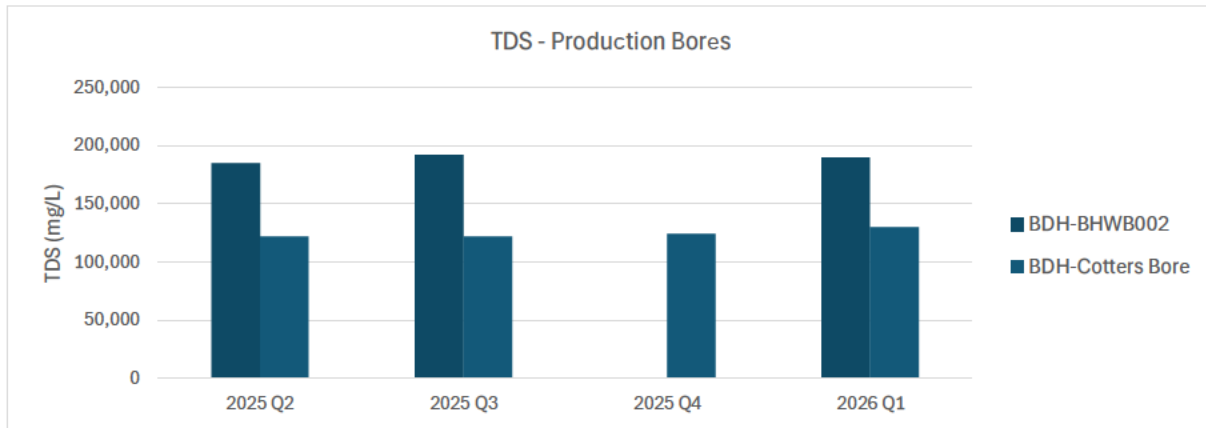


Figure 12: Laboratory Water Quality (TDS) – Production Bores

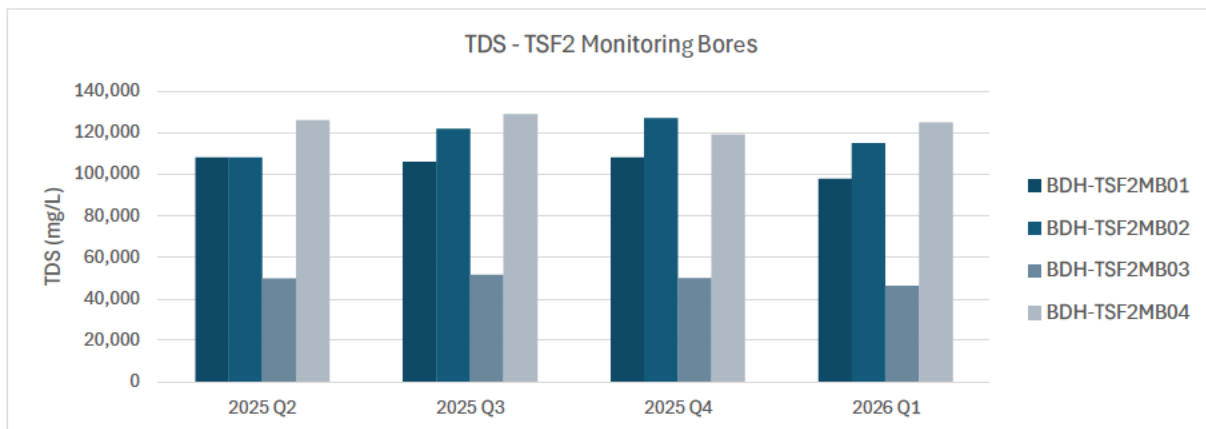


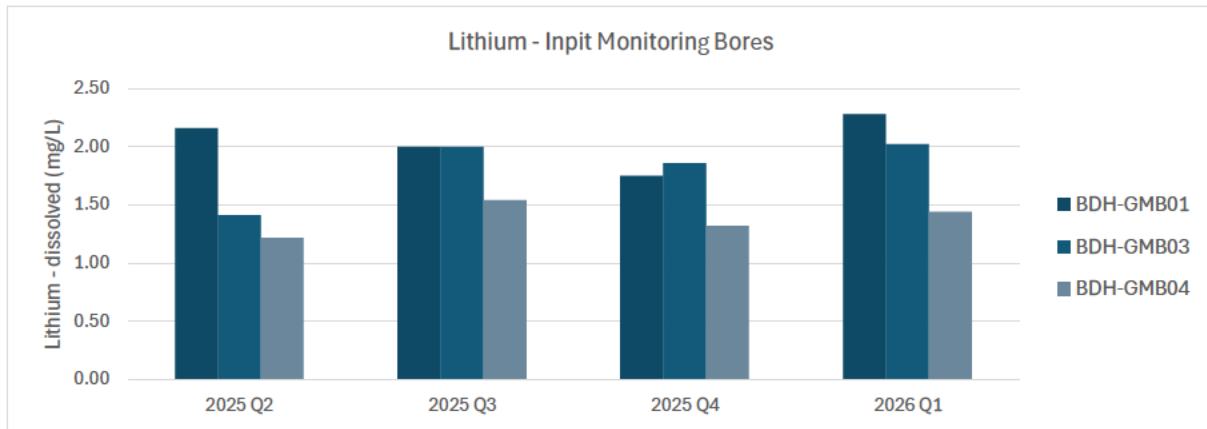
Figure 13: Laboratory Water Quality (TDS) – TSF2 Monitoring Bores

### Lithium (Li)

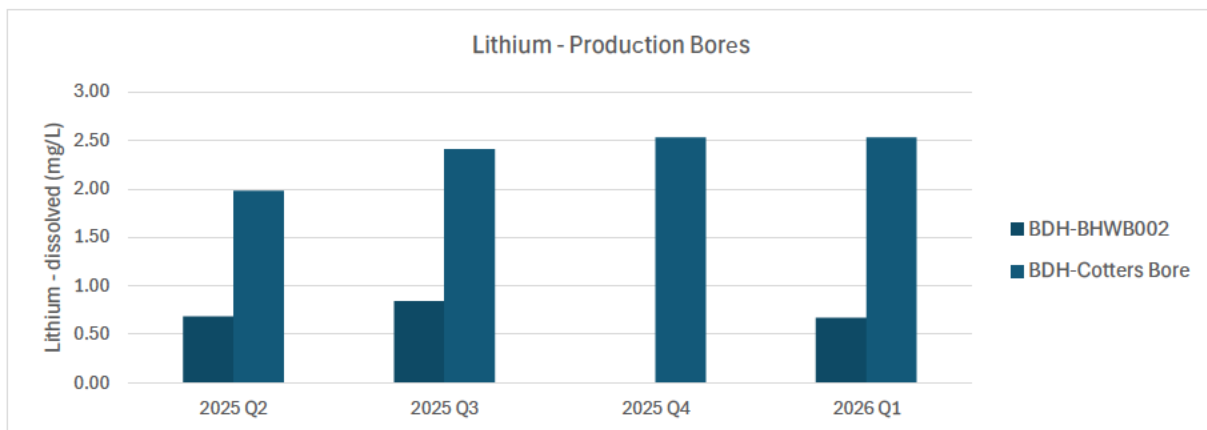
- The average Li concentration across the monitoring sites ranged from 2.40 mg/L (Cotters Bore) to 0.68 mg/L (TSF2MB03) (Table 8).
- Li concentrations for the site's inactive Boreline In-pit TSF monitoring sites ranged from a maximum of 2.28 mg/L (GMB03) to a minimum of 1.22 mg/L (GMB04) (Error! Reference source not found.).
- The Project's two (2) active Production Bores recorded Li concentrations higher than the other monitoring sites, which would suggest some hydrological connectivity with the upgradient Boreline In-pit TSF and Central Pit (Error! Reference source not found.).
- Li concentrations for the TSF2 monitoring bores ranged from a minimum of 0.73 mg/L at TSF2MB03 to a maximum concentration of 1.64 mg/L at TSF2MB02 (Error! Reference source not found.).

**Table 8: Ambient Groundwater Monitoring – Lithium**

Site ID	May-25	Aug-25	Nov-25	Feb-26	Max	Min	Average
	mg/L				mg/L		
BHWP002	0.69	0.84	- <sup>11</sup>	0.67	0.84	0.67	0.76
Cotters Bore	1.98	2.41	2.53	2.53	2.53	1.98	2.40
GMB01	2.16	2.00	1.75	2.28	2.28	1.75	2.09
GMB03	1.41	2.00	1.86	2.02	2.02	1.41	1.86
GMB04	1.22	1.54	1.32	1.44	1.54	1.22	1.41
TSF2MB01	0.83	0.82	0.72	0.73	0.83	0.72	0.79
TSF2MB02	1.26	1.64	1.34	1.42	1.64	1.26	1.46
TSF2MB03	0.67	0.73	0.66	0.60	0.73	0.60	0.68
TSF2MB04	1.43	1.24	1.03	1.16	1.43	1.03	1.26



**Figure 14: Laboratory Water Quality (Li) - Inpit Monitoring Bores**



**Figure 15: Laboratory Water Quality (Li) - Production Bores**

<sup>11</sup> No dip tube. Bore not used for 6 months.

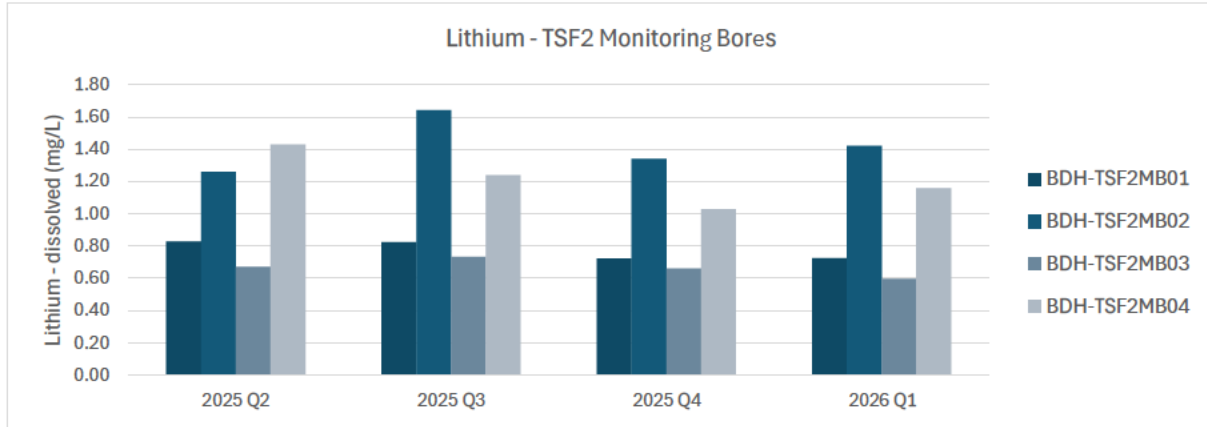


Figure 16: Laboratory Water Quality (Li) – TSF2 Monitoring Bores

**Radiological analytes**

- Results recorded for radium-228, radium-226, Gross-alpha and Gross-beta during the Annual Period generally aligned with the previous reporting period:
  - Levels appeared slightly elevated at Cotters Bore, TSF2MB03 and TSF2MB04 (Table 9, Figure 17, Figure 18); however
  - There is insufficient baseline radiological data for the Bald Hill site to determine if these levels are naturally occurring or otherwise. Sampling of additional isotopes has been scheduled for CY Q2 and CY Q3 to determine the isotopic composition of Gross-alpha and Gross-beta and identify any potential concerns.

Table 9: Ambient Groundwater Monitoring – R-226, R-228, Gross-a and Gross-β

Bore	Gross-a (Bq/L)			Gross Beta (Bq/L)			Radium-226 (Bq/L)			Radium-228 (Bq/L)		
	Aug-25	Nov-25	Feb-26	Aug-25	Nov-25	Feb-26	Aug-25	Nov-25	Feb-26	Aug-25	Nov-25	Feb-26
Cotters Bore	12.40	3.28	-12	21.20	28.40	-12	1.99	4.86	-12	1.62	2.48	-12
TSF2MB03	3.03	0.52	-12	11.70	8.83	-12	0.18	0.16	-12	0.12	0.13	-12
TSF2MB04	4.15	2.10	-12	25.20	38.40	-12	0.95	0.73	-12	1.03	0.82	-12

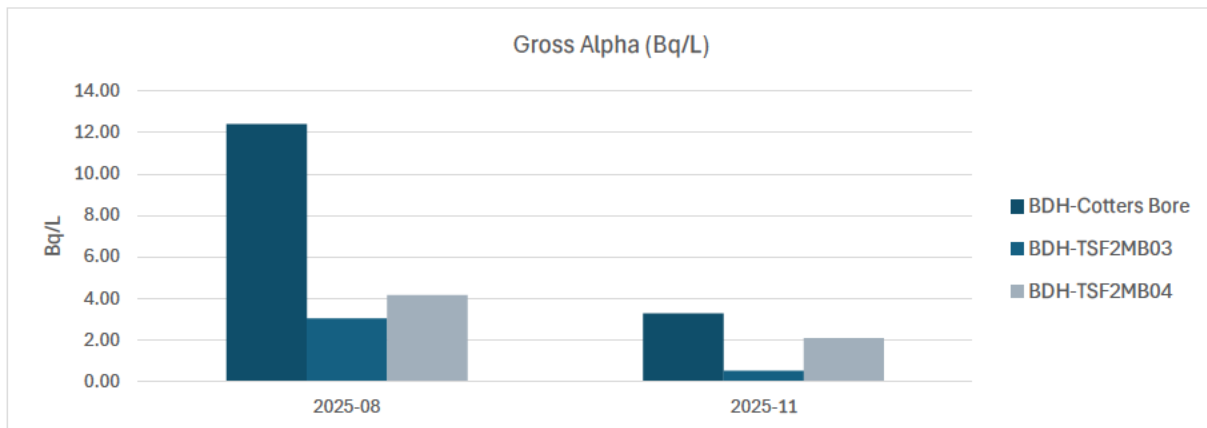


Figure 17: Laboratory Water Quality (Gross-a)

<sup>12</sup> Laboratory results not received at time of reporting.

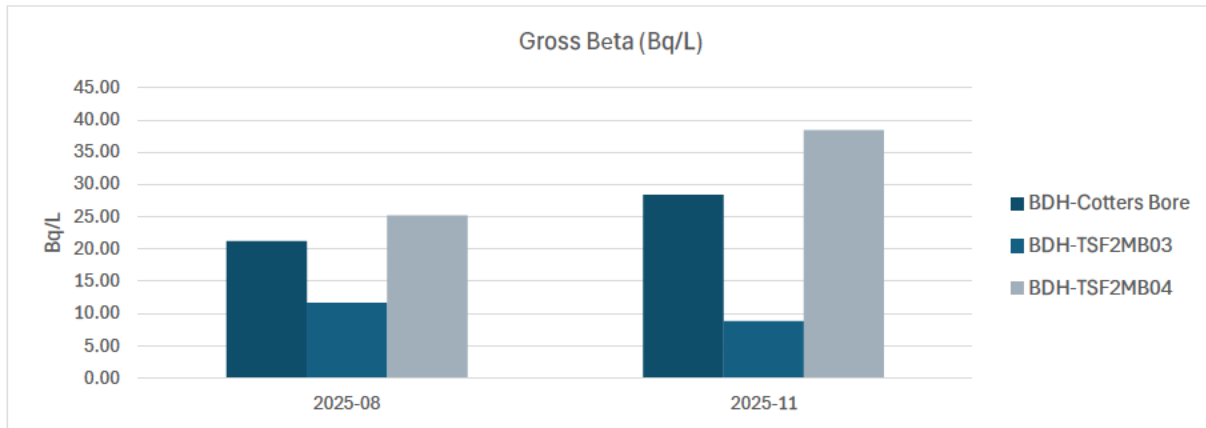


Figure 18: Laboratory Water Quality (Gross-β)

## 6.2 MANAGEMENT ACTIONS

Management actions proposed to improve the Project's groundwater monitoring program include:

- Sampling of additional isotopes at Cotters Bore, TSF2MB03 and TSF2MB04 has been scheduled for CY Q2 and CY Q3 to determine the isotopic composition of Gross-alpha and Gross-beta.
- On recommencement of operations, ensure adequate onsite resourcing is available to achieve 100% sampling frequency, as required under Condition 15, Table 8 of the licence.
- Implement improvements to TSF2 seepage recovery infrastructure, with further information provided in **Section 6.2.1**.

### 6.2.1 TSF2 Seepage Recovery Improvements

Following a review the Project's TSF monitoring network, it was determined that TSF2MB04 was ineffective for seepage recovery, and that a new location was required. Seepage recovery from TSF2MB04 commenced in October 2023, with results indicating limited reduction in seepage induced groundwater mounding and poor pumping performance (<0.5 L/s). It is considered that this poor recovery performance is due in part the bore not being originally designed and constructed for use as recovery point.

Given the above, the following changes have been proposed within the Licence Amendment Request submitted in March 2026:

- TSF2MB04 be replaced with a suitably designed and constructed seepage recovery bore located to the west of its current location, as shown in **Figure 19**.
- Installation of a new groundwater monitoring bore in proximity to the new seepage recovery bore, with an indicative location provided in **Figure 19**.

Installation of the new recovery bore in proximity to TSF2 was not proposed given the facility's footprint is likely to increase with future approved embankment raises.

Monitoring of TSF2MB04 for SWL will continue as per Licence requirements.



Figure 19: Indicative Location Map - TSF2MB04 Replacement Infrastructure

## 7. STAKEHOLDER COMPLAINTS

Condition 18 of the Licence requires a complaints management system to be implemented that as a minimum, records the number and details and responses to complaints received during the Annual Period. To address this Condition, MinRes utilise the Community Complaints Management Procedure (the **Procedure**) to ensure that any feedback or complaint raised by a community member or other affected stakeholder of a MinRes Project is managed consistently and in accordance with relevant MinRes policies and procedures and legislative and reporting requirements.

The Procedure allows MinRes to:

- Facilitate early resolution of grievances.
- Provide an open and responsive grievance management process.
- Enable the Community Engagement team to resolve grievances in a consistent, timely and effective manner.
- Avoid issues escalating.
- Identify risks and trends to inform strategies or work plans and identify improvement opportunities.
- Meet compliance requirements.

All complaints and feedback can be lodged to the Communities and Stakeholder Engagement team through the following means:

- Email: [communities@mrl.com.au](mailto:communities@mrl.com.au)
- Phone: Manager Communities and Stakeholder Engagement 0427 395 522
- Phone: Principal Community Engagement 0456 692 989
- Online [Community Feedback Online Form](#).

**During the Annual Period, the project received zero community and/ or other stakeholder complaints.**

## 8. COMPLIANCE SUMMARY

### 8.1 ENVIRONMENTAL INCIDENTS

Condition 19, Table 9 of the Licence requires a summary of Limit exceedances and/ or incidents involving a failure or malfunction of pollution control equipment that has occurred during the Annual Period.

During the Annual Period, the following incidents were recorded:

- Nil Reportable environmental incidents.
- Nil Limit (SWL) exceedances (Project remained in C&M and was non-operational).
- Nil failure of pollution control equipment.

### 8.2 ANNUAL AUDIT COMPLIANCE REPORT

In accordance with Condition 17 of the Licence, an Annual Audit Compliance Report (AACR) detailing the Project's compliance status against the respective conditions of the Licence is provided in **Appendix A**.

One non-compliance was identified for the Annual Period against Condition 15 and is included in the Annual Audit Compliance Report. This relates to missed monthly dust deposition sampling from April-June 2025 (detailed in **Section 5.1.1.1**) with further details set out below.

Table 7, Condition 15 of the Licence stipulates ambient air quality is to be monitored monthly.

Due to logistical challenges with the Project being in Care and Maintenance, a delivery of sample bottles scheduled for February 2025 was delayed until July 2025, ergo dust deposition gauge bottles were unable to be changed out between March and June 2025.

To ensure that there remained a continuity of monitoring, the bottles deployed in February 2025 remained *in situ* until July 2025, and resulting data was adjusted accordingly to determine the g/m<sup>2</sup>/month particulate levels.

As the bottles continued to collect samples during this period, it can be confirmed that the DDG results (Insoluble Solids) remained at extremely low concentrations during the Annual Period; the maximum Insoluble Solids concentration recorded was 2.40 g/m<sup>2</sup>/month at SDM2 in February 2026, with the average remaining below 4.0 g/m<sup>2</sup>/month for all DDGs.

The overall sampling frequency rate was 75% for the Annual Period and monthly DDG analysis, resumed in July 2025.

Surplus replacement DDG sample bottles are now stored on site to ensure 100% sampling frequency is achieved.

# **APPENDIX A** ANNUAL AUDIT OF COMPLIANCE REPORT

## Annual Audit Compliance Report Form

*Environmental Protection Act 1986, Part V*

Section A – Licence Details			
Licence number:	L8830/2014/2	Licence file number:	DER2014/001293-2
Licence holder:	Lithco No.2 Pty Ltd		
Trading as:	Lithco No.2		
ACN:	612 726 922		
Registered address:	20 Walters Drive OSBORNE PARK WA 6017		
Reporting period:	01/04/2025 to 30/03/2026		

Section B – Statement of Compliance with Licence Conditions
Did you comply with all of your licence conditions during the reporting period? (please tick the appropriate box)
<input type="checkbox"/> Yes – please complete: <ul style="list-style-type: none"> <li>• section C;</li> <li>• section D if required; and</li> <li>• sign the declaration in Section F.</li> </ul>
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none"> <li>• section C;</li> <li>• section D if required;</li> <li>• section E; and</li> <li>• sign the declaration at Section F.</li> </ul>

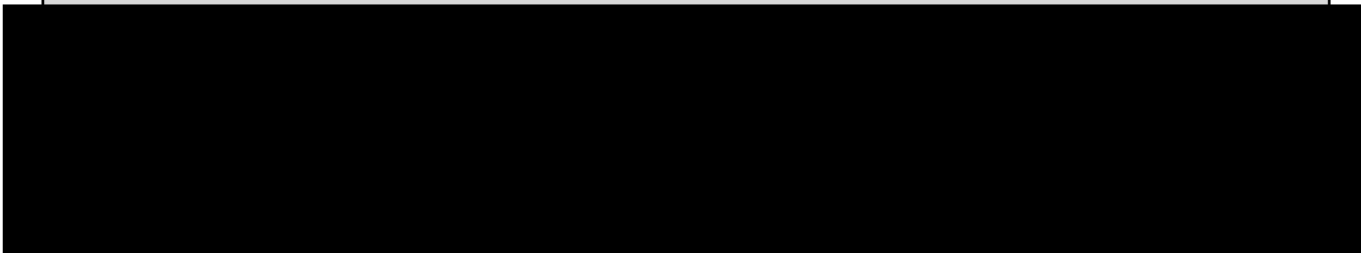
Section C – Statement of Actual Production	
Provide the actual production quantity for this reporting period. Supporting documentation is to be attached.	
Prescribed Premises Category	Actual Production Quantity
Category 5: Processing or beneficiation of metallic or non-metallic ore	Nil wet metric tonnes

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 89: Putrescible landfill site	7.5 tonnes

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	15 (Table 7)	Date(s) of non-compliance:	01/04/25 – 15/07/2025
Details of non-compliance:			
Ambient air quality was not monitored on a monthly basis from April to July 2025.			
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
Nil environmental impact associated with the non-compliance:			
<ul style="list-style-type: none"> <li>• DDG results (Insoluble Solids) demonstrate extremely low concentrations recorded at the four (4) monitoring sites.</li> <li>• The maximum Insoluble Solids concentration recorded for the Annual Period was 2.40 g/m<sup>2</sup>/month at SDM2 in February 2026.</li> <li>• All monthly Insoluble Solids concentration results for the Annual Period were below 4.0 g/m<sup>2</sup>/month, considered the standard operational trigger used to assist in the management of dust impacts.</li> </ul>			
Cause (or suspected cause) of non-compliance:			
Dust Deposition Gauge (DDG) sample bottles unavailable.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<ul style="list-style-type: none"> <li>• The overall sampling frequency rate was 75% for the Annual Period and monthly DDG analysis resumed in July 2025.</li> <li>• Surplus replacement DDG sample bottles are now stored on site to ensure 100% sampling frequency is achieved.</li> </ul>			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> No <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 particular<sup>1</sup>. I/We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.



Date:		Date:	
Seal (if signing under seal):			

<sup>1</sup> 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.

<sup>2</sup> 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.

# **APPENDIX B** GROUNDWATER MONITORING RESULTS

## B-1 GROUNDWATER QUALITY RESULTS – MAJOR IONS, METALS & METALLOIDS

Site ID	Date	TDS	Al	Ba	B	Cd	Cr	Co	Cu	F	Pb	Li	Mn	Hg	Mo	Ni	P <sup>1</sup>	Se	Ta	Tl	Th	Sn	U	V	Zn
		mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
TSF2MB01	14/05/2025	108000	<0.10	0.102	5.87	0.0233	<0.010	<0.010	0.017	2.00	<0.010	0.828	0.690	<0.0001	<0.010	0.130	0.08	<0.100	<0.010	<0.010	<0.010	<0.010	0.023	<0.10	<0.050
	07/08/2025	106000	<0.20	0.095	6.22	0.0188	<0.020	<0.020	<0.02	1.30	<0.020	0.824	0.646	<0.0005	<0.020	0.098	0.62	<0.200	<0.020	<0.020	<0.020	<0.020	0.022	<0.20	<0.100
	19/11/2025	108000	<0.20	0.092	6.44	0.0185	<0.020	<0.020	<0.020	0.80	<0.020	0.724	0.482	<0.0005	<0.020	0.088	0.07	<0.080	<0.020	<0.020	<0.020	<0.020	0.014	<0.20	<0.100
	10/02/2026	97700	<0.10	0.097	5.93	0.0199	<0.010	<0.010	<0.010	2.40	<0.010	0.726	0.495	<0.0005	<0.010	0.093	<0.05	<0.040	<0.010	<0.010	<0.010	<0.010	<0.020	<0.10	<0.050
TSF2MB02	14/05/2025	108000	<0.1	0.236	6.11	0.0095	<0.010	<0.010	0.022	4.00	<0.010	1.260	0.404	0.0002	<0.010	0.106	0.05	<0.100	<0.010	<0.010	<0.010	<0.010	0.017	<0.10	0.113
	07/08/2025	122000	<0.2	0.157	8.36	0.0130	<0.020	<0.020	<0.02	3.70	<0.020	1.640	0.474	<0.0005	<0.020	0.033	<0.05	<0.200	<0.020	<0.020	<0.020	<0.020	<0.020	<0.20	<0.100
	19/11/2025	127000	<0.20	0.197	6.62	0.0096	<0.020	<0.020	<0.020	1.80	<0.020	1.340	0.426	<0.0005	<0.020	0.062	0.07	<0.080	<0.020	<0.020	<0.020	<0.020	<0.020	<0.20	<0.100
	10/02/2026	115000	<0.20	0.190	6.33	0.0081	<0.020	<0.020	<0.020	5.30	<0.020	1.420	0.428	<0.0005	<0.020	0.056	<0.05	<0.080	<0.020	<0.020	<0.020	<0.020	<0.020	<0.20	<0.100
TSF2MB03	14/05/2025	49800	<0.10	0.073	5.86	0.0086	<0.010	0.013	<0.010	2.80	<0.010	0.672	0.314	0.0003	<0.010	0.672	0.04	<0.100	<0.010	<0.010	<0.010	<0.010	<0.010	<0.10	0.176
	07/08/2025	51700	<0.10	0.058	6.05	0.0066	<0.010	0.024	<0.010	3.00	<0.010	0.733	0.276	0.0002	<0.010	0.766	0.11	<0.100	<0.010	<0.010	<0.010	<0.010	<0.010	<0.10	0.133
	19/11/2025	50000	<0.10	0.074	5.57	0.0080	<0.010	0.019	<0.010	2.20	<0.010	0.662	1.030	<0.0002	<0.010	0.519	0.04	<0.040	<0.010	<0.010	<0.010	<0.010	<0.010	<0.10	0.113
	10/02/2026	46200	<0.05	0.066	5.01	0.0071	<0.005	0.014	<0.005	2.80	<0.005	0.597	0.835	<0.0001	<0.005	0.495	0.06	<0.020	<0.005	<0.005	<0.005	<0.005	0.009	<0.05	0.116
TSF2MB04	14/05/2025	126000	<0.10	0.200	8.07	0.0167	<0.010	0.013	<0.010	5.20	<0.010	1.43	0.650	<0.0001	<0.010	0.145	<0.05	<0.100	<0.010	<0.010	<0.010	<0.010	0.017	<0.10	0.361
	07/08/2025	129000	<0.20	0.194	8.11	0.0334	<0.020	<0.020	<0.020	3.60	<0.020	1.24	0.271	<0.0005	<0.020	0.065	<0.05	<0.200	<0.020	<0.020	<0.020	<0.020	0.020	<0.20	0.135
	19/11/2025	119000	0.25	0.185	6.95	0.0264	<0.020	<0.020	<0.020	1.90	<0.020	1.03	0.059	<0.0005	<0.020	0.069	<0.10	<0.080	<0.020	<0.020	<0.020	<0.020	<0.020	<0.20	0.166
	10/02/2026	125000	<0.20	0.167	6.52	0.0270	<0.020	<0.020	<0.020	5.60	<0.020	1.16	0.155	<0.0005	<0.020	0.095	<0.05	<0.080	<0.020	<0.020	<0.020	<0.020	<0.020	<0.20	0.131
GMB01	14/05/2025	68900	<0.10	0.028	12.80	<0.0010	<0.010	<0.010	<0.010	2.50	<0.010	2.16	0.012	<0.0001	<0.010	0.013	0.08	<0.100	<0.010	<0.010	<0.010	<0.010	0.012	<0.10	<0.050
	07/08/2025	68400	<0.10	0.027	12.10	<0.0010	<0.010	<0.010	<0.010	2.60	<0.010	2.00	<0.01	<0.0002	<0.010	<0.01	0.13	<0.100	<0.010	<0.010	<0.010	<0.010	0.012	<0.10	<0.050
	19/11/2025	73000	<0.10	0.034	10.50	<0.0010	<0.010	<0.010	<0.010	2.30	<0.010	1.75	0.017	<0.0002	<0.010	<0.010	0.06	<0.040	<0.010	<0.010	<0.010	<0.010	<0.010	<0.10	<0.050
	10/02/2026	69200	<0.10	0.038	13.0	<0.0010	<0.010	<0.010	<0.010	4.50	<0.010	2.28	0.012	<0.0005	<0.010	<0.010	0.10	<0.040	<0.010	<0.010	<0.010	<0.010	0.013	<0.10	0.0660
GMB02	14/05/2025	Bore Dry																							
	07/08/2025	Bore Dry																							
	19/11/2025	Bore Dry																							
	10/02/2026	Bore Dry																							
GMB03	14/05/2025	96700	<0.10	0.055	12.60	0.0114	<0.010	0.044	0.022	4.40	<0.010	1.41	1.720	<0.0001	<0.010	0.183	0.18	<0.100	<0.010	<0.010	<0.010	<0.010	<0.010	<0.10	0.067
	07/08/2025	101000	<0.20	0.053	12.40	0.0086	<0.020	<0.02	<0.020	3.10	<0.020	2.00	0.023	<0.0005	<0.020	0.139	0.10	<0.200	<0.020	<0.020	<0.020	<0.020	<0.020	<0.20	<0.100
	19/11/2025	111000	<0.20	0.056	9.92	0.0073	<0.020	0.028	<0.020	2.00	<0.020	1.86	0.763	<0.0005	<0.020	0.132	<0.10	<0.080	<0.020	<0.020	<0.020	<0.020	0.024	<0.20	<0.100
	10/02/2026	112000	<0.20	0.063	9.00	0.0027	<0.020	0.120	0.042	5.60	<0.020	2.02	3.660	<0.0005	<0.020	0.154	0.08	<0.080	<0.020	<0.020	<0.020	<0.020	0.035	<0.20	0.108
GMB04	14/05/2025	112000	<0.10	0.034	7.12	<0.001	<0.010	<0.010	<0.010	3.60	<0.010	1.22	0.387	<0.0001	<0.010	0.014	0.36	<0.100	<0.010	<0.010	<0.010	<0.010	<0.010	<0.10	<0.050
	07/08/2025	120000	<0.20	0.033	8.82	<0.002	<0.020	<0.020	<0.020	2.40	<0.020	1.54	0.504	<0.0005	<0.020	<0.020	0.15	<0.200	<0.020	<0.020	<0.020	<0.020	<0.020	<0.20	<0.100
	19/11/2025	128000	<0.20	0.037	7.17	<0.002	<0.020	<0.020	<0.020	1.40	<0.020	1.32	0.440	<0.0005	<0.020	<0.020	<0.10	<0.080	<0.020	<0.020	<0.020	<0.020	<0.020	<0.20	<0.100
	10/02/2026	120000	<0.20	0.038	7.50	<0.002	<0.020	<0.020	<0.020	3.80	<0.020	1.44	0.487	<0.0005	<0.020	<0.020	0.05	<0.080	<0.020	<0.020	<0.020	<0.020	<0.020	<0.20	<0.100
BHWB002	14/05/2025	185000	<0.20	0.030	3.40	0.0058	<0.020	0.023	<0.020	2.10	<0.020	0.686	1.48	<0.0001	<0.020	0.054	0.18	<0.200	<0.020	<0.020	<0.020	<0.020	<0.020	<0.20	3.500
	07/08/2025	192000	<0.50	<0.050	4.64	0.0078	<0.050	<0.050	<0.050	1.20	<0.050	0.840	1.72	<0.0005	<0.050	0.061	0.18	<0.500	<0.050	<0.050	<0.050	<0.050	<0.050	<0.50	0.624
	19/11/2025	-2																							
	10/02/2026	190000	<0.20	0.037	4.01	0.0050	<0.020	0.023	<0.020	1.90	<0.020	0.668	1.62	<0.0005	<0.020	0.058	<0.10	<0.080	<0.020	<0.020	<0.020	<0.020	<0.020	<0.20	0.739
Cofters Bore	14/05/2025	122000	0.11	0.042	8.85	0.0304	0.0240	0.051	0.039	5.10	0.025	1.98	2.17	<0.0001	0.019	0.141	2.05	<0.10	<0.010	<0.010	<0.010	<0.010	0.064	<0.10	0.351
	07/08/2025	122000	<0.20	0.040	10.00	0.0322	<0.020	0.051	<0.020	3.50	<0.020	2.41	2.48	<0.0005	<0.020	0.133	1.48	<0.20	<0.020	<0.020	<0.020	<0.020	0.069	<0.20	0.285
	19/11/2025	124000	<0.20	0.047	8.50	0.0250	<0.020	0.080	<0.020	2.00	<0.020	2.53	3.35	<0.0005	0.026	0.208	<0.10	<0.080	<0.020	<0.020	<0.020	<0.020	0.101	<0.20	0.330
	10/02/2026	130000	<0.20	0.047	7.91	0.0263	<0.020	0.070	<0.020	5.60	<0.020	2.53	3.20	<0.0005	0.029	0.369	<0.10	<0.080	<0.020	<0.020	<0.020	<0.020	0.098	<0.20	0.259

<sup>1</sup> Phosphorus (P) - measured as Total mg/L

<sup>2</sup> Bore not running, unable to collect sample. Bore not used for 6 months.

## B-2 GROUNDWATER QUALITY RESULTS – RADIUM 226, RADIUM 228, GROSS ALPHA AND GROSS BETA

Site ID	Date	Radium-226	Radium-228	Gross-alpha	Gross-beta
		Bq/L	Bq/L	Bq/L	Bq/L
Cotters Bore	07/08/2025	1.99	1.62	12.40	21.20
	19/11/2025	4.86	2.48	3.28	28.40
	10/02/2026	³	³	³	³
TSF2MB03	07/08/2025	0.18	0.12	3.03	11.70
	19/11/2025	0.16	0.13	<1.04	8.83
	10/02/2026	³	³	³	³
TSF2MB04	07/08/2025	0.95	1.03	4.15	25.20
	19/11/2025	0.73	0.82	2.10	38.40
	10/02/2026	³	³	³	³

³ At date of submission, results for the February 2026 sampling event had not been received from the lab. Data to be included in the 2026-2027 AER.



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