



Earl Grey Lithium Project
EPBC Decision 2017/7950 Approval
Annual Compliance Report
Period: 01 April 2024 – 31 March 2025
Report date: 23 June 2025



Contents

1. Introduction	4
2. Description of Activities	4
3. Reporting Methodology	5
3.1. Audit Methodology	5
3.2. Audit terminology	5
3.3. Public Availability	6
4. Audit Results	6
4.1. Opportunities for Improvement	6
5. References	15

Tables

Table 1: Description of Activities	4
Table 2: Terminology used for the Audit (DCCEEW 2023)	5
Table 3: Summary of Compliance Results	6
Table 4: Audit Table of Compliance with EPBC Decision 2017/7950	7

Appendices

Appendix A: Terrestrial Fauna Management Plan Compliance Assessment	16
Appendix B: Ironcap Banksia Conservation Plan Compliance Assessment	29
Appendix C: Threatened Fauna Offset Management Plan Compliance Assessment	44
Appendix D: Supporting Figures	54
Appendix E: Evidence Register	63



Declaration of accuracy

In making this declaration, I am aware that sections 490 and 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed

DocuSigned by:



D6254BA1428E459...

Full name (please print)

Lisa McGrath

Position (please print)

Manager Environment and Approvals

Organisation (please print including ABN/ACN if applicable)

Covalent Lithium Pty Ltd

ACN 623 090 139

Date

23/6/2025 | 11:54 AM AWST

Mt Holland Lithium Project					
Document Control					
Rev	Description	Changes	Originator	Approver	Date
0	Issue for use	NA	B Longbottom	L McGrath	23 June 2025



1. Introduction

This Annual Compliance Report (ACR) has been prepared to assess the status and compliance of the conditions of the Environmental Protection and Biodiversity Conservation (EPBC) Decision 2017/7950 for the Covalent Lithium Pty Ltd (Covalent) Earl Grey Lithium Project. This ACR addresses the compliance status during the period 1 April 2024 to 31 March 2025.

2. Description of Activities

During the reporting period, Covalent performed the key activities summarised in Table 1.

Table 1: Description of Activities

Project Title	Earl Grey Lithium Project
Approval Number	EPBC 2017/7950 (date of decision 29/3/22)
Approval Holder	Covalent Lithium Pty Ltd
ACN	623 090 139
Action	To clear native vegetation to undertake open cut mining and processing of lithium ore, at the abandoned Mt Holland Mine Site, WA, with transport of a lithium concentrate to an existing Western Australian port for export to overseas markets, subject to the variations of the action accepted by the Minister under section 156 B on 11 February 2018 and 14 November 2019. [See EPBC Act referral 2017/7950]
Project Location	105 km south-southeast of Southern Cross in the Shire of Yilgarn
Current Reporting Period	1 April 2024 to 31 March 2025
Key Activities in Reporting Period	To the end of the Reporting Period, a cumulative total of 389 ha of native vegetation has been cleared (Appendix D). Management plans required by EPBC 2017/7950 include: - Terrestrial Fauna Environmental Management Plan (TFEMP) - Ironcap Banksia Conservation Plan (<i>Banksia dolichostyla</i>) (IBCP) - Threatened Fauna Offset Management Plan (TFOMP) The TFOMP has not yet been approved by DWER and as such has not been implemented during the reporting period.



	During the reporting period a significant bushfire, Skeleton Rock Bushfire, impacted the Project in January 2025 (Appendix D). The severity and extent of the Skeleton Rock Bushfire has resulted in an inability to demonstrate compliance with EPBC 2017/7950 commitments from 24 January 2025 to 31 March 2025 within the Reporting Period. An initial update on the inability to meet conditions was communicated to DCCEEW on 5 February 2025 and was followed up with email correspondence providing additional information on 15 May 2025.
New Environmental Risks	The Skeleton Rock Bushfire impacted Covalent’s ability to meet several requirements of Ministerial Statement 1199 management plans. In response, Covalent are working closely with environmental consultants to review and update existing monitoring programs to ensure they remain appropriate in a post-fire context. Many activities will cease, while others will be modified in methodology or frequency, and new programs may be introduced. The relevant management plans will be revised and resubmitted following expert review.

3. Reporting Methodology

3.1. Audit Methodology

An internal audit was conducted to support the development of this ACR for actions conducted during the reporting period.

3.2. Audit terminology

The audit table has a field named ‘Status’ which describes the implementation of the action and compliance with the audit element. The DCCEEW issued the Annual Compliance Report Guidelines (DCCEEW 2023), terminology from this guidance has been applied in this audit, listed in Table 2.

Table 2: Terminology used for the Audit (DCCEEW 2023)

Status	Description
Compliant	‘Compliance’ is achieved when all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions.
Not Applicable	A designation of ‘not applicable’ must be given where the requirements of a condition or elements of a condition fall outside of the scope of the current reporting period. For example, a condition that applies to an activity that has not yet commenced.
Non-Compliant	A designation of ‘non-compliant’ must be given where the requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met.



3.3. Public Availability

In accordance with Condition 12, this ACR has been made publicly available to stakeholders by publication on the Covalent website.

4. Audit Results

The results of the 2024-2025 audit are provided in Table 3. There were no non-compliances identified with EPBC conditions, the Terrestrial Fauna Environmental Management Plan or the Terrestrial Fauna Offset Management Plan.

Two non-compliances were identified in commitments of the Ironcap Banksia Conservation Plan in respect to unauthorised damage to a vegetation exclusion zone (machinery impact) and an increase in weed abundance. Further details are provided in the audit table in Appendix B.

Table 33: Summary of Compliance Results

Audit Result	EPBC 2017/7950	TFEMP	IBCP	TFOMP
Compliant	36	54	33	3
Not Applicable	13	1	28	60
Non-Compliant	0	0	2	0
Total Audit Items	49	55	63	63

4.1. Opportunities for Improvement

Reporting Alignment

Covalent requests amendment of the reporting period to align with the WA Ministerial Statement 1199 reporting requirements. The reporting period would be 1 January – 31 December with the report submitted by the 30 April. If agreed in writing by the Minister, Covalent will issue the next ACR on 30 April 2026 for the 2025 calendar year.

Changes to Plans as a result of Skeleton Rock Bushfire

The Skeleton Rock Bushfire (January 2025) impacted Covalent’s ability to meet several requirements of Ministerial Statement 1199 management plans. In response, Covalent are working closely with environmental consultants to review and update existing monitoring programs to ensure they remain appropriate in a post-fire context. Many activities will cease, while others will be modified in methodology or frequency, and new programs may be introduced. The relevant management plans will be revised and resubmitted following expert review.

Figures showing the impacts of the Skeleton Rock Bushfire are provided in Appendix D.



Table 44: Audit Table of Compliance with EPBC Decision 2017/7950

Reference	Condition	Phase	Verification Method	Evidence	Determination Assessment	Status
Part A – Conditions Specific to the Action						
EPBC Decision 2017/7950 Condition 1:		To minimise impacts to the Malleefowl (<i>Leipoa ocellata</i>) and Chuditch (<i>Dasyurus geoffroii</i>), the approval holder must not clear more than 442 ha of native vegetation within the 1,984 ha Development Envelope shown at Attachment A.				
EPBC 1	Must not clear more than 442 ha of native vegetation within the 1,984 ha Development Envelope.	Overall	Updated GIS files	E01_ACR2024-2025_VegetationClearingEEZ E36_SkeletonRockBushfire_Im pactToDE	Clearing of native vegetation has not exceeded 442 ha. Skeleton Rock Bushfire (not Proposal-related) occurred in January 2025, impacting approximately 612 hectares within the Development Envelope.	Compliant
EPBC Decision 2017/7950 Condition 2:		To minimise impacts to Ironcap Banksia (<i>Banksia dolichostyla</i>), the approval holder must not clear more than 2 Ironcap Banksia individuals.				
EPBC 2	Must not clear more than 2 Ironcap Banksia individuals.	Overall	Calculations	E02_ACR2024-2025_IroncapBanksia E36_SkeletonRockBushfire_Im pactToBanksia	There has been no proposal-related clearing of Ironcap Banksia (<i>Banksia dolichostyla</i>) individuals within the Development Envelope since commencement of the project. Skeleton Rock Bushfire (not Proposal-related) occurred in January 2025, impacting over 5,000 Ironcap Banksia individuals within the Development Envelope.	Compliant
EPBC Decision 2017/7950 Condition 3:		To minimise impacts to the Malleefowl (Leipoa ocellate) and Chuditch (Dasyurus geoffroii), the approval holder must comply with Condition 3 (Terrestrial Fauna Environmental Management Plan) of the Western Australia approval, where relevant to Malleefowl (Leipoa ocellate) and Chuditch (Dasyurus geoffroii).				
Ministerial Statement MS1199:3		Terrestrial Fauna				
EPBC 3A MS1199:3-1	The proponent shall implement the proposal to meet the environmental outcomes and objectives: 1) No direct or indirect impacts to malleefowl mounds within the exclusion areas.	Overall	Updated GIS files	E01_ACR2024-2025_VegetationClearingEEZ E03_ECO_2023-2024 MalleefowlMonitoringReport	The Project did not have any direct or indirect impacts on Malleefowl Mounds within the exclusion areas. Note – due to the Malleefowl breeding season, the annual population monitoring report provided as evidence covers September 2023 – March 2024 breeding season. The most recent breeding season of September 2024 – March 2025 report is not yet available from the consultant, delayed due to additional commentary required on impacts from the Skeleton Rock Bushfire.	Compliant
	2) No direct or indirect adverse impacts to malleefowl and chuditch within the developmental envelope.	Overall	Monitoring Report	E03_ECO_2023-2024 MalleefowlMonitoringReport E04_ECO_2024ChuditchMonit oringReport E39_SkeletonRockBushfire_Im pactToMMEZ	Pre-bushfire monitoring was undertaken of both Malleefowl and Chuditch in the reporting period. Note there was significant data loss during Malleefowl monitoring as trail cameras were destroyed by fire. Neither monitoring reports indicated any direct or indirect proposal-related significant adverse impacts to Malleefowl and Chuditch within the Development Envelope. The Skeleton Rock Bushfire has likely adversely impacted Malleefowl and Chuditch within the Development Envelope. There was one confirmed mortality of Malleefowl as a result of the fire, found within aerodrome fence and suspected cause of death as smoke inhalation or intense heat.	Compliant
	3) No removal of active malleefowl mounds within the Development Envelope.	Overall	Monitoring Report	E03_ECO_2023-2024 MalleefowlMonitoringReport	Monitoring indicated no active mounds within the Development Envelope were removed.	Compliant



Reference	Condition	Phase	Verification Method	Evidence	Determination Assessment	Status
					Pre-clearance surveys were undertaken prior to clearing activities, and impact to mounds avoided via the Ground Disturbance Permit (GDP) procedure.	
	4) Minimise proposal related direct or adverse indirect impacts to malleefowl from feral animals within the Development Envelope.	Overall	Monitoring Report	E03_ECO_2023-2024 MalleefowlMonitoringReport E05_ECO_2023-202IntroducedPredatorMonitoringReport E06_APAS_Jun24FeralCatControlProgram E07_APAS_Sep24FeralCatControlProgram E08_APAS_Sep24WildDogControlProgram	A feral cat control trapping and feral dog surveying and baiting program was undertaken in June, and September 2024. A summary of feral animal presence as captured during the Malleefowl annual monitoring was undertaken, including data provided from opportunistic sightings.	Compliant
EPBC 3B MS1199:3-2	In order to meet the requirements of condition 3-1, within six (6) months of approval of this Statement, the proponent shall update the Earl Grey Lithium Project Terrestrial Fauna Environmental Management Plan (April 2022). This plan shall: 1) Outline how the pre-clearance surveys will be undertaken using LIDAR or similar technology. 2) Outline the procedure for capture and release of chuditch, and malleefowl if required, prior to clearing of native vegetation. 3) Specify trigger criteria that must provide an early warning that the environmental outcomes and objectives identified in condition 3-1 may not be met. 4) Specify threshold criteria to demonstrate compliance with the environmental outcomes and objectives specified in condition 3-1. 5) Specify monitoring to determine if trigger criteria and threshold criteria are exceeded. 6) Specify trigger level actions to be implemented in the event that trigger criteria have been exceeded. 7) Specify threshold contingency actions to be implemented in the event that threshold criteria are exceeded; 8) Provide contingency measures and adaptive management techniques to ensure the outcomes of conditions 3-1 are met and include options for changes to operations and reductions in disturbance. 9) Provide the format and timing for the reporting of monitoring results against trigger criteria and threshold criteria to demonstrate that condition 3-1 has been met over the reporting period in the Compliance Assessment Report required by condition 8-6.	Overall	Submission email to DWER with updated EGLP TFEMP attached.	Completed in previous audit period	Completed in previous audit period	Compliant (Completed)
EPBC 3C MS1199:3-3	The proponent must not commence clearing exceeding the extent of the original authorised proposal until the CEO has confirmed by notice in writing that the Earl Grey Lithium Project Terrestrial Fauna Environmental Management Plan satisfied the requirements of 3-2.	Planning	Letter from DWER CEO approving updated EGLP TFEMP as per condition MS1199:M3.2.	Completed in previous audit period	Completed in previous audit period	Compliant (Completed)
EPBC 3D MS1199:3-4	The proponent must implement the most recent version of Terrestrial Fauna Environmental Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated that the environmental outcomes and objectives in condition 3-1 have been met.	Overall	Annual CAR	Refer Appendix A	The most recent revision of the approved TFEMP – Rev 5 has been implemented for the Reporting Period.	Compliant



Reference	Condition	Phase	Verification Method	Evidence	Determination Assessment	Status
EPBC 3E MS1199:3-5	In the event that monitoring or investigations indicate exceedance of threshold criteria specified in the Terrestrial Fauna Environmental Management Plan, the proponent shall: 1) Report the exceedance in writing to the CEO within seven (7) days of the exceedance being identified. 2) Implement the threshold contingency actions specified in the Terrestrial Fauna Environmental Management Plan within twenty-four (24) hours of the exceedance being reported as required by condition 3-5(1) and continue implementation of those actions until the CEO has confirmed by notice in writing that it has been demonstrated that the threshold criteria are being met, and the implementation of the threshold contingency actions is no longer required. 3) investigate to determine the cause of the threshold criteria being exceeded. 4) investigate to provide information for the CEO to determine potential environmental harm or alteration of the environment that occurred due to threshold criteria being exceeded. 5) provide a report to the CEO within twenty-one (21) days of the exceedance being reported as required by condition 3 5(1) The report shall include: a) details of threshold contingency actions implemented. b) the effectiveness of the threshold contingency actions implemented, against the threshold criteria. c) the findings of the investigations required by conditions 3-5(3) and 3-5(4). d) measures to prevent the threshold criteria being exceeded in the future. e) measures to prevent, control or abate the environmental harm which may have occurred. f) justification of the threshold remaining, or being adjusted based on better understanding, demonstrating that objectives will continue to be met.	Overall	Evidence of notification	Nil	There were no exceedances of threshold criteria specified in the TFEMP.	Compliant
EPBC 3F MS1199	The proponent: 1) May review and revise the Terrestrial Fauna Environmental Management Plan. 2) Shall review and revise the Terrestrial Fauna Environmental Management Plan as and when directed by the CEO .	Overall	Approved EGLP TFEMP	Nil	The TFEMP was not required to be reviewed or revised during the reporting period.	Compliant
EPBC 3G MS1199:3-7	The proponent shall implement the latest revision of the Terrestrial Fauna Environmental Management Plan, which the CEO has confirmed by notice in writing, satisfies the requirements of condition 3-2.	Overall	Annual CAR	Refer Appendix A	The most recent revision of the approved TFEMP – Rev 5 has been implemented for the Reporting Period.	Compliant
EPBC Decision 2017/7950 Condition 4		To compensate for residual significant impacts to the Malleefowl (Leipoa ocellate) and Chuditch (Dasyurus geoffroii), the approval holder must: a) acquire, manage and protect for enduring conservation offset area(s) that comprise existing Malleefowl and Chuditch foraging and breeding habitat and that collectively offset the residual significant impacts to the Malleefowl (Leipoa ocellate) and Chuditch (Dasyurus geoffroii) of the action in accordance with the EPBC Act Environmental Offsets Policy. b) submit for the Minister’s written approval a Fauna Offset Management Plan in respect of each offset area required to meet Condition 4(a); and c) implement each approved Fauna Offset Management Plan(s) at least until the end date of the period of effect of the approval.				
EPBC 4I	Acquire, manage and protect for enduring conservation fauna offset area(s).	On approval of each TFOMP	Implementation of TFOMP	Refer Appendix C	The implementation of the TFOMP will not commence until it is approved.	Not Applicable
EPBC 4II	Submit a TFOMP for each offset area under EPBC 4A.	Overall	Submission correspondence to Minister with TFOMP attached Ministers Approval	Not Applicable	This condition was completed in a previous reporting period.	Compliant (complete)
EPBC 4III	Implement each TFOMP until the end of the effect of the approval.	Upon approval of the TFOMP	Compliance audit	Refer Appendix C	The implementation of the TFOMP will not commence until it is approved.	Not Applicable
EPBC Decision 2017/7950 Condition 4A		Each Fauna Offset Management Plan required under Condition 4 must be prepared in accordance with the environmental management plan guidelines, and include the following: a) the residual significant impacts to the Malleefowl (Leipoa ocellate) and Chuditch (Dasyurus geoffroii) quantified as the area of clearing of native vegetation within the Development Envelope) that will be offset by implementing the plan; b) the environmental values of the proposed offset area, including results from field validation surveys, quantifiable ecological data on habitat quality and how the offset area will provide habitat connectivity with adjacent vegetation communities and biodiversity corridors, c) the size of the offset area in hectares, and maps that define the location and boundaries of the offset area; d) measurable ecological outcomes for habitat quality, when these will be achieved and the period for which these will be maintained; e) offset completion criteria to demonstrate attainment of the ecological outcomes and an explanation of how the proposed offset completion criteria will be achieved; f) management measures (including timing, frequency, duration and method of outcome measurement) that will be implemented to achieve the ecological outcomes for malleefowl				



Reference	Condition	Phase	Verification Method	Evidence	Determination Assessment	Status
		(Leipoa ocellate) and Chuditch (Dasyurus geoffroii); g) evidence that the management measures are consistent with relevant conservation advices, recovery plans and threat abatement plans; h) an analysis of potential risks of the plan, if implemented, failing to attain and/or maintain the offset completion criteria; i) criteria for triggering corrective actions should risks be realised, and a monitoring program designed to detect the criteria and track progress against offset completion criteria; j) the activities and land uses that will be prohibited in the offset area, including, for example, mining, exploration or grazing; k) a schedule for evaluating and reporting, at least annually, on the effectiveness of management measures and progress against offset completion criteria; l) the nature and timing of the proposed legal mechanism for securing the offset area, and contingency measures if the specified legal mechanism is not established in a timely manner; m) an explanation of how the offset area and offset area management addresses the principles of the EPBC Act Environmental Offsets Policy; and n) the role of the approval holder in controlling and managing the offset area and the identity and offset management role(s) of any other involved party. Each Fauna Offset Management Plan required under Condition 4 must be submitted to the Department within 12 months of the clearing of native vegetation within the Development Envelope that, in accordance with Condition 4A.a., it offsets. Each Fauna Offset Management Plan submitted in accordance with Condition 4.b. must be accompanied by shapefiles that define the location and boundaries of the offset area, the offset attributes (including physical address of the offset area(s), coordinates of the boundary points in decimal degrees, the EPBC Act Listed threatened species that the environmental offset area(s) compensate for, and the size of the offset area(s) in hectares.				
EPBC 4A	Elements under EPBC Condition 4A a to n are required in the TFOMP required under EPBC 4II	Overall	TFOMP	Not Applicable	This condition was completed in a previous reporting period.	Compliant (complete)
EPBC Decision 2017/7950 Condition 4B		The approval holder must not commence the action until a Fauna Offset Management Plan is approved by the Minister in writing.				
EPBC 4B	The TFOMP must be approved before the action can commence	Prior to commencement	Approval from the Minister	Not Applicable	This condition was completed in a previous reporting period.	Compliant (complete)
EPBC Decision 2017/7950 Condition 4C		This condition was revoked 29/03/2022.				
EPBC Decision 2017/7950 Condition 5		To mitigate significant impacts to the Ironcap Banksia (Banksia dolichostyla), the approval holder must prevent impacts to Ironcap Banksia other than as permitted under Condition 2 and, within 10 years from commencement of the action, establish at least 69 Ironcap Banksia plants within the Development Envelope. The approval holder must submit for the Minister’s written approval an Ironcap Banksia Conservation Plan (the Plan) to specify how it will achieve these requirements. The Plan must be prepared consistent with the environmental management plan guidelines, and must: a) Show how the approval holder will prevent impacts to Ironcap Banksia, other than as permitted under Condition 2: i. Include maps that clearly show the location of Ironcap Banksia within the Development Envelope and in relation to native vegetation to be cleared or otherwise disturbed. ii. Specify the total number and location of Ironcap Banksia plants within the Development Envelope. iii. Identify potential impacts to Ironcap Banksia from the action and describe management measures to avoid and/or mitigate those impacts and corrective actions to be implemented if impacts are detected. iv. Include management triggers for detecting potential impacts to Ironcap Banksia from the action. v. Demonstrate that management measures are consistent with relevant approved conservation advice, recovery plans and threat abatement plans. b) Show how the approval holder will, within 10 years from commencement of the action, establish at least 69 Ironcap Banksia plants within the Development Envelope: i. Specify a portion of the Development Envelope, that is contained within an exclusion zone specified in Condition 6-1 of the Western Australia approval, in which Ironcap Banksia can be established and protected. ii. Include shapefiles to clearly define the location and boundaries of the Ironcap Banksia establishment site(s), coordinates of the boundary points in decimal degrees, and the area of the establishment site(s) in hectares. iii. Include establishment criteria for Ironcap Banksia plants. iv. Include an analysis of the potential risks that may prevent Ironcap Banksia plants being established and self-sustaining at the proposed establishment site(s). v. Describe management measures to achieve the establishment criteria, and corrective actions to be implemented if establishment criteria have not been, or are unlikely to be, achieved or maintained. vi. Describe how establishment criteria will be maintained for the period of approval. c) Include a program that monitors the health of Ironcap Banksia plants and is designed to detect management triggers and attainment of establishment criteria. d) Contain a schedule for evaluating and reporting, at least annually, on the health of Ironcap Banksia plants, the detection of management triggers, progress against establishment criteria, and the effectiveness of management measures; and e) Include timeframes for implementing corrective actions. The approval holder must not commence the action until the Plan is approved by the Minister in writing. The Plan must be implemented at least until the end date of the period of effect of the approval.				
EPBC 5A	Establish at least 69 Ironcap Banksia plants within the Development Envelope.	Within 10 years from commencement of the action	Monitoring report	Not Applicable	Not required at this stage.	Not Applicable



Reference	Condition	Phase	Verification Method	Evidence	Determination Assessment	Status
EPBC 5B	Submit an Ironcap Banksia Conservation Plan to the Minister for approval.	Prior to commencement of the action	Submission Correspondence to the Minister with the Ironcap Banksia Conservation Plan attached. Ministers Approval	Not Applicable	This condition was completed in a previous reporting period.	Compliant (complete)
EPBC 5C	The Ironcap Banksia Conservation Plan must include elements 5(a)-(e) under EPBC condition 5.	Prior to commencement of the action	Compliance audit	Not Applicable	This condition was completed in a previous reporting period.	Compliant (complete)
EPBC 5D	The action must not commence until Plan is approved by writing by the Minister.	Prior to commencement of the action	Ministers Approval	Not Applicable	This condition was completed in a previous reporting period.	Compliant (complete)
EPBC 5E	The Plan must be implemented at least until the end date of the period of effect of the approval.	At least until the end date of the period of effect of the approval	Compliance audit	Refer Appendix B	The IBCP has been implemented for the Reporting Period.	Compliant
Part B – Standard Administrative Conditions						
EPBC Decision 2017/7950 Condition 6		The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.				
EPBC 6	The approval holder must notify the Department in writing of the date of commencement of the action.	Within 10 business days after the date of commencement	Notification to the Department	Not Applicable	This condition was completed in a previous reporting period.	Compliant (complete)
EPBC Decision 2017/7950 Condition 7:		The approval holder must maintain accurate and complete compliance records.				
EPBC 7	Maintain accurate and complete compliance records.	Overall	Compliance audit	This 2024-2025 Annual Compliance Report	Accurate and complete archive of compliance records, including reports, correspondence and spatial data have been maintained.	Compliant
EPBC Decision 2017/7950 Condition 8:		If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request. Note: Compliance records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the Department's website or through the general media.				
EPBC 8	Provide electronic records to the Department on request.	Within the timeframe specified in the request	Submission correspondence	Not Applicable	There was no request to provide electronic records.	Compliant
EPBC Decision 2017/7950 Condition 9:		The approval holder may, at any time, apply to the Minister for a variation to an action management plan approved by the Minister, or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of Section 143A of the EPBC Act. If the Minister approves a Revised Action Management Plan (RAMP) then, from the date specified, the approval holder must implement the RAMP in place of the previous action management plan.				
EPBC 9	The approval hold can apply to the Minister for a variation to a Revised Action Management Plan (RAMP).	At any time	Submission correspondence to the minister with marked up RAMP attached	Not Applicable	The TFEMP or IBCP were not reviewed or revised during the reporting period.	Compliant
EPBC Decision 2017/7950 Condition 10:		The approval holder must: a) Submit plans electronically to the Department for approval by the Minister. b) Publish each plan on the website within twenty (20) business days of the date the plan is approved by the Minister or of the date a revised action management plan is submitted to the Minister or the Department, unless otherwise agreed to in writing by the Minister. c) Exclude or redact sensitive ecological data from plans published on the website or provided to a member of the public; and d) Keep plans published on the website until the end date of this approval.				
EPBC 10A	The approval holder must submit plans electronically to the Department for approval by the Minister;	On submission	Submission correspondence	Not Applicable	No revision of plans during the reporting period.	Compliant
EPBC 10B	The approval holder must publish each plan on the website	Within twenty (20) business days of the date the plan is	Compliance audit	Environment - Covalent Lithium	The following EPBC approved plans are available on the Covalent website:	Compliant



Reference	Condition	Phase	Verification Method	Evidence	Determination Assessment	Status
		approved, or RAMP submitted to the Minister			- Terrestrial Fauna Management Plan (Rev 5) - Ironcap Banksia Conservation Plan (Rev2) - Threatened Fauna Offset Management Plan (Rev 0)	
EPBC 10C	Exclude or redact sensitive ecological data from plans published on the website or provided to a member of the public.	When publishing plans on website	Compliance audit	Not Applicable	No sensitive ecological data has been excluded or redacted from plans published on the website. No member of the public has requested a copy of the plans.	Compliant
EPBC 10D	The approval holder must keep plans published on the website until the end date of this approval.	Until the end date of the approval.	Compliance audit	Refer to EPBC 10B	Refer to EPBC 10B	Compliant
EPBC Decision 2017/7950 Condition 11:		The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under a plan, is prepared in accordance with the Department's Guidelines for biological survey and mapped data (2018) and submitted electronically to the Department in accordance with the requirements of the plan.				
EPBC 11A	Ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under a plan, is prepared in accordance with the Department's Guidelines for biological survey and mapped data (2018).	Overall	Compliance audit	E03_ECO_2023-2024 MalleefowlMonitoringReport E04_ECO_2024ChuditchMonitoringReport E05_ECO_2023-2022IntroducedPredatorMonitoringReport E09_MAT_VegConditionMonitoringAutumn2024 E10_MAT_VegConditionMonitoringSpring2024 E11_MAT_IntroducedFloraWeedSurvey2024 E12_AST_QualitativeVegHealthMonitoring2024	Monitoring data, surveys, maps, and other spatial and metadata required as per the Terrestrial Fauna Management Plan and Ironcap Banksia Conservation Plan were prepared in accordance with the Guidelines for biological survey and mapped data (DCCEEW 2018).	Compliant
EPBC 11B	Submit monitoring data electronically to the Department in accordance with the requirements of the plan.	Overall	Submission correspondence to the Department with attached monitoring data	Not Applicable	Survey reports, surveys and maps provided in line with Plan. Supporting spatial data available upon request.	Compliant
EPBC Decision 2017/7950 Condition 12:		The approval holder must prepare a compliance report for each 12-month period following the date of commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must: a) Publish each compliance report on the website within sixty (60) business days following the relevant 12-month period. b) Notify the Department by email that a compliance report has been published on the website and provide the web link for the compliance report within five (5) business days of the date of publication. c) Keep all compliance reports publicly available on the website until this approval expires. d) Exclude or redact sensitive ecological data from compliance reports published on the website; and e) Where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within five (5) business days of publication. Note: Compliance reports may be published on the Department's website.				
EPBC 12A	Prepare a compliance report for each 12- month period	1 Apr to 31 Mar	Annual compliance report	This 2024-2025 Annual Compliance Report	This Compliance Report summarises the results of the audit undertaken to assess the level of compliance against the EPBC Decision 2017/7950 approval conditions for the 2024/2025 period.	Compliant
EPBC 12B	Publish each compliance report on the website	Within sixty (60) business days following the relevant 12- month period (1 Apr to 31 Mar)	Compliance audit	Environment - Covalent Lithium	The last ACR 2023/2024 was published to the website within the 60-day period.	Compliant



Reference	Condition	Phase	Verification Method	Evidence	Determination Assessment	Status
EPBC 12C	Notify the Department by email that a compliance report has been published on the website and provide the web link for the compliance report	Within five (5) business days of the date of publication	Notification correspondence	Environment - Covalent Lithium	Covalent notified the Department that the CAR had been published on their website within 5 business days of publication.	Compliant
EPBC 12D	Keep all compliance reports publicly available on the website	Until the EPBC approval expires	Compliance audit	Environment - Covalent Lithium	The previous ACRs are available on the Covalent website.	Compliant
EPBC 12E	Exclude or redact sensitive ecological data from compliance reports published on the website	When publishing ACRs on the website	Compliance audit	Not Applicable	No sensitive ecological data has been excluded or redacted from the compliance report published on the website.	Not Applicable
EPBC 12F	Where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department.	Within five (5) business days of the date of publication	Submission correspondence with full ACR attached	Not Applicable	Refer to EPBC 12E	Not Applicable
EPBC Decision 2017/7950 Condition 13:		The approval holder must notify the Department in writing of any: incident ; non-compliance with the conditions; or non-compliance with the commitments made in plans . The notification must be given as soon as practicable, and no later than two (2) business days after becoming aware of the incident or non-compliance. The notification must specify: a) Any condition which is or may be in breach. b) A short description of the incident and/or non-compliance; and c) The location (including co-ordinates), date, and time of the incident and/or non-compliance. In the event the exact information cannot be provided, provide the best information available.				
EPBC 13A	Must notify the Department of: - any incident - non-compliance with conditions - non-compliance with the commitments made in plans	As soon as practicable, and no later than 2 business days after becoming aware of the incident or non- compliance	Notification to the Department	E13_Notification_IncidentJuly2024 E14_Notification_InabilityToComplyFebruary2025 E35_SkeletonRockBushfire_Extent	Notification was sent in July 2024 to DCCEEW due to an incident which involved vegetation disturbance in a Vegetation Exclusion Zone. Though not a project-related incident or non-compliance, it is noted a letter was sent to DCCEEW in February 2025 to notify the inability to comply with conditions in EPBC Decision 2017/7950 due to the Skeleton Rock Bushfire.	Compliant
EPBC 13B	The notification in EPBC 13A is required to include the aspects listed in condition 13a to 13c.	As soon as practicable, and no later than 2 business days after becoming aware of the incident or non- compliance	Notification to the Department	E13_Notification_IncidentJuly2024	The notification sent in July 2024 included the aspects listed in condition 13a to 13c.	Compliant
EPBC Decision 2017/7950 Condition 14:		The approval holder must provide to the Department the details of any incident or non-compliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying: a) Any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future. b) The potential impacts of the incident or non-compliance. c) The method and timing of any remedial action that will be undertaken by the approval holder.				
EPBC 14	Details in condition 14 (a)-(c) must be provided to the department within 10 business days of any incident or non-compliance with the conditions or commitments.	no later than 10 business days after becoming aware of the incident or non-compliance	Submission correspondence to the Department	E13_Notification_IncidentJuly2024	The notification sent in July 2024 included the aspects listed in condition 14a to 14c.	Compliant
EPBC Decision 2017/7950 Condition 15:		The approval holder must ensure that independent audits of compliance with the conditions are conducted as requested in writing by the Minister .				
EPBC 15	Conduct independent audits of compliance with conditions if requested by the minister.	When requested in writing by the Minister	Minister request correspondence	Not Applicable	There has been no request by the Minister.	Not Applicable
EPBC Decision 2017/7950 Condition 16:		For each independent audit , the approval holder must: a) Provide the name and qualifications of the independent auditor and the draft audit criteria to the Department . b) Only commence the independent audit once the audit criteria have been approved in writing by the Department ; and c) Submit an audit report to the Department within the timeframe specified in the approved audit criteria.				



Reference	Condition	Phase	Verification Method	Evidence	Determination Assessment	Status
EPBC 16A	Provide the name and qualifications of the independent auditor and the draft audit criteria to the Department.	When an independent audit is requested by the Minister	Submission correspondence to the Department	Not Applicable	Refer to EPBC 15	Not Applicable
EPBC 16B	Only commence the independent audit once the audit criteria have been approved in writing by the Department.	When an independent audit is requested by the Minister	Compliance Audit	Not Applicable	Refer to EPBC 15	Not Applicable
EPBC 16C	Submit an audit report to the Department within the timeframe specified in the approved audit criteria.	Within the timeframe specified in the approved audit criteria.	Submission correspondence to the Department with attached Independent Audit	Not Applicable	Refer to EPBC 15	Not Applicable
EPBC Decision 2017/7950 Condition 17:		The approval holder must publish the audit report on the website within ten (10) business days of receiving the Department's approval of the audit report and keep the audit report published on the website until the end date of this approval.				
EPBC 17A	Publish the Independent Audit Report on the website	Within 10 business days of receiving approval from the department.	Compliance audit	Not Applicable	Refer to EPBC 15	Not Applicable
EPBC 17B	Keep the Independent Audit Report published on the website	until the end date of the approval.	Compliance audit	Not Applicable	Refer to EPBC 15	Not Applicable
EPBC Decision 2017/7950 Condition 18:		Within thirty (30) days after the completion of the action , the approval holder must notify the Department in writing and provide completion data .				
EPBC 18A	Notify the Department in writing of the completion date	Within 30 days after the completion of the action	Notification to the Department	Not Applicable	The action has not been completed.	Not Applicable
EPBC 18B	Provide the Department with the completion data.	Within 30 days after the completion of the action	Submission correspondence to the Department	Not Applicable	Refer EPBC 18A	Not Applicable



5. References

Department of Climate Change, Energy, the Environment and Water (2019) *Independent Audit and Audit Report Guidelines for controlled actions which have been approved under Chapter 4 of the Environment Protection and Biodiversity Conservation Act 1999*. Report prepared by the DCCEEW (formerly as the Department of Energy and the Environment). Commonwealth of Australia.

Department of Climate Change, Energy, the Environment and Water (2023) *Annual Compliance Report Guidelines*, Reporting under the Environment Protection and Biodiversity Conservation Act 1999, Commonwealth of Australia, Canberra.



Appendix A: Terrestrial Fauna Management Plan Compliance Assessment

The audit findings for conformance with commitments in the Terrestrial Fauna Environmental Management Plan are presented in the following table.



Terrestrial Fauna Environmental Management Plan Audit Table

Reference	Objective	Timing	Status	Evidence	Comment
TFEMP 01	Management targets: Avoid removal of any active malleefowl mounds.	Ongoing	Compliant	E03_ECO_2023-2024 MalleefowlMonitoringReport	No active malleefowl mounds were removed in the reporting period.
TFEMP 02	Management targets: Avoid clearing of vegetation within 100 m of malleefowl mounds.	Ongoing	Compliant	E03_ECO_2023-2024 MalleefowlMonitoringReport E15_FaunaPreClearanceSurveys2024	There was no proposal related disturbance within 100 metres of malleefowl mounds during the reporting period. Pre-clearance surveys were undertaken as part of vegetation clearing procedure in addition to annual population monitoring.
TFEMP 03	Management targets: Minimise mortality of malleefowl or chuditch from clearing activity, entrapment, vehicle strike or mining related fire.	Ongoing	Compliant	E16_InternalIncidentInvestigation_VehicleStrike E17_InternalIncidentInvestigation_FireImpact E18_EnvironmentSiteNotice_TrafficManagement E39_SkeletonRockBushfire_ImpactToMMEZ	Internal incident investigation (E18) reported a mortality by vehicle strike to an unknown bird species which was suspected to be a Malleefowl but not possible to confirm. Internal incident investigation (E19) reported a mortality of Malleefowl within the aerodrome fence, suspected cause of death being smoke inhalation or extreme heat during the Skeleton Rock Bushfire. There were no other records of mortality of Malleefowl or Chuditch from clearing activity, entrapment, vehicle strike or mining related fire in the reporting period.
TFEMP 04	Management targets: Minimise decline of Malleefowl and Chuditch population due to predation from introduced predators.	Ongoing	Compliant	E03_ECO_2023-2024 MalleefowlMonitoringReport E04_ECO_2024ChuditchMonitoringReport E05_ECO_2023-2024IntroducedPredatorMonitoringReport E06_APAS_Jun24FeralCatControlProgram E07_APAS_Sep24FeralCatControlProgram E08_APAS_Sep24WildDogControlProgram	Annual population of Malleefowl and Chuditch monitoring did not indicate a decline in population due to predation from introduced predators.
TFEMP 05	Management targets: Minimise decline of Malleefowl and Chuditch population due to dust, noise, light, vibration and displacement.	Ongoing	Compliant	E03_ECO_2023-2024 MalleefowlMonitoringReport E04_ECO_2024ChuditchMonitoringReport	Annual population of Malleefowl and Chuditch monitoring did not indicate a decline in population due to dust, noise, light, vibration or displacement.
TFEMP 06	Management targets: Minimise potential risk of a decline in fauna habitat condition due to change in fire regime.	Ongoing	Compliant	E35_SkeletonRockBushfire_Extent E36_SkeletonRockBushfire_ImpactToDE	There were no project related fires in the Development Envelope during the reporting period. The Skeleton Rock Bushfire was not project related.
TFEMP 07	If Trigger Criteria is met: - Report internally as an incident in accordance with internal procedures. - Review management strategies and implement changes to prevent future occurrences which may include the following: - Audit and review of training and staff inductions (i.e. increase in staff training and awareness to include information on MMEZ, legislative requirements, appropriate clearing procedures). - Ground Disturbance Permit competency training. - Installation of signage where appropriate. - Review of effectiveness of 10 m trigger response criteria for unauthorised clearing approaching a MMEZ and update FMP appropriately.	Ongoing	Compliant	E01_ACR2024-2025_VegetationClearingEEZ	There was no unauthorised clearing of native vegetation during the reporting period within the DE or MMEZ. Records of all clearing during the reporting period were maintained.



Reference	Objective	Timing	Status	Evidence	Comment
	- Review impact of unauthorised clearing and report as a potential non-compliance to CEO DWER within 7 days of identification. - Undertake rehabilitation of unauthorised clearing (i.e. disturbance from vehicle tracks, vegetation clearing) by appropriately qualified personnel as required, in accordance with rehabilitation procedures.				
TFEMP 08	If Trigger Criteria is met: - Unauthorised access by personnel to a MMEZ Proponent will take response actions: - Report internally as an incident in accordance with internal procedures. - Consult with a fauna specialist to review management strategies and implement changes to prevent future occurrences which may include the following: • Review proximity of potential of disturbance to Malleefowl mounds within the MMEZ. • Should disturbance occur to an active Malleefowl mound as a result of unauthorised access, report to CEO DWER within 7 days of identification. - Undertake rehabilitation of unauthorised access (i.e. disturbance from vehicle tracks) as required in accordance with internal rehabilitation procedures.	Ongoing	Compliant	E01_ACR2024-2025_VegetationClearingEEZ	There were no reports of unauthorised access to a MMEZ during the reporting period.
TFEMP 09	If Trigger Criteria is met: Clearing or disturbance of vegetation within 100 m of any newly identified active malleefowl mounds and / or the MMEZs. Proponent will take response actions: - Cease clearing activities. - Undertake investigation to determine source of disturbance. - If disturbance is attributed to Project activities, undertake a review of Indicative Site Layout to determine if impact can be minimised, development actions to prevent a recurrence and communicate findings to relevant personnel. - Suitably qualified fauna specialist to undertake an assessment of impact. - If potential impacts to eggs are expected, consultation with DBCA will occur to determine if egg removal is required. - Rehabilitation of vegetation disturbance to be considered to restore fauna habitat. - Any impacts to Malleefowl nest mounds to be rehabilitated following consultation with DBCA and a suitably qualified fauna specialist. - Report as a potential non-compliance to CEO DWER within 7 days of identification. - Investigate and report in accordance with Condition 3-1(3) to Condition 3-1(6) of MS1199. Report submitted to CEO DWER with remediation actions proposed.	Ongoing	Compliant	E01_ACR2024-2025_VegetationClearingEEZ	There was no project-related clearing and/or disturbance of vegetation within 100m of a newly identified active malleefowl mound, or MMEZ during the reporting period.
TFEMP 10	Conduct internal audit of recorded malleefowl mounds against areas of clearing.	Ongoing	Compliant	E03_ECO_2023-2024 MalleefowlMonitoringReport	There was no clearing of any Malleefowl mounds during the reporting period.
TFEMP 11	Undertake monitoring of incident reports for over clearing light and noise disturbance and fire.	Ongoing	Compliant	E01_ACR2024-2025_VegetationClearingEEZ	Environment incident reports monitored as part of routine activities. Incidents of internal clearing boundary exceedances did not impact any Malleefowl mounds or MMEZ.
TFEMP 12	If Trigger Criteria is met: Chuditch Trigger Criteria: A 25% decrease at impact sites in female abundance for two consecutive monitoring events. Malleefowl Trigger Criteria: A 25% decrease in the estimated local population number (based on temporal analysis) over a consecutive two year period. Proponent will take response actions: - Report internally as an incident. - Review all monitoring data (including control sites) in relation to management measures (Table 2-3Table 2-4) and any other available data such as weather and climate to determine if the decrease is due to Project-related impacts. - Determine whether the changes observed within the Development Envelope for Chuditch are comparable to the observations in the reference sites. - Investigate potential causes for the observed decrease in female Chuditch abundance or decrease in local Malleefowl population which may include, but are not limited to: • Seasonal conditions (e.g. rainfall and temperatures). • Effectiveness of introduced predator control.	Ongoing	Compliant	Nil	There were no trigger criteria exceeded during the reporting period.



Reference	Objective	Timing	Status	Evidence	Comment
	- Changes in nest mound usage patterns by Malleefowl (i.e. use of mounds that are not surveyed). - Spatial variation (near-impact areas) versus sites located further from impact. - Reliability of observations obtained from the sightings register. - Fauna deaths reported. - Seek advice from a suitably qualified fauna specialist, as required. - If a Project-related impact is suspected, review management measures on advice from a suitably qualified fauna specialist. Management measures may include the following: - Review of annual Malleefowl and Chuditch monitoring, where required. - Review and increase effectiveness of pre-clearance monitoring (for example timing/duration of surveys). - Review and refine remote camera monitoring for introduced predator fauna (foxes and cats). - A proportionate increase in trapping/ baiting intensity may be required for introduced predator control in areas where increased sightings occur. - Increase in the frequency of introduced predator control undertaken may be required. - Increase internal audits and inspections for incident reports relating to vehicle interactions, unauthorised clearing, light and noise disturbance and fire. - Fauna mortality register may require review and locations of mortalities examined to identify areas where a decrease in speed limits, alteration to roads and/or extra signage may be required. - Increase in staff training and awareness to include information on introduced predator fauna (foxes and cats), for example the impact of predator fauna on Malleefowl and Chuditch populations, no feeding of predator fauna, reducing availability of food waste to predator fauna and all sightings of predator fauna to be reported. - Consider changes to the mining operations (for example, change in the location, duration and/or method(s) of mining operations). - Consider changes in land disturbance (for example, change in location of disturbance or the method of vegetation clearing, or a reduction in the extent of disturbance).				
TFEMP 13	Undertake pre-clearance monitoring	Prior to clearing	Compliant	E15_FaunaPreClearanceSurveys2024	Pre-clearance monitoring was undertaken during the reporting period.
TFEMP 14	Annual monitoring of malleefowl activity using motion sensor cameras	Ongoing	Compliant	E03_ECO_2023-2024MalleefowlMonitoringReport	Annual monitoring with motion sensor cameras was undertaken in the reporting period.
TFEMP 15	Annual monitoring of malleefowl as per NMRT (2019) guidelines	Ongoing	Compliant	E03_ECO_2023-2024MalleefowlMonitoringReport	Annual monitoring of Malleefowl was undertaken as per NMRT Monitoring Manual (2020).
TFEMP 16	Annual monitoring of chuditch using cage trapping	Ongoing	Compliant	E04_ECO_2024ChuditchMonitoringReport	Annual monitoring of chuditch using cage trapping was undertaken in the reporting period.
TFEMP 17	If Trigger Criteria is met: Chuditch Threshold Criteria: A 50% decrease at impact sites in female abundance for two consecutive monitoring events. Malleefowl Threshold Criteria: A project related 50% decrease in the estimated local population (based on temporal analysis) over a consecutive two-year period. Proponent will take response actions: - Report as a potential non-compliance to CEO DWER within 7 days of identification - Investigate and report in accordance with Condition 3-1(3) to Condition 3-1(6) of MS1199. Report submitted to CEO DWER with remediation actions proposed. - Review all monitoring data (including control sites) in relation to management measures (Table 2-3) and any other available data such as weather and climate to determine if the decrease is due to Project-related impacts. - Seek advice from a suitably qualified fauna specialist, as required. - If Project-related impact is suspected, increase management measures on advice from a suitably qualified fauna specialist to reduce the exceedance below threshold criteria.	Ongoing	Compliant	Nil	There were no trigger criteria exceeded during the reporting period.



Reference	Objective	Timing	Status	Evidence	Comment
TFEMP 18	Management Target: Minimise the potential for incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike. Management Actions - Clearing management controls: - Implementation of an internal clearing permit procedure, including onsite demarcation and notification procedures, that limits access to the MMEZs by foot only or only by car where there is an existing track. - MMEZs within close proximity to operational areas to be delineated with flagging tape, signage or similar to alert all personnel of their location. - Inductions of all site personnel to include information on the location of MMEZs, management targets, measures and expectations. - Undertake progressive clearing, minimising the amount of active disturbance present. - Progressively rehabilitate areas as appropriate. - Preferential clearing outside of the egg incubation season (September to February) and potentially the mound building season (June to August). - Clearing of the Malleefowl nest mounds within the Indicative Site Layout will occur between March to May, outside of the mound building, breeding and incubation season (June to February). - Where a recently 'active' Malleefowl nest mound coincides with the Indicative Site Layout, and removal of the nest mound cannot be avoided, the Malleefowl nest mound will be removed only during the non-breeding period (i.e. when the nest mound is not being actively used for Malleefowl breeding). Alternatively, the nest mound may be covered during the non-breeding period to exclude the potential for Malleefowl breeding occurring during the breeding period; such that the nest mound can then be removed during either the breeding or non-breeding periods. This approach will ensure that no 'active' Malleefowl nest mounds are removed during implementation of the Project. Monitoring: - Annual monitoring of Malleefowl and Chuditch. Reporting: - Annual reporting. - Internal audit reporting for areas of clearing. - Incident reports.	Ongoing	Compliant	E15_FaunaPreClearanceSurveys2024 E18_EnvironmentSiteNotice_TrafficManagement E19_GDPProcedure E20_GDPTrainingPresentation E21_GDP0093_Example E22_FaunaManagementTrenchClearingProcedure	There was one confirmed reported mortality of Malleefowl and no reported mortality of Chuditch during the reporting period. Clearing Management Controls implemented: - Implementation of Ground Disturbance Permit (GDP) Procedure requires demarcation and notification and limits access to MMEZ. - Where activities are location within 100 metres of MMEZ, delineation and signage in place. - The GDP Awareness induction covers exclusion zones and requirements to avoid them. The presentation covers management targets, measures and expectations. - Clearing undertaken progressively with typically only one workgroup active at any time. - Clearing undertaken outside of the Malleefowl breeding season where possible. - There no Malleefowl mounds removed during the reporting period. - Rehabilitation opportunities are limited in the first five years of operations.
TFEMP 26	Management Target: Minimise the potential for incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike. Management Actions - Malleefowl management controls: - All malleefowl sightings, active and inactive mounds will be recorded including date, observer, status of mound/malleefowl and a location description. This information will be assessed as part of annual monitoring. Pre-clearance surveys: - Pre-clearance surveys will be conducted in accordance with the NMRT (2019) National Malleefowl Mound Monitoring Manual and utilise LiDAR technology. - Pre-clearance surveys will only be undertaken during the incubation period when mounds are likely to be active from September to February and occur a minimum of two weeks prior to clearing, to identify any malleefowl mounds and determine their status. Outside of this incubation period, annual and 5-year population monitoring will be adequate to determine the presence of mounds and their status. - LiDAR survey of areas planned for clearing will be undertaken to inform pre- clearance surveys annually for the first year during the construction period and any potential mounds checked to determine if they are active, and the monitoring period defined. - Following the initial one-year period, LiDAR surveys will be undertaken as required depending on the size and scale of the clearing area. If it is more practical and effective to search an area on foot as opposed to LiDAR, 10 m wide transects across the entire area will be employed to determine the presence of mounds and their status. - Pre-clearance walk throughs will be undertaken to identify and disperse Malleefowl individuals prior to clearing. Pre-clearance walk throughs will be undertaken the morning before clearing / disturbance to disperse individuals and will include searching and checking refugia sites. In the event that Malleefowl are found in the area to be cleared and there are no new active mounds, fauna specialists will implement a dispersal method to allow the Malleefowl to egress on their own but remain within their home range.	Ongoing	Compliant	E03_ECO_2023-2024MalleefowlMonitoringReport E04_ECO_2024ChuditchMonitoringReport E15_FaunaPreClearanceSurveys2024 E16_InternalIncidentInvestigation_VehicleStrike E17_InternalIncidentInvestigation_FireImpact E23_COVFaunaTakingRelocationLicences	- A fauna sightings register is kept with opportunistic sightings including Malleefowl and Chuditch sightings. This is assessed annually as a part of annual Malleefowl population and introduced predator monitoring, with data included in the relevant report. - Baseline pre-clearance surveys were undertaken as described by Section 2.5.2 and in accordance with the NRMT in a previous reporting period. Annual and 5-year population monitoring is deemed adequate to determine the presence of mounds and their status. - Annual Malleefowl population monitoring was undertaken - LiDAR survey completed in a previous reporting period. - Transect fauna surveys and LiDAR ground truthing completed in previous reporting period. - Pre-clearance walk-through were undertaken to identify and disperse Malleefowl individuals prior to clearing. - Active Malleefowl mounds were avoided and 100 m buffer applied.



Reference	Objective	Timing	Status	Evidence	Comment
	- Active nest mounds will be avoided as per MS1199 Condition 3-1(3) and a 100m buffer will be applied to any active mounds to be flagged in the field as no-go zones (consistent with Figure 2.1). - Suitably qualified fauna personnel will be present during clearing activities. Covalent personnel hold a Fauna Taking (Relocation) Licence granted under Regulation 28 of the Biodiversity Conservation Regulations 2018 (WA) to allow for the handling and movement of conservation significant fauna, if encountered. Any required handling or movement of conservation significant fauna is undertaken subject to the guidance of consulting ecologists. Covalent will have access to a care facility that can be used to rehabilitate any injured fauna and a procedure in place developed in consultation with DBCA. Monitoring - Annual Malleefowl population monitoring Reporting - Annual reporting - Internal audit reporting for areas of clearing - Incident reports				- Covalent environmental personnel hold required Fauna Taking (Relocation) Licence and present during clearing activities. There was no requirement for the handling or movement of conservation significant fauna during the reporting period. - There was one confirmed mortality of a Malleefowl which was found within the aerodrome fence following the Skeleton Rock Bushfire.
TFEMP 34	Management Target: Minimise the potential for incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike. Management Actions - Chuditch controls: - Clearing will be avoided between the months of September to November where possible to mitigate impacts to denning females. - Vegetation clearing will be undertaken during the daytime only, when Chuditch are generally less active. Pre-clearance surveys: - Pre-clearance surveys will be undertaken as described by Section 2.5.2 Pre-clearance Survey Monitoring to record the presence/absence of Chuditch in the area to be cleared. - The procedure will involve pre-clearance walk throughs to be undertaken the morning before clearing / disturbance to disperse Chuditch individuals and will include searching and checking refugia sites and trapping for Chuditch the night immediately prior to clearing and holding the Chuditch for no more than one night. Chuditch will be released into a nearby area from where it was caught following the completion of daytime clearing activities. - Should clearing be undertaken during September to November then the pre- clearance survey procedure for the months of September, October and November will be modified to further mitigate the risk to breeding and denning females. During these months, in the event a female is captured it will be held during the day and released during the evening with a radio collar. The radio- collared female will be tracked to identify the location of the den. Once the den location identified, trail cameras will be installed to monitor den activity and an exclusion radius of 100 m applied for clearing activity. The exclusion radius area will be maintained until the female and young have left the den. A fauna handling procedure will be developed in consultation with DBCA. - Suitably qualified fauna personnel will be present for clearing activities. The person will hold a Fauna Taking (Relocation) Licence granted under Regulation 28 of the Biodiversity Conservation Regulations 2018 (WA) to allow for the handling and movement of conservation significant fauna, if encountered. Any required handling or movement of conservation significant fauna is undertaken subject to the guidance of consulting ecologists. The person will have access to a care facility that can be used to rehabilitate any injured fauna and a procedure in place developed in consultation with DBCA. Monitoring - Annual Chuditch population monitoring Reporting - Annual reporting - Internal audit reporting for areas of clearing - Incident reports	Ongoing	Compliant	E03_ECO_2023-2024MalleefowlMonitoringReport E04_ECO_2024ChuditchMonitoringReport E15_FaunaPreClearanceSurveys2024 E22_FaunaManagementTrenchClearingProcedure E23_COVFaunaTakingRelocationLicences	- Clearing undertaken outside of the Chuditch denning season where possible. - All clearing activities occur on dayshift only as part of site standard. - Baseline pre-clearance surveys were undertaken as described by Section 2.5 in a previous reporting period. Annual population monitoring is deemed adequate to record the presence/absence of Chuditch within the DE. - Pre-clearance trapping is undertaken by external consultant the night immediately prior to clearing. An additional pre-clearance walkthrough is undertaken the morning of clearing to disperse Chuditch and other fauna. No Chuditch were captured during pre-clearance trapping activities in the reporting period. - Covalent environmental personnel hold required Fauna Taking (Relocation) Licence and present during clearing activities. There was no requirement for the handling or movement of conservation significant fauna during the reporting period. - Annual Chuditch population monitoring has been undertaken in the reporting period. - There were no incidents of Chuditch mortality recorded during the reporting period.
TFEMP 40	Management Target: Minimise the potential for incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.	Ongoing	Compliant	E18_EnvironmentSiteNotice_TrafficManagement	- Traffic management and fauna specific risks are provided to all personnel via site notices and toolbox talks. This includes



Reference	Objective	Timing	Status	Evidence	Comment
	Management Actions – Traffic management controls: - Avoid accidental disturbance to fauna and habitat by enforcing strict traffic management rules (e.g. keeping to designated tracks, limited driving between dusk and dawn, driving to road and weather conditions, reduced speed limits within suitable habitat, Malleefowl and Chuditch signage). - All sightings and interactions with Malleefowl and Chuditch to be reported to Environmental personnel. - Environmental personnel to identify and establish working relationships with local wildlife carers/vets for injured Malleefowl and Chuditch. - Worker awareness training. Monitoring - Annual Malleefowl and Chuditch population monitoring - Internal audit of speeding and night driving. - Monitoring of incident reports for Malleefowl and Chuditch, vehicle strike, speeding and night driving. Reporting - Annual reporting - Internal audit reporting for speeding and night driving. - Incident reports			E24_EnvironmentSiteNotice_ReportingFaunaSightings	reducing speed limit of the village access road during Malleefowl breeding season. - A fauna sightings register is kept with opportunistic sightings including Malleefowl and Chuditch sightings. This is assessed annually as a part of annual Malleefowl population and introduced predator monitoring, with data included in the relevant report. - All personnel receive GDP Awareness Training prior to mobilising to site which includes information on Malleefowl and Chuditch. - Covalent environment team regularly liaises with Wildcare, and a rehabilitation specialist located in Moorine Rock for all injured fauna on site.
TFEMP 44	Management Target: Minimise the potential for incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike. Management Actions – Fauna entrapment controls: - During construction, all construction pipes, culverts, or similar structures stored on-site overnight will be inspected for wildlife by a qualified fauna specialist or properly trained on-site personnel before the pipe is buried, capped, used, or moved. - If the inspection indicates presence of conservation significant species inside stored materials or equipment, work on those materials will cease until a suitably qualified fauna specialist determines the appropriate course of action. - To prevent entrapment of animals, all excavations, steep-walled holes or trenches ≥ 1 m depth will be secured against animal entry at the close of each day, where possible. Any of the following measures may be employed, depending on the size of the hole and method feasibility: • Construction holes and trenches will be securely covered (no gaps) with plywood or similar materials at the close of each working day, or any time the opening will be left unattended for more than one hour. • In the absence of covers, the excavation will be provided with escape ramps constructed of earth or untreated wood, sloped no steeper than 2:1, and located no farther than 100 m apart. • In situations where escape ramps are unfeasible, the hole or trench will be surrounded by filter fabric fencing or a similar barrier with the bottom edge buried to prevent entry as appropriate, or • If a trench with a greater distance than 100 m is required to be left open for > 1 day, trench inspections shall be undertaken to identify any entrapped fauna and relocation completed. The requirement and specifics (frequency and timing) for trench inspections will be determined by environmental personnel, however inspections after sunrise, before sunset and prior to backfilling may be required. - Domestic waste facilities will be fenced, and putrescible waste receptacles will be covered.	Ongoing	Compliant	E22_FaunaManagementTrenchClearingProcedure E25_LandfillFacilityManagementProcedure	- The Fauna Management and Trench Clearing procedure outlines the requirements for inspection by personnel before the pipe is buried, capped, used, or moved. There were no reports of mortality from pipes, culverts, or similar structures in the reporting period. - The onsite landfill is fenced and covered regularly in line with DWER Licence (L9326/2022/1).
TFEMP 48	Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike. Action (fauna entrapment controls): Containers to have doors closed securely when not in use.	Ongoing	Compliant	E22_FaunaManagementTrenchClearingProcedure	Containers have doors closed when not in use, to prevent entry by Malleefowl or Chuditch.
TFEMP 49	Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike. Action (fauna entrapment controls): Permanent water sources (tanks, ponds and dams) to be fenced and / or have fauna egress mats installed.	Ongoing	Compliant	E22_FaunaManagementTrenchClearingProcedure	Permanent water sources (tanks, ponds and dams) are fenced and/or have fauna egress mats installed.



Reference	Objective	Timing	Status	Evidence	Comment
TFEMP 50	Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike. Action (fauna entrapment controls): To prevent entrapment within the Mine Pit(s) at mine closure, a ramp will be put in place during closure to enable fauna to exit and avoid entrapment.	Mine closure	Not Applicable	Nil	Not yet in closure phase.
TFEMP 51	Management Target: Minimise decline in population due to predation from introduced predators. Action (introduced predator control management): Introduced predator fauna identified will be reported to Environmental personnel and recorded to monitor occurrences.	Ongoing	Compliant	E05_ECO_2023-2024IntroducedPredatorMonitoringReport E24_EnvironmentSiteNotice_ReportingFaunaSightings	A fauna sightings register is kept with opportunistic sightings including Malleefowl and Chuditch sightings. This is assessed annually as a part of annual Malleefowl population and predator monitoring, with data included in the relevant report.
TFEMP 52	Management Target: Minimise decline in population due to predation from introduced predators. Action (introduced predator control management): Avoid attraction of introduced predators to the Development Envelope by implementing domestic waste management procedures (e.g. fencing of landfills, regularly covering putrescible waste, secure lids on bins).	Ongoing	Compliant	E25_LandfillFacilityManagementProcedure	The onsite landfill is fenced and covered in line with DWER Licence (L9326/2022/1) and managed via the Landfill Facility Management Procedure.
TFEMP 53	Management Target: Minimise decline in population due to predation from introduced predators. Action (introduced predator control management): Introduced predator control will be undertaken within the Development Envelope plus a 3 km area surrounding the Development Envelope, and in collaboration with DBCA regional control programs where practicable.	Ongoing	Compliant	E05_ECO_2023-2024IntroducedPredatorMonitoringReport E06_APAS_Jun24FeralCatControlProgram E07_APAS_Sep24FeralCatControlProgram E08_APAS_Sep24WildDogControlProgram	Introduced predator control was undertaken throughout the reporting period within and surrounding the DE, where tenement permission was granted. Permission has not been granted on third party tenure within the 3km area surrounding the DE and is excluded from relevant permit to carry out the activity.
TFEMP 54	Management Target: Minimise decline in population due to predation from introduced predators. Action (introduced predator control management): Induct personnel on waste management and introduced predator control measures.	Ongoing	Compliant	E24_EnvironmentSiteNotice_ReportingFaunaSightings E26_EnvironmentSiteNotice_WasteManagement E27_EnvironmentSiteNotice_IntroducedPredatorControl	Personnel are inducted on relevant topics, with ongoing awareness provided in Site Notices and Environmental Toolbox Talks.
TFEMP 55	Management Target: Minimise decline in population due to predation from introduced predators. Action (introduced predator control management): Introduced predator monitoring to be undertaken in accordance with methodology outlined in Section 2.5 Monitoring.	Ongoing	Compliant	E05_ECO_2023-2024IntroducedPredatorMonitoringReport	Monitoring has not indicated a change in Malleefowl, Chuditch due to predation from introduced predators.
TFEMP 56	Management Target: Minimise decline in population due to predation from introduced predators. Action (introduced predator control management): Predator density by monitoring activity will be assessed and any causal factors identified to ensure appropriate management measures are undertaken. Consideration shall be given to local and regional baiting or a review of food sources at camp or the landfill.	Ongoing	Compliant	E05_ECO_2023-2024IntroducedPredatorMonitoringReport E06_APAS_Jun24FeralCatControlProgram E07_APAS_Sep24FeralCatControlProgram E08_APAS_Sep24WildDogControlProgram	Monitoring has not indicated a change in Malleefowl, Chuditch due to predation from introduced predators.
TFEMP 57	Management Target: Minimise the potential for decline in population due to dust, light, noise, vibration and displacement. Management Actions: - Dust, noise, light and vibration management: - o Dust suppression measures that include good house-keeping practices for vehicles, cleared areas, and active stockpiles. - o Dust suppression measures such as the use of watercarts will be used during dry and windy conditions, as required. - Noise, light and vibration management: - o Machinery and equipment will be fitted with noise attenuation measures to meet personnel safety requirements.	Ongoing	Compliant	E03_ECO_2023-2024 MalleefowlMonitoringReport E04_ECO_2024ChuditchMonitoringReport E05_ECO_2023-2024IntroducedPredatorMonitoringReport	- Dust suppression carried out on unsealed roads, cleared open areas and active stockpiles. - Machinery and equipment meet health and safety requirements for noise and vibration.



Reference	Objective	Timing	Status	Evidence	Comment
	- Installation of lighting that direct lights toward plant areas to minimise light spill into adjacent vegetated areas. - Equipment design will specify compliance with Australian Standard noise limits. Monitoring: - Monitoring of incident reports for light and noise disturbance. - Malleefowl and Chuditch population monitoring. - Dust, flora and vegetation health monitoring as per FVEMP. Reporting: - Annual reporting. - Flora and vegetation health reporting as per FVEMP. - Incident reports of speeding. - Incident reports of significant dust plumes.			E09_MAT_VegConditionMonitoringAutumn2024 E10_MAT_VegConditionMonitoringSpring2024 E11_MAT_IntroducedFloraWeedSurvey2024 E12_AST_QualitativeVegHealthMonitoring2024	- Lighting towers both fixed and temporary are utilised and directed on operational areas and roads, not into vegetated areas. - All equipment and machinery is designed and tested to comply with Australian Noise Limit Standards. - Annual flora and vegetation health population monitoring was undertaken and reported in this CAR. - Annual population monitoring of Malleefowl and Chuditch has been undertaken and reported in this CAR. - There were no relevant incident reports with potential for fauna impacts within the reporting period.
TFEMP 62	Management Target: Minimise decline in fauna habitat condition due to changed fire regimes. Management Actions: - Implementation of fire management procedures (e.g. maintenance of fire breaks, Hot Work Permit system, firefighting training, Emergency Response Plan). - Firefighting equipment will be located on site and in vehicles. - Lightning protection equipment will be installed as part of Project design where necessary. - Vehicles will not be permitted to leave access tracks or cleared areas. - Coordination with DBCA and Department of Fire and Emergency Services (DFES) to undertake prescribed burns. Monitoring: - Flora and vegetation health population monitoring as per FVEMP. Reporting: - FVEMP reporting as per FVEMP - Annual Reporting	Ongoing	Compliant	E28_MtHollandEmergencyResponsePlan E09_MAT_VegConditionMonitoringAutumn2024 E10_MAT_VegConditionMonitoringSpring2024 E11_MAT_IntroducedFloraWeedSurvey2024 E12_AST_QualitativeVegHealthMonitoring2024 E35_SkeletonRockBushfire_Extent E36_SkeletonRockBushfire_ImpactToDE E40_SkeletonRockBushfire_DFESFirebreakClearing	Fire management procedures are in place as identified in the Mt Holland Emergency Response Plan. Annual flora and vegetation health population monitoring was undertaken in the reporting period in line with FVEMP requirements. The Skeleton Rock Bushfire resulted in the decline of fauna habitat. Management of the event included clearing of firebreaks and back-burning practices as managed under emergency control by DFES.
TFEMP 67	Covalent will require all workers, both during construction and operation of the mine, to attend a worker awareness training/environmental induction covering the following topics. - Malleefowl and Chuditch (e.g. how to identify, conservation status, the importance of minimising impacts on the species, requirements of personnel including adherence to speed limits and staying on roads as well as locations and incidents, reporting to Environmental personnel). - Information on other conservation-significant fauna recorded within the Development Envelope. - Information on introduced predator fauna controls (no feeding of introduced predators and all sightings to be reported) and their potential to impact to Malleefowl and Chuditch. - Information on the prevention and management of fires to protect fauna habitat.	Ongoing	Compliant	E29_EnvironmentTBT_EEZReportingEnvironmentalIncidents E30_EnvironmentTBT_ProtectOurMalleefowl E31_EnvironmentTBT_NationalBiodiversityMonth E32_EnvironmentTBT_ThreatenedSpeciesDay E33_EnvironmentTBT_MalleefowlWatchS6	- All personnel complete a site induction which includes the minimum environmental requirements for site. - In addition, environmental awareness campaigns (e.g. National Biodiversity Month, National Threatened Species Day, Malleefowl breeding season etc) are ongoing throughout the year and delivered via environmental toolbox talks.
TFEMP 68	Environmental incidents are defined as breaches or non-adherences to objectives and procedures applied to the Project and prescribed in the TFEMP. Environmental incidents are to be reported to the Covalent Environmental Manager by the person responsible for the incident or the first person at the site of an incident.	Ongoing	Compliant	Nil	There were no breaches or non-adherences to objectives and procedures in relation to the TFEMP during the reporting period.
TFEMP 69	The Covalent Environmental Manager will assess the type and severity of the incident in accordance with internal procedures. Relevant personnel shall be notified and consulted whether the incident requires notification to regulatory agencies.	Ongoing	Compliant	Nil	There were no breaches or non-adherences to objectives and procedures in relation to the TFEMP during the reporting period.



Reference	Objective	Timing	Status	Evidence	Comment
TFEMP 70	Annual Population monitoring of Malleefowl and Chuditch as per Section 2.51	Annual	Compliant	E03_ECO_2023-2024 MalleefowlMonitoringReport E04_ECO_2024ChuditchMonitoringReport	Annual monitoring is undertaken in accordance with Section 2.51.
TFEMP 71	Pre-Clearance Surveys - Malleefowl pre-clearance surveys during incubation period of September to February - Chuditch pre-clearance surveys the night immediately prior to ground disturbing activities - As described by section 2.5.2	Ongoing	Compliant	E15_FaunaPreClearanceSurveys2024	Pre-clearance surveys undertaken as per Section 2.5.2.
TFEMP 72	Mortality monitoring Monitoring of incident reports for malleefowl and chuditch predation, vehicle strike, speeding and night driving.	Ongoing and annual review	Compliant	Nil	No records of predation, vehicle strike (unconfirmed), speeding and night driving incidents resulting in mortality of Malleefowl or Chuditch.
TFEMP 73	Introduced predator monitoring Monitoring of the existing introduced predator populations (focussing on the fox and cat populations). This information is intended to provide a baseline for comparison of introduced predator populations over the life of mine. The information will also guide any introduced predator control programs implemented in the Proposal area.	Ongoing and annual review	Compliant	E05_ECO_2023-2024IntroducedPredatorMonitoringReport E06_APAS_Jun24FeralCatControlProgram E07_APAS_Sep24FeralCatControlProgram E08_APAS_Sep24WildDogControlProgram	Baseline introduced predator monitoring has been undertaken in 2021 and 2022. Predator control program was implemented in April 2023 and throughout 2024.
TFEMP 74	Clearing monitoring - Monitoring of clearing register for compliance to approvals. - Review of clearing footprint to determine clearing proximity to active malleefowl mounds.	Ongoing and annual review	Compliant	E19_GDPPProcedure E21_GDP0093_Example	Monitoring of clearing is undertaken in line with GDP procedure and internal GIS specialist.
TFEMP 75	Clearing monitoring Internal audit and inspection of areas of clearing, areas of potential entrapment, speeding and night driving.	Ongoing and annual review	Compliant	E19_GDPPProcedure	Internal auditing and inspections being undertaken.
TFEMP 76	Fauna habitat monitoring Annual monitoring of vegetation condition as an indicator of fauna habitat quality.	As FVEMP	Compliant	E09_MAT_VegConditionMonitoringAutumn2024 E10_MAT_VegConditionMonitoringSpring2024 E11_MAT_IntroducedFloraWeedSurvey2024 E12_AST_QualitativeVegHealthMonitoring2024	Vegetation health is reported in the vegetation monitoring reports.
TFEMP 77	Covalent is required to prepare and submit annually of a Compliance Assessment Report (CAR) to CEO DWER in accordance with Condition 8 of MS1199. The CAR will include: - A summary of compliance requirements. - Summary of compliance during the reporting period. - Non-compliances and corrective / preventative actions. - Compliance assessment table. - Documentary evidence. - Provision of data (annually) from monitoring programs to relevant regulatory authorities	Annually	Compliant	Environment - Covalent Lithium	CAR submitted annually as required. This CAR for the 2024/2025 reporting period will be submitted in 2025.
TFEMP 78	If a trigger is exceeded then action will be:	At time of event	Compliant	Nil	There were no trigger criteria exceeded in reporting period.



Reference	Objective	Timing	Status	Evidence	Comment
	Internal incident report and investigation to prevent a recurrence and reduce the exceedance below trigger criteria.				
TFEMP 79	In the event a Threshold criteria is met, Covalent will notify the CEO DWER within 7 days of identification of the Threshold criteria being met, including information on remediation actions that have been or will be implemented, in accordance with Condition 3-5(1) of MS1199.	Within 7 days of event	Compliant	Nil	There were no trigger criteria exceeded in reporting period.
TFEMP 80	Covalent will investigate the cause of the Threshold criteria being met and prepare and submit a report to CEO DWER within 21 days of the exceedance in accordance with Condition 3-5(3) to Condition 3-5(5) of MS1199. The report will include: - Details of contingency actions implemented. - Effectiveness of the actions implemented, measured against the threshold criteria. - Findings of investigations. - Measures to prevent the Threshold criteria being exceeded in the future. - Measures to prevent, control or abate any environmental harm which may have occurred. - Justification the Threshold criteria remaining, or being adjusted based on a better understanding, demonstrating that objectives will continue to be met	Within 21 days of event	Compliant	Nil	There were no trigger criteria exceeded in reporting period.
TFEMP 81	If there is fauna injury or abandonment, then action will be: The relevant regulatory authorities (DBCA) will be notified annually within the CAR of threatened and specifically protected fauna being injured or abandoned.	Annually	Compliant	E23_COVFaunaTakingRelocationLicences	DBCA receive annual submission of "Return of Fauna Relocated" as is required by the Fauna Taking (Relocation) Licence.
TFEMP 82	If there is mortality of conservation significant fauna, then action will be: The relevant regulatory authorities (including DBCA and DAWE) will be notified annually within CAR. Any fauna found deceased, accidentally killed or euthanised due to injury will be offered to the Western Australian Museum as specimens.	Annually	Compliant	E17_InternalIncidentInvestigation_FireImpact	There was one confirmed mortality of a Malleefowl which was found within the aerodrome fence after the January Skeleton Rock Bushfire. The carcass was not offered to Western Australian Museums as a specimen due to emergency road closure measures.
TFEMP 83	Evaluation and revision of the TFEMP Review and submit to CEO DWER as per Condition 3-6 of MS1199.	As required.	Compliant	Nil	The TFEMP was not required to be reviewed or revised during the reporting period.
TFEMP 84	Management Target: Minimise the risk of incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike or mining related fire. Early Response Trigger: 25% decrease in Malleefowl or Chuditch sightings within or adjacent to Development Envelope over two consecutive years. Early Response Action: - Report internally that early response trigger has been met in accordance with internal procedures. - Due diligence checks to ensure the following is adequate: - o Internal audit of waste management facilities - o Review of traffic management controls to determine management action amendments - o Refresher training on Malleefowl, Chuditch and associated controls and injured animal management. - Early response trigger contingency actions may include but are not limited to: - o Consider changes to the mining operations (for example, change in the location, duration and/or method(s) of mining operations). - o Consider changes in land disturbance (for example, change in location of disturbance or the method of vegetation clearing, or a reduction in the extent of disturbance). - o Avoid clearing September to November to mitigate any potential risk to breeding and denning female Chuditch. - o Near miss of fauna on roads or during clearing and mining activities reported. - o Warning signs erected in areas of increased Malleefowl or Chuditch records. - o Increase in frequency of internal audits and inspections of vehicle speeds. - o Increased presence of Malleefowl or Chuditch on site discussed in staff induction programs.	Ongoing	Compliant	E03_ECO_2023-2024 MalleefowlMonitoringReport E04_ECO_2024ChuditchMonitoringReport	Annual population monitoring of Chuditch and Malleefowl was undertaken. The Early Response Trigger was not exceeded during the reporting period.



Reference	Objective	Timing	Status	Evidence	Comment
	- Staff training and awareness to provide information on Malleefowl (e.g. how to identify adults, chicks and mounds, conservation status, the importance of minimising impacts on the species, adherence to speed limits, reporting to Environmental personnel). - Staff training and awareness to include information on the prevention and management of fires. - Domestic waste facilities will be fenced and putrescible wastes will be regularly covered. Containers to have doors closed securely when not in use.				
TFEMP 87	Management Target: Minimise the risk of a decline in Malleefowl or Chuditch populations due to predation from introduced fauna Early Response Trigger: 25% increase in introduced predators (fox or cat) sightings (opportunistic sightings and remote camera) over two consecutive years. Early Response Action: - Report internally that early response trigger has been met in accordance with internal procedures. - Review introduced predators control programme and amend as required. - Trigger contingency actions may include but are not limited to the following: - A proportionate increase in trapping/ baiting intensity for introduced predators in areas where increased sightings of foxes and/ or cats have occurred. - If after the two consecutive monitoring events, a threshold exceedance has not been identified, resume standard monitoring. - Installation of signage: Feeding animals prohibited, minimise availability of food waste. - Review and refine remote camera monitoring for introduced predators (foxes and cats) across the DE should it be required. Staff training and awareness to include information on feral species (e.g. impact of feral animals on malleefowl and chuditch populations, no feeding of feral species, reducing availability of food waste to feral animals and all sightings of feral species to be reported).	Ongoing	Compliant	E05_ECO_2023-202IntroducedPredatorMonitoringReport	Introduced predator monitoring was undertaken during the reporting period. The Early Response Trigger was not exceeded during the reporting period.
TFEMP 90	Management Target: Minimise the risk of a decline in Malleefowl or Chuditch populations due to dust, light, noise, vibration or displacement. Early Response Trigger: 25% decrease in Malleefowl or Chuditch (camera sightings or trapping results) that are statistically different from previous monitoring results but do not breach trigger criteria as it has not been consecutive for two years. Early Response Action: - Review monitoring program for adequacy: - Determine whether the changes observed in the impact sites are comparable to the observations in the reference sites. - Consider changes to the mining operations (for example, change in the location, duration and/or method(s) of mining operations). - Consider changes in land disturbance (for example, change in location of disturbance or the method of vegetation clearing, or a reduction in the extent of disturbance). - Investigate potential causes for population decrease. Factors that may affect populations of threatened fauna are varied and it is difficult to determine the exact factors as a decline in sightings could be associated with: - Seasonal conditions (e.g. rainfall and temperatures) - Changes in mound usage patterns by malleefowl (i.e., use of mounds that are not surveyed) - Effectiveness of introduced predator control - Spatial variation (near-impact areas) versus sites located further from impact); and - Reliability of the results obtained from the fauna sightings register - Attributable to clearing, construction, operation activities. Where the trigger is attributed to clearing, construction or operational activities, report the exceedance to DWER within 7 days of the exceedance being identified.	Ongoing	Compliant	E03_ECO_2023-2024 MalleefowlMonitoringReport E04_ECO_2024ChuditchMonitoringReport	Annual population monitoring of Chuditch and Malleefowl was undertaken. The Early Response Trigger was not exceeded during the reporting period.



Reference	Objective	Timing	Status	Evidence	Comment
TFEMP 94	Covalent will amend this TFEMP as required to include any adaptive management updates based on information gathered from monitoring results. These amendments will involve regulatory consultation and be submitted to CEO DWER for review. If Covalent has gathered sufficient information through research and long-term monitoring to propose revisions to management targets, this TFEMP may be amended and resubmitted to the CEO DWER for approval in accordance with Condition 3-6(1) of MS1199.	Ongoing	Compliant	Nil	The TFEMP was not amended or resubmitted in the reporting period.
TFEMP 95	Furthermore, in accordance with Condition 3-6 (2) of MS1199, Covalent will update this TFEMP as and when directed by notice in writing by CEO DWER	Ongoing	Compliant	Nil	There was no request to update this management plan from DWER in the reporting period.



Appendix B: Ironcap Banksia Conservation Plan Compliance Assessment

The audit findings for conformance with commitments in the Ironcap Banksia Conservation Plan are presented in the following table.



Ironcap Banksia Conservation Plan Audit Table

Condition	Reference	Requirement	Timing	Status	Evidence	Assessment
Management Actions						
IBCP 01	Section 3.2	Ensuring no proposal-related direct or adverse indirect impacts to flora and vegetation within the VEZs	Overall	Compliant	E09_MAT_VegConditionMonitoringAutumn2024 E10_MAT_VegConditionMonitoringSpring2024 E11_MAT_IntroducedFloraWeedSurvey2024 E12_AST_QualitativeVegHealthMonitoring2024 E37_SkeletonRockBushfire_ImpactToFVEZ	Monitoring prior to the Skeleton Rock Bushfire in January 2025, did not report proposal related direct impact to flora and vegetation within a VEZ. The Skeleton Rock Bushfire in January 2025 (not project-related) impacted six FVEZ, ranging from 80-100% area impacted.
IBCP 02	Section 3.2	Ensure a Flora and Vegetation Environmental Management Plan is developed, approved and implemented. The Flora and Vegetation Environmental Management Plan includes trigger and threshold criteria to ensure no proposal related impact to the VEZs occurs.	Overall	Compliant	E34_MS1199_2024ComplianceAssessmentReport	The FVEMP is approved and implemented and contains threshold and trigger criteria.
IBCP 03	Section 3.2	Reporting and investigations of any threshold criteria exceedance of the Flora and Vegetation Environmental Management Plan	Overall	Compliant	E34_MS1199_2024ComplianceAssessmentReport E37_SkeletonRockBushfire_ImpactToFVEZ E38_SkeletonRockBushfire_ImpactToBanksia	There was an exceedance of threshold criteria (reference IPBC 28) in the reporting period. Notification was provided to DWER, DCCEEW and DBCA within 7 days of the exceedance being identified. All threshold contingency actions were implemented, including an internal investigation for the incident recorded in INX InControl - Report 19476. Disturbance was found to be attributable to Project activities (vehicle impact to FVEZ). The impact was assessed by flora specialists and determined to be minor and restricted to one species that was neither a Threatened nor Priority Flora species. A closeout report of the incident was provided to all required regulatory agencies within 21 days of the exceedance.
IBCP 04	Section 3.2	Clear no more than the approved two (2) <i>B. dolichostyla</i> individuals by direct effects (clearing for mining operations).	Clearing	Compliant	E02_ACR2024-2025_IroncapBanksia E37_SkeletonRockBushfire_ImpactToFVEZ E38_SkeletonRockBushfire_ImpactToBanksia	No <i>Banksia dolichostyla</i> individuals had been cleared within the Development Envelope since commencement of the Project. The Skeleton Rock Bushfire in January 2025 (not project-related) impacted over 5,000 Ironcap Banksia individuals, majority located within FVEZ09.
IBCP 05	Section 3.2	Have indirect impact on no more than 67 known individuals of <i>B. dolichostyla</i> located in close proximity (≤ 50 meters (m)) to the Project. Potential indirect effects may include: - Fire - introduction / spread of weeds and dieback (<i>Phytophthora cinnamomi</i>) - changed hydrology / salinisation - fragmentation	Overall	Compliant	E11_MAT_IntroducedFloraWeedSurvey2024 E36_SkeletonRockBushfire_ImpactToDE E37_SkeletonRockBushfire_ImpactToFVEZ E38_SkeletonRockBushfire_ImpactToBanksia	The Skeleton Rock Bushfire in January 2025 (not project-related) impacted over 5,000 <i>Banksia dolichostyla</i> individuals, majority located within FVEZ09.



Condition	Reference	Requirement	Timing	Status	Evidence	Assessment
IBCP 06	Table 3.1	Management Objective: No proposal related direct impact to flora and vegetation within a VEZ. Management Action: Avoidance - implementation of an internal clearing permit procedure - implementation of an internal procedure limiting access to VEZs by foot only or only by car where there is an existing track. - VEZs to be delineated with flagging tape, physical barrier, signage or similar to alert all personnel of their location - Inductions of all site personnel to include information on the location of VEZs, management targets, measures and expectations Management Target: - No unauthorized clearing within the Development Envelope or VEZs. - No unauthorized access to a VEZ. Monitoring: - Clearing register. - Survey records of all clearing undertaken during operation of the Project.	Ongoing	Compliant	E09_MAT_VegConditionMonitoringAutumn2024 E10_MAT_VegConditionMonitoringSpring2024 E12_AST_QualitativeVegHealthMonitoring2024 E13_Notification_IncidentJuly2024 E19_GDPPProcedure E29_EnvironmentTBT_EEZReportingEnvironmentalIncidents E34_MS1199_2024ComplianceAssessmentReport E37_SkeletonRockBushfire_ImpactToFVEZ E45_InternalIncidentInvestigation_VegetationHealthDecline	- Vegetation clearing was undertaken in accordance with the Covalent Lithium Ground Disturbance Procedure. - VEZs are delineated via fencing and signage within the Development Envelope. Note – majority of VEZ were impacted by January 2025 Skeleton Rock Bushfire, including vegetation, fencing and signage. - There was an exceedance of threshold criteria (reference IPBC 28) in the reporting period. Notification was provided to DWER, DCCEEW and DBCA within 7 days of the exceedance being identified. All threshold contingency actions were implemented, including an internal investigation for the incident recorded in INX InControl - Report 19476. Disturbance was found to be attributable to Project activities (vehicle impact to FVEZ). The impact was assessed by flora specialists and determined to be minor and restricted to one species that was neither a Threatened nor Priority Flora species. A closeout report of the incident was provided to all required regulatory agencies within 21 days of the exceedance. - Two qualitative vegetation monitoring events were conducted in Autumn in Spring 2024 across 18 permanent paired transect sites. During both vegetation monitoring events, transect pair B (Transect 3 – Control and 4 – Impact) exceeded the trigger criteria of a statistically significant (more than 20%) difference in mean condition rating within a VEZ in comparison to control sites. The Autumn monitoring event recorded a 24.39% Impact-Control difference, and the Spring event recorded a 22.2% Impact-Control difference for transect pair B. - The trigger criteria exceedance was internally reported as an environmental incident and investigated (Report 22627). The decline in vegetation health at transect pair B was attributed to inherent edaphic factors, including variations in soil depths, coarse fragment content, variable shading from surrounding woodlands, topographic gradients and/or aspects. These factors influence soil moisture availability in an exposed vegetation community with shallow soils. Additionally, persistent below-average rainfall since baseline monitoring has likely exacerbated the decline in vegetation health at this site. The investigation found no evidence linking the observed vegetation decline to Project-related activities.
IBCP 10	Table 3.1	Management Objective: Minimise dust deposition on vegetation from mining and related activities. Management Action: The Proponent will minimise dust deposition on vegetation through: - dust suppression on cleared areas - maximise efficiency of loads when transporting ore or concentrate (including haul trucks and conveyers) - use dust covers on machinery and dust suppressants on exposed areas where possible - minimise open area footprint and rehabilitate or cover (using vegetation, rock, water and/or dust suppressant) exposed areas as soon as practicable - design the mine layout to minimise dust emissions to VEZs where practicable Management Target: Dust deposition (present as insoluble solids) at any gauge in excess of 10 g/m²/month. Monitoring: Dust deposition rates will be measured monthly using dust deposition gauges for the first 24 months from implementation of the proposal.	Monthly	Compliant	E41_EnviroSys_DustDepositionResults	Dust deposition on vegetation has been minimised in the reporting period by: - Dust suppression via water carts of cleared unsealed roads, cleared areas and active stockpiles. - Haul trucks and road haulage trucks are operated at or near capacity to maximise efficiency. - The main access road and village access road have been sealed. Dust deposition gauges were monitored monthly and reported no exceedances during the reporting period. Most dust deposition gauges were destroyed in the Skeleton Rock Bushfire and will not be replaced given the significant impact to vegetation at the monitoring sites, which has rendered dust monitoring redundant.



Condition	Reference	Requirement	Timing	Status	Evidence	Assessment
IBCP 11	Table 3.1	Management Objective: Minimise spread of weeds / dieback. Management Action: The Proponent will minimise the risk of introduction of invasive species and spread of dieback through: - implementation of a vehicle hygiene procedure, dieback management procedure and weed control. - Development Envelope and VEZs will be surveyed for weeds periodically, so that any infestations of invasive species that establish can be eradicated before the plants can flower and set seed. - The Proponent will minimise the risk of introduction of invasive species and spread of dieback through Phytophthora (dieback) controls including signage, clean down points, vehicle hygiene shall be implemented. Management Target - Minimise new weeds introduced to site. - Prevent spread of weeds to VEZs. - Prevent spread of dieback onsite. Monitoring: - Annual weed monitoring across Development Envelope. - A Dieback Management Plan will be produced and provided to DBCA, following the completion of baseline monitoring. - Dieback monitoring programme to be developed. - Quarterly observations of plant health on commencement of Proposal for first 12 months. Following the development of a strong dataset over this period, the monitoring methodology, frequency and monitoring sites will be reviewed. - Quarterly health monitoring at vegetation quadrats within VEZs and control sites to include observations for weeds and if the presence of weeds is having a potential indirect impact.	Ongoing	Compliant	E11_MAT_IntroducedFloraWeedSurvey2024 E42_SOU_DEDiebackManagementPlan E45_20250331_Vehicle Hygiene register	Annual survey for weed species carried out by consultant in 2024. Weed management via herbicide application carried out by contractor in September 2024. Dieback monitoring across the Development Envelope was completed by Southern Ecology in June 2024. A dieback management plan has been provided by the consultant and discussions with DBCA to follow. All equipment, machinery and vehicles are required to be clean on entry to the Project Development Envelope as part of site mobilisation procedures, and results kept in the vehicle hygiene register. A total of 259 vehicles completed hygiene inspection and were approved prior to entry.



Condition	Reference	Requirement	Timing	Status	Evidence	Assessment
IBCP 14	Table 3.1	Management Objective: Avoid alteration of fire regimes Management Action: The Proponent will contribute to fire management at the mine site and in the region through: - Internal procedures to prevent fires and manage the occurrence of fires due to operational activities (emergency response team, automated fire extinguishers on equipment, personnel trained to use firefighting equipment). - implementing fire management procedures (e.g. maintenance of fire breaks, Hot Work Permit system, firefighting training, Emergency Response Plan) - lightning protection equipment will be installed as part of Project design where necessary - firefighting equipment will be located on site and in vehicles - coordination with DBCA and Department of Fire and Emergency Services (DFES) to undertake prescribed burns. Management Target: Prevent fires attributed to mining and associated Project activities. Monitoring: - Incident reports of fire. - Quarterly observations of plant health on commencement of Proposal for first 12 months. Following the development of a strong dataset over this period, the monitoring methodology, frequency and monitoring sites will be reviewed.	At all times	Compliant	E28_MtHollandEmergencyResponseManagementPlan	No fire incidents attributable to operational activities in the reporting period. Required Management Actions have been undertaken: - There is an Emergency Management Plan in place which outlines emergency response including fire, emergency response teams and training. - Fire management procedures are in place such as firefighting training, Emergency Response Plan and the Hot Work Permit system. - Firefighting equipment is located on site and in vehicles. - Lightning protection infrastructure is installed on buildings and infrastructure - No prescribed burns were undertaken during the audit period.
IBCP 19	Table 3.1	Management Objective: Avoid alteration of surface hydrology Management Action: The Proponent will ensure the appropriate design of infrastructure including: - Drainage measures designed and constructed to minimise changes to natural surface water flow, including diversion drains, rock cladding and contouring as required. - Rehabilitation and closure to follow contours of natural landforms. Management Target: Prevent changes to surface water hydrology attributed to mining and associated Project activities. Monitoring: - Quarterly observations of plant health on commencement of Proposal for first 12 months. Following the development of a robust dataset over this period, the monitoring methodology, frequency, and monitoring sites will be reviewed. - Quarterly health monitoring at vegetation quadrats within VEZs and control sites	Quarterly	Compliant	E09_MAT_VegConditionMonitoringAutumn2024 E10_MAT_VegConditionMonitoringSpring2024	Across the Project is a general network of culverts, stormwater drains and ponds to manage surface water flow. The Spring and Autumn 2024 vegetation monitoring reports consider potential impacts to vegetation as a result of changes to surface water flow patterns; water table draw down and including the associated potential to cause erosion. No detrimental impacts to vegetation due to altered local hydrology were noted in the reports.
Management Triggers						



Condition	Reference	Requirement	Timing	Status	Evidence	Assessment
IBCP 20	Section 3.5	Where monitoring indicates that unauthorised impacts to <i>B. dolichostyla</i> are not being avoided (or are unlikely to be), Covalent will implement additional actions which may include (as appropriate) - reporting internally as a Management Trigger in accordance with internal procedures (within 24 hours of identification to the Covalent Environment Manager). - Notification to DAWE and other stakeholders if considered a non-compliance or incident (potential to impact on <i>B. dolichostyla</i>) (as per Condition 13) within two business days of identification. Further details of the non-compliance or incident are to be provided within ten business days. - Review monitoring data; - Review management strategies and implement changes to prevent future occurrences, which will include: • Investigation (to identify cause) is completed within 21 days; • Audit and review of training and staff inductions (i.e. increase in staff training and awareness on vegetation exclusion zones, legislative requirements, appropriate clearing procedures; and • Review and upgrade signage/delineation. - Review/update of management and monitoring measures/frequency; - Establish additional <i>B. dolichostyla</i> in a VEZ to offset additional impacts, at a 35:1 ratio; - Reporting of monitoring outcomes against Management Targets with Annual Compliance Report to DAWE (as per Condition 12) within 12 months following date of commencement; - • Revise this plan and submit the revised plan for EPBC Act approval	On Trigger	Compliant	E09_MAT_VegConditionMonitoringAutumn2024 E10_MAT_VegConditionMonitoringSpring2024	Monitoring did not indicate any unauthorised impacts to <i>B. dolichostyla</i> .
IBCP 28	Table 3.2	Management Targets: - No unauthorised clearing within the Development Envelope or VEZs. - No unauthorised access to a VEZ Management Trigger: - Vegetation clearing without an authorized internal permit within the Development Envelope, but outside of the VEZs. - Unauthorised access by personnel to a VEZ Corrective Action: - Report internally as Management Trigger Exceedance in accordance with internal procedures (within 24 hours of identification to the Covalent Environment Manager). - Review proximity of potential disturbance within/to VEZ. - Should disturbance or potential impact occur to <i>B. dolichostyla</i> as a result of Management Trigger Exceedance, report to DAWE within two business days of identification with further details within 10 business days. - Complete investigation within 21 days of identification - Review management strategies and implement changes to prevent future occurrences. Further management measures to be considered will include: • Review and upgrade VEZ signage/delineation where appropriate. • Audit and review of training and staff inductions (i.e. Increase in staff training and awareness to include information on VEZ's, legislative requirements, appropriate clearing procedures) • Ground disturbance permit training competency training. • Undertake rehabilitation of unauthorised clearing (i.e. disturbance from vehicle tracks, vegetation clearing) by appropriately qualified personnel as required, in accordance with rehabilitation procedure.	On Trigger	Non-Compliant	E13_Notification_IncidentJuly2024	There was an exceedance of the management trigger in the reporting period. Notification was provided to DWER, DCCEEW and DBCA within 2 days of the exceedance being identified. During routine monitoring activities on the 28 June 2024, damaged fencing to a flora and vegetation exclusion zone (FVEZ) was observed. Upon further investigation, tracks were identified from mobile plant that has veered from the road and damaged vegetation within the FVEZ. Disturbance was found to be attributable to Project activities (vehicle impact to FVEZ). The impact was assessed by flora specialists and determined to be minor and restricted to one species that was neither a Threatened nor Priority Flora species. All corrective actions were implemented, including an internal investigation for the incident. A closeout report of the incident was provided to all required regulatory agencies within 21 days of the exceedance.



Condition	Reference	Requirement	Timing	Status	Evidence	Assessment
IBCP 29	Table 3.2	Management Targets: Minimisation of dust emissions Management Trigger: Dust deposition results at a single VEZ site exceed 5 g/m2 for two consecutive months. Corrective Action: - Report internally that Management Trigger Exceedance has been met in accordance with internal procedures (within 24 hours of identification to the Covalent Environment Manager). - Should disturbance or potential impact occur to <i>B. dolichostyla</i> as a result of Management Trigger Exceedance, report to DAWE within two business days of identification with further details within 10 business days. - Complete investigation within 21 days of identification - Investigate and determine improvement strategy. - Investigate the cause of the exceedance to determine if it is attributable to proposal related activities. - Review dust monitoring program. Determine whether the changes observed in the VEZ are comparable with control monitoring sites. - Review dust mitigation measures	On Trigger	Compliant	E09_MAT_VegConditionMonitoringAutumn2024 E10_MAT_VegConditionMonitoringSpring2024 E41_EnviroSys_DustDepositionResults	Dust deposition management triggers were not exceeded in the reporting period. Most dust deposition gauges were destroyed in the Skeleton Rock Bushfire and will not be replaced given the significant impact to vegetation at the monitoring sites, which has rendered dust monitoring redundant.



Condition	Reference	Requirement	Timing	Status	Evidence	Assessment
IBCP 30	Table 3.2	Management Targets: Minimise new weeds introduced to site. Management Trigger: One new weed species sighted during annual monitoring but with limited to negligible coverage. Corrective Action: - Report internally that Management Trigger Exceedance has been met in accordance with internal procedures (within 24 hours of identification to the Covalent Environment Manager). - Should disturbance or potential impact occur to <i>B. dolichostyla</i> as a result of Management Trigger Exceedance, report to DAWE within two business days of identification with further details within 10 business days. - Complete investigation within 21 days of identification - Review weed monitoring and control program and amend as required. - Response actions to be considered will include the following: • Review monitoring frequency (quarterly for initial 12 months then annually), adjust accordingly. • Adjust timing of monitoring if appropriate, so that infestations of invasive species that establish can be eradicated before the plants can flower and set seed. • Review suitability of weed monitoring locations, adjust accordingly. • Determine whether the changes observed are comparable with control monitoring sites. • If after the two consecutive monitoring events, a threshold exceedance has not been identified, resume standard monitoring. • Develop and implement of a Weed Management Plan • Staff training and awareness to include information on weed species and preventative measures such as vehicle/ weed hygiene procedures. • Undertake further weed control	On Trigger	Non-Compliant	E09_MAT_VegConditionMonitoringAutumn2024 E10_MAT_VegConditionMonitoringSpring2024 E11_MAT_IntroducedFloraWeedSurvey2024 E43_InternalAudit_VehicleEquipmentHygiene E44_EnvironmentSiteNotice_VehilceMobileEquipmentHygiene	During annual weed monitoring more than one new species was identified. There was an increase in both range and species and numbers of individual weeds than recorded in prior surveys. The additional species is potentially a result of expanding the survey scope to areas outside of VEZ. The presence of introduced species was predominantly restricted to the areas of historical clearing associated within the former Bounty Mine area, the village and the current operational areas. No indirect effect on the health of <i>B. dolichostyla</i> due to weed presence was observed. Weeds detected during annual monitoring were not Weeds of National Significance or Declared Weeds. All weeds recorded were permitted under section 11 of the <i>Biosecurity and Agriculture Management Act 2007</i>. Weeds were largely detected within operational areas only, with minimal to nil impact on native vegetation or VEZ. Management actions and monitoring in accordance with FVEMP were undertaken throughout the reporting period: - A weed control program via herbicide application was carried out across the site was undertaken by an external contractor in September 2024. Contractor availability has been a limiting factor due to location of the Project. Further weed control is scheduled in July 2025. - Site Mobilisation procedure is implemented requiring all mobile vehicles and equipment entering site to be 'clean on entry'. This requirement is achieved by requiring all personnel mobilising to complete a Vehicle and Mobile Equipment Hygiene Inspection form via Project QR Code, and records captured in a register. - Annual weed monitoring within the Development Envelope, particularly in operational areas and VEZ's, was undertaken in July and November 2024. - The methodology for vegetation health monitoring programs includes observations for weeds. Across all transect sites, a single small, introduced flora species was observed during quantitative monitoring. - Qualitative and quantitative vegetation health monitoring programs were undertaken throughout the reporting period and weed presence was not reported as impacting vegetation health. - Staff training and awareness of weed hygiene requirements upon site mobilisation was addressed throughout the reporting period by distribution of site-wide Site Notices and Toolbox Talks on a regular basis. As a result of the increase in weed presence, the following actions will be undertaken within the next reporting period. - Engage external specialist to undertake a comprehensive assessment and field survey so that weed species present can be categorised in order of management priority and recommended control options provided. A review of weed monitoring locations is also planned. - Increased frequency of compliance audits of the Vehicle and Mobile Equipment Hygiene Inspection form have been undertaken. Based on the results of the audits, actions to improve compliance will be undertaken where required. An example of a corrective action implemented following a poor result in the March internal audit was all site vehicles were directed to undertake a vehicle washdown in the wash bay.



Condition	Reference	Requirement	Timing	Status	Evidence	Assessment
IBCP 31	Table 3.2	Management Targets: Prevent fires attributed to mining and associated activities. Management Trigger: A fire occurrence within the Development Envelope that impacts on native vegetation. Corrective Action: - Report internally that Management Trigger Exceedance has been met in accordance with internal procedures (within 24 hours of identification to the Covalent Environment Manager). - Should disturbance or potential impact occur to <i>B. dolichostyla</i> as a result of Management Trigger Exceedance, report to DAWE within two business days of identification with further details within 10 business days. - Complete investigation within 21 days of identification - Internal audit of fire management plan - Review fire mitigation strategies to limit the spread of fire. - Staff training and awareness to include information on the prevention and management of fires. - Investigate the cause of the exceedance to determine if it is attributable to proposal related activities.	On Trigger	Compliant	Nil	No fire incidents attributable to operational activities occurred within the reporting period.
Monitoring Actions						
IBCP 32	Section 3.6.1	Two baseline plant condition monitoring in spring and summer to provide a qualitative assessment of the vegetation condition will be undertaken at permanent representative sites within the VEZs and control sites away from any proposal related indirect effects.	Prior to commencement of construction	Compliant (complete)	Nil	Completed in a previous audit period.
IBCP 33	Section 3.6.1	Quarterly plant condition monitoring for first 12 months to during construction and operations to review monitoring and inform the frequency of future monitoring.	For first 12 months	Compliant (complete)	Nil	Completed in a previous audit period.
IBCP 34	Section 3.6.1	The data gained over quarterly plant condition monitoring period will be used to review monitoring and inform the methodology and frequency of future monitoring.	After 12 months of monitoring	Compliant (complete)	Nil	Completed in a previous audit period.
IBCP 35	Section 3.6.1	Should triggers be exceeded at any point, monitoring intensity shall be reviewed, and potentially increased and remain increased until such time as the trigger is no longer exceeded.	Overall	Compliant	E09_MAT_VegConditionMonitoringAutumn2024 E10_MAT_VegConditionMonitoringSpring2024 E11_MAT_IntroducedFloraWeedSurvey2024	- Trigger criteria exceeded: One new weed species sighted during annual monitoring but with limited to negligible coverage. Monitoring was reviewed and decided that an external specialist will be engaged in the next reporting period to undertake an assessment and field survey. - Trigger criteria exceeded: Unauthorized access by personnel to a VEZ and damage to vegetation. Monitoring intensity was reviewed and not required to be increased. - Trigger criteria exceeded: a statistically significant reduction in mean condition rating greater than 20%. Monitoring was reviewed and based of the investigation no change to monitoring was recommended.
IBCP 36	Section 3.6.1	The mean condition monitoring scores will be compared across species and sites and appropriate statistical analysis undertaken to determine if there is a statistically significant difference between VEZs and control sites.	Overall	Compliant	E09_MAT_VegConditionMonitoringAutumn2024 E10_MAT_VegConditionMonitoringSpring2024	The monitoring reports contain comparison across species and sites to determine statistically significant differences between VEZ and control sites.
IBCP 37	Section 3.6.2	Within or adjacent to each of the monitoring quadrats detailed by section 3.6.1, 25 plants (five from each keystone species) will be selected for testing with a PEA quarterly.	For first 12 months	Compliant	E12_AST_QualitativeVegHealthMonitoring2024	PEA monitoring commenced in the reporting period though monitoring locations were substantially impacted by the Skeleton Rock Bushfire. Further monitoring utilising the PEA is under review by expert consultant.



Condition	Reference	Requirement	Timing	Status	Evidence	Assessment
IBCP 38	Section 3.6.2	After the first 24 months the plant health monitoring dataset will be reviewed and used to inform future monitoring requirements.	After 12 months of monitoring	Compliant (complete)	Nil	Completed in a previous audit period.
IBCP 39	Section 3.6.3	Undertake dust deposition monitoring in accordance with AS/NZS 3580.10.1:2003 at nine DDGs on a monthly basis for 24-months following the commencement of the Action.	Monthly	Compliant	E41_EnviroSys_DustDepositionResults	Dust deposition monitoring was undertaken monthly prior to the Skeleton Rock Bushfire. Majority of dust deposition gauges were destroyed in the Skeleton Rock Bushfire and will not be replaced given the significant impact to vegetation at the monitoring sites, which has rendered dust monitoring redundant.
IBCP 40	Section 3.6.3	Comparison dust deposition results between VEZs and control sites to determine any proposal related indirect effects.	As required	Compliant	Refer to IBCP 29	Refer to IBCP 29
Restoration Plan						
IBCP 41	Section 4.1	Establish at least 69 <i>B. dolichostyla</i> plants within the Development Envelope to mitigate significant impacts to the species	Within 10 years of Project commencement	Compliant	E46_BanksiaRestorationUpdatedSchedule	Covalent commenced the Restoration Plan as outlined in Section 4 of the IBCP during the reporting period. Detail of actions undertaken are outlined under the detailed requirements following in IBCP 42 – 72. The restoration schedule has been revised to commence year 1 in 2024.
IBCP 42	Section 4.3	The Establishment Site will be fenced to minimise the risk of herbivorous grazing (rabbits and kangaroos). The fence will be sufficient to exclude rabbits and kangaroos, therefore may be up to 2 m in height with lap wiring to prevent rabbit access. Fencing will be maintained until Establishment Criteria is met.	Year 2	Not Applicable	E46_BanksiaRestorationUpdatedSchedule	Fencing will be installed after initial earthworks and ground contouring have been completed.
IBCP 43	Section 4.3.1	Collect 1,340 <i>B. dolichostyla</i> seeds from more than 50 individuals to ensure genetic representation/variation.	Year 1	Compliant	E47_BanksiadolichostylaTPFRF	<i>B. dolichostyla</i> seed was collected by suitably qualified consultants with the appropriate authorisations in December 2024.
IBCP 44	Section 4.3.1	Germinate 400 <i>B. dolichostyla</i> seeds to plant 1-year after collection at a designated nursery.	Year 2+	Not Applicable	E46_BanksiaRestorationUpdatedSchedule	<i>B. dolichostyla</i> seed is currently being stored in preparation for germination at a RIAWA accredited seed processing facility in preparation for propagation prior to planting at the Establishment Site.
IBCP 45	Section 4.3.1	Target <i>B. dolichostyla</i> seeds to be broadcast 1-year after collection.	Year 2+	Not Applicable	E46_BanksiaRestorationUpdatedSchedule	Not required at this stage. <i>B. dolichostyla</i> seed will be broadcast at the same time as seedling planting (Year 2+)
IBCP 46	Section 4.3.2	Remove the airstrip hardstand.	Year 2	Not Applicable	E46_BanksiaRestorationUpdatedSchedule	Advice provided by DEMIRS in 2024 indicated insufficient approval existed under the <i>Mining Act 1978</i> to commence rehabilitation works for <i>Banksia dolichostyla</i> at the Establishment Site. As a result, Programme of Work (POW) REG ID 200493 was submitted to DEMIRS in December 2024 to commence rehabilitation earthworks. Approval of the POW was received on the 4 March 2025. Earthworks to remove the hardstand began outside the reporting period. All Site preparation activities including removal of airstrip hardstand, Deep ripping, area reprofiling and spread of topsoil have been completed as of June 2025.
IBCP 47	Section 4.3.2	Deep rip subsoil using a 'crosshatch' methodology following the removal of the airstrip hardstand to reduce subsoil compaction and facilitate water infiltration.	Year 2	Not Applicable	E46_BanksiaRestorationUpdatedSchedule	Refer IBCP 46: All Site preparation activities including removal of airstrip hardstand, Deep ripping, area reprofiling and spread of topsoil have been completed as of June 2025.
IBCP 48	Section 4.3.2	Import and spread topsoil-subsoil mix from recently cleared areas (no stockpiling) to provide a growth medium and initial seed store for seeds and seedlings.	Year 2	Not Applicable	E46_BanksiaRestorationUpdatedSchedule	Refer IBCP 46: All Site preparation activities including removal of airstrip hardstand, Deep ripping, area reprofiling and spread of topsoil have been completed as of June 2025.
IBCP 49	Section 4.3.2	Establishment and operation of the irrigation system (design to be confirmed as either broadcast spray or drip-feed)	Year 2	Not Applicable	E46_BanksiaRestorationUpdatedSchedule	Not required at this stage: Irrigation System is currently being planned for installation in late 2025.



Condition	Reference	Requirement	Timing	Status	Evidence	Assessment
IBCP 50	Section 4.3.2	Signposting of the remainder of the boundary of the Restoration Site to minimise the risk of inadvertent access into the Restoration Site by personnel or machinery.	Year 2	Not Applicable	E46_BanksiaRestorationUpdatedSchedule	Not required at this stage
IBCP 51	Section 4.3.3	Install guards around seedlings to prevent grazing.	Planting	Not Applicable	E46_BanksiaRestorationUpdatedSchedule	Not required at this stage
IBCP 52	Section 4.3.4	Irrigate seeds and seedlings with fresh water for a period of 2-year period following planting, after which irrigation will cease.	As required for 2- years	Not Applicable	E46_BanksiaRestorationUpdatedSchedule	Not required at this stage
IBCP 53	Section 4.4	Inspection and maintenance of the fence to ensure exclusion of feral animals.	Ongoing	Not Applicable	E46_BanksiaRestorationUpdatedSchedule	Not required at this stage
IBCP 54	Section 4.4	Inspection and maintenance of irrigation infrastructure.	Ongoing	Not Applicable	E46_BanksiaRestorationUpdatedSchedule	Not required at this stage
IBCP 55	Section 4.4	Weed inspection and weed control programmes are required.	Ongoing	Not Applicable	E46_BanksiaRestorationUpdatedSchedule	Not required at this stage
IBCP 56	Section 4.4	Maintenance of Project site fire breaks to minimise risk of fire.	Ongoing	Compliant	E28_MtHollandEmergencyResponseManagementPlan	Fire breaks were maintained throughout the reporting period.
IBCP 57	Section 4.5	Where monitoring indicates that the Establishment Criteria are unlikely to be met, Covalent will implement additional actions at the Restoration Site, which will include (as appropriate): - additional site preparation works. - additional seed collection, seeding and/or seedling planting; and/or - additional irrigation of seeds and seedlings. - Additional actions will be taken as soon as practical; however, action implementation will occur within 12 months of confirming action requirement.	Overall	Not Applicable	E46_BanksiaRestorationUpdatedSchedule	Not required at this stage
IBCP 58	Section 4.5	If the above additional actions are considered unlikely to result in the Establishment Criteria being met, then Covalent will consult with DBCA and DAWE on other potential contingency actions which could be implemented. Other contingency actions could include, for example, a change to the location of the restoration works into areas of native vegetation known to support <i>B. dolichostyla</i> (i.e. supplement existing population within existing habitat). Under these circumstances Covalent will review and revise this plan and submit the revised plan for EPBC Act approval.	Overall	Not Applicable	E46_BanksiaRestorationUpdatedSchedule	Not required at this stage



Condition	Reference	Requirement	Timing	Status	Evidence	Assessment
IBCP 59	Table 4.2	Establishment Criteria: Establish at least 69 individuals of <i>B. dolichostyla</i> within the Development Envelope within ten (10) years of the implementation of the Action. Establishment criteria of the <i>B. dolichostyla</i> are as follows: - The health of vegetation is 'Good' (or higher) for at least two (2) consecutive years after irrigation has ceased; and - Reproductive capability is observed. Contingency Actions: - Additional seed collection and seeding/seedling planting. - Soil analysis to determine any soil deficiencies and development of a remediation plan (soil amelioration or further soil preparation trials) - Review of environmental conditions and investigate additional irrigation requirements	Ongoing	Not Applicable	E46_BanksiaRestorationUpdatedSchedule	Not required at this stage
IBCP 60	Table 4.3	Restoration Schedule - Collection of seed material (approximately September to December 2021) - Germination of seedlings in nursery	Year 1	Compliant	E46_BanksiaRestorationUpdatedSchedule E47_BanksiadolichostylaTPFRF	As per updated restoration schedule, <i>B. dolichostyla</i> seed was collected by suitably qualified consultants with the appropriate authorisations in December 2024. <i>B. dolichostyla</i> seed is currently being stored in preparation for germination at a RIAWA accredited seed processing facility in preparation for rehabilitation.
IBCP 61	Table 4.3	Restoration Schedule: - Restoration site preparation: • fencing of adjacent vegetation • removal of airstrip hard cap • crosshatch deep ripping. - Site rehabilitation works (approximately March – April): • spreading of topsoil/subsoil materials from mining area • establishment and operation of irrigation system - Planting of seeds and seedlings (early winter) - Twice yearly monitoring of site rehabilitation success (to confirm site suitability) - Weed control of restoration site (if necessary) - Irrigation commences immediately after planting (as required) - <i>B. dolichostyla</i> monitoring commences every two months. - Collection of additional seed material - Germination of additional seedlings in nursery	Year 2	Compliant	E46_BanksiaRestorationUpdatedSchedule	Advice provided by DEMIRS in 2024 indicated insufficient approval existed under the <i>Mining Act 1978</i> to commence rehabilitation works for <i>Banksia dolichostyla</i> at the Establishment Site. As a result, Programme of Work (POW) REG ID 200493 was submitted to DEMIRS in December 2024 to commence rehabilitation earthworks. Approval of the POW was received on the 4 March 2025. Earthworks to remove the hardstand began outside the reporting period. All Site preparation activities including removal of airstrip hardstand, Deep ripping, area reprofiling and spread of topsoil have been completed as of June 2025.
IBCP 62	Table 4.3	Restoration Schedule - <i>B. dolichostyla</i> monitoring continues every four months. - Irrigation continues. - Weed control (if necessary) - Supplementary seeding / seedling planting (if necessary)	Year 3	Not Applicable	E46_BanksiaRestorationUpdatedSchedule	Not required at this stage
IBCP 63	Table 4.3	Restoration Schedule - <i>B. dolichostyla</i> monitoring continues every six months. - Implementation of contingency actions (if necessary) - Irrigation ceases	Year 4	Not Applicable	E46_BanksiaRestorationUpdatedSchedule	Not required at this stage



Condition	Reference	Requirement	Timing	Status	Evidence	Assessment
IBCP 64	Table 4.3	Restoration Schedule - <i>B. dolichostyla</i> monitoring continues every six months. - Implementation of contingency actions (if necessary)	Year 5 +	Not Applicable	E46_BanksiaRestorationUpdatedSchedule	Not required at this stage
IBCP 65	Section 4.7	For each restored individual of <i>B. dolichostyla</i> (whether from germinated seed or planted seedling) the following information will be recorded annually: - survival (number live/dead) - size (height/width) - health condition, similar to the methodology presented in Table 3-5 - reproductive status (flowering/fruitletting/setting seed) - photograph - GPS location (for future locating) - observations of health/growth constraints (e.g. grazing, weeds) The purpose of the environmental monitoring will be to demonstrate if the Establishment Criteria have been met.	Annual	Not Applicable	Nil	Not required at this stage
IBCP 66	Table 4.4	Risk Factor: No or insufficient seed germination. Trigger: - Year 1 – 2: Germination of <80% of seed - Year 2 - 3: Seed and tube stock survival <70% following one year after germination. Contingency Action / Response: - Review initial germination and survival numbers to determine if further seed collection is required. - If required, re-collect seed and undertake an investigation into potential seed germination failure and survival. - Consider other methods of germination to rehabilitate the species. - Consider alternate treatments. - Liaise with experts (e.g. Botanic Gardens and Parks Authority research division) to develop further trials trial. - Consider supplementary planting of seedlings.	On trigger	Not Applicable	Nil	Not required at this stage
IBCP 67	Table 4.4	Risk Factor: No or insufficient establishment. Trigger: Year 2 - 4: - Survival of <50% of each year's plants beyond their first summer - Survival of <40% of all plants planted beyond their first three summers. Contingency Action / Response: - Consider other methods of germination to rehabilitate the species. - Consider alternate treatments. - Liaise with experts (e.g. Botanic Gardens and Parks Authority research division) to develop further trials trial. - Consider supplementary planting of seedlings.	On trigger	Not Applicable	Nil	Not required at this stage



Condition	Reference	Requirement	Timing	Status	Evidence	Assessment
IBCP 68	Table 4.4	Risk Factor: Ongoing survival without irrigation does not occur. Trigger: Year 5+: - Survival of <30% of all plants planted. - <80% of surviving plants are producing viable seed at a rate similar to that of plants in natural populations. - Plant survivorship and fully formed (effectively pollinated) fruit production is statistically less than that of the adjacent established <i>B. dolichostyla</i> in undisturbed vegetation. Year 10+: - <i>B. dolichostyla</i> healthy individual average heights < 1 m in height after 10 years Contingency Action / Response: - Consider other methods of germination to rehabilitate the species. - Consider alternate treatments. - Liaise with experts (e.g. Botanic Gardens and Parks Authority research division) to develop further trials trial. - Consider supplementary planting of seedlings.	On trigger	Not Applicable	Nil	Not required at this stage
IBCP 69	Table 4.4	Risk Factor: Clearing impacts to established individuals. Triggers and Contingency Action / Response: Refer to Table 3-2. The Establishment Site is protected through the Vegetation Exclusion Zone associated with the Western Australian approval.	On trigger	Not Applicable	Nil	Not required at this stage
IBCP 70	Table 4.4	Risk Factor: Proposal related indirect impacts to established individuals. Triggers and Contingency Action / Response: Refer to Table 3-2. The Establishment Site is protected through the Vegetation Exclusion Zone associated with the Western Australian approval.	On trigger	Not Applicable	Nil	Not required at this stage
IBCP 71	Table 5.1	All personnel (including employees, contractors, and/or subcontractors) must be inducted / re-inducted on the key requirements of the Ironcap Banksia Conservation Management Plan prior to commencement of work onsite.	Annual	Compliant	E20_GDPTrainingPresentation	All personnel are required to complete Ground Disturbance Permit training which outlines conservation significant flora and the requirement for personnel to adhere to conditions.
IBCP 72	Tabel 5.2	Funding of the implementation of this Conservation Plan will be provided by Covalent as the proponent for the Project.	Overall	Compliant	Nil	The IBCP will be funded by Covalent.
Reporting						
IBCP 73	Section 5.3	<u>Environmental Management</u> Report the implementation status of management actions to DAWE annually in the ACR.	Annual	Compliant	This report	As part of this annual compliance report to the DCCEEW under EPBC Decision 2017/7950, this table documents the implementation status of management actions in the Ironcap Banksia Conservation Plan.
IBCP 74	Section 5.3	<u>Environmental Management</u> Report the results of the environmental monitoring to DAWE annually in the ACR.	Annual	Compliant	Nil	Not required at this stage
IBCP 75	Section 5.3	<u>Environmental Management</u> Report the implementation of the outcomes of any contingency actions (if required) to DAWE annually in the ACR.	As required	Not applicable	Nil	Not required at this stage



Condition	Reference	Requirement	Timing	Status	Evidence	Assessment
IBCP 76	Section 5.3	<u>Restoration Management</u> Report the implementation of restoration actions to DAWE annually in the ACR.	Annual	Compliant	This 2024-2025 Annual Compliance Report	As part of this annual compliance report to the DCCEEW under EPBC Decision 2017/7950, this table documents the implementation status of restoration actions.
IBCP 77	Section 5.3	<u>Restoration Management</u> Report the results of the environmental monitoring to DAWE annually in the ACR.	Annual	Not applicable	Nil	Not required at this stage
IBCP 78	Section 5.3	<u>Restoration Management</u> Report the implementation of the outcomes of any contingency actions (if required) to DAWE annually in the ACR.	As required	Not applicable	Nil	Not required at this stage
IBCP 79	Section 5.3	Report any potential/non-compliances or incidents to the DCCEEW within two (2) business days, with further details provided within ten (10) business days as required under Condition 14 of the EPBC Decision 2017/7950 approval.	Annual	Compliant	E13_Notification_IncidentJuly2024	There was one incident in relation to the IBCP in the reporting period. In line with corrective actions in Requirements IBCP20 and IBCP28 there was no impact or potential impact to <i>B. dolichostyla</i> . Reporting was undertaken in accordance with the requirements of IBCP20 and IBCP28.



Appendix C: Threatened Fauna Offset Management Plan Compliance Assessment

The audit findings for conformance with commitments in the Threatened Fauna Offset Management Plan are presented in the following table.



Threatened Fauna Offset Management Plan Audit Table

Reference	Objective	Timing	Status	Evidence	Assessment
TFOMP 01	Clear no more than the approved 442 ha of remnant native vegetation/fauna habitat within the Development Envelope.	Clearing	Compliant	E01_ACR2024-2025_VegetationClearingEEZ	Clearing of native vegetation has not exceeded 442 ha in the Development Envelope.
TFOMP 02	Implement each approved Fauna Offset Management Plan(s) at least until the end date of the period of effect of the approval.	Upon approval	Not Applicable	Nil	The Fauna Offset Management Plan was submitted to the DCCEEW on 26 March 2021 and approved on 31 March 2021. Covalent Lithium are awaiting approval of the Fauna Offset Management Plan from the WA Minster for Environment; therefore, the management and monitoring components of the Fauna Offset Management Plan have not commenced at this stage. During the reporting period Covalent provided DWER with an updated Fauna Offset Strategy on 13 August 2024 and are awaiting feedback. The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.
TFOMP 03	Retain and improve habitat critical to the survival of the Chuditch in-line with the ‘ <i>Chuditch (Dasyurus geoffroii) National Recovery Plan.</i> ’	Ongoing	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 04	Retain and improve habitat critical to the survival of the Malleefowl in-line with the ‘ <i>National Recovery Plan for Malleefowl (Leipoa ocellata).</i> ’	Ongoing	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 05	Undertake European Red Fox (<i>Vulpes vulpes</i>) control activities in-line with the ‘ <i>Threat Abatement Plan for predation by the European red fox.</i> ’	Ongoing	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 06	Undertake feral cat (<i>Felis catus</i>) control activities in-line with the ‘ <i>Threat Abatement Plan for predation by feral cats.</i> ’	Ongoing	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 07	Acquire and manage a 1,645 ha offset area(s) that consists of Chuditch and Malleefowl foraging and breeding habitat to offset the residual significant impacts of the Action.	Pre-clearing	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 08	Detect Chuditch within the acquired offset area(s), between May and July, each year over three (3) consecutive years. Performance and completion criteria include: - In 0 to 5 years, Chuditch are detected in two (2) annual monitoring events; - In 5 to 10 years, Chuditch are in two (2) consecutive annual monitoring events; and - In 10 to 15 years, Chuditch are detected in three (3) consecutive annual monitoring events.	Annual	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 09	Detect Malleefowl within the acquired offset area(s), each year, over three (3) consecutive years. Performance and completion criteria include: - In 0 to 5 years, Malleefowl are detected in two (2) annual monitoring events; - In 5 to 10 years, Malleefowl are detected in over two (2) consecutive annual monitoring events; and - In 10 to 15 years, Malleefowl are detected in over three (3) consecutive annual monitoring events.	Annual	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 10	Detect a recently active (1- to 2-year-old) Malleefowl mound within the acquired offset area(s). Performance and completion criteria include: - In 0 to 5 years, a recently active Malleefowl mound is detected; and - In 5 to 10 and 10 to 15 years, a recently active Malleefowl mound is detected onsite during at least two (2) monitoring events during each five (5) year period.	Annual	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 11	Detect Chuditch and Malleefowl within 5 km of the acquired offset area(s). Performance and completion criteria include: - Chuditch and Malleefowl are detected within 5 km, in each five-year period.	Annual	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.



Reference	Objective	Timing	Status	Evidence	Assessment
TFOMP 12	Vegetation condition within the acquired offset area(s) are classified as 'Very Good' or higher as per the Keighery Scale. Performance and completion criteria include: - In 0 to 5 years, vegetation condition is averaged as 'Good' across all baseline assessment locations; and - In 5 to 10 and 10 to 15 years, vegetation condition is averaged as 'Very Good' or higher across all baseline assessment locations. Note: In the event that baselines assessments determine vegetation condition is currently 'Very Good' or higher, completion criteria will be amended to reflect an increase to 'Excellent' or higher as per the Keighery Scale.	Annual	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 13	Record hollow fallen trees within the acquired offset area(s). Performance and completion criteria include: - In 0 to 5 years, suitable hollow fallen trees are recorded at four (4) or more baseline habitat assessment locations; and - In 5 to 10 and 10 to 15 years, suitable hollow fallen trees are recorded at eight (8) or more baseline habitat assessment locations.	Annual	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 14	Record the presence of prey species of the Chuditch within the acquired offset area(s). Performance and completion criteria include: - In 0 to 5 years, Chuditch prey species are recorded at greater than six (6) baseline habitat assessment locations; and - In 5 to 10 and 10 to 15 years, Chuditch prey species are recorded at eight (8) or more baseline habitat assessment locations.	Annual	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 15	Record sufficient leaf litter to be utilised by the Malleefowl to build a mound within the acquired offset area(s). Performance and completion criteria include: - In 0 to 5 years, sufficient leaf litter to build a mound is recorded at four (4) or more habitat assessment locations; and - In 5 to 10 and 10 to 15 years, sufficient leaf litter to build a mound is recorded at eight (8) or more habitat assessment locations.	Annual	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 16	Record the presence of foraging resources of the Malleefowl within the acquired offset area(s). Performance and completion criteria include: - In 0 to 5 years, Malleefowl foraging resources are recorded at six (6) or more baseline habitat assessment locations; and - In 5 to 10 and 10 to 15 years, Malleefowl foraging resources are recorded at eight (8) or more baseline habitat assessment locations.	Annual	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 17	Achieve all completion criteria within twenty (20) years from the approval of the Fauna Offset Management Plan.	Ongoing	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 18	Covalent will fund land acquisition, transfer and implementation of this OMP, to attain and maintain completion criteria, for the period of effect of EPBC Act approval for this project.	Overall	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER
TFOMP 19	Install firebreaks within and around the acquired offset area(s) to minimise likelihood of uncontrolled fires impacting on conservation values.	As required	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER
TFOMP 20	Install perimeter fencing around the acquired offset area(s) to prevent the unauthorised access of pedestrians and/or vehicles and exclude livestock grazing.	As required	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER
TFOMP 21	Undertake prescribed burning in consultation with the Department of Biodiversity, Conservation and Attractions and other relevant stakeholders to minimise likelihood of uncontrolled fires impacting on conservation values.	As required	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER
TFOMP 22	Remove waste and unwanted infrastructure.	As required	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER
TFOMP 23	Undertake predator control in consultation with the Department of Biodiversity, Conservation and Attractions and other relevant stakeholders to reduce predation on	As required	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER



Reference	Objective	Timing	Status	Evidence	Assessment
TFOMP 24	Undertake introduced flora control in consultation with the Department of Biodiversity, Conservation and Attractions and other relevant stakeholders for the purpose of improving habitat condition to 'Very Good' as per the Keighery Scale.	As required	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER
TFOMP 25	Event: Presence of species is not confirmed during monitoring activities Trigger: 0 - 5 Year Performance Criteria not met as per Table 3.2 Contingency Action / Response: - Review monitoring (habitat quality) and management measures (for example feral predator control) to determine any potential contributions to absence of species and amend plan as required, which may include: • Feral cat trapping as determined by monitoring results • Fox baiting as determined by monitoring results • Additional habitat quality improvement through weed control, fire management or improved fencing - Continue annual monitoring - Assess if increase in monitoring effort is required - Undertake research programmes to improve likelihood of species presence	If trigger criteria met	Not Applicable	Nil	T The TFOMP will not be implemented until it is approved by DCCEEW and DWER
TFOMP 26	Event: Presence of species is not confirmed during monitoring activities Trigger: 5 - 10 Year Performance Criteria not met as per Table 3.2 Contingency Action / Response: - As per 5 Year Performance Criteria - Investigate requirements for additional or alternative offset site through consultation with DAWE and DWER - Provide additional or alternative offset, as required by DAWE and DWER, and revise and submit OMP for approval	If trigger criteria met	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER
TFOMP 27	Event: Presence of species is not confirmed during monitoring activities Trigger: 10 - 15 Year Performance Criteria not met as per Table 3.2 Contingency Action / Response: - As per 10 Year Performance Criteria - Investigate feasibility of translocation or reintroduction programmes in consultation with DBCA and specialist groups (National Malleefowl Recovery Team, Perth Zoo)	If trigger criteria met	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER
TFOMP 28	Event: Presence of foxes and cats increasing risk of predation Trigger: Monitoring identifies an increase in feral animal records from previous monitoring period Contingency Action / Response: - Review of impacts on species presence as determined through monitoring - Feral predator management controls (involvement in site or regional feral predator programmes) are implemented, in consultation with DBCA and relevant stakeholders (Eastern Wheatbelt Biosecurity Group and adjacent landowners)	If trigger criteria met	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER
TFOMP 29	Event: Offsite development activities displace species Trigger: Offsite development approval within 1 km of Offset Site Contingency Action / Response: - Review adjacent development activities and consult with proponent to minimise species displacement - Review monitoring programme to detect any potential population changes - Investigate and implement requirement for additional management measures, such as noise barriers, improved fencing or feral predator management controls	If trigger criteria met	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.



Reference	Objective	Timing	Status	Evidence	Assessment
TFOMP 30	Event: Presence of Chuditch during breeding season is not confirmed during monitoring activities Trigger: 0 - 5 Year Performance Criteria not met as per Table 3.2 Contingency Action / Response: - Review monitoring (habitat quality) and management measures (for example feral predator control) to determine any potential contributions to absence of species and amend as required, which may include: • Feral cat trapping as determined by monitoring results • Fox baiting as determined by monitoring results • Additional habitat quality improvement through weed control, fire management or improved fencing - Continue annual monitoring - Assess if increase in monitoring effort is required - Undertake research programmes to improve likelihood of species presence and breeding habitat (for example artificial den creation)	If trigger criteria met	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 31	Event: Presence of Chuditch during breeding season is not confirmed during monitoring activities Trigger: 5 - 10 and 10 - 15 Year Performance Criteria not met as per Table 3.2 Contingency Action / Response: - As per 5 Year Performance Criteria - Investigate feasibility of translocation or reintroduction programmes in consultation with DBCA and specialist groups (Perth Zoo) - Investigate requirements for additional or alternative offset site through consultation with DAWE and DWER - Provide additional or alternative offset, as required by DAWE and DWER, and revise and submit OMP for approval	If trigger criteria met	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 32	Event: Presence of recently active Malleefowl mounds is not confirmed during monitoring activities Trigger: 0 - 5 Year Performance Criteria not met as per Table 3.2 Contingency Action / Response: - Review of monitoring (habitat quality) and management measures (for example feral predator control) to determine any potential contributions to absence of species and amend as required, which may include: • Feral cat trapping as determined by monitoring results • Fox baiting as determined by monitoring results • Additional habitat quality improvement through weed control, fire management or improved fencing - Continue annual monitoring - Assess if increase in monitoring effort is required - Undertake research programmes to improve likelihood of species presence and breeding habitat (for example artificial mound creation)	If trigger criteria met	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 33	Event: Presence of recently active Malleefowl mounds is not confirmed during monitoring activities Trigger: 5 - 10 and 10 - 15 Year Performance Criteria not met as per Table 3.2 Contingency Action / Response: - As per 5 Year Performance Criteria - Investigate feasibility of translocation or reintroduction programmes in consultation with DBCA and specialist groups (National Malleefowl Recovery Team) - Investigate requirements for additional or alternative offset site through consultation with DAWE and DWER - Provide additional or alternative offset, as required by DAWE and DWER, and revise and submit OMP for approval	If trigger criteria met	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.



Reference	Objective	Timing	Status	Evidence	Assessment
TFOMP 34	Event: Presence of species surrounding Site 10 is not confirmed during monitoring activities Trigger: Performance Criteria not met as per Table 3.2 Contingency Action / Response: - Review of monitoring and management measures (for example feral predator control) to determine any potential contributions to absence of species and amend as required, which may include: • Feral cat trapping as determined by monitoring results • Fox baiting as determined by monitoring results • Additional habitat quality improvement through fire management - Continue monitoring at current frequency - Assess if increase in monitoring effort is required - Undertake research programmes to improve likelihood of species presence and breeding habitat (for example artificial mound creation)	If trigger criteria met	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 35	Event: Evidence of Chuditch prey species or Malleefowl foraging resources is not confirmed during monitoring activities Trigger: 5-year Performance Criteria not met as per Table 3.2 Contingency Action / Response: - Review of monitoring (habitat quality) and management measures (for example feral predator control) to determine any potential contributions and amend as required, which may include: • Feral cat trapping as determined by monitoring results • Additional habitat quality improvement through weed control, fire management or improved fencing - Continue annual monitoring - Assess if increase in monitoring effort is required - Investigate rehabilitation practices which may improve habitat quality, such as seeding programmes and implement if required	If trigger criteria met	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 36	Event: Evidence of Chuditch prey species or Malleefowl foraging resources is not confirmed during monitoring activities Trigger: 10- and 15-year Performance Criteria not met as per Table 3.2 Contingency Action / Response: - As per 5 Year Performance Criteria - Investigate requirements for additional or alternative offset site through consultation with DAWE and DWER - Provide additional or alternative offset, as required by DAWE and DWER, and revise and submit OMP for approval	If trigger criteria met	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 37	Event: Evidence of numerous hollow fallen trees and sufficient leaf litter is not confirmed during monitoring activities Trigger: 5-year Performance Criteria not met as per Table 3.2 Contingency Action / Response: - Review of monitoring (habitat quality) and management measures to determine any potential contributions and amend as required, which may include: • Additional habitat quality improvement through weed control, fire management or improved fencing - Continue annual monitoring - Assess if increase in monitoring effort is required - Undertake research programmes to improve quality of breeding habitat (for example artificial den or mound creation)	If trigger criteria met	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 38	Event: Evidence of numerous hollow fallen trees and sufficient leaf litter is not confirmed during monitoring activities Trigger: 10- and 15-year Performance Criteria not met as per Table 3.2 Contingency Action / Response: - As per 5 Year Performance Criteria - Investigate requirements for additional or alternative offset site through consultation with DAWE and DWER	If trigger criteria met	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.



Reference	Objective	Timing	Status	Evidence	Assessment
	- Provide additional or alternative offset, as required by DAWE and DWER, and revise and submit OMP for approval				
TFOMP 39	Event: Vegetation condition is not classified as Very Good during monitoring activities Trigger: 5-year Performance Criteria not met – Vegetation condition is averaged as Good (Keighery scale) across all assessment locations Contingency Action / Response: - Review of monitoring and management measures to determine any potential contributions and amend as required, which may include: • Additional habitat quality improvement through weed control, fire management or improved fencing - Continue annual monitoring - Assess if increase in monitoring effort is required - Investigate rehabilitation practices which may improve habitat quality, such as seeding programmes and implement if required	If trigger criteria met	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 40	Event: Vegetation condition is not classified as Very Good during monitoring activities Trigger: 10- and 15-year Performance Criteria not met – Vegetation condition is averaged as Very Good (Keighery scale) across all assessment locations Contingency Action / Response: - As per 5 Year Performance Criteria - Investigate requirements for additional or alternative offset site through consultation with DAWE and DWER - Provide additional or alternative offset, as required by DAWE and DWER, and revise and submit OMP for approval	If trigger criteria met	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 41	Event: Unplanned fires result in vegetation condition and breeding habitat decline Trigger: Unplanned fire identified Contingency Action / Response: - Review of monitoring and management measures to determine any improvement and amend as required, which may include: • Maintenance or improvement to fire management tracks • Prescribed burns • Weed control • Involvement in regional fire management measures with local shire, DFES and DBCA to prevent recurrence - Review vegetation condition monitoring programme to determine if amendments are required	If trigger criteria met	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 42	Event: Prescribed burns detrimentally impact vegetation condition and breeding habitat decline Trigger: Prescribed burn considered necessary Contingency Action / Response: - Undertake consultation with DBCA and other relevant stakeholders (for example Shire of Yilgarn and DFES) to ensure appropriate controls in place for prescribed burn activities - Ensure mosaic burns or only high-risk portions of site are burnt, to ensure hollow logs and leaf litter is retained to maintain species breeding habitat - Review Fauna habitat assessment monitoring programme to determine if amendments are required	If trigger criteria met	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.



Reference	Objective	Timing	Status	Evidence	Assessment
TFOMP 43	Event: Unauthorised site access or grazing result in vegetation condition and breeding habitat decline Trigger: Evidence of unauthorised access or stock grazing is identified Contingency Action / Response: - Review of monitoring and management measures to determine any improvement and amend as required, which may include: • Repair, maintenance or improvement to perimeter fencing and gates • Consultation with adjacent landowners to exclude stock - Review vegetation condition monitoring programme to determine if amendments are required	If trigger criteria met	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 44	Event: Increase in weed invasion result in vegetation condition and breeding habitat decline Trigger: Vegetation condition monitoring identifies an increase in weed species and cover Contingency Action / Response: - Review of monitoring and management measures to determine any improvement and amend as required, which may include: • Weed spraying programmes • Targeted weed controls programmes • Review and improvement of vehicle entry and hygiene procedures - Review vegetation condition monitoring programme to determine if amendments are required	If trigger criteria met	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 45	Event: Land unavailable for purchase Trigger: Land unavailable for purchase Contingency Action / Response: - If acquisition is delayed, revised timeframes will be confirmed with DAWE and DWER. - If acquisition is unsuccessful, alternative offset sites will be proposed and revised OMP submitted	If trigger criteria met	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 46	Event: - Conversion to conservation estate is unsuccessful - Exclusion of exploration, mining and grazing is unsuccessful Trigger: Conversion to conservation reserve does not occur within five years following site acquisition Contingency Action / Response: - If conservation reserve creation is delayed, revised timeframes will be confirmed with DAWE and DWERs. - If conservation reserve creation is unsuccessful, alternative offset sites will be proposed and revised OMP submitted, or consultation will be undertaken to determine if a conservation covenant provides sufficient protective mechanisms	If trigger criteria met	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 47	All personnel (employees, contractors, and/or subcontractors) must be inducted/reinducted on the key requirements of the Fauna Offset Management Plan prior to commencement of work onsite.	Annual	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 48	Inspect and, if required, maintain perimeter fencing of the acquired offset area(s)	As required	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 49	Inspect and, if required, control introduced flora (weed) cover and density within the acquired offset area(s)	As required	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 50	Inspect and, if required, control feral animal occurrences and frequency within the acquired offset area(s)	As required	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 51	Inspect and, if required, maintain firebreaks of the acquired offset area(s)	As required	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.



Reference	Objective	Timing	Status	Evidence	Assessment
TFOMP 52	Inspect and, if required, control any unauthorised access incidents and/or livestock grazing within the acquired offset area(s)	As required	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 53	Undertake vegetation monitoring within the acquired offset area(s) to determine the following: - Dominant three (3) vascular flora species in each strata. - Percent cover of native vegetation in each strata. - Percent cover of bare ground in each strata. - Percent cover of leaf litter. - Percent cover of introduced flora species - Flora species composition in each strata. - Condition/health of each strata; and - Disturbances (if any), disturbance type and their estimated frequency;	Annual	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 54	Undertake fauna habitat assessments within the acquired offset area(s) to determine the following: - Number of hollow fallen trees; - Presence of prey species of the Chuditch; - Sufficient leaf litter to be utilised by Malleefowl to build a mound; and - Presence of foraging resources of the Malleefowl.	Annual	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 55	Undertake Chuditch presence monitoring within the acquired offset area(s) as follows: - Monitor in Chuditch breeding season (May to July); - Use cameras at static locations with a minimum of two arrays of 20 cameras with 200 m between cameras as per Rayner et al. (2011); and - Record opportunistic evidence of Chuditch, including tracks, scats, scratching and/or sightings.	Annual	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 56	Undertake Malleefowl presence monitoring within the acquired offset area(s) as follows: - Monitor in Malleefowl mound-building season (September to December); - Use LiDAR imagery to identify potential mounds with field verification or field verification of previously identified mounds; - Record opportunistic evidence of Malleefowl, including additional mounds, feathers, tracks, scats, scratching and/or sightings; - Align fauna monitoring with the with the 'National Malleefowl Monitoring Manual' (2019) including mound activity status; and - Submit data via a cyber-tracker software program to the National Malleefowl Monitoring Database for population trend analysis, as well as the National Malleefowl Recovery Plan.	Annual	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 57	Provide an estimate of local population numbers for Chuditch, Malleefowl and feral animals based on evidence collated and temporal analysis.	Annual	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 58	Report the progress of the acquisition of the offset area(s).	Annual	Compliant	Nil	Covalent Lithium has identified and acquired of an offset property containing foraging and breeding habitat for the Malleefowl (<i>Leipoa ocellata</i>) and the Chuditch (<i>Dasyurus geoffroi</i>). The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 59	Report the progress of the transfer of the offset area(s) to a conservation reserve system for management by the Department of Biodiversity, Conservation and Attractions.	Annual	Compliant	Nil	There is no progress in transferring the offset area to the conservation reserve system. This is not anticipated until the TFOMP is approved by both DCCEEW and DWER.



Reference	Objective	Timing	Status	Evidence	Assessment
TFOMP 60	Report the implementation status of management actions.	Annual	Not Applicable	Nil	This ACR reports that the TFOMP will be implemented once approved.
TFOMP 61	Report the results of the environmental monitoring.	Annual	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 62	Report the implementation of the outcomes of any contingency actions (if required).	As required	Not Applicable	Nil	The TFOMP will not be implemented until it is approved by DCCEEW and DWER.
TFOMP 63	Report any potential/non-compliances or incidents to the DCCEEW within two (2) business days, with further details provided within ten (10) business days as required under Condition 14 of the EPBC Decision 2017/7950 approval.	Annual	Not Applicable	Nil	No potential/non-compliances or incidents related to the TFOMP occurred within the reporting period.



Appendix D: Supporting Figures

E01 ACR2024-2025 Vegetation Clearing and Environmental Exclusion Zones

E02 ACR2024-2025 Vegetation Clearing and Ironcap Banksia

E35 Skeleton Rock Bushfire Impact Extent

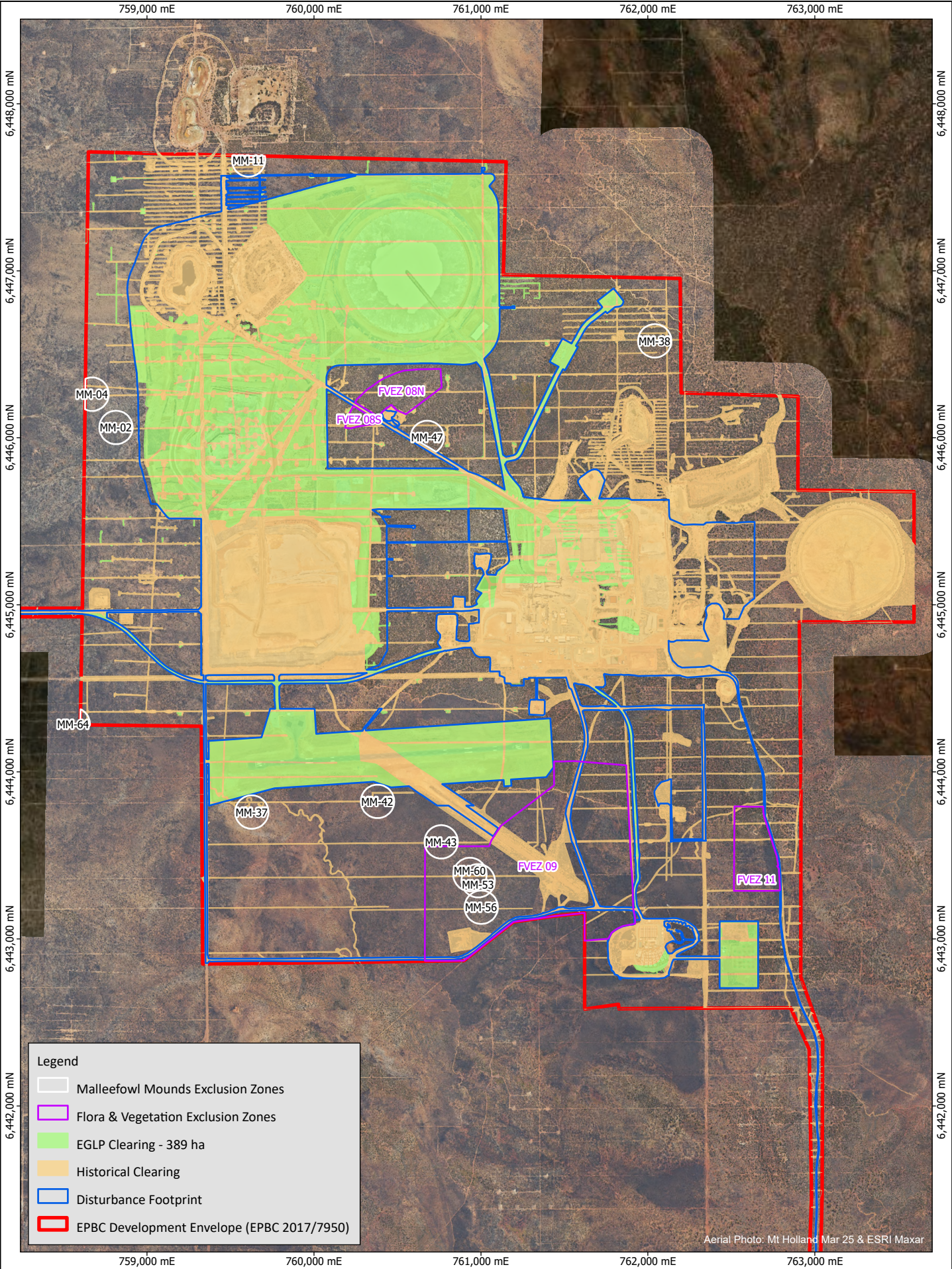
E36 Skeleton Rock Bushfire Fire Impact to Development Envelope

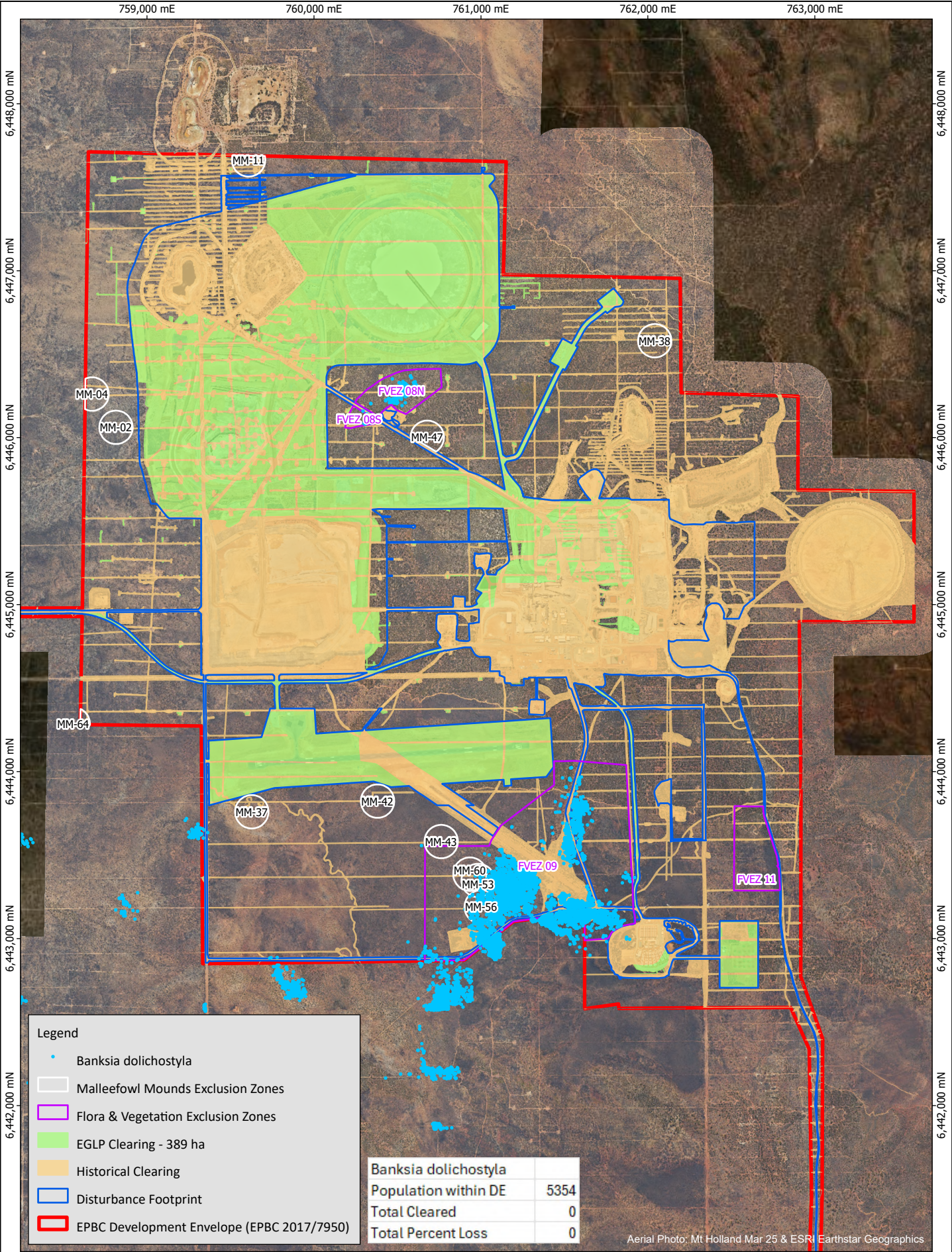
E37 Skeleton Rock Bushfire Impact to Flora Vegetation Exclusion Zones

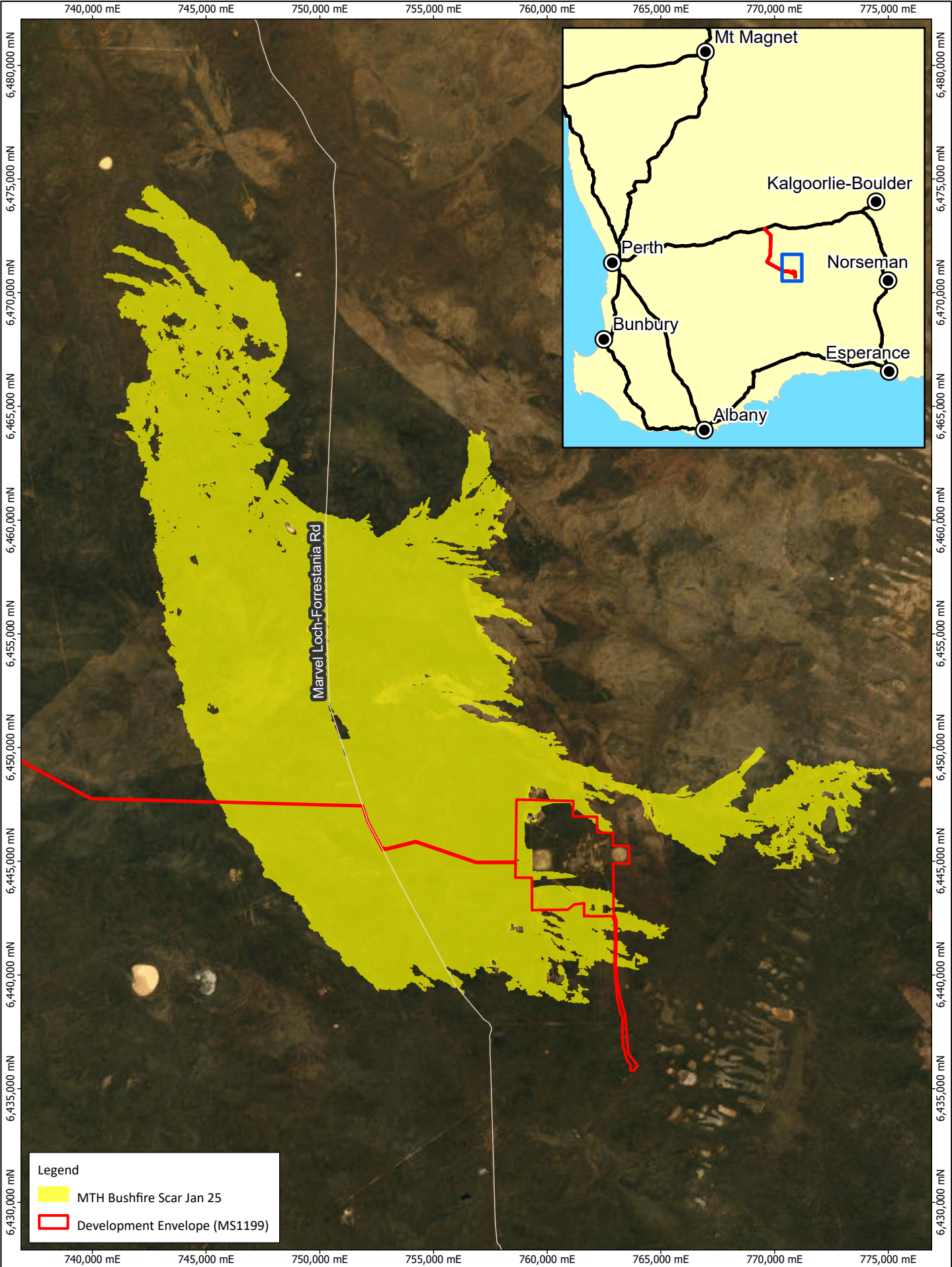
E38 Skeleton Rock Bushfire Impact to Ironcap Banksia

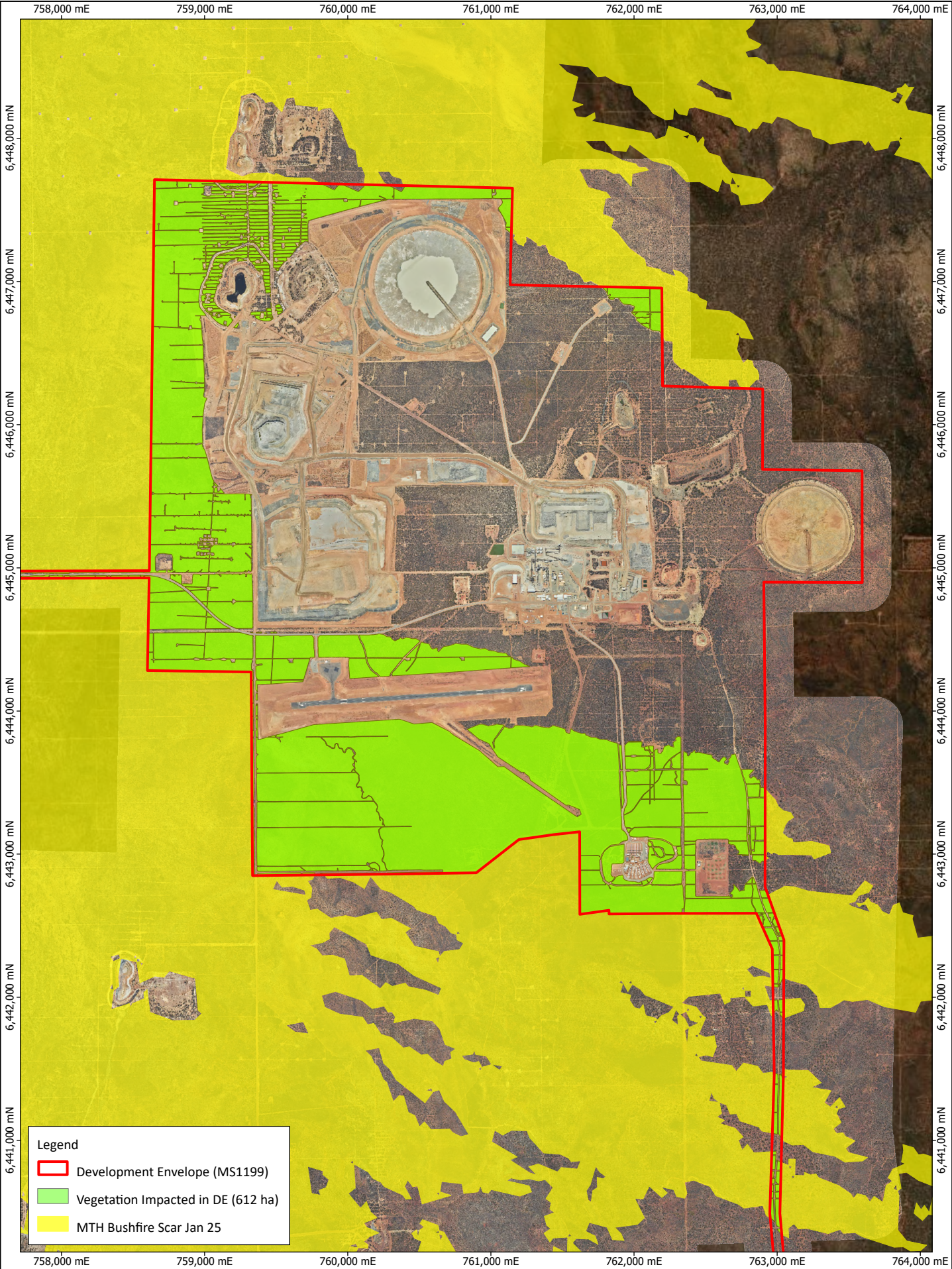
E39 Skeleton Rock Bushfire Impact to Malleefowl Mound Exclusion Zones

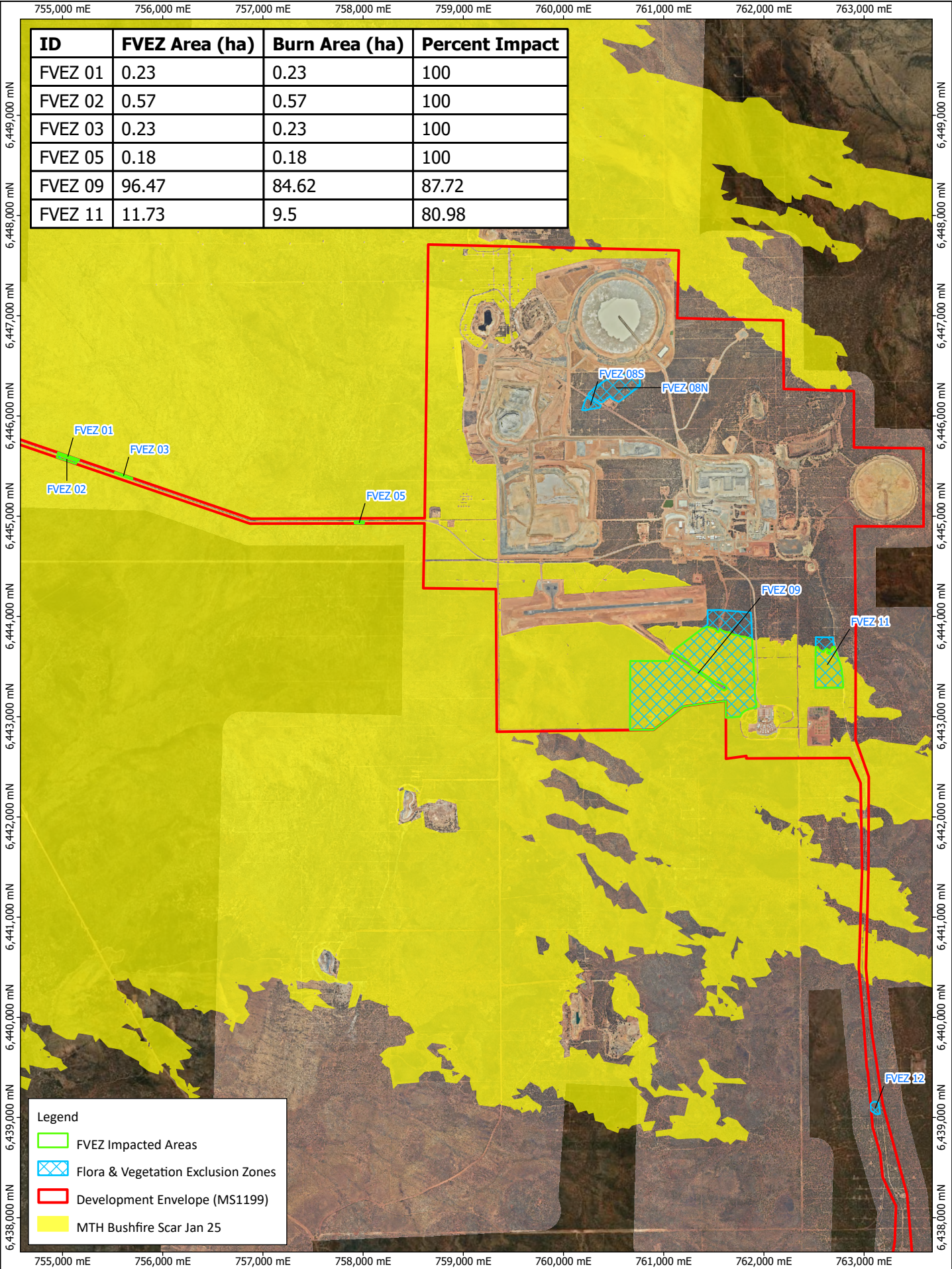
E40 Skeleton Rock Bushfire DFES Firebreak Clearing

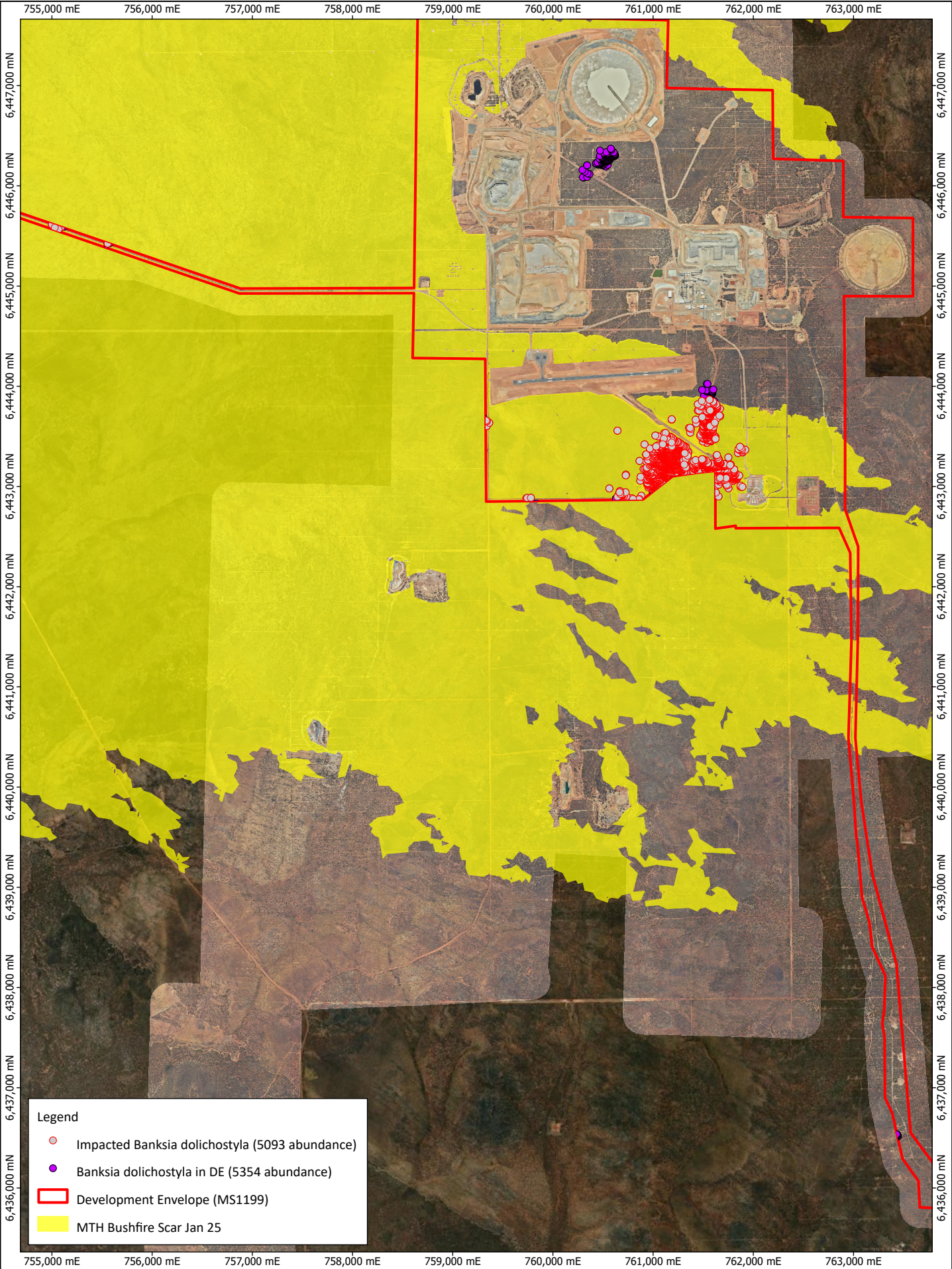


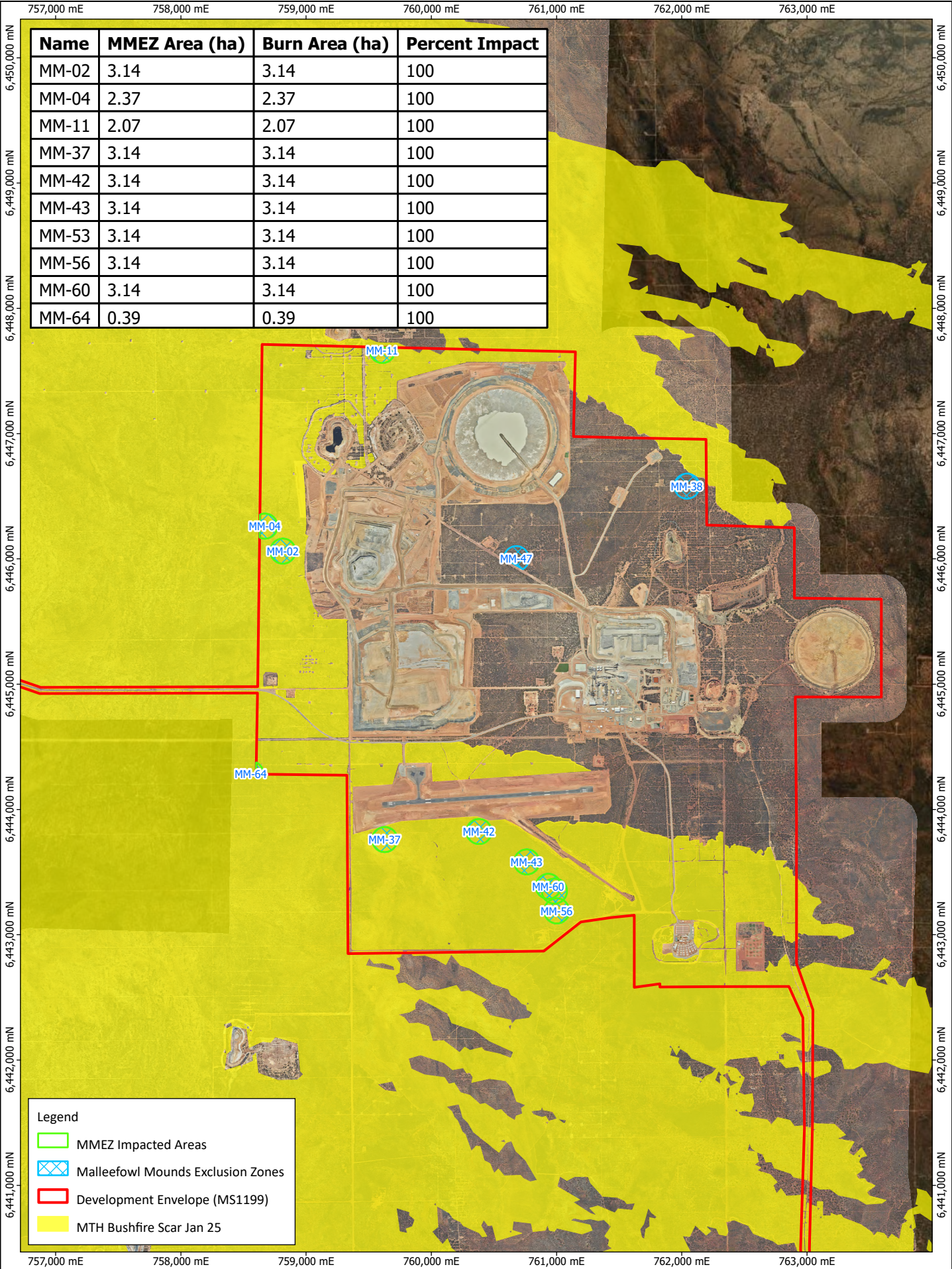
















Appendix E: Evidence Register

Ref	Title	Author	Description
E01	ACR 2024-2025 Vegetation Clearing EEZ	Covalent Lithium	Figure
E02	ACR 2024-2025 Ironcap Banksia	Covalent Lithium	Figure
E03	2023-2024 Malleefowl Monitoring Report	Ecoscape Australia	Report
E04	2024 Chuditch Monitoring Report	Ecoscape Australia	Report
E05	2023-2024 Introduced Predator Monitoring Report	Ecoscape Australia	Report
E06	June 2024 Feral Cat Control Program	Alpha Pest Animal Solutions	Report
E07	September 2024 Feral Cat Control Program	Alpha Pest Animal Solutions	Report
E08	September 2024 Wild Dog Control Program	Alpha Pest Animal Solutions	Report
E09	Vegetation Condition Monitoring Autumn 2024	Mattiske Consulting	Report
E10	Vegetation Condition Monitoring Spring 2024	Mattiske Consulting	Report
E11	Introduced Flora (Weed) Survey 2024	Mattiske Consulting	Report
E12	Qualitative Vegetation Health Monitoring 2024	Astron Environmental Services	Report
E13	Notification of July 2024 incident regarding VEZ	Covalent Lithium, AECOM	Email notification and supporting documents
E14	Notification of inability to comply with conditions following Skeleton Rock Bushfire	Covalent Lithium	Letter
E15	Fauna Pre-Clearance Survey forms	Covalent Lithium, Ecoscape Australia	Records
E16	Internal Incident Investigation – Vehicle Strike	Covalent Lithium	Records
E17	Internal Incident Investigation – Fire Impact	Covalent Lithium	Records
E18	Environment Site Notice – Traffic Management	Covalent Lithium	Records
E19	Ground Disturbance Permit (GDP) Procedure	Covalent Lithium	Procedure
E20	GDP Training Presentation	Covalent Lithium	Records
E21	GDP0093 Geotechnical Program – Example	Covalent Lithium	Records
E22	Fauna Management and Trench Clearing Procedure	Covalent Lithium	Procedure
E23	Fauna Taking (Relocation) Licence	Covalent Lithium	Records
E24	Environment Site Notice – Reporting Fauna Sightings	Covalent Lithium	Records
E25	Landfill Facility Management Procedure	Covalent Lithium	Procedure
E26	Environment Site Notice – Waste Management	Covalent Lithium	Records
E27	Environment Site Notice – Introduced Predator Control	Covalent Lithium	Records
E28	Mt Holland Emergency Response Management Plan	Covalent Lithium	Management Plan
E29	Environment Site Notice – Reporting Environmental Incidents (EEZ)	Covalent Lithium	Records
E30	Environment Toolbox Talk – Protect our Malleefowl	Covalent Lithium	Records
E31	Environment Toolbox Talk – National Biodiversity Month	Covalent Lithium	Records
E32	Environment Toolbox Talk – Threatened Species Day	Covalent Lithium	Records
E33	Environment Toolbox Talk – Malleefowl Watch S6	Covalent Lithium	Records
E34	Ministerial Statement 1199 2024 Compliance Assessment Report	Covalent Lithium	Compliance Assessment Report (DWER)



Ref	Title	Author	Description
E35	Skeleton Rock Bushfire – Extent	Covalent Lithium	Figure
E36	Skeleton Rock Bushfire – Impact to DE	Covalent Lithium	Figure
E37	Skeleton Rock Bushfire – Impact to FVEZ	Covalent Lithium	Figure
E38	Skeleton Rock Bushfire – Impact to Ironcap Banksia	Covalent Lithium	Figure
E39	Skeleton Rock Bushfire – Impact to MMEZ	Covalent Lithium	Figure
E40	Skeleton Rock Bushfire – DFES Firebreak Clearing	Covalent Lithium	Records
E41	EnviroSys 2024 Dust Deposition Results	Covalent Lithium	Records
E42	DE Dieback Management Plan	Southern Ecology	Management Plan
E43	Internal Audit Vehicle Equipment Hygiene	Covalent Lithium	Records
E44	Environment Site Notice – Vehicle Equipment Hygiene	Covalent Lithium	Records
E45	Internal Incident Investigation – Vegetation Health Decline	Covalent Lithium	Records
E46	Banksia Restoration Updated Schedule (Table 4 IBCP)	Covalent Lithium	Records
E47	Threatened and Priority Flora Report – Banksia	Natural Area	Records (DBCA)