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LJE

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Dr Tom Hatton
EPA Chairman
Environmental Protection Authority
Level 4, 168 St Georges Terrace
PERTH WA 6000

Dear Dr Hatton

Talisson Lithium Australia Pty Ltd Greenbushes Lithium Mine Expansion Section 43A request to change proposal during assessment

The expansion of the existing Greenbushes Lithium Mine (the Proposal) was referred to the Environmental Protection Authority (EPA) by Talisson Lithium Pty Ltd (Talisson) on 29th June 2018. The Proposal was publically advertised in July 2018 and the EPA determined that the Proposal would be 'Assessed on Referral Information' (with Additional Information required). Tailings Retreatment Plant (TRP) was included in the proposal on 29th November 2018 under Section 43 of the EP Act and provided the requested additional information to the Department of Water and Environmental Regulation (DWER) EPA Services Unit and the information was published on the 18th December with the public consultation period ending on the 21st January 2019.

During the public consultation process time, Talisson finalised an assessment on a suitable location for a mine access road, designed to reduce traffic through the town of Greenbushes. It also identified the need to review the access point from Maranup Ford Road to the proposed Tailing Retreatment Plant (TRP) improve access safety. This letter is submitted as a Section 43A request to make minor changes to the Greenbushes Lithium Mine Expansion Proposal to reflect this updated information.

1. Explanation of Changes to Project Description

The proposed change involves the following elements:

- a. Addition of supporting infrastructure including the Mine Access Road (outside the Mine Development Envelope (MDE)); and

- b. An access road to the proposed TRP (outside the MDE)

There will be no additional clearing required or change to the MDE, the net clearing remains unchanged from the original submission and additional referral information submitted. Table 1 outlines the changes to the key characteristics.

Table 1: Changes to Key Characteristics

Element	Changes to Key Characteristics
Linear Supporting Infrastructure	Inclusion of sections Mine Access Road and TRP Access Road outside of the MDE due to consultation with stakeholders, including Main Roads WA with respect to safe design and location. (~ 2.5 km of Road with up to 60m in a disturbance width (max) - including drainage, shoulders and 16m pavement)

The proposed extent of changes is outlined in the table below:

Element	Referral	Section 43A	Change
Supporting linear infrastructure (access roads/pipelines/powerlines) and the explosives and MSA infrastructure)	23.5ha	-6.4ha	-6.4ha
Northern Mine Access Road	N/a	4.3ha	4.3ha
TRP Mine Access Road	N/a	2.1ha	2.1ha
Totals (Linear Supporting linear infrastructure (access roads/pipelines/powerlines) and the explosives and MSA infrastructure)	23.5ha	0ha	0ha

The original referral included the establishment of a mine concentrate haulage route to the mine. At the stage of referral, feasibility studies into this route had not yet been conducted. Talison engaged specialist road engineers to investigate a southern route as well as provide alternative mine access to the north. Flora and fauna surveys were also carried out in respect of the proposed routes

The purpose of the access road study was to reduce mine traffic and related community impacts in the centre of Greenbushes. On further investigation and discussion with Main Roads WA it was found that:

The southern access road is considered not suitable as an alternative concentrate haulage truck route to the Mine due to:

1. Poor sight distances at the intersection with South west Highway which did not meet the required standards set by MRWA and the Austroads Design Guidelines for vehicles of this size; and

2. The route would also result in additional banking up truck traffic on the hilly section of South West Highway between Forest Park Road and Stannifer Street.

The Northern access road was considered suitable as an alternative concentrate haulage truck route due to:

1. access onto South West Highway could be safely designed to meet MRWA standards and the Austroads Design Guidelines;
2. An alignment which achieves safe design can be provided within predominantly previously cleared or disturbed and rehabilitated areas.
3. It reduces the distance that trucks are required to travel on the South West Highway.

The Northern access road is near Community facilities (Greenbushes Pool & Sports Ground), therefore additional works, to manage traffic and pedestrian interactions, are proposed to improve safety and usability in these areas and minimise community impacts.

2. Rationale for Change

As identified in section 1, the proposed changes consist of the inclusion of the mine and tailing's retreatment plant roads that were not included in the original referral or additional information. The tailings retreatment plant road has been design to improve safety access to the tailing retreatment plant. Designs for both roads have been formalised. Studies including both flora and fauna have been completed and have been attached. A review of the changes and associated approvals is provided in Table 2 following.

Table 2: Review of Changes

Element	Location	Existing Approval	Authorised Extent (Referral Document)	Authorised Extent (s43A request)
Physical Elements				
Mine and associated infrastructure (Mine Access Road & TRP Access Road)	M01/3, M01/6 & M01/9	N/a	Clearing 350 ha Native Vegetation	No Change

3. Significance of potential impacts of the change

Talison does not consider that the described changes will introduce any additional environmental impacts or social impacts associated with the Proposal as no new activities, emission increases or vegetation clearing are planned. There will be no increase to the 350ha as applied for in the referral. The majority of the mine access road falls within previously disturbed historic mining areas outside the current active mining area. Flora and fauna assessments have been undertaken and are submitted for review. Table 3 outlines theses changes with respect to key factors to provide a review of the relevant factors identified by key factor and potential impact.

The review in Table 3 identifies that the proposed change does not significantly increase any impact that the proposal may have on the environment.

Table 3: Significance of change

Key Factor	Proposed Change	Justification	Significance of Impact
Air quality, Noise, Vegetation clearing	Linear Supporting Infrastructure (Mine Access Road & TRP Access Road)	There will be no additional vegetation clearing required (350 ha).	Nil

Onshore was commissioned by Talison to complete a two-season detailed flora and vegetation survey of the proposed infrastructure corridors for the Greenbushes Site. Vegetation condition across most of the study area was rated as degraded (10.8 ha or 41.5% of the study area) reflecting a high proportion of the area having been disturbed and rehabilitated as part of historical tin mining operations. Approximately 7.8 ha (29.8% of the study area) had been cleared for a mixture of existing road infrastructure, and as part of historical mining activities; these areas do not support any native vegetation cover.

The two-season detailed flora and vegetation survey was carried out in a manner that was compliant with Environmental Protection Authority (EPA) requirements for the environmental surveying and reporting of flora and vegetation in Western Australia:

- Technical Guidance Flora and Vegetation Surveys for Environmental Impact Assessment (EPA 2016a); and
- Environmental Factor Guideline: Flora and Vegetation (EPA 2016b).

The survey was performed, as per the specific requirement for 'linear corridor surveys' to incorporate vegetation unit's characterisation using survey data and aerial photography from 500 m to 1,000 m on both sides of the infrastructure corridor (where this is not already part of the survey area) to provide context for environmental impact assessment (EPA 2016a). Onshore conducted vegetation mapping along the defined infrastructure corridor and merged this with adjacent mapping recently completed by Onshore for Mine Development Envelope. Vegetation mapping was then inferred for any open areas remaining within a 500-metre buffer of the infrastructure corridor. Further information can be found in the Onshore report which is attached with this Section 43A Letter.

Talison also commissioned a Level 1 Vertebrate Fauna Survey of the proposed area of impact. The field survey was completed by a Senior Zoologist from Onshore Environmental working over a three-day period between the 4th and 7th October 2018. No conservation significant fauna species were recorded from the study area during the survey. No introduced fauna species (feral animals) were observed during the survey. A total of seven fauna habitat types were described and mapped from the study area, with a majority of the study area consisting of hill slope habitat type, as well as areas of historical mine rehabilitation, or road disturbance. The habitat trees recorded during the survey only one is deemed potential hollow and suitable for use by black cockatoos. The works will not impact on this hollow and will be in line with Talison Conservation Significant Fauna Plan as submitted. This includes establishing establish Black Cockatoo Tree Protection Zones (TPZs) of 10 m around hollow. Clearing will be timed outside the black cockatoo breeding seasons if possible. The road will be

designed by road engineers to meet MRWA standards and the Austroads Design Guidelines to minimise noise and dust. Noting that the road will be a sealed road to ensure these factors are minimised in the long-term. A suitable contractor will be engaged to construct the roads and established recognised construction principles will be followed during the road to ensure noise and dust are managed during the construction phase. Talison will apply the appropriate noise and dust management plans and procedures to the construction of the roads.

4. Consultation

Talison has conducted significant stakeholder engagement regarding the establishment of the Mine access road, separate to the overall consultation with respect to the project expansion. The access road was presented at two public meetings, and Talison maintained a weekly in-town community relations office (open for an 1hr each Wednesday). The proposed layout plans and design document information was publicly available at the Greenbushes CRC and Shire of Bridgetown Greenbushes administration offices for 2 months. The Shire of Bridgetown Greenbushes also ran a formal consultation process requesting public feedback. From this process, Talison notes there is public concern regarding the possible impact or closure of the Greenbushes Pool (a previous mining void rehabilitated by Talison, and its predecessors, for recreational use). Talison has committed to continue its ongoing support to ensuring this area is maintained for recreation and free public short-term camping in line with the Shire of Bridgetown Greenbushes plans and strategic goals for the town. This commitment will include ensuring the final road design appropriately addresses concerns and continuing Talison's ongoing support assisting with the development and maintenance of the Schwenkes wetland project and the pool.

Talison has also consulted with Main Roads WA, Shire of Bridgetown Greenbushes, Department of Land, Planning and Heritage and the Department of Biodiversity, Conservation and Attractions regarding the road tenure and management.

Yours sincerely,



Steve Green
Manager WHST&E

Atts

Attachment 1: Plan Section43A_CG

Attachment 2: v1_Greenbushes Corridors_Fauna Survey_20181119

Attachment 3: v2_Greenbushes Corridor Flora Survey