



# Earl Grey Lithium Project

*Environmental Protection and Biodiversity Conservation Act 1999*

**EPBC Decision 2017/7950 Approval**

**Annual Compliance Report (2023)**

JBS&G Australia Pty Ltd | 66747 | Rev 0

25 June 2024





**We acknowledge the Traditional Custodians of Country throughout Australia and their connections to land, sea and community.**

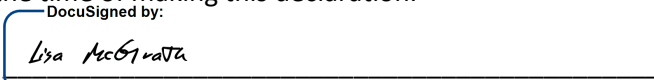
We pay respect to Elders past and present and in the spirit of reconciliation, we commit to working together for our shared future.

Caring for Country The Journey of JBS&G  
Artist: Patrick Caruso, Eastern Arrernte



### 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   
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 25/6/2024 | 3:45 PM AWST

## Table of Contents

<b>1.</b>	<b>Introduction .....</b>	<b>4</b>
1.1	Project Background.....	4
1.2	Environmental Approval to Implement the Project .....	6
1.2.1	Approval under the EPBC Act .....	6
1.2.2	Variations to Approval.....	6
<b>2.</b>	<b>Current Status .....</b>	<b>6</b>
<b>3.</b>	<b>Audit Methodology .....</b>	<b>6</b>
3.1	Audit Plan.....	6
3.1.1	Purpose & Scope.....	6
3.1.2	Methodology .....	7
3.1.3	Terminology.....	7
<b>4.</b>	<b>Audit Results .....</b>	<b>8</b>
4.1	Summary of Compliance.....	8
4.1.1	EPBC Decision 2017/7950 Approval .....	8
4.1.2	Terrestrial Fauna Management Plan .....	8
4.1.3	Ironcaps Banksia Conservation Plan.....	8
4.1.4	Threatened Fauna Offset Management Plan .....	8
4.2	EPBC Approval Non-compliances.....	8
4.3	Management Plan Potential Non-compliances .....	9
4.3.1	Dieback Management Plan.....	9
4.3.2	Restoration Schedule.....	9
4.4	Opportunities for Improvement .....	9
<b>5.</b>	<b>New Environmental Risks .....</b>	<b>19</b>
<b>6.</b>	<b>Monitoring .....</b>	<b>19</b>
<b>7.</b>	<b>Limitations .....</b>	<b>20</b>
<b>8.</b>	<b>References .....</b>	<b>21</b>

## List of Tables

Table 3.1:	Key Personnel Consulted for the Audit.....	7
Table 3.2:	Terminology used for the Audit (DCCEEW 2023) .....	7
Table 4.1:	Audit Table of Compliance with EPBC Decision 2017/7950 .....	10
Table D.1:	Terrestrial Fauna Environmental Management Plan Audit Table (Rev 5).....	25
Table E.1:	Ironcaps Banksia Conservation Plan Audit Table (Rev 2) .....	41
Table F.1:	Threatened Fauna Offset Management Plan Audit Table (Rev 0).....	56
Table M.1:	Evidence Register .....	72

## List of Figures

Figure 1.1:	Earl Grey Lithium Project (the Action).....	5
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## **Appendices**

<b>Appendix A</b>	<b>EPBC 2017/7950 Final Approval Decision Notice</b>
<b>Appendix B</b>	<b>EPBC 2017/7950 Correction Notice</b>
<b>Appendix C</b>	<b>EPBC 2017/7950 Variation of Conditions</b>
<b>Appendix D</b>	<b>Terrestrial Fauna Management Plan Compliance Assessment</b>
<b>Appendix E</b>	<b>Ironcaps Banksia Conservation Plan Compliance Assessment</b>
<b>Appendix F</b>	<b>Threatened Fauna Offset Management Plan Compliance Assessment</b>
<b>Appendix G</b>	<b>Malleefowl Monitoring 2022-23</b>
<b>Appendix H</b>	<b>Chuditch Monitoring 2023</b>
<b>Appendix I</b>	<b>Vegetation Condition Monitoring Spring 2023</b>
<b>Appendix J</b>	<b>Fauna Pre-clearance Survey March 2023</b>
<b>Appendix K</b>	<b>Introduced Predator Monitoring 2022</b>
<b>Appendix L</b>	<b>Dust Report 2023</b>
<b>Appendix M</b>	<b>Evidence Register</b>

# 1. Introduction

The Earl Grey Lithium Project (the 'Action') was referred to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) (formerly the Department of Agriculture, Water and the Environment) under the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) in May 2017 for environmental assessment. Following the environmental assessment, the Project was approved with conditions in February 2020 through the EPBC Decision 2017/7950 Approval (Appendix A).

The approval holder of the EPBC Decision 2017/7950 approval is Covalent Lithium Pty Ltd ('Covalent Lithium'). Covalent Lithium is a joint venture between Wesfarmers Limited and Sociedad Química y Minera de Chile.

Following the Action's approval (Appendix A), two (2) EPBC Decision 2017/7950 variations in July 2020 (Appendix B) and December 2020 (Appendix C).

In accordance with Condition 12 of EPBC Decision 2017/7950 Approval, the 'Approval Holder' is required to submit a Compliance Report that addresses the status of the implementation of and level of compliance with the conditions of EPBC 2017/7950 for each 12-month period.

This Compliance Report summarises the results of the audit undertaken by JBS&G Australia Pty Ltd (JBS&G) to assess the Approval Holder's level of compliance against the EPBC Decision 2017/7950 Approval conditions for the 2023 reporting period (01 April 2023 to 31 March 2024). The reporting period also covers the period 01 January 2023 to 31 March 2023 as due to misunderstanding with the alignment with the MS1199 reporting period, this period was not included in the previous ACR.

## 1.1 Project Background

The Action is located at the previously abandoned Mt. Holland Mine Site, approximately 105 km south of the Southern Cross township in Western Australia (WA) (Figure 1.1). The Action comprises open-cut mining and processing of a pegmatite-hosted lithium deposit within a 2,347 ha Development Envelope, within which up to 442 ha of native vegetation/fauna habitat clearing has been authorised.

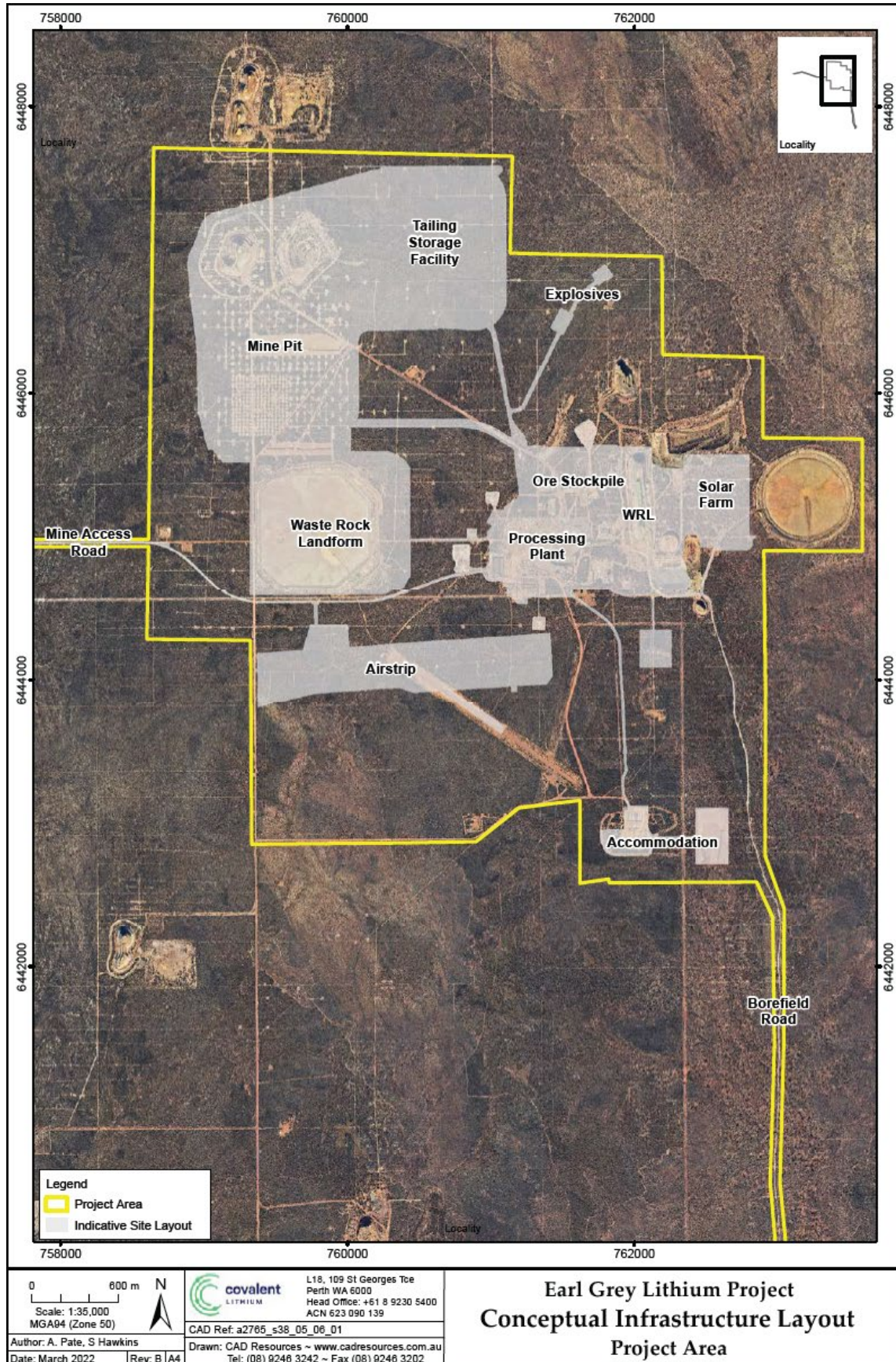


Figure 1.1: Earl Grey Lithium Project (the Action)

## 1.2 Environmental Approval to Implement the Project

### 1.2.1 Approval under the EPBC Act

The Action was referred under the state of WA's *Environmental Protection Act 1986* (EP Act) and the Commonwealth's EPBC Act in May 2017. Upon referral, the Action was assessed via the accredited assessment process under the EPBC Act.

The Action was determined to be a 'Controlled Action' due to the potential for significant effects on the following Matters of National Environmental Significance (MNES), including:

- Ironcaps Banksia (*Banksia dolichostyla*)<sup>1</sup> (Vulnerable);
- Malleefowl (*Leipoa ocellata*) (Vulnerable); and
- Chuditch (*Dasyurus geoffroii*) (Vulnerable).

The Action was approved under the EPBC Act in February 2020 through the EPBC 2017/7950 Approval (Appendix A).

### 1.2.2 Variations to Approval

Following the Action's approval in February 2020, variations to the conditions of EPBC 2017/7950 Approval have been approved in July 2020 (Appendix B) and December 2020 (Appendix C).

## 2. Current Status

Covalent Lithium commenced the construction of the Project in April 2021. Construction and commissioning activities have been undertaken in 2023. The total amount of spodumene concentrate produced during commissioning was 15,339 tonnes.

The Commonwealth approved plans in place during the reporting period include:

- Terrestrial Fauna Environmental Management Plan (Rev 5)
- Conservation Plan for Ironcaps Banksia (*Banksia sphaerocarpa* var. *dolichostyla*) (Rev 2)
- Threatened Fauna Offset Management Plan (Rev 0)

The Threatened Fauna Offset Management Plan has not been approved by DWER and as such has not been implemented in the reporting period.

## 3. Audit Methodology

### 3.1 Audit Plan

#### 3.1.1 Purpose & Scope

This Compliance Report has been prepared for the reporting period from 1 January 2023 to 31 March 2024 to fulfil the requirements of Condition 12.

Condition 12 requires the approval holder (Covalent Lithium) to publish a report on a 12-month basis, addressing compliance against conditions in EPBC 2017/7950 Approval (Appendix A).

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<sup>1</sup>*Banksia dolichostyla* was previously assessed as *Banksia sphaerocarpa* var. *dolichostyla*.



Condition 12 states:

*“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 **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 **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 **5 business days** of publication.”*

This report is due 60 business days after the 01 April 2024 which for the current ACR is 26 June 2024.

### 3.1.2 Methodology

A compliance audit was undertaken by JBS&G in May and June 2024 to inform this Compliance Report. The audit primarily involved consultation with the key persons associated with the Action and review of relevant documentation to assess the level of compliance against the approval conditions of the EPBC 2017/7950 Approval. The key persons consulted during the audit are listed below in Table 3.1.

**Table 3.1: Key Personnel Consulted for the Audit**

Personnel	Position
Anthea Pate	Manager for Environment, Approvals & Safety Manager, Covalent
Annette Latto	Principal, Client Contact JBS&G

### 3.1.3 Terminology

The ‘Status’ field of audit table (refer to Section 4.1) describes the level of compliance against the approval conditions. In 2019, the DCCEEW issued the *Annual Compliance Report Guidelines* (DCCEEW 2023). Terminology from this guidance has been applied in the audit and is listed below in Table 3.2.

**Table 3.2: Terminology used for the Audit (DCCEEW 2023)**

Term	Definition
<b>Compliant</b>	‘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.
<b>Potentially non-compliant</b>	A designation of ‘potentially 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.
<b>Not applicable</b>	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.

## 4. Audit Results

### 4.1 Summary of Compliance

There are 18 conditions contained within EPBC Decision 2017/7950.

#### 4.1.1 EPBC Decision 2017/7950 Approval

A total of 58 sub-conditions of EPBC Decision 2017/7950 were audited in Table 4.1 below. The following audit results were determined:

- 33 conditions were found to be 'Compliant' including nine conditions 'Compliant (complete)'
- 21 conditions were found to be 'Not applicable';
- One condition was found to be 'Potentially non-compliant'; and
- Two conditions were substantiated as non-compliant by DCCEEW in the reporting period.

The potential non-compliance relates to the late submission of the ACR from the previous reporting period (which was submitted October 2023 within the 1 Apr 2023 to 31 March 2024 reporting period).

For further details on the administrative non-compliances refer to Section 4.2.

#### 4.1.2 Terrestrial Fauna Management Plan

A total of 95 conditions are contained within the Terrestrial Fauna Management Plan (Revision 5) as per Appendix D. The following audit results were determined:

- 74 conditions were found to be 'Compliant';
- 21 conditions were found to be 'Not applicable'; and
- No conditions were found to be 'Potentially non-compliant'.

#### 4.1.3 Ironcaps Banksia Conservation Plan

A total of 79 conditions are contained within the Ironcaps Banksia Conservation Plan (Revision 2) as per Appendix E. The following audit results were determined:

- 28 conditions were found to be 'Compliant' including four conditions 'Compliant (complete)';
- 48 conditions were found to be 'Not applicable'; and
- Three conditions were found to be 'Potentially non-compliant'.

#### 4.1.4 Threatened Fauna Offset Management Plan

A total of 63 conditions are contained within the Threatened Fauna Offset Management Plan (Revision 0) as per Appendix F. The following audit results were determined:

- 6 conditions were found to be 'Compliant';
- 57 conditions were found to be 'Not applicable'; and
- No conditions were found to be 'Potentially non-compliant'.

### 4.2 EPBC Approval Non-compliances

One potential non-compliance with condition 12) was identified in the reporting period associated with the late submission of the 2023 ACR (previous ACR).

Two administrative non-compliances with condition 6 and 14 were identified 13/07/2023, reported to DCCEEW and were subject to a DCCEEW warning letter (these have been documented in this ACR). To prevent

future administrative non-compliances and potential non-compliances, Covalent have improved their processes, roles and accountabilities for ensuring compliance with environmental conditions.

### **4.3 Management Plan Potential Non-compliances**

Three potential non-compliances were identified during the assessment of the Ironcaps Banksia Conservation Plan. These related to:

- The Dieback Management Plan had not been developed or provided to DBCA at the time of the audit.
- The proponent had not commenced the 2021 and 2022 Ironcaps Banksia Conservation Plan Restoration Schedules.

No potential non-compliances were identified for the compliance assessment of the Terrestrial Fauna Management Plan or Fauna Offset Management Plan.

#### **4.3.1 Dieback Management Plan**

Glevan Consulting undertook an assessment for dieback presence in December 2022 in the project area following previous assessments in 2019 and 2021. Samples taken did not add to the known occurrence of Phytophthora. Some of the sites previously sampled positive have since been cleared. The survey recommends that boundaries of disturbed areas are to be assessed biennially. Covalent considers that further monitoring is required to bring the baseline assessment to the necessary standard to determine ongoing monitoring and management actions. This work is currently being planned for 2024. The baseline assessment is fundamental to the development of the Dieback Management Plan.

#### **4.3.2 Restoration Schedule**

The proponent did not undertake the required year 1 (2021) and year 2 (2022) activities noted in the Restoration Schedule provided within the Ironcaps Banksia Conservation Plan. Covalent has focussed on the finalisation and approval of the State Flora Offset Strategy for Ministerial Statement 1199 which also requires offsets for Banksia dolichostyla. No actions were undertaken to date in order that restoration would meet the requirements of both the State and Federal conditions of approval. Regardless, the proponent notes that no agreement was reached with DCCEEW to defer the implementation of the EPBC approved plan. Covalent has commenced year 1 activities in 2024 and these will be reported in future compliance reports. Dates in Table 4.3 of the Ironcaps Banksia Conservation Plan will restart as at 2024.

### **4.4 Opportunities for Improvement**

Opportunities for improvement in regard to Management Plans could include:

- The fauna register does not include observer name. If this is not relevant, amend the TFEMP to take out this requirement.

Table 4.1: Audit Table of Compliance with EPBC Decision 2017/7950

Condition	Date	Condition	Timing	Verification Method	Evidence	Determination Assessment	Compliance Status
<b>Part A – Conditions Specific to the Action</b>							
<b>EPBC Decision 2017/7950 Condition 1:</b>			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 <b>Attachment A</b> .				
EPBC 1	29/03/2022	Do not clear more than 442 ha of native vegetation within the 1,984 ha development envelope	Overall	GIS files - updated	M02_Coalent ACR Evidence Request Response Rev 0 R03_Coalent Lithium CAR 2023 (Rev 0) G02_CAR23 Calcs 20240429 R02_EGLP Annual Compliance Report (2023)(Rev 0) C05_Coalent Reconciliation of clearing	An additional 20.5ha was cleared within the development envelope in the reporting period. The total cleared area since the commencement of the project in the development envelope is 384.7ha.	Compliant
<b>EPBC Decision 2017/7950 Condition 2:</b>			To minimise impacts to Ironcaps Banksia ( <i>Banksia sphaerocarpa</i> var. <i>dolichostyla</i> ), the approval holder must not clear more than two (2) Ironcaps Banksia plants.				
EPBC 2	23/12/2020	Do not clear more than two (2) Ironcaps Banksia plants.	Overall	GIS files - updated	R03_Coalent Lithium CAR 2023 (Rev 0) G02_CAR23 Calcs 20240429	No Ironcaps Banksia ( <i>Banksia dolichostyla</i> ) individuals had been cleared within the Development Envelope since commencement of the project.	Compliant
<b>EPBC Decision 2017/7950 Condition 3:</b>			To minimise impacts to the Malleefowl ( <i>Leipoa ocellata</i> ) and Chuditch ( <i>Dasyurus geoffroii</i> ), the approval holder must comply with Condition 7 of the Western Australia approval, where relevant to Malleefowl ( <i>Leipoa ocellata</i> ) and Chuditch ( <i>Dasyurus geoffroii</i> ).				
Ministerial Statement MS118:7-1			The proponent shall implement the proposal to meet the following environmental outcomes and objectives: (1) The proponent shall ensure there is no proposal-related direct or adverse indirect impacts to Malleefowl mounds within the exclusion areas as shown on Figure 4 and delineated by coordinates in Schedule 2. (2) The proponent shall ensure there is no direct or indirect proposal-related significant adverse impacts to malleefowl and Chuditch within the development envelope. (3) The proponent shall ensure there is no removal of active malleefowl mounds within the development envelope.				
EPBC 3A MS118:7-1(1)	23/12/2020 21/11/2019	Ensure there is no proposal-related direct or adverse indirect impacts to malleefowl mounds within the exclusion areas.	Ongoing	Malleefowl monitoring report	R04_20230725 ECO 2022_23 Malleefowl Monitoring	Malleefowl monitoring (R04) provides no evidence of proposal-related direct or adverse indirect impacts to Malleefowl mounds within the exclusion areas.	Compliant
EPBC 3B MS118:7-1(2)	23/12/2020 21/11/2019	Ensure there is no direct or indirect proposal-related significant adverse impacts to malleefowl and Chuditch within the development envelope.	Ongoing	Malleefowl monitoring report Chuditch monitoring report	R04_20230725 ECO 2022_23 Malleefowl Monitoring R05_20240216 ECO 2023 Mt Holland Chuditch Monitoring	Malleefowl monitoring (R04) and Chuditch monitoring provide no evidence of direct or indirect proposal-related significant adverse impacts to Malleefowl and Chuditch within the development envelope.	Compliant
EPBC 3C MS118:7-1(3)	23/12/2020 21/11/2019	Ensure there is no removal of active malleefowl mounds within the development envelope.	Ongoing	Malleefowl monitoring report	R04_20230725 ECO 2022_23 Malleefowl Monitoring E03_GDP60_V7_SWRL Fauna Preclearance G01_a2765 CAR23 f01 03 - Fig3 Clearing	Records of clearing, preclearance surveys and Malleefowl monitoring show that no active Malleefowl mounds were removed in the development envelope in the reporting period.	Compliant
Ministerial Statement MS118:7-2			In order to meet the requirements of condition 7-1, the proponent shall prepare and submit to the CEO a Terrestrial Fauna Environmental Management Plan on advice of the Department of Biodiversity, Conservation and Attractions within six (6) months of this Statement being issued.				
EPBC 3D MS118:7-2(1)	23/12/2020 21/11/2019	Prepare a Terrestrial Fauna Environmental Management Plan on advice of the Department of Biodiversity, Conservation and Attractions.	Within six (6) months of this Statement being issued.	TFEMP Written advice from DBCA	R09_Terrestrial Fauna Management Plan Rev 5 C03_MS1199 - TFEMP Rev 5 approval R13_Coalent Lithium CAR 2022 (Rev 0)	This was complete in a previous reporting period as reported in Ministerial Statement MS1118 Compliance Assessment Report 2022 (R13).	Compliant (complete)
EPBC 3D MS118:7-2(2)	23/12/2020 21/11/2019	Submit a TFEMP to the DWER CEO.	Within six (6) months of this Statement being issued.	Submission correspondence to DWER CEO with TFEMP attached.	Refer to EPBC 3D	Refer to EPBC 3D	Compliant (complete)
Ministerial Statement MS118:7-3			The proponent shall not commence ground disturbing activities until such a time as the Terrestrial Fauna Environmental Management Plan required by condition 7-2 is approved by the CEO.				

Condition	Date	Condition	Timing	Verification Method	Evidence	Determination Assessment	Compliance Status
EPBC 3E MS1118:7-3	23/12/2020 21/11/2019	Ground disturbing activities are not to commence until the TFEMP is approved by the DWER CEO.	Within six (6) months of this Statement being issued.	TFEMP Approval from DWER CEO.	R09_Terrestrial Fauna Management Plan Rev 5 C03_MS1199 - TFEMP Rev 5 approval E03_GDP60_V7_SWRL Fauna Preclearance	Revision 5 of the TFEMP (R09) was approved 09/03/2023 (C03). Clearing commenced on 14/03/2023.	Compliant
Ministerial Statement MS1118:7-4			<p>The Terrestrial Fauna Environmental Management Plan shall:</p> <ol style="list-style-type: none"> <li>(1) outline how the pre-clearance surveys will be undertaken using LIDAR or similar technology;</li> <li>(2) outline the procedure for capture and release of Chuditch, and malleefowl if required, prior to clearing of native vegetation;</li> <li>(3) specify trigger criteria that must provide an early warning that the environmental objectives identified in condition 7-1 may not be met;</li> <li>(4) specify threshold criteria to demonstrate compliance with the environmental objectives specified in condition 7-1;</li> <li>(5) specify monitoring to determine if trigger criteria and threshold criteria are exceeded;</li> <li>(6) specify trigger level actions to be implemented in the event that trigger criteria have been exceeded;</li> <li>(7) specify threshold contingency actions to be implemented in the event that threshold criteria are exceeded; and</li> <li>(8) provide the format and timing for the reporting of monitoring results against trigger criteria and threshold criteria to demonstrate that condition 7-1 has been met over the reporting period in the Compliance Assessment Report required by condition 4-6.</li> </ol>				
EPBC 3F MS1118:7-4	23/12/2020 21/11/2019	TFEMP to contain aspects 1 to 8 of MS1118:7-4	Within six (6) months of this Statement being issued.	Submission correspondence to DWER CEO with TFEMP attached.	R09_Terrestrial Fauna Management Plan Rev 5 C03_MS1199 - TFEMP Rev 5 approval	The approval letter (C03) for the TFEMP confirms that the document contains the elements listed in MS1118:7-4.	Compliant
Ministerial Statement MS1118:7-5			<p>After receiving notice in writing from the CEO that the Terrestrial Fauna Environmental Management Plan satisfies the requirements of condition 7-4, the proponent shall:</p> <ol style="list-style-type: none"> <li>(1) implement the provisions of the Terrestrial Fauna Environmental Management Plan; and</li> <li>(2) continue to implement the Terrestrial Fauna Environmental Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated the objectives specified in conditions 7-1 have been met.</li> </ol>				
EPBC 3G MS1118:7-5(1)	23/12/2020 21/11/2019	Implement the TFEMP	Once approved	Compliance audit	R01_EGLP Annual Compliance Report (2024)(Rev 0) ACR Appendix D	Covalent have implemented the TFEMP. Appendix D presents a compliance audit of the TFEMP with the following findings: <ul style="list-style-type: none"> <li>• 74 conditions were found to be 'Compliant';</li> <li>• 21 conditions were found to be 'Not applicable'; and</li> <li>• No conditions were found to be 'Potentially non-compliant'.</li> </ul>	Compliant
EPBC 3H MS1118:7-5(2)	23/12/2020 21/11/2019	Continue to implement the TFEMP	Until the CEO has confirmed in writing that objectives have been met	Compliance audit Notification from DWER CEO	Refer to EPBC 3G	Refer to EPBC 3G	Compliant
Ministerial Statement MS1118:7-6			<p>In the event that monitoring, tests, surveys or investigations indicates exceedance of threshold criteria specified in the Terrestrial Fauna Environmental Management Plan, the proponent shall:</p> <ol style="list-style-type: none"> <li>1) report the exceedance in writing to the CEO within seven (7) days of the exceedance being identified;</li> <li>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 7-6(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;</li> <li>3) investigate to determine the cause of the threshold criteria being exceeded;</li> <li>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; and</li> <li>5) provide a report to the CEO within twenty-one (21) days of the exceedance being reported as required by condition 7-6(1). The report shall include: <ol style="list-style-type: none"> <li>a) details of threshold contingency actions implemented;</li> <li>b) the effectiveness of the threshold contingency actions implemented, against the threshold criteria;</li> <li>c) the findings of the investigations required by conditions 7-6(3) and 7-6(4);</li> <li>d) measures to prevent the threshold criteria being exceeded in the future;</li> <li>e) measures to prevent, control or abate the environmental harm which may have occurred; and</li> <li>f) justification of the threshold remaining, or being adjusted based on better understanding, demonstrating that objectives will continue to be met.</li> </ol> </li> </ol>				
EPBC 3I MS1118:7-6(1)	23/12/2020 21/11/2019	Report exceedance of a TFEMP threshold criteria to the DWER CEO	within 7 days of the exceedance being identified	Notification from DWER CEO Incident Register - updated	Refer to EPBC 3G	There were no exceedances of a TFEMP threshold criteria.	Not applicable

Condition	Date	Condition	Timing	Verification Method	Evidence	Determination Assessment	Compliance Status
EPBC 3J MS1118:7-6(2)	23/12/2020 21/11/2019	Implement threshold contingency actions specified in the TFEMP	within 24 hours of the exceedance being reported	Incident investigations Client advice	Refer to EPBC 3I	Refer to EPBC 3I	Not applicable
EPBC 3K MS1118:7-6(3)	23/12/2020 21/11/2019	Continue implementing contingency actions.	Until notified by the DWER CEO by notice in writing	Notification from the DWER CEO	Refer to EPBC 3I	Refer to EPBC 3I	Not applicable
EPBC 3L MS1118:7-6(4)	23/12/2020 21/11/2019	Investigate to determine the cause of the threshold criteria being exceeded.	In the event of an exceedance	Exceedance investigation report	Refer to EPBC 3I	Refer to EPBC 3I	Not applicable
EPBC 3M MS1118:7-6(5)	23/12/2020 21/11/2019	Investigate to determine potential environmental harm or alteration of the environment that occurred due to threshold criteria being exceeded.	In the event of an exceedance	Exceedance investigation report	Refer to EPBC 3I	Refer to EPBC 3I	Not applicable
EPBC 3N MS1118:7-6(6)	23/12/2020 21/11/2019	Provide a report to the CEO including the elements 5a to 5f of MS1118:7-6	Within 21 days of the exceedance being reported	Submission correspondence to DWER CEO with 21 day exceedance report attached	Refer to EPBC 3I	Refer to EPBC 3I	Not applicable
Ministerial Statement MS1118:7-7			The proponent: (1) may review and revise the Terrestrial Fauna Environmental Management Plan, or (2) shall review and revise the Terrestrial Fauna Environmental Management Plan as and when directed by the CEO.				
EPBC 3O MS1118:7-7(1)	23/12/2020 21/11/2019	The proponent may review and revise the TFEMP	At any time	Submission of marked up TFEMP	Refer to EPBC 3P	Refer to EPBC 3P	Not applicable
EPBC 3P MS1118:7-7(2)	23/12/2020 21/11/2019	The proponent shall review and revise the TFEMP	When directed by the DWER CEO	Direction from DWER CEO to review and revise the TFEMP Submission of marked up TFEMP	C03_MS1199 - TFEMP Rev 5 approval E09_Ministerial Statement MS1199	The proponent was directed to review and revise the TFEMP under Ministerial Statement MS1199. Revision 5 was approved 09/03/2023.	Compliant
Ministerial Statement MS1118:7-8			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 7-4.				
EPBC 3Q MS1118:7-8	23/12/2020 21/11/2019	Implement the latest version of the TFEMP confirmed by the DWER CEO.	Overall	Compliance audit	Refer to EPBC 3G	The proponent has implemented Revision 5 of the TFEMP.	Compliant
<b>EPBC Decision 2017/7950 Condition 4:</b>			To compensate for residual significant impacts to the Malleefowl ( <i>Leipoa ocellata</i> ) and Chuditch ( <i>Dasyurus geoffroii</i> ), the approval holder must: a. Acquire, manage and protect for enduring conservation offset area(s) that comprise Malleefowl and Chuditch foraging and breeding habitat and that collectively offset the residual significant impacts of the action to the Malleefowl ( <i>Leipoa ocellata</i> ) and Chuditch ( <i>Dasyurus geoffroii</i> ) in accordance with the <b>EPBC Act Environmental Offsets Policy</b> to the satisfaction of the <b>Minister</b> ; b. Submit for the <b>Minister's</b> written approval a Fauna Offset Management Plan in respect of each offset area required to meet Condition 4A; and c. Implement each approved Fauna Offset Management Plan at least until the end date of the period of effect of the approval.				
EPBC 4I	29/03/2022	Acquire, manage and protect for enduring conservation fauna offset area(s).	On approval of each FOMP	Implementation of TFOMP	M01_Coalent CAR Evidence Request Response Rev 0 C02_DWER TFOS Review 20231026	The Fauna Offset Management Plan was submitted to the DCCEEW on 26 March 2021 and approved on 31 March 2021. As of 29 April 2024, Coalent Lithium are awaiting approval of the Fauna Offset Management Plan from the WA Minister for Environment; therefore, the management and monitoring components of the Fauna Offset Management Plan have not commenced at this stage.  DWER have provided feedback (26/10/2023) on the offset strategy submission including the requirement to meet new conditions under an additional Ministerial Statement (MS1199) and Coalent are compiling an updated document.  The implementation of the TFOMP will not commence until it is approved.	Not applicable

Condition	Date	Condition	Timing	Verification Method	Evidence	Determination Assessment	Compliance Status
EPBC 4II	29/03/2022	Submit a TFOMP for each offset area under EPBC 4A.	Overall	Submission correspondence to Minister with TFOMP attached Ministers Approval	R12_Threatened Fauna Offset Management Plan	This condition was completed in a previous reporting period.	Compliant (complete)
EPBC 4III	29/03/2022	Implement each TFOMP until the end of the effect of the approval.	Upon approval of the TFOMP	Compliance audit	R01_EGLP Annual Compliance Report (2024)(Rev 0) Appendix F	Appendix F assesses the compliance of the implementation of the TFOMP. Of the 63 commitments audited: <ul style="list-style-type: none"> <li>6 conditions were found to be 'Compliant';</li> <li>57 conditions were found to be 'Not applicable'; and</li> <li>No conditions were found to be 'Potentially non-compliant'.</li> </ul>	Compliant
<b>EPBC Decision 2017/7950 Condition 4A:</b>			<p>Each Fauna Offset Management Plan required under Condition 4 must be prepared in accordance with the environmental management plan guidelines, and include the following:</p> <ol style="list-style-type: none"> <li>The residual significant impacts to the Malleefowl (<i>Leipoa ocellata</i>) and Chuditch (<i>Dasyurus geoffroii</i>), quantified as the area of <b>clearing</b> of native vegetation within the <b>development envelope</b>, that will be offset by implementing the plan;</li> <li>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;</li> <li>The size of the offset area in hectares, and maps that define the location and boundaries of the offset area;</li> <li>Measurable ecological outcomes for habitat quality, when these will be achieved and the period for which these will be maintained;</li> <li>Offset completion criteria to demonstrate attainment of the ecological outcomes and an explanation of how the proposed offset completion criteria will be achieved;</li> <li>Management measures (including timing, frequency, duration and method of outcome measurement) that will be implemented to achieve the ecological outcomes for Malleefowl (<i>Leipoa ocellata</i>) and Chuditch (<i>Dasyurus geoffroii</i>);</li> <li>Evidence that the management measures are consistent with relevant conservation advice, recovery plans and threat abatement plans;</li> <li>An analysis of potential risks of the plan, if implemented, failing to attain and/or maintain the offset completion criteria;</li> <li>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;</li> <li>The activities and land uses that will be prohibited in the offset area, including, for example, mining, exploration or grazing;</li> <li>A schedule for evaluating and reporting, at least annually, on the effectiveness of management measures and progress against offset completion criteria;</li> <li>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;</li> <li>An explanation of how the offset area and offset area management addresses the principles of the EPBC Act Environmental Offsets Policy; and</li> <li>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.</li> </ol> <p>Each Fauna Offset Management Plan required under Condition 4 must be submitted to the <b>Department</b> within twelve (12) months of the <b>clearing</b> of native vegetation within the <b>development envelope</b> that, in accordance with Condition 4A a., it offsets. Each Fauna Offset Management Plan submitted in accordance with Condition 4B. must be accompanied by <b>shapefiles</b> 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 <b>EPBC Act Listed threatened species</b> that the environmental offset area(s) compensate for, and the size of the offset area(s) in hectares.</p>				
EPBC 4A	29/03/2022	Elements under EPBC Condition 4A a to n are required in the TFOMP required under EPBC 4II	Overall	TFOMP	R12_Threatened Fauna Offset Management Plan	The Fauna Offset Management Plan was prepared in accordance with the EPBC Offsets Assessment Guide (DCCEEW 2012) and the Environmental Management Plan Guidelines (DCCEEW 2014). The Fauna Offset Management Plan was submitted on 26 March 2021 and approved the by DCCEEW on 31 March 2021; being within 12-months of the clearing of native vegetation/fauna habitat within the Development Envelope.	Compliant (complete)
<b>EPBC Decision 2017/7950 Condition 4B:</b>			The approval holder must not commence the action until a Fauna Offset Management Plan is approved by the Minister in writing.				
EPBC 4B	23/12/2020	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. The Threatened Fauna Offset Management Plan was submitted on 26 March 2021 and approved by the DCCEEW on 31 March 2021. The Action officially commenced in April 2021.	Compliant (complete)
<b>EPBC Decision 2017/7950 Condition 4C:</b>			The approval holder must not <b>clear</b> more than the area of <b>clearing</b> within the <b>development envelope</b> specified (in accordance with Condition 4A(a)) in all approved Fauna Offset Management Plans.				
EPBC 4C	29/03/2022	<i>This condition has been revoked</i>					

Condition	Date	Condition	Timing	Verification Method	Evidence	Determination Assessment	Compliance Status
EPBC Decision 2017/7950 Condition 5:		<p>To mitigate significant impacts to the Ironcaps Banksia (<i>Banksia phaeocarpa</i> var. <i>dolichostyla</i>), the approval holder must prevent impacts to Ironcaps Banksia other than as permitted under Condition 2 and, within ten (10) years from <b>commencement of the action</b>, establish at least 69 Ironcaps Banksia plants within the <b>development envelope</b>.</p> <p>The approval holder must submit for the <b>Minister's</b> written approval an Ironcaps Banksia Conservation Plan (the Plan) to specify how it will achieve these requirements. The Plan must be prepared consistent with the <b>environmental management plan guidelines</b>, and must:</p> <ol style="list-style-type: none"> <li>Show how the approval holder will prevent impacts to Ironcaps Banksia, other than as permitted under Condition 2: <ol style="list-style-type: none"> <li>Include maps that clearly show the location of Ironcaps Banksia within the <b>development envelope</b> and in relation to native vegetation to be <b>cleared</b> or otherwise disturbed;</li> <li>Specify the total number and location of Ironcaps Banksia plants within the <b>development envelope</b>;</li> <li>Identify potential impacts to Ironcaps 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;</li> <li>Include management triggers for detecting potential impacts to Ironcaps Banksia from the action;</li> <li>Demonstrate that management measures are consistent with relevant <b>approved conservation advice, recovery plans and threat abatement plans</b>;</li> </ol> </li> <li>Show how the approval holder will, within 10 years from commencement of the action, establish at least 69 Ironcaps Banksia plants within the <b>development envelope</b>: <ol style="list-style-type: none"> <li>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 Ironcaps Banksia can be established and protected;</li> <li>Include shapefiles to clearly define the location and boundaries of the Ironcaps Banksia establishment site(s), coordinates of the boundary points in decimal degrees, and the area of the establishment site(s) in hectares;</li> <li>Include establishment criteria for Ironcaps Banksia plants;</li> <li>Include an analysis of the potential risks that may prevent Ironcaps Banksia plants being established and self-sustaining at the proposed establishment site(s);</li> <li>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;</li> <li>Describe how establishment criteria will be maintained for the period of approval;</li> </ol> </li> <li>Include a program that monitors the health of Ironcaps Banksia plants and is designed to detect management triggers and attainment of establishment criteria;</li> <li>Contain a schedule for evaluating and reporting, at least annually, on the health of Ironcaps Banksia plants, the detection of management triggers, progress against establishment criteria, and the effectiveness of management measures; and</li> <li>Include timeframes for implementing corrective actions.</li> </ol> <p>The approval holder must <b>not commence the action</b> until the Plan is approved by the <b>Minister</b> in writing. The Plan must be implemented at least until the end date of the period of effect of the approval.</p>					
EPBC 5A	23/12/2020	Establish at least 69 Ironcaps Banksia plants within the development envelope.	Within 10 years from commencement of the action	Monitoring report	R01_EGLP Annual Compliance Report (2024)(Rev 0) Appendix E	The program to establish 69 Ironcaps Banksia plants within the development envelope has not commenced.	Not applicable
EPBC 5B	23/12/2020	Submit an Ironcaps Banksia Conservation Plan to the Minister	Prior to commencement of the action	Submission Correspondence to the Minister with the Ironcaps Banksia Conservation Plan attached	R10_Ironcaps Banksia Conservation Plan (Rev2)	The Covalent Lithium Ironcaps Banksia Conservation Plan was submitted on 3 February 2021.	Compliant (complete)
EPBC 5C	23/12/2020	The Ironcaps Banksia Conservation Plan required under EPBC 5B must contain the elements 5a to 5e under EPBC condition 5.	Prior to commencement of the action	Compliance audit	R10_Ironcaps Banksia Conservation Plan (Rev2)	The Covalent Lithium Ironcaps Banksia Conservation Plan encompasses all elements required under Condition 5 (a) to (e).	Compliant (complete)
EPBC 5D	23/12/2020	The Ironcaps Banksia Conservation Plan must be approved by the Minister.	Prior to commencement of the action	Ministers Approval	R10_Ironcaps Banksia Conservation Plan (Rev2)	The Covalent Lithium Ironcaps Banksia Conservation Plan was approved by the DCCEEW on 12 February 2021.	Compliant (complete)
EPBC 5E	23/12/2020	The Ironcaps Banksia Conservation Plan must be implemented.	At least until the end date of the period of effect of the approval	Compliance audit	R01_EGLP Annual Compliance Report (2024)(Rev 0) Appendix E	Compliance with the implementation of the Ironcaps Banksia Conservation Plan is included in Appendix E. Of the 79 conditions contained within the IBCP the following audit results were determined: <ul style="list-style-type: none"> <li>28 conditions were found to be 'Compliant' including four conditions 'Compliant (complete)';</li> <li>48 conditions were found to be 'Not applicable'; and</li> <li>Three conditions were found to be 'Potentially non-compliant'</li> </ul>	Compliant



Condition	Date	Condition	Timing	Verification Method	Evidence	Determination Assessment	Compliance Status
<b>Part B – Standard Administrative Conditions</b>							
<b>Notification of Date of Commencement of the Action</b>							
<b>EPBC Decision 2017/7950 Condition 6:</b>			The approval holder must notify the <b>Department</b> in writing of the date of <b>commencement of the action</b> within ten (10) <b>business days</b> after the date of <b>commencement of the action</b> .				
EPBC 6	21/02/2020	The approval holder must notify the Department of the date of commencement,	Within 10 business days after the date of commencement	Notification to the Department	C07_20230713 Covalent Lithium EGLP EPBC Decision 20177950 Approval - Notice to DCCEEW C09_2017_7950 CR 23 003265 240502 Earl Grey Lithium Project Close out letter_non-compliant_NFA	The Action commenced in April 2021. Covalent Lithium notified the DCCEEW of the commencement of the Action on 13 July 2023 (C07). Note DCCEEW substantiated this as a non-compliance on 06/06/2024 (C09).	Non-compliant (substantiated by DCCEEW 06/06/2024)
<b>Compliance Records</b>							
<b>EPBC Decision 2017/7950 Condition 7:</b>			The approval holder must maintain accurate and complete <b>compliance records</b> .				
EPBC 7	21/02/2020	Maintain accurate and complete compliance records	Overall	Compliance audit	R01_EGLP Annual Compliance Report (2024)(Rev 0) Appendix M	Covalent Lithium have maintained an accurate and complete archive of compliance records, including reports, correspondence and spatial data. These records have been used to inform this Compliance Report to assess Covalent Lithium's level of compliance against the EPBC Decision 2017/7950 approval conditions. Appendix M (R01) contains an evidence register of the compliance documents for this ACR.	Compliant
<b>EPBC Decision 2017/7950 Condition 8:</b>			If the <b>Department</b> makes a request in writing, the approval holder must provide electronic copies of <b>compliance records</b> to the <b>Department</b> within the timeframe specified in the request. <b>Note: Compliance records</b> 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 <b>Department's</b> website or through the general media.				
EPBC 8	21/02/2020	Provide electronic records to the Department on request	Within the timeframe specified in the request	Submission correspondence	C07_20230713 Covalent Lithium EGLP EPBC Decision 20177950 Approval - Notice to DCCEEW C08_2017_7950 - 240313 - Show cause C09_Covalent Response to DCCEEW Show Cause	The DCCEEW requested further information 24/03/2024 (C08) on potential non-compliances reported 13/07/2023 (C07). Covalent provided a response with the requested information 08/04/2024 (C09).	Not applicable
<b>Preparation &amp; Publication of Plans</b>							
<b>EPBC Decision 2017/7950 Condition 9:</b>			The approval holder may, at any time, apply to the <b>Minister</b> for a variation to an action management plan approved by the <b>Minister</b> , or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of Section 143A of the <b>EPBC Act</b> . If the <b>Minister</b> 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	21/02/2020	The approval hold can apply to the Minister for a variation to a RAMP	At any time	Submission correspondence to the minister with marked up RAMP attached	Refer to EPBC 3P	Refer to EPBC 3P	Compliant
<b>EPBC Decision 2017/7950 Condition 10:</b>			The approval holder must: <ul style="list-style-type: none"> <li>a. Submit plans electronically to the Department for approval by the Minister;</li> <li>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;</li> <li>c. Exclude or redact sensitive ecological data from plans published on the website or provided to a member of the public; and</li> <li>d. Keep plans published on the website until the end date of this approval.</li> </ul>				
EPBC 10A	21/02/2020	Submit plans electronically to the Department for approval by the Minister	On submission	Submission correspondence	Refer to EPBC 3D, EPBC 4II, EPBC 5B	Refer to EPBC 3D, EPBC 4II, EPBC 5B	Compliant (complete)

Condition	Date	Condition	Timing	Verification Method	Evidence	Determination Assessment	Compliance Status
EPBC 10B	21/02/2020	Publish each plan on the website.	Within twenty (20) business days of the date the plan is approved, or RAMP submitted to the Minister	Compliance audit	E01_Website Screenshot 2024-06-10 R09_Terrestrial Fauna Management Plan Rev 5 R10_Ironcaps Banksia Conservation Plan (Rev2) R12_Threatened Fauna Offset Management Plan	The following plans are available on the Covalent website at: <a href="https://www.covalentlithium.com/sustainability">https://www.covalentlithium.com/sustainability</a> <ul style="list-style-type: none"> <li>Terrestrial Fauna Management Plan (Rev 5)</li> <li>Ironcaps Banksia Conservation Plan (Rev2)</li> <li>Threatened Fauna Offset Management Plan (Rev 0)</li> </ul>	Compliant
EPBC 10C	21/02/2020	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.	Not applicable
EPBC 10D	21/02/2020	Keep plans published on the website.	Until the end date of the approval.	Compliance audit	Ref to EPBC 10B	Ref to EPBC 10B	Compliant
<b>EPBC Decision 2017/7950 Condition 11:</b>			The approval holder must ensure that any monitoring data (including <b>sensitive ecological data</b> ), surveys, maps, and other spatial and metadata required under a plan, is prepared in accordance with the <b>Department's Guidelines for biological survey and mapped data (2018)</b> and submitted electronically to the <b>Department</b> in accordance with the requirements of the plan.				
EPBC 11A	21/02/2020	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	R04_20230725 ECO 2022_23 Malleefowl Monitoring R05_20240216 ECO 2023 Mt Holland Chuditch Monitoring R06_Mattiske Veg Condition Monitoring Spring 2023 R07_20230720 ECO 2022 Predator Monitoring R08_20230915_Maxy Engineering Dust Report	Monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required as per the Terrestrial Fauna Management Plan and Ironcaps Banksia Conservation Plan were prepared in accordance with the Guidelines for biological survey and mapped data (DCCEEW 2018).	Compliant
EPBC 11B	21/02/2020	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	R01_EGLP Annual Compliance Report (2024)(Rev 0) Section 6 and Appendix G to L	Monitoring data have been submitted to the DCCEEW in Section 6 and the Appendices of this report.	Compliant
<b>EPBC Decision 2017/7950 Condition 12:</b>			The approval holder must prepare a <b>compliance report</b> for each 12-month period following the date of <b>commencement of the action</b> , or otherwise in accordance with an annual date that has been agreed to in writing by the <b>Minister</b> . The approval holder must: <ul style="list-style-type: none"> <li>a. Publish each <b>compliance report</b> on the <b>website</b> within sixty (60) <b>business days</b> following the relevant 12-month period;</li> <li>b. Notify the <b>Department</b> by email that a <b>compliance report</b> has been published on the website and provide the web link for the <b>compliance report</b> within five (5) <b>business days</b> of the date of publication;</li> <li>c. Keep all <b>compliance reports</b> publicly available on the <b>website</b> until this approval expires;</li> <li>d. Exclude or redact <b>sensitive ecological data</b> from <b>compliance reports</b> published on the <b>website</b>; and</li> <li>e. Where <b>any sensitive ecological data</b> has been excluded from the version published, submit the full <b>compliance report</b> to the <b>Department</b> within five (5) <b>business days</b> of publication.</li> </ul> <b>Note: Compliance reports</b> may be published on the <b>Department's</b> website.				
EPBC 12A	21/02/2020	Prepare a compliance report for each 12-month period	1 Apr to 31 Mar	ACR	R01_EGLP Annual Compliance Report (2024)(Rev 0)	This Compliance Report (R01) summarises the results of the audit undertaken to assess Covalent Lithium's level of compliance against the EPBC Decision 2017/7950 approval conditions for the 2023 period (30 April 2023 to 29 April 2024).	Compliant
EPBC 12B	21/02/2020	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	R02_EGLP Annual Compliance Report (2022)(Rev 0) E01_Website Screenshot 2024-06-10	The 2022 Annual Compliance Report (R02) is published on the Covalent website (E01) at: <a href="https://www.covalentlithium.com/sustainability">https://www.covalentlithium.com/sustainability</a> The report was published on the website 23/10/2023 which was greater than 60 days following the relevant 12 month period.	Potentially non-compliant

Condition	Date	Condition	Timing	Verification Method	Evidence	Determination Assessment	Compliance Status
EPBC 12C	21/02/2020	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	C01_Notice of EPBC Act Approval 2017_7950 2022 Annual Compliance Report for Covalent Earl Grey Lithium Project_SEC_OFFICIAL_E01_Website Screenshot 2024-06-10	Covalent notified the Department by email (C01) that the 2022 Annual Compliance Report had been published on their website (E01) with a weblink on the day the compliance report had been published 23/10/2023.	Compliant
EPBC 12D	21/02/2020	Keep all compliance reports publicly available on the website	Until the EPBC approval expires	Compliance audit	R02_EGLP Annual Compliance Report (2022)(Rev 0) E01_Website Screenshot 2024-06-10	The 2022 Annual Compliance Report (R02) was the first compliance report, and it remains on the Covalent website (E01).	Compliant
EPBC 12E	21/02/2020	Exclude or redact sensitive ecological data from compliance reports published on the website	When publishing ACRs on the website	Compliance audit	R02_EGLP Annual Compliance Report (2022)(Rev 0) E01_Website Screenshot 2024-06-10	No sensitive ecological data has been excluded or redacted from the compliance report published on the website.	Not applicable
EPBC 12F	21/02/2020	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	Refer to EPBC 12E	Refer to EPBC 12E	Not applicable
<b>EPBC Decision 2017/7950 Condition 13:</b>			The approval holder must notify the <b>Department</b> in writing of any: <b>incident</b> ; non-compliance with the conditions; or non-compliance with the commitments made in <b>plans</b> . 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: <ul style="list-style-type: none"> <li>a. Any condition which is or may be in breach;</li> <li>b. A short description of the <b>incident</b> and/or non-compliance; and</li> <li>c. The location (including co-ordinates), date, and time of the <b>incident</b> and/or non-compliance. In the event the exact information cannot be provided, provide the best information available.</li> </ul>				
EPBC 13A	21/02/2020	The approval holder must notify the Department of: <ul style="list-style-type: none"> <li>• any incident</li> <li>• non-compliance with conditions</li> <li>• non-compliance with the commitments made in plans</li> </ul>	As soon as practicable, and no later than 2 business days after becoming aware of the incident or non-compliance	Notification to the Department	C07_20230713 Covalent Lithium EGLP EPBC Decision 20177950 Approval - Notice to DCCEEW	Covalent Lithium notified the DCCEEW of the non-compliance with Conditions 6 and 12 of EPBC Decision 2017/7950 approval on 13 July 2023 (C07).	Compliant
EPBC 13B	21/02/2020	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	C07_20230713 Covalent Lithium EGLP EPBC Decision 20177950 Approval - Notice to DCCEEW C08_2017_7950 - 240313 - Show cause	The notification dated 13/07/2023 included the aspects listed in condition 13a to 13c as confirmed by DCCEEW's Show Cause findings 21/03/2024 (C08).	Compliant
<b>EPBC Decision 2017/7950 Condition 14:</b>			The approval holder must provide to the <b>Department</b> the details of any <b>incident</b> or non-compliance with the conditions or commitments made in <b>plans</b> as soon as practicable and no later than <b>10 business days</b> after becoming aware of the <b>incident</b> or non-compliance, specifying: <ul style="list-style-type: none"> <li>a. Any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future;</li> <li>b. The potential impacts of the <b>incident</b> or non-compliance; and</li> <li>c. The method and timing of any remedial action that will be undertaken by the approval holder.</li> </ul>				
EPBC 14	21/02/2020	Details listed in condition 14a to 14c pertaining to the incident or non-compliance as per EPBC 13A must be provided to the Department	no later than 10 business days after becoming aware of the incident or non-compliance	Submission correspondence to the Department	C08_2017_7950 - 240313 - Show cause C09_2017_7950 CR 23 003265 240502 Earl Grey Lithium Project Close out letter_non-compliant_NFA	The correspondence dated 13/07/2023 was specified as notification under condition 13 and DCCEEW determined that it did not include all of the aspects listed in condition 14a to 14c (C08). Note DCCEEW substantiated this as a non-compliance on 06/06/2024 (C09).	Non-compliant (substantiated by DCCEEW 06/06/2024)
<b>EPBC Decision 2017/7950 Condition 15:</b>			The approval holder must ensure that <b>independent audits</b> of compliance with the conditions are conducted as requested in writing by the <b>Minister</b> .				
EPBC 15	21/02/2020	Conduct independent audits of compliance	When requested in writing by the Minister	Minister request correspondence	M02_Covalent ACR Evidence Request Response Rev 0	No independent audit of compliance with conditions have been requested by the Minister since the commencement of the Action in April 2021.	Not applicable

Condition	Date	Condition	Timing	Verification Method	Evidence	Determination Assessment	Compliance Status
<b>EPBC Decision 2017/7950 Condition 16:</b>			For each <b>independent audit</b> , the approval holder must: <ol style="list-style-type: none"> <li>Provide the name and qualifications of the independent auditor and the draft audit criteria to the <b>Department</b>;</li> <li>Only commence the <b>independent audit</b> once the audit criteria have been approved in writing by the <b>Department</b>; and</li> <li>Submit an audit report to the <b>Department</b> within the timeframe specified in the approved audit criteria.</li> </ol>				
EPBC 16A	21/02/2020	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	Refer to EPBC 15	Refer to EPBC 15	Not applicable
EPBC 16B	21/02/2020	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	Refer to EPBC 15	Refer to EPBC 15	Not applicable
EPBC 16C	21/02/2020	Submit an audit report to the Department.	Within the timeframe specified in the approved audit criteria.	Submission correspondence to the Department with attached Independent Audit	Refer to EPBC 15	Refer to EPBC 15	Not applicable
<b>EPBC Decision 2017/7950 Condition 17:</b>			The approval holder must publish the audit report on the <b>website</b> within ten (10) <b>business days</b> of receiving the <b>Department's</b> approval of the audit report and keep the audit report published on the <b>website</b> until the end date of this approval.				
EPBC 17A	21/02/2020	Publish the Independent Audit Report on the website	within ten (10) business days of receiving the Department's approval of the audit report	Compliance audit	Refer to EPBC 15	Refer to EPBC 15	Not applicable
EPBC 17B	21/02/2020	Keep the Independent Audit Report published on the website	until the end date of the approval.	Compliance audit	Refer to EPBC 15	Refer to EPBC 15	Not applicable
<b>EPBC Decision 2017/7950 Condition 18:</b>			Within thirty (30) days after the <b>completion of the action</b> , the approval holder must notify the <b>Department</b> in writing and provide <b>completion data</b> .				
EPBC 18A	21/02/2020	Notify the Department in writing of the completion date	Within 30 days after the completion of the action	Notification to the Department	Not required	As of 31 December 2022, the Action has not been completed.	Not applicable
EPBC 18B	21/02/2020	Provide the Department with the completion data.	Within 30 days after the completion of the action	Submission correspondence to the Department	Refer to EPBC 18A	Refer to EPBC 18A	Not applicable

## 5. New Environmental Risks

Since Covalent Lithium commenced the implementation of the Action in April 2021, there have been no new environmental risks identified, for example no new MNES have been identified in the development envelope that may potentially be impacted by the Action.

## 6. Monitoring

Any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under a plan, is required to be submitted electronically to the Department in accordance with the requirements of the plan. The following monitoring reports have been included with this ACR:

- Appendix G - Malleefowl Monitoring 2022-2023 (As required under the TFEMP)
- Appendix H - Chuditch Monitoring 2023 (As required under the TFEMP)
- Appendix I - Vegetation Condition Monitoring Spring (As required under the TFEMP & IBCP)
- Appendix J - Fauna Pre-clearance Survey (As required under the TFEMP)
- Appendix K - Introduced Predator Monitoring (As required under the TFEMP)
- Appendix L - Dust Report (As required under the TFEMP & IBCP)

## 7. Limitations

### Scope of Services

This report ('the report') has been prepared by JBS&G in accordance with the scope of services set out in the contract, or as otherwise agreed, between the Client and JBS&G. In some circumstances, a range of factors such as time, budget, access and/or site disturbance constraints may have limited the scope of services. This report is strictly limited to the matters stated in it and is not to be read as extending, by implication, to any other matter in connection with the matters addressed in it.

### Reliance on Data

In preparing the report, JBS&G has relied upon data and other information provided by the Client and other individuals and organisations, most of which are referred to in the report ('the data'). Except as otherwise expressly stated in the report, JBS&G has not verified the accuracy or completeness of the data. To the extent that the statements, opinions, facts, information, conclusions and/or recommendations in the report ('conclusions') are based in whole or part on the data, those conclusions are contingent upon the accuracy and completeness of the data. JBS&G has also not attempted to determine whether any material matter has been omitted from the data. JBS&G will not be liable in relation to incorrect conclusions should any data, information or condition be incorrect or have been concealed, withheld, misrepresented or otherwise not fully disclosed to JBS&G. The making of any assumption does not imply that JBS&G has made any enquiry to verify the correctness of that assumption.

The report is based on conditions encountered and information received at the time of preparation of this report or the time that site investigations were carried out. JBS&G disclaims responsibility for any changes that may have occurred after this time. This report and any legal issues arising from it are governed by and construed in accordance with the law as at the date of this report.

### Environmental Conclusions

Within the limitations imposed by the scope of services, the preparation of this report has been undertaken and performed in a professional manner, in accordance with generally accepted environmental consulting practices. No other warranty, whether express or implied, is made.

The advice herein relates only to this project and all results conclusions and recommendations made should be reviewed by a competent person with experience in environmental investigations, before being used for any other purpose.

JBS&G accepts no liability for use or interpretation by any person or body other than the client who commissioned the works. This report should not be reproduced without prior approval by the client or amended in any way without prior approval by JBS&G, and should not be relied upon by other parties, who should make their own enquiries.

## 8. 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    EPBC 2017/7950 Final Approval Decision Notice**





**Australian Government**

**Department of Agriculture, Water and the Environment**

**APPROVAL**

**Earl Grey Lithium Project (EPBC 2017/7950)**

This decision is made under sections 130(1) and 133(1) of the *Environment Protection and Biodiversity Conservation Act 1999 (Cth)*. Note that section 134(1A) of the **EPBC Act** applies to this approval, which provides in general terms that if the approval holder authorises another person to undertake any part of the action, the approval holder must take all reasonable steps to ensure that the other person is informed of any conditions attached to this approval, and that the other person complies with any such condition.

**Details**

<b>Person to whom the approval is granted (approval holder)</b>	Covalent Lithium Pty Ltd
<b>ACN or ABN of approval holder</b>	ACN: 623 090 139
<b>Action</b>	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.

**Proposed Approval decision**

My decision on whether or not to approve the taking of the action for the purposes of the controlling provision for the action is as follows.

**Controlling Provisions**

<b>Listed Threatened Species and Communities</b>	
Section 18	Approve
Section 18A	Approve

***Period for which the approval has effect***

This approval has effect until 31 December 2069

**Decision-maker**

<b><i>Name and position</i></b>	Declan O'Connor-Cox A/g Assistant Secretary, Environment Approvals Division Department of Agriculture, Water and the Environment
<b><i>Signature</i></b>	
<b><i>Date of decision</i></b>	21/2/2020

**Conditions of approval**

This approval is subject to the conditions under the EPBC Act as set out in ANNEXURE A.

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## ANNEXURE A – CONDITIONS OF APPROVAL

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### Part A – Conditions specific to the action

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1. To minimise impacts to the Malleefowl (*Leipoa ocellata*) and Chuditch (*Dasyurus geoffroii*) the approval holder must not **clear** more than 386 ha of native vegetation within the 1,984 ha development envelope shown at **Attachment A**.
2. To minimise impacts to Ironcaps Banksia (*Banksia sphaerocarpa* var. *dolichostyla*), the approval holder must not **clear** more than 69 Ironcaps Banksia individuals.
3. To minimise impacts to **EPBC Act listed threatened species**, the approval holder must comply with Condition 6 (Flora and Vegetation Environmental Management Plan) and Condition 7 (Terrestrial Fauna Environmental Management Plan) of the **Western Australia approval**, where relevant to **EPBC Act listed threatened species**.
4. To compensate for the residual significant impacts to the Malleefowl and Chuditch, the approval holder must submit for the **Minister's** written approval a Fauna Offset Plan. The Fauna Offset Plan must include the following:
  - a) Identification of the specific offset area(s) to be acquired and protected for enduring conservation that comprise existing Malleefowl and Chuditch foraging and breeding habitat.
  - b) Identification of the environmental values of the offset area(s) including:
    - a. relevant baseline information regarding the offset area(s), including results from field validation surveys, and quantifiable ecological data on **habitat quality** for the Malleefowl and Chuditch currently in the offset areas,
    - b. how the offset area(s) will provide connectivity with other habitats and biodiversity corridors and/or will contribute to a larger strategic offset for the **total quantum of impact**,
    - c. a description and maps (including **shapefiles**) to clearly define the location and boundaries of the offset area(s), accompanied by 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 environmental offset area(s) in hectares, and
    - d. evidence of how the proposed offset site will meet the requirements of the **EPBC Act Environmental Offsets Policy**.
  - c) Commitment to measureable, defined ecological outcomes to protect the baseline **habitat quality** for the Malleefowl and Chuditch for which the offset area(s) are being provided and the period for which these will be achieved.
  - d) Offset completion criteria and an explanation of how the proposed ecological outcomes will be achieved.
  - e) The management measures (including timing, frequency, duration and method of outcome measurement) that will be implemented to achieve the following:
    - a. the ecological outcomes for the protection of the Malleefowl and Chuditch for which the offset area(s) is(are) being provided, and
    - b. the protection of the **habitat quality scores** for the Malleefowl and Chuditch.
  - f) The management measures and land uses that will be prohibited in the offset area(s), including, for example, mining/exploration, grazing or development.

- g) Evidence that the management measures proposed are consistent with **environmental management plan guidelines** and relevant **conservation advices, recovery plans** and **threat abatement plans**.
- h) Criteria for triggering corrective actions and the proposed time-bound corrective actions or process for determining these.
- i) A monitoring program designed to detect triggers and track progress against performance criteria in a timely manner.
- j) A risk analysis of the potential risks to the offset area(s) that may prevent them from achieving the performance and completion criteria, including for if the offset area(s) fail to achieve and maintain the completion criteria.
- k) A schedule for evaluating and reporting, at least annually, on the effectiveness of management measures and progress against completion criteria.
- l) The proposed legal mechanism(s) for securing the offset area(s), the timing for implementation of the legal mechanism(s) and contingency measures in the event the specified legal mechanisms can not proceed in a timely manner.
- m) The role of the approval holder in relation to the management and ownership of the offset area(s) and the identity and role(s) of any other involved party.

The approval holder must not **commence** the action until the Fauna Offset Plan is approved by the **Minister** in writing. The approved Fauna Offset Plan must be implemented at least until the end date of the period of effect of the approval.

- 5. To compensate for the residual significant impacts to the Ironcaps Banksia, the approval holder must submit for the **Minister's** written approval a Flora Offset Plan. The Flora Offset Plan must include the following:
  - a) Identification of offset area(s) to be protected, managed and/or rehabilitated for enduring conservation that contains Ironcaps Banksia.
  - b) Identification of the environmental values of the offset area(s), including:
    - a. relevant baseline information regarding the offset area(s), including results from field validation surveys, and quantifiable ecological data on **habitat quality** and the number of Ironcaps Banksia individuals currently in the offset areas,
    - b. how the offset area(s) will provide connectivity with other habitats and biodiversity corridors and/or will contribute to a larger strategic offset for the **total quantum of impact**, and
    - c. a description and maps (including **shapefiles**) to clearly define the location and boundaries of the offset area(s), accompanied by 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 environmental offset area(s) in hectares, and
    - d. evidence of how the proposed offset site will meet the requirements of the **EPBC Act Environmental Offsets Policy**.
  - c) Commitment to measureable, defined ecological outcomes to protect the baseline **habitat quality** and number of Ironcaps Banksia individuals for which the offset area(s) are being provided and the period for which these will be achieved.
  - d) Offset completion criteria and an explanation of how the proposed ecological outcomes will be achieved.

- e) The management and/or rehabilitation measures (including timing, frequency, duration and method of outcome measurement) that will be implemented to achieve the following:
  - a. the ecological outcomes for the protection of the Ironcaps Banksia for which the offset area(s) is(are) being provided, and
- f) The management measures and land uses that will be prohibited in the offset area(s), including, for example, mining/exploration, grazing or development.
- g) Evidence that the management measures proposed are consistent with **environmental management plan guidelines** and relevant **conservation advices, recovery plans and threat abatement plans**.
- h) Criteria for triggering corrective actions and the proposed time-bound corrective actions or process for determining these.
- i) A monitoring program designed to detect triggers and track progress against completion criteria in a timely manner.
- j) A risk analysis of the potential risks to the offset area(s) that may prevent them from achieving the performance and completion criteria, including for if the offset area(s) fail to achieve and maintain the completion criteria.
- k) A schedule for evaluating and reporting, at least annually, on the effectiveness of management measures and progress against completion criteria.
- l) The proposed legal mechanism(s) for securing the offset area(s), the timing for implementation of the legal mechanism(s) and contingency measures in the event the specified legal mechanisms can not proceed in a timely manner.
- m) The role of the approval holder in relation to the management and ownership of the offset area(s) and the identity and role(s) of any other involved party, and
- n) Detail any funding arrangements and timing of funding for conservation activities.

The approval holder must not **commence** the action until the Flora Offset Plan is approved by the **Minister** in writing. The Flora Offset Plan must be implemented at least until the end date of the period of effect of the approval.

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## Part B – Standard administrative conditions

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### Notification of date of commencement of the action

- 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**.

### Compliance records

- 7. The approval holder must maintain accurate and complete **compliance records**.
- 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.

### Preparation and publication of plans

- 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.

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 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.
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.

#### **Annual compliance reporting**

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 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 weblink for the **compliance report** within five **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 5 **business days** of publication.

**Note:** **Compliance reports** may be published on the **Department's** website.

#### **Reporting non-compliance**

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 **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.
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; and
- c. the method and timing of any remedial action that will be undertaken by the approval holder.

#### **Independent audit**

15. The approval holder must ensure that **independent audits** of compliance with the conditions are conducted as requested in writing by the **Minister**.
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.
17. The approval holder must publish the audit report on the **website** within 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.

#### **Completion of the action**

18. Within 30 days after the **completion of the action**, the approval holder must notify the **Department** in writing and provide **completion data**.

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#### **Part C - Definitions**

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19. In these conditions, except where contrary intention is expressed, the following definitions are used:

**Approved conservation advice** means a conservation advice approved by the **Minister** under section 266B(2) of the **EPBC Act**. Where relevant, this includes the approved Conservation Advice for *Banksia sphaerocarpa* var. *dolichostyla* (Ironcaps Banksia).

**Business day** means a day that is not a Saturday, a Sunday or a public holiday in the state or territory of the action.

**Clear / Clearing** means the cutting down, felling, thinning, logging, removing, killing, destroying, poisoning, ringbarking, uprooting or burning of vegetation (but not including weeds – see the *Australian weeds strategy 2017 to 2027* for further guidance).

**Commencement of the action** means the first instance of any specified activity associated with the action including **clearing** and **construction**. **Commencement of the action** does not include minor physical disturbance necessary to:

- i. undertake pre-clearance surveys or monitoring programs;
- ii. install signage and /or temporary fencing to prevent unapproved use of the project area;
- iii. protect environmental and property assets from fire, weeds and pests, including use of existing surface access tracks; and
- iv. install temporary site facilities for persons undertaking pre-commencement activities so long as these are located where they have no impact on the **EPBC Act Listed threatened species**.

**Completion data** means an environmental report and spatial data clearly detailing how the conditions of this approval have been met. The **Department's** preferred spatial data format is **shapefile**.

**Completion of the action** means all specified activities associated with the action have permanently ceased.

**Compliance records** means all documentation or other material in whatever form required to demonstrate compliance with the conditions of approval in the approval holder's possession or that are within the approval holder's power to obtain lawfully.

**Compliance reports** means written reports:

- i. providing accurate and complete details of compliance, **incidents**, and non-compliance with the conditions and the **plans**;
- ii. consistent with the **Department's Annual Compliance Report Guidelines (2014)**;
- iii. include a **shapefile** of any clearance of any **protected matters**, or their habitat, undertaken within the relevant 12 month period; and
- iv. annexing a schedule of all **plans** prepared and in existence in relation to the conditions during the relevant 12 month period.

**Construction** means the erection of a building or structure that is or is to be fixed to the ground and wholly or partially fabricated on-site; the alteration, maintenance, repair or demolition of any building or structure; preliminary site preparation work which involves breaking of the ground (including pile driving); the laying of pipes and other prefabricated materials in the ground, and any associated excavation work; but excluding the installation of temporary fences and signage.

**Department** means the Australian Government agency responsible for administering the **EPBC Act**.

**EPBC Act** means the *Environment Protection and Biodiversity Conservation Act 1999* (Cth).

**EPBC Act Environmental Offsets Policy** is the *Environment Protection and Biodiversity Conservation Act 1999 Environmental Offsets Policy (October 2012)*, or subsequent revision, including the Offsets Assessment Guide. Available at:

[https://www.environment.gov.au/system/files/resources/12630bb4-2c10-4c8e-815f-2d7862bf87e7/files/offsets-policy\\_2.pdf](https://www.environment.gov.au/system/files/resources/12630bb4-2c10-4c8e-815f-2d7862bf87e7/files/offsets-policy_2.pdf)

**EPBC Act Listed threatened species** means the **EPBC Act** listed Malleefowl (*Leipoa ocellata*), Chuditch (*Dasyurus geoffroii*) and Ironcaps Banksia (*Banksia sphaerocarpa* var. *dolichostyla*).

**Habitat quality** means the baseline condition of suitable habitat for **EPBC Act Listed threatened species** determined from ecological surveys and with consideration of relevant **Departmental** documents including, but not be limited to, the **EPBC Act Environmental Offsets Policy**, **EPBC Act** referral guidelines, listing advices, **approved conservation advices** and **recovery plans**.

**Incident** means any event which has the potential to, or does, impact on one or more **protected matter(s)**.

**Independent audit**: means an audit conducted by an independent and **suitably qualified person** as detailed in the *Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines (2019)*.

**Minister** means the Australian Government Minister administering the **EPBC Act** including any delegate thereof.

**Plan(s)** means any of the documents required to be prepared, approved by the **Minister**, published on the **website** and/or implemented by the approval holder in accordance with these conditions (includes action management plans and/or strategies).

**Protected matter** means a matter protected under a controlling provision in Part 3 of the **EPBC Act** for which this approval has effect.

**Recovery Plan** means a recovery plan made or adopted by the **Minister** under the **EPBC Act**, including the *National Recovery Plan for Malleefowl *Leipoa ocellata* and the Chuditch (*Dasyurus geoffroii*) Recovery Plan*.

**Sensitive ecological data** means data as defined in the Australian Government Department of the Environment (2016) *Sensitive Ecological Data – Access and Management Policy V1.0*.

**Shapefile** means location and attribute information of the action provided in an Esri shapefile format. Shapefiles must contain '.shp', '.shx', '.dbf' files and a '.prj' file that specifies the projection/geographic coordinate system used. Shapefiles must also include an '.xml' metadata file that describes the shapefile for discovery and identification purposes.

**Suitably qualified person** means a person who has professional qualifications, training, skills, and/or experience related to the nominated subject matter and can give authoritative independent assessment, advice and analysis on performance relative to the subject matter using the relevant protocols, standards, methods and/or literature.

**Threat abatement plan** means a threat abatement plan made or adopted by the **Minister** under the **EPBC Act**.

**Total quantum of impact** has the same meaning as in the Offset Assessment Guide of the **EPBC Act Environmental Offsets Policy**. It is a measure of the adjusted hectares based on an assessment of the maximum impact area specified in Conditions 1 and 2, measured against the of **habitat quality** for that area.

**Website** means a set of related web pages located under a single domain name attributed to the approval holder and available to the public.

**Western Australia approval** means the WA Ministerial statement issued under the *Environmental Protection Act 1986* - Statement No. 1118 published on 21 November 2019.



### Attachment A – Development Envelope





## **Appendix B    EPBC 2017/7950 Correction Notice**



**Australian Government**

**Department of Agriculture, Water and the Environment**

## **CORRECTION NOTIFICATION**

### **EPBC No 2017/7950 – Earl Grey Lithium Project**

#### **Correction notice - Condition 5 attached to the approval dated 21 February 2020**

Subcondition 5 e) of the conditions attached to the approval notice signed on 21 February 2020 appears to be missing subconditions after 5 e) a. because it is followed by the word 'and'.

This notice is published to confirm that there is no subcondition of 5 e), such as a 5 e) b., after 5 e) a.

Subcondition 5 e) should read as follows:

5 e) The management and/or rehabilitation measures (including timing, frequency, duration and method of outcome measurement) that will be implemented to achieve the ecological outcomes for the protection of the Ironcaps Banksia for which the offset area(s) is (are) being provided.

#### **Person making correction**

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<b>Name and position</b>	Dwaine McMaugh A/g Director Post Approvals Section
<b>Date of correction</b>	23 July 2020

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## Appendix C EPBC 2017/7950 Variation of Conditions



**Australian Government**

**Department of Agriculture, Water and the Environment**

**Variation of Conditions Attached to Approval**

**Earl Grey Lithium Project (EPBC 2017/7950)**

This decision to vary conditions of approval is made under section 143 of the *Environment Protection and Biodiversity Conservation Act 1999*.

**Approved action**

<b>Person to whom the approval is granted</b>	Covalent Lithium Pty Ltd ACN: 623 090 139
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<b>Approved action</b>	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 E on 11 February 2018 and 14 November 2019.
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**Variation**

<b>Variation of conditions of approval</b>	The variation is:  Delete conditions 2, 3, 4 and 5 of the approval and replace with conditions 2, 3, 4, 4A, 4B, 4C and 5 specified below.  Add the definitions of <b>development envelope</b> and <b>environmental management plan guidelines</b> specified below.
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<b>Date of effect</b>	This variation has effect on the date the instrument is signed
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**Person authorised to make decision**

<b>Name and position</b>	Declan O'Connor-Cox Acting Assistant Secretary Environment Assessments (Vic, Tas) and Post Approvals Branch
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<b>Signature</b>	
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<b>Date of decision</b>	23 December 2020
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**Conditions attached to the approval:**

2. To minimise impacts to Ironcaps Banksia (*Banksia sphaerocarpa* var. *dolichostyla*), the approval holder must not **clear** more than 2 Ironcaps Banksia plants.
  3. To minimise impacts to the Malleefowl (*Leipoa ocellate*) and Chuditch (*Dasyurus geoffroii*), the approval holder must comply with Condition 7 (Terrestrial Fauna Environmental Management Plan) of the **Western Australia approval**, where relevant to Malleefowl (*Leipoa ocellate*) and Chuditch (*Dasyurus geoffroii*).
  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.
- 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 (*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 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

- 4B.** The approval holder must not **commence** the action until a Fauna Offset Management Plan is approved by the **Minister** in writing.
- 4C.** The approval holder must not **clear** more than the area of **clearing** within the **development envelope** specified (in accordance with Condition 4A(a)) in all approved Fauna Offset Management Plans.
- 5.** To mitigate significant impacts to the Ironcaps Banksia (*Banksia sphaerocarpa* var. *dolichostyla*), the approval holder must prevent impacts to Ironcaps Banksia other than as permitted under Condition 2 and, within 10 years from **commencement of the action**, establish at least 69 Ironcaps Banksia plants within the **development envelope**.

The approval holder must submit for the **Minister's** written approval an Ironcaps 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 Ironcaps Banksia, other than as permitted under Condition 2:
  - i. include maps that clearly show the location of Ironcaps 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 Ironcaps Banksia plants within the **development envelope**;
  - iii. identify potential impacts to Ironcaps 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 Ironcaps Banksia from the action;
  - v. demonstrate that management measures are consistent with relevant **approved conservation advices, 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 Ironcaps 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 Ironcaps Banksia can be established and protected;
  - ii. include **shapefiles** to clearly define the location and boundaries of the Ironcaps 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 Ironcaps Banksia plants;
  - iv. include an analysis of the potential risks that may prevent Ironcaps 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 Ironcaps 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 Ironcaps 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.

**Definition attached to the approval:**

**Development envelope** means the area enclosed by the blue line designated as 'Development Envelope' in the map at **Attachment A**.

**Environmental management plan guidelines** means the Environmental Management Plan Guidelines, Commonwealth of Australia 2014, available at <http://www.environment.gov.au/system/files/resources/21b0925f-ea74-4b9e-942e-a097391a77fd/files/environmental-management-plan-guidelines.pdf>.

## Appendix D Terrestrial Fauna Management Plan Compliance Assessment

Table D.1: Terrestrial Fauna Environmental Management Plan Audit Table (Rev 5)

Commitment	Requirement	Timing	Evidence	Assessment	Status
TFEMP 01	Management targets: <ul style="list-style-type: none"> <li>Avoid removal of any active malleefowl mounds.</li> </ul>	Ongoing	R04_20230725 ECO 2022_23 Malleefowl Monitoring E03_GDP60_V7_SWRL Fauna Preclearance E29_GDP0060_V9_SWRL_ExistingTSF2 E30_GDP0071_TSFCOnstruction_V1	No removal of active Malleefowl mounds occurred during the reporting period.	Compliant
TFEMP 02	Management targets: <ul style="list-style-type: none"> <li>Avoid clearing of vegetation within 100 m of malleefowl mounds.</li> </ul>	Ongoing	E03_GDP60_V7_SWRL Fauna Preclearance R04_20230725 ECO 2022_23 Malleefowl Monitoring	Pre-clearance surveys are undertaken prior to clearing to determine the presence of malleefowl mounds. Annual monitoring of known malleefowl nests is undertaken. There was no disturbance within 100m of malleefowl mounds in the audit period.	Compliant
TFEMP 03	Management targets: <ul style="list-style-type: none"> <li>Minimise mortality of malleefowl or Chuditch from clearing activity, entrapment, vehicle strike or mining related fire.</li> </ul>	Ongoing	R09_Terrestrial Fauna Management Plan Rev 5 E22_2023-2024 MTH Environmental Incident Register from INX	The TFEMP is implemented to minimise mortality of malleefowl or Chuditch from clearing activity, entrapment, vehicle strike or mining related fire. There were no records of mortality of malleefowl or Chuditch from clearing activity, entrapment, vehicle strike or mining related fire in the reporting period.	Compliant
TFEMP 04	Management targets: <ul style="list-style-type: none"> <li>Minimise decline of Malleefowl and Chuditch population due to predation from introduced predators.</li> </ul>	Ongoing	R16_20230425_APAS_Feral Cat Control Program Report R04_20230725 ECO 2022_23 Malleefowl Monitoring R05_20240216 ECO 2023 Mt Holland Chuditch Monitoring	Monitoring has not indicated a change in malleefowl or Chuditch population. Introduced predator monitoring indicates that numbers of predators are not increasing.	Compliant
TFEMP 05	Management targets: <ul style="list-style-type: none"> <li>Minimise decline of Malleefowl and Chuditch population due to dust, noise, light, vibration and displacement.</li> </ul>	Ongoing	R04_20230725 ECO 2022_23 Malleefowl Monitoring R05_20240216 ECO 2023 Mt Holland Chuditch Monitoring	Monitoring has not indicated a change in malleefowl or Chuditch population.	Compliant
TFEMP 06	Management targets: <ul style="list-style-type: none"> <li>Minimise potential risk of a decline in fauna habitat condition due to change in fire regime.</li> </ul>	Ongoing	M01_Coalent CAR Evidence Request Response Rev 0	There were no fires in the development envelope in the audit period.	Compliant
TFEMP 07	If Trigger Criteria is met: <ul style="list-style-type: none"> <li>Report internally as an incident in accordance with internal procedures.</li> <li>Review management strategies and implement changes to prevent future occurrences which may include the following:               <ul style="list-style-type: none"> <li>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).</li> <li>Ground Disturbance Permit competency training.</li> <li>Installation of signage where appropriate.</li> <li>Review of effectiveness of 10 m trigger response criteria for unauthorised clearing approaching a MMEZ and update FMP appropriately.</li> </ul> </li> <li>Review impact of unauthorised clearing and report as a potential non-compliance to CEO DWER within 7 days of identification.</li> <li>Undertake rehabilitation of unauthorised clearing (i.e. disturbance from vehicle tracks, vegetation clearing) by appropriately qualified personnel as required, in accordance with rehabilitation procedures.</li> </ul>	Ongoing	E22_2023-2024 MTH Environmental Incident Register from INX M02_Coalent ACR Evidence Request Response Rev 0	There were no incidents of unauthorised clearing in the audit period.	Compliant

Commitment	Requirement	Timing	Evidence	Assessment	Status
TFEMP 08	<p>If Trigger Criteria is met:</p> <ul style="list-style-type: none"> <li>• Unauthorised access by personnel to a MMEZ</li> </ul> <p>Proponent will take response actions:</p> <ul style="list-style-type: none"> <li>• Report internally as an incident in accordance with internal procedures.</li> <li>• Consult with a fauna specialist to review management strategies and implement changes to prevent future occurrences which may include the following: <ul style="list-style-type: none"> <li>o Review proximity of potential of disturbance to Malleefowl mounds within the MMEZ.</li> <li>o Should disturbance occur to an active Malleefowl mound as a result of unauthorised access, report to CEO DWER within 7 days of identification.</li> </ul> </li> <li>• Undertake rehabilitation of unauthorised access (i.e. disturbance from vehicle tracks) as required in accordance with internal rehabilitation procedures.</li> </ul>	Ongoing	E22_2023-2024 MTH Environmental Incident Register from INX	No unauthorised access to a Malleefowl mound exclusion zone occurred during the reporting period.	Not applicable
TFEMP 09	<p>If Trigger Criteria is met:</p> <ul style="list-style-type: none"> <li>• Clearing or disturbance of vegetation within 100 m of any newly identified active malleefowl mounds and / or the MMEZs.</li> </ul> <p>Proponent will take response actions:</p> <ul style="list-style-type: none"> <li>• Cease clearing activities.</li> <li>• Undertake investigation to determine source of disturbance.</li> <li>• 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.</li> <li>• Suitably qualified fauna specialist to undertake an assessment of impact.</li> <li>• If potential impacts to eggs are expected, consultation with DBCA will occur to determine if egg removal is required.</li> <li>• Rehabilitation of vegetation disturbance to be considered to restore fauna habitat.</li> <li>• Any impacts to Malleefowl nest mounds to be rehabilitated following consultation with DBCA and a suitably qualified fauna specialist.</li> <li>• Report as a potential non-compliance to CEO DWER within 7 days of identification.</li> <li>• 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.</li> </ul>	Ongoing	E22_2023-2024 MTH Environmental Incident Register from INX	There was no clearing and/or disturbance of vegetation within 100m of a newly identified active malleefowl mound occurred during the reporting period.	Not applicable
TFEMP 10	Conduct internal audit of recorded malleefowl mounds against areas of clearing.	Ongoing	R04_20230725 ECO 2022_23 Malleefowl Monitoring E03_GDP60_V7_SWRL Fauna Preclearance E29_GDP0060_V9_SWRL_ExistingTSF2 E30_GDP0071_TSFCOnstruction_V1	No clearing of active Malleefowl mounds occurred during the reporting period.	Compliant
TFEMP 11	Undertake monitoring of incident reports for over clearing light and noise disturbance and fire.	Ongoing	E22_2023-2024 MTH Environmental Incident Register from INX	No incidents of over clearing, light or noise disturbance or fire.	Compliant

Commitment	Requirement	Timing	Evidence	Assessment	Status
TFEMP 12	<p>If Trigger Criteria is met:</p> <p>Chuditch Trigger Criteria: A 25% decrease at impact sites in female abundance for two consecutive monitoring events.</p> <p>Malleefowl Trigger Criteria: A 25% decrease in the estimated local population number (based on temporal analysis) over a consecutive two year period.</p> <p>Proponent will take response actions:</p> <ul style="list-style-type: none"> <li>• Report internally as an incident.</li> <li>• 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.</li> <li>• Determine whether the changes observed within the Development Envelope for Chuditch are comparable to the observations in the reference sites.</li> <li>• 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: <ul style="list-style-type: none"> <li>o Seasonal conditions (e.g. rainfall and temperatures).</li> <li>o Effectiveness of introduced predator control.</li> <li>o Changes in nest mound usage patterns by Malleefowl (i.e. use of mounds that are not surveyed).</li> <li>o Spatial variation (near-impact areas) versus sites located further from impact.</li> <li>o Reliability of observations obtained from the sightings register.</li> <li>o Fauna deaths reported.</li> </ul> </li> <li>• Seek advice from a suitably qualified fauna specialist, as required.</li> <li>• If a Project-related impact is suspected, review management measures on advice from a suitably qualified fauna specialist. Management measures may include the following: <ul style="list-style-type: none"> <li>o Review of annual Malleefowl and Chuditch monitoring, where required.</li> <li>o Review and increase effectiveness of pre-clearance monitoring (for example timing/duration of surveys).</li> <li>o Review and refine remote camera monitoring for introduced predator fauna (foxes and cats).</li> <li>o A proportionate increase in trapping/ baiting intensity may be required for introduced predator control in areas where increased sightings occur.</li> <li>o Increase in the frequency of introduced predator control undertaken may be required.</li> <li>o Increase internal audits and inspections for incident reports relating to vehicle interactions, unauthorised clearing, light and noise disturbance and fire.</li> <li>o 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.</li> <li>o 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.</li> </ul> </li> <li>• Consider changes to the mining operations (for example, change in the location, duration and/or method(s) of mining operations).</li> <li>• 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).</li> </ul>	Ongoing	R04_20230725 ECO 2022_23 Malleefowl Monitoring R05_20240216 ECO 2023 Mt Holland Chuditch Monitoring	Trigger criteria was not met.	Not applicable
TFEMP 13	Undertake pre-clearance monitoring	Prior to clearing	E03_GDP60_V7_SWRL Fauna Preclearance	Pre-clearance monitoring was undertaken in the reporting period.	Compliant

Commitment	Requirement	Timing	Evidence	Assessment	Status
TFEMP 14	Annual monitoring of malleefowl activity using motion sensor cameras	Ongoing	R04_20230725 ECO 2022_23 Malleefowl Monitoring	Annual monitoring with motion sensor cameras undertaken in the reporting period.	Compliant
TFEMP 15	Annual monitoring of malleefowl as per NMRT (2019) guidelines	Ongoing	R04_20230725 ECO 2022_23 Malleefowl Monitoring	Annual monitoring of malleefowl undertaken as per NMRT Monitoring Manual (2022).	Compliant
TFEMP 16	Annual monitoring of Chuditch using cage trapping	Ongoing	R05_20240216 ECO 2023 Mt Holland Chuditch Monitoring	Annual monitoring of Chuditch using cage trapping undertaken in the reporting period.	Compliant

Commitment	Requirement	Timing	Evidence	Assessment	Status
TFEMP 17	<p>If Trigger Criteria is met:</p> <p>Chuditch Threshold Criteria: A 50% decrease at impact sites in female abundance for two consecutive monitoring events.</p> <p>Malleefowl Threshold Criteria: A project related 50% decrease in the estimated local population (based on temporal analysis) over a consecutive two year period.</p> <p>Proponent will take response actions:</p> <ul style="list-style-type: none"> <li>• Report as a potential non-compliance to CEO DWER within 7 days of identification</li> <li>• 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.</li> <li>• 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.</li> <li>• Seek advice from a suitably qualified fauna specialist, as required.</li> <li>• If Project-related impact is suspected, increase management measures on advice from a suitably qualified fauna specialist to reduce the exceedance below threshold criteria.</li> <li>• Management measures may include, but are not limited to, the following: <ul style="list-style-type: none"> <li>o Review of annual Malleefowl and Chuditch monitoring where required and threshold criteria and early response triggers.</li> <li>o Review and increase effectiveness of pre-clearance monitoring (for example timing/duration of surveys).</li> <li>o Review and refine remote camera monitoring for introduced predator fauna (foxes and cats), for example trapping effort, survey timing and frequency, location and placement of cameras.</li> <li>o A proportionate increase in trapping/baiting intensity may be required for introduced fauna control in collaboration with DBCA regional control programs.</li> <li>o Increase in the frequency of introduced predator fauna control undertaken may be required.</li> <li>o Increased frequency of internal audits and inspections for incident reports relating to vehicle interactions, unauthorised clearing, light and noise disturbance and fire.</li> <li>o 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.</li> <li>o 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.</li> <li>o Further regional surveys and monitoring to determine impacts to population.</li> </ul> </li> <li>• Consider changes to the mining operations (for example, change in the location, duration and/or method(s) of mining operations).</li> <li>• 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).</li> </ul>	Ongoing	<p>R04_20230725 ECO 2022_23 Malleefowl Monitoring</p> <p>R05_20240216 ECO 2023 Mt Holland Chuditch Monitoring</p>	Trigger criteria was not met.	Not applicable
TFEMP 18	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (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.</p>	Ongoing	<p>P01_COV-000-EN-PRO-0012.2.IFU GDP Procedure</p> <p>E29_GDP0060_V9_SWRL_ExistingTSF2</p> <p>E30_GDP0071_TSFCOnstruction_V1</p>	Implementation of GDP Procedure requires demarcation and notification and limits access to MMEZ.	Compliant

Commitment	Requirement	Timing	Evidence	Assessment	Status
TFEMP 19	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (clearing management controls): MMEZs within close proximity to operational areas to be delineated with flagging tape, signage or similar to alert all personnel of their location.</p>	Ongoing	E04_Exclusion Signage 1 E05_Exclusion Signage 2 E06_Exclusion Signage 3	MMEZ is delineated by signage and / or tape to prevent unauthorised access.	Compliant
TFEMP 20	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (clearing management controls): Inductions of all site personnel to include information on the location of MMEZs, management targets, measures and expectations.</p>	Ongoing	E25_2023_MtHollandGDPAwarenessScript	Slide 6 of the GDP Awareness covers exclusion zones and requirements to avoid them. The presentation covers management targets, measures and expectations.	Compliant
TFEMP 21	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (clearing management controls): Undertake progressive clearing, minimising the amount of active disturbance present.</p>	Ongoing	P01_COV-000-EN-PRO-0012.2.IFU GDP Procedure E29_GDP0060_V9_SWRL_ExistingTSF2 E30_GDP0071_TSFClearance_V1	Item 38 of the GDP60 v9 and 31 of GDP 71 cover conducting activities to minimise harm to fauna.	Compliant
TFEMP 22	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (clearing management controls): Progressively rehabilitate areas as appropriate.</p>	Ongoing	M01_Coalent CAR Evidence Request Response Rev 0	Mining areas ready for rehabilitation will not be available until Q4 2024.	Not applicable
TFEMP 23	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (clearing management controls): Preferential clearing outside of the egg incubation season (September to February) and potentially the mound building season (June to August).</p>	Ongoing	M02_Coalent ACR Evidence Request Response Rev 0 E03_GDP60_V7_SWRL Fauna Preclearance	Clearing in the reporting period was undertaken 13 <sup>th</sup> to 19 <sup>th</sup> March 2023; outside of the egg incubation season (September to February) and potentially the mound building season (June to August).	Compliant
TFEMP 24	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (clearing management controls): 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).</p>	Ongoing	M01_Coalent CAR Evidence Request Response Rev 0 E03_GDP60_V7_SWRL Fauna Preclearance	No mounds were removed in the reporting period.	Not applicable
TFEMP 25	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (clearing management controls): 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.</p>	Ongoing	E03_GDP60_V7_SWRL Fauna Preclearance	No mounds were removed in the reporting period.	Not applicable
TFEMP 26	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (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.</p>	Ongoing	E21_Fauna Register as at 240531	<p>The fauna register includes malleefowl sightings.</p> <p><b>OFI</b> The fauna register does not include observer name. If this is not relevant, amend the TFEMP to take out this requirement.</p>	Compliant
TFEMP 27	Pre-clearance surveys will be undertaken as described by Section 2.5.2 Pre-clearance Survey Monitoring. Pre-clearance surveys will be conducted in accordance with the NMRT (2019) National Malleefowl Mound Monitoring Manual and utilise LiDAR technology.	Ongoing	E03_GDP60_V7_SWRL Fauna Preclearance	Pre-clearance surveys were undertaken as described by Section 2.5.2 and in accordance with the NMRT.	Compliant

Commitment	Requirement	Timing	Evidence	Assessment	Status
TFEMP 28	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (pre-clearance surveys - malleefowl): 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.</p>	Ongoing	E03_GDP60_V7_SWRL Fauna Preclearance R04_20230725 ECO 2022_23 Malleefowl Monitoring	Pre-clearance surveys and annual surveys are being undertaken. Five year population monitoring is due in 2025.	Compliant
TFEMP 29	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (pre-clearance surveys - malleefowl): 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.</p>	Ongoing	E03_GDP60_V7_SWRL Fauna Preclearance R04_20230725 ECO 2022_23 Malleefowl Monitoring	Monitoring post initial LiDAR survey is being undertaken.	Compliant
TFEMP 30	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (pre-clearance surveys - malleefowl): 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.</p>	Ongoing	E03_GDP60_V7_SWRL Fauna Preclearance	Pre-clearance survey employs LiDAR.	Compliant
TFEMP 31	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (pre-clearance surveys - malleefowl): 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.</p>	Ongoing	E03_GDP60_V7_SWRL Fauna Preclearance R04_20230725 ECO 2022_23 Malleefowl Monitoring	The fauna preclearance documents Chuditch trapping undertaken for one night prior to vegetation clearing. It does not specifically state that pre-clearance walk throughs were undertaken for Malleefowl however, the pre-clearance walk throughs would have been undertaken in conjunction with the collection of the traps.	Compliant
TFEMP 32	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (pre-clearance surveys - malleefowl): 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).</p>	Ongoing	E03_GDP60_V7_SWRL Fauna Preclearance R04_20230725 ECO 2022_23 Malleefowl Monitoring	No active mounds were cleared.	Compliant
TFEMP 33	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (pre-clearance surveys - malleefowl): 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.</p>	Ongoing	E03_GDP60_V7_SWRL Fauna Preclearance	Fauna Pre-clearance surveys were completed by licence fauna handlers from ecoscape during the reporting period.	Compliant
TFEMP 34	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (Chuditch controls): Clearing will be avoided between the months of September to November where possible to mitigate impacts to denning females.</p>	Ongoing	M01_Coalvent CAR Evidence Request Response Rev 0 E30_GDP0071_TSFClearing_V1	Clearing has been undertaken during periods operationally suitable. The clearing for TSF was undertaken 13 <sup>th</sup> to 19 <sup>th</sup> March 2023.	Compliant



Commitment	Requirement	Timing	Evidence	Assessment	Status
TFEMP 35	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (Chuditch controls): Vegetation clearing will be undertaken during the daytime only, when Chuditch are generally less active.</p>	Ongoing	M01_Coalent CAR Evidence Request Response Rev 0	Ground disturbance clearing activities are undertaken during dayshift hours only. Fauna traps are collected at first daylight in the morning and a walk through of the clearing area undertaken prior to approval being given for clearing to commence.	Compliant
TFEMP 36	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (pre-clearance surveys - Chuditch): 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.</p>	Ongoing	E03_GDP60_V7_SWRL Fauna Preclearance	The results of the pre-clearance fauna trapping are collated at the end of each clearance event and a copy of the report is saved against the GDP. An example of a pre-clearance survey is attached as E03.	Compliant
TFEMP 37	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (pre-clearance surveys - Chuditch): 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.</p>	Ongoing	M01_Coalent CAR Evidence Request Response Rev 0 E03_GDP60_V7_SWRL Fauna Preclearance	Fauna traps are set in the evening and collected at first daylight in the morning. A walk through of the clearing area is undertaken prior to approval being given for clearing to commence. If Chuditch are trapped, then they are released into nearby area following the completion of daytime clearing activities.	Compliant
TFEMP 38	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (pre-clearance surveys - Chuditch): 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.</p>	Ongoing	M01_Coalent CAR Evidence Request Response Rev 0	Clearing was not undertaken during the September to November period.	Not applicable
TFEMP 39	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (pre-clearance surveys - Chuditch): 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.</p>	Ongoing	E03_GDP60_V7_SWRL Fauna Preclearance	Fauna pre-clearance surveys were completed by licence fauna handlers from Ecoscape during the reporting period.	Compliant
TFEMP 40	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (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).</p>	Ongoing	M01_Coalent CAR Evidence Request Response Rev 0	Personnel are made aware of the requirement to keep to designated tracks, limit driving between dusk and dawn, drive to road and weather conditions and limiting speeds to protect conservation significant fauna.	Compliant
TFEMP 41	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (traffic management controls): All sightings and interactions with malleefowl and Chuditch to be reported to Environmental personnel.</p>	Ongoing	E21_Fauna Register as at 240531	There is a fauna register which includes malleefowl Chuditch sightings in the reporting period.	Compliant

Commitment	Requirement	Timing	Evidence	Assessment	Status
TFEMP 42	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (traffic management controls): Environmental personnel to identify and establish working relationships with local wildlife carers/vets for injured malleefowl and Chuditch.</p>	Ongoing	M01_Coalent CAR Evidence Request Response Rev 0	Coalent liaises with the Parnana Pikurtu Wildlife Sanctuary located at the Nulla Nulla Farm Retreat approximately 130km drive North-West of the Mt Holland Project.	Compliant
TFEMP 43	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (traffic management controls): Worker awareness training.</p>	Ongoing	E25_2023_MtHollandGDPAwarenessScript	Personnel undergo GDP Awareness Training which includes information on Malleefowl and Chuditch and the requirements for fauna clearance.	Compliant
TFEMP 44	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (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.</p>	Ongoing	P02_COV-M000-EN-PRO-0001 Fauna Management Trench Clearing E22_2023-2024 MTH Environmental Incident Register from INX	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.	Compliant
TFEMP 45	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (fauna entrapment controls): 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.</p>	Ongoing	P02_COV-M000-EN-PRO-0001 Fauna Management Trench Clearing	The fauna management and trench clearing procedure outlines in Section 3.7 the requirements for conservation significant fauna.	Compliant
TFEMP 46	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (fauna entrapment controls): To prevent entrapment of animals, all excavations, steep-walled holes or trenches <math>\geq 1</math> 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:</p> <ul style="list-style-type: none"> <li>o 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.</li> <li>o 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.</li> <li>o 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</li> <li>o If a trench with a greater distance than 100 m is required to be left open for <math>&gt; 1</math> 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.</li> </ul>	Ongoing	P02_COV-M000-EN-PRO-0001 Fauna Management Trench Clearing E31_DMIRS 2023_Fauna Egress	Steep walled holes and trenches are secured against animal entry or provided with fauna egress.	Compliant
TFEMP 47	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (fauna entrapment controls): Domestic waste facilities will be fenced, and putrescible waste receptacles will be covered.</p>	Ongoing	E23_Landfill inspection Nov 2023 P03_COV-M000-EN-PRO-0003.1.IFU Landfill Facility Management Procedure E26_Landfill Fencing E27_Landfill Fencing E28_Landfill Fencing	Waste is taken to the onsite landfill. The November 2023 inspection report identifies that the perimeter fence is not adequate to keep waste in and feral animals out. No actions were proposed on the inspection record (E23). Actions are entered into INX system and assigned. Photos of the fencing 26/04/2024 show that issue has been rectified.	Compliant

Commitment	Requirement	Timing	Evidence	Assessment	Status
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	E24_Putrescible skip	Skip bins are closed when not in use (E24).	Compliant
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	E31_DMIRS 2023_Fauna Egress	Permanent water sources (tanks, ponds and dams) are fenced and / or have fauna egress mats installed.	Compliant
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.	Ongoing	M01_Coalent CAR Evidence Request Response Rev 0	Site is not under closure.	Not applicable
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	E21_Fauna Register as at 240531	Introduced predators are recorded on the fauna register.	Compliant
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	E24_Putrescible skip E23_Landfill inspection Nov 2023 E26_Landfill Fencing E27_Landfill Fencing E28_Landfill Fencing	The landfill is fenced (E26, E27, E28) and checked regularly (E23), putrescible waste is covered with secure lids on bins (E24).	Compliant
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	R16_20230425_APAS_Feral Cat Control Program Report	Feral animal control was undertaken in April 2023 in cooperation with a mine 100km south of Coalent.	Compliant
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	M01_Coalent CAR Evidence Request Response Rev 0	Personnel are inducted on waste management.	Compliant
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	R16_20230425_APAS_Feral Cat Control Program Report R04_20230725 ECO 2022_23 Malleefowl Monitoring R05_20240216 ECO 2023 Mt Holland Chuditch Monitoring	Monitoring has not indicated a change in malleefowl or Chuditch population. Introduced predator monitoring has not indicated that numbers of predators are increasing.	Compliant
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	R16_20230425_APAS_Feral Cat Control Program Report R04_20230725 ECO 2022_23 Malleefowl Monitoring R05_20240216 ECO 2023 Mt Holland Chuditch Monitoring	Monitoring has not indicated a change in malleefowl or Chuditch population. Introduced predator monitoring has not indicated that numbers of predators are increasing.	Compliant

Commitment	Requirement	Timing	Evidence	Assessment	Status
TFEMP 57	Management Target: Minimise decline in population due to dust, light, noise, vibration and displacement. Action (dust, noise, light and vibration management): Dust suppression measures that include good house-keeping practices for vehicles, cleared areas, and active stockpiles.	Ongoing	E12_Dust Suppression FY23	Dust suppression of cleared unsealed roads, cleared areas and active stockpiles was undertaken by water carts as per water volumes (E12).	Compliant
TFEMP 58	Management Target: Minimise decline in population due to dust, light, noise, vibration and displacement. Action (dust, noise, light and vibration management): Dust suppression measures such as the use of watercarts will be used during dry and windy conditions, as required.	Ongoing	E12_Dust Suppression FY23	Dust suppression of cleared unsealed roads and laydown areas was undertaken by water carts in the audit period.	Compliant
TFEMP 59	Management Target: Minimise decline in population due to dust, light, noise, vibration and displacement. Action (noise, light and vibration management): Machinery and equipment will be fitted with noise attenuation measures to meet personnel safety requirements.	Ongoing	M01_Coalent CAR Evidence Request Response Rev 0	Machinery and equipment meet health and safety requirements for noise and vibration.	Compliant
TFEMP 60	Management Target: Minimise decline in population due to dust, light, noise, vibration and displacement. Action (noise, light and vibration management): Installation of lighting that direct lights toward plant areas to minimise light spill into adjacent vegetated areas.	Ongoing	M01_Coalent CAR Evidence Request Response Rev 0	Lighting towers both fixed and temporary are utilised in operational areas of the Mine and roads only, lighting is only directed on operational areas and not into adjacent vegetated areas.	Compliant
TFEMP 61	Management Target: Minimise decline in population due to dust, light, noise, vibration and displacement. Action (noise, light and vibration management): Equipment design will specify compliance with Australian Standard noise limits.	Ongoing	R03_Coalent Lithium CAR 2023 (Rev 0)	All equipment and machinery are designed and tested to comply with Australian Noise Limit Standards. Periodical Occupational Noise and Dust exposure monitoring is conducted by Occupational Hygiene Consultants.	Compliant
TFEMP 62	Management Target: Minimise decline in fauna habitat condition due to changed fire regimes. Action: Implementation of fire management procedures (e.g. maintenance of fire breaks, Hot Work Permit system, firefighting training, Emergency Response Plan).	Ongoing	M01_Coalent CAR Evidence Request Response Rev 0	Fire management procedures are in place including the Hot Work Permit system, firefighting training and Emergency Response Plan.	Compliant
TFEMP 63	Management Target: Minimise decline in fauna habitat condition due to changed fire regimes. Action: Firefighting equipment will be located on site and in vehicles.	Ongoing	E20_Fire Hydrants_Hose Reels E19_Fire Extinguisher Workshop E16_Fire Equipment Service register E13_Truck Example Fire Suppression System Photo 1 E14_Dozer Example Fire Suppression System Photo 1 E15_Dozer Example Fire Suppression System Photo 2 E17_Fire Extinguisher Workshop Vehicle Example E18_Fire Extinguisher Workshop Vehicles Tag	Firefighting equipment is located on site (E20, E19, E16) and in vehicles (E13, E14, E15, E17, E18).	Compliant
TFEMP 64	Management Target: Minimise decline in fauna habitat condition due to changed fire regimes. Action: Lightning protection equipment will be installed as part of Project design where necessary.	Ongoing	E02_Lightning Protection Infrastructure	Lightning protection infrastructure is installed on buildings and infrastructure (E02) to redirect and minimise potential lightning caused fires.	Compliant
TFEMP 65	Management Target: Minimise decline in fauna habitat condition due to changed fire regimes. Action: Vehicles will not be permitted to leave access tracks or cleared areas.	Ongoing	E22_2023-2024 MTH Environmental Incident Register from INX	There were no incidents of vehicles leaving access tracks or cleared areas.	Compliant

Commitment	Requirement	Timing	Evidence	Assessment	Status
TFEMP 66	<p>Management Target: Minimise decline in fauna habitat condition due to changed fire regimes.</p> <p>Action: Coordination with DBCA and Department of Fire and Emergency Services (DFES) to undertake prescribed burns.</p>	Ongoing	M01_Coalent CAR Evidence Request Response Rev 0	No prescribed burns were undertaken during the audit period.	Compliant
TFEMP 67	<p>Coalent will require all workers, both during construction and operation of the mine, to attend a worker awareness training/environmental induction covering the following topics.</p> <ul style="list-style-type: none"> <li>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).</li> <li>Information on other conservation-significant fauna recorded within the Development Envelope.</li> <li>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.</li> <li>Information on the prevention and management of fires to protect fauna habitat.</li> </ul>	Ongoing	<p>E07_Mt Holland Environmental Induction</p> <p>E34_20230116 TBT Reporting Fauna Sightings</p> <p>E35_20230823 Reporting Fauna Sightings</p> <p>E36_20230912 TBT Site Speed Limits</p> <p>E37_20231203 TBT Protect Our Malleefowl</p> <p>E38_20230418 Introduced Predator Control</p> <p>E39_20230809 TBT Malleefowl Breeding Season</p> <p>E40_20230903 TBT Snake Awareness</p> <p>E41_20230907 TBT Threatened Species Day</p>	<p>The induction includes:</p> <ul style="list-style-type: none"> <li>Identification and conservation status of Malleefowl and Chuditch (Slide 81 including 81 a and b)</li> <li>Requirements of personnel (Slide 82)</li> <li>Reporting injury or mortality of conservation significant fauna (slide 88a)</li> <li>Impact of introduced predator fauna on Chuditch (slide 81b) (not Malleefowl)</li> </ul> <p>Toolbox talks are utilised to convey worker awareness of topics such as:</p> <ul style="list-style-type: none"> <li>Conservation-significant fauna in the Development Envelope (E53)</li> <li>Information on the prevention and management of fires to protect fauna habitat</li> </ul> <p>Site Notices include:</p> <p>Sightings of introduced predators should be recorded and that they not to be fed (E50)</p>	Compliant
TFEMP 68	<p>Environmental incidents are defined as breaches or non-adherences to objectives and procedures applied to the Project and prescribed in the TFEMP.</p> <p>Environmental incidents are to be reported to the Coalent Environmental Manager by the person responsible for the incident or the first person at the site of an incident.</p>	Ongoing	<p>M01_Coalent CAR Evidence Request Response Rev 0</p> <p>E22_2023-2024 MTH Environmental Incident Register from INX</p> <p>M02_Coalent ACR Evidence Request Response Rev 0</p>	There were no breaches or non-adherences to objectives and procedures.	Compliant
TFEMP 69	The Coalent 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	Refer to TFEMP 68	Refer to TFEMP 68	Compliant
TFEMP 70	Annual Population monitoring of Malleefowl and Chuditch as per Section 2.51	Annual	<p>R04_20230725 ECO 2022_23 Malleefowl Monitoring</p> <p>R05_20240216 ECO 2023 Mt Holland Chuditch Monitoring</p>	Annual monitoring is undertaken in accordance with Section 2.51.	Compliant
TFEMP 71	<p>Pre-Clearance Surveys</p> <ul style="list-style-type: none"> <li>Malleefowl pre-clearance surveys during incubation period of September to February</li> <li>Chuditch pre-clearance surveys the night immediately prior to ground disturbing activities</li> <li>As described by section 2.5.2</li> </ul>	Ongoing	E03_GDP60_V7_SWRL Fauna Preclearance	Pre-clearance surveys undertaken as per Section 2.5.2.	Compliant
TFEMP 72	<p>Mortality monitoring</p> <p>Monitoring of incident reports for malleefowl and Chuditch predation, vehicle strike, speeding and night driving.</p>	Ongoing and annual review	<p>M01_Coalent CAR Evidence Request Response Rev 0</p> <p>E22_2023-2024 MTH Environmental Incident Register from INX</p>	No records of predation, vehicle strike, speeding and night driving incidents with malleefowl and Chuditch.	Not applicable

Commitment	Requirement	Timing	Evidence	Assessment	Status
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	R17_IntroducedPredatorMonitoring 2021 R07_20230720_ECO_2022PredatorMonitoring R16_20230425_APAS_Feral Cat Control Program Report	Baseline introduced predator monitoring has been undertaken in 2021 and 2022. Predator control program was implemented in April 2023.	Compliant
TFEMP 74	Clearing monitoring <ul style="list-style-type: none"> <li>Monitoring of clearing register for compliance to approvals.</li> <li>Review of clearing footprint to determine clearing proximity to active malleefowl mounds.</li> </ul>	Ongoing and annual review	G01_a2765 CAR23 f01 03 - Fig3 Clearing E29_GDP0060_V9_SWRL_ExistingTSF2 E30_GDP0071_TSFClearing_V1	Monitoring of clearing is being undertaken.	Compliant
TFEMP 75	Clearing monitoring Internal audit and inspection of areas of clearing, areas of potential entrapment, speeding and night driving.	Ongoing and annual review	E32_20230321_Environmental Inspection E33_20230903_Environmental Inspection	Internal auditing and inspections being undertaken.	Compliant
TFEMP 76	Fauna habitat monitoring Annual monitoring of vegetation condition as an indicator of fauna habitat quality.	As FVEMP	R06_Mattiske Veg Condition Monitoring Spring 2023	Vegetation health is reported in the vegetation monitoring report (R06).	Compliant
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: <ul style="list-style-type: none"> <li>A summary of compliance requirements.</li> <li>Summary of compliance during the reporting period.</li> <li>Non-compliances and corrective / preventative actions.</li> <li>Compliance assessment table.</li> <li>Documentary evidence.</li> <li>Provision of data (annually) from monitoring programs to relevant regulatory authorities</li> </ul>	Annually	R03_Covalent Lithium CAR 2023 (Rev 0)	Submission receipt for CAR (R03) received from DWER 03/05/2024. The CAR included: <ul style="list-style-type: none"> <li>A summary of compliance requirements.</li> <li>Summary of compliance during the reporting period.</li> <li>Non-compliances and corrective / preventative actions.</li> <li>Compliance assessment table.</li> <li>Documentary evidence.</li> <li>Provision of data (annually) from monitoring programs to relevant regulatory authorities</li> </ul>	Compliant
TFEMP 78	If a trigger is exceeded then action will be: Internal incident report and investigation to prevent a recurrence and reduce the exceedance below trigger criteria.	At time of event	M01_Covalent CAR Evidence Request Response Rev 0	No trigger was exceeded	Compliant
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	M01_Covalent CAR Evidence Request Response Rev 0	No threshold was exceeded	Compliant
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: <ul style="list-style-type: none"> <li>Details of contingency actions implemented.</li> <li>Effectiveness of the actions implemented, measured against the threshold criteria.</li> <li>Findings of investigations.</li> <li>Measures to prevent the Threshold criteria being exceeded in the future.</li> <li>Measures to prevent, control or abate any environmental harm which may have occurred.</li> <li>Justification the Threshold criteria remaining, or being adjusted based on a better understanding, demonstrating that objectives will continue to be met</li> </ul>	Within 21 days of event	M01_Covalent CAR Evidence Request Response Rev 0	No threshold was exceeded	Not applicable

Commitment	Requirement	Timing	Evidence	Assessment	Status
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	M01_Coalent CAR Evidence Request Response Rev 0 E21_Fauna Register as at 240531	No specially protected fauna injured or abandoned. Fauna injuries as follows: <ul style="list-style-type: none"> <li>Lesser Long-Eared Bat (27/01/2023) Found at Village Camp - Kept overnight and taken to wildlife carers at Nulla Nulla Farm Retreat</li> <li>Lesser Long-Eared Bat (18/04/2023) Found at Primero Concentrator Area - Bat cared for overnight and taken to carer</li> </ul> Fauna mortalities as follows: <ul style="list-style-type: none"> <li>Wallaby (30/01/2023) Vehicle strike</li> <li>Goanna (31/01/2023) Vehicle strike</li> <li>Snake (12/02/2023) Vehicle strike</li> <li>Snake - Dugite (28/09/2023) Vehicle strike</li> <li>Yellow Spotted Monitor (18/10/2023) Vehicle strike</li> <li>Sand Monitor (9/12/2023) Vehicle strike</li> </ul>	Compliant
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	M01_Coalent CAR Evidence Request Response Rev 0 E21_Fauna Register as at 240531	No conservation significant fauna deaths in 2023.	Compliant
TFEMP 83	Evaluation and revision of the TFEMP Review and submit to CEO DWER as per Condition 3-6 of MS1199.	As required.	Refer to MS1199:3-6	Refer to MS1199:3-6	Compliant
TFEMP 84	Trigger: 25% increase in malleefowl or Chuditch sightings within or adjacent to mining activity areas over two consecutive years. Action: Report internally that early response trigger has been met in accordance with internal procedures.	Ongoing	R04_20230725 ECO 2022_23 Malleefowl Monitoring R05_20240216 ECO 2023 Mt Holland Chuditch Monitoring	Trigger not met.	Not applicable
TFEMP 85	Trigger: 25% increase in malleefowl or Chuditch sightings within or adjacent to mining activity areas over two consecutive years. Action: Due diligence checks to ensure the following is adequate: <ul style="list-style-type: none"> <li>Internal audit of waste management facilities</li> <li>Review of traffic management controls to determine management action amendments</li> <li>Refresher training on malleefowl, Chuditch and associated controls and injured animal management.</li> </ul>	Ongoing	R04_20230725 ECO 2022_23 Malleefowl Monitoring R05_20240216 ECO 2023 Mt Holland Chuditch Monitoring	Trigger not met.	Not applicable

Commitment	Requirement	Timing	Evidence	Assessment	Status
TFEMP 86	<p>Trigger: 25% increase in malleefowl or Chuditch sightings within or adjacent to mining activity areas over two consecutive years.</p> <p>Early response trigger contingency actions may include but are not limited to:</p> <ul style="list-style-type: none"> <li>• Avoid clearing September to November to mitigate any potential risk to breeding and denning female Chuditch.</li> <li>• Near miss of fauna on roads or during clearing and mining activities reported.</li> <li>• Warning signs erected in areas of increased malleefowl or Chuditch records</li> <li>• Increase in frequency of internal audits and inspections of vehicle speeds.</li> <li>• Increased presence of malleefowl or Chuditch on site discussed in staff induction programs</li> <li>• 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).</li> <li>• Staff training and awareness to include information on the prevention and management of fires.</li> <li>• Domestic waste facilities will be fenced, and putrescible wastes will be regularly covered.</li> <li>• Containers to have doors closed securely when not in use.</li> </ul>	Ongoing	R04_20230725 ECO 2022_23 Malleefowl Monitoring R05_20240216 ECO 2023 Mt Holland Chuditch Monitoring	Trigger not met.	Not applicable
TFEMP 87	<p>Trigger: 25% increase in introduced predators (fox or cat) sightings (opportunistic sightings and remote camera) over two consecutive years.</p> <p>Action: Report internally that early response trigger has been met in accordance with internal procedures.</p>	Ongoing	R16_20230425_APAS_Feral Cat Control Program Report	Monitoring in April 2023 did not identify any feral cats or dogs. Monitoring occurred prior to landfill commissioning.	Not applicable
TFEMP 88	<p>Trigger: 25% increase in introduced predators (fox or cat) sightings (opportunistic sightings and remote camera) over two consecutive years.</p> <p>Action: Review introduced predators control programme and amend as required.</p>	Ongoing	R07_20230720_ECO_2022 Predator Monitoring R17_IntroducedPredatorMonitoring 2021 R16_20230425_APAS_Feral Cat Control Program Report	Monitoring in April 2023 showed predator numbers reduced from monitoring undertaken in 2022 and 2021.	Not applicable
TFEMP 89	<p>Trigger: 25% increase in introduced predators (fox or cat) sightings (opportunistic sightings and remote camera) over two consecutive years.</p> <p>Trigger contingency actions may include but are not limited to the following:</p> <ul style="list-style-type: none"> <li>• A proportionate increase in trapping/ baiting intensity for introduced predators in areas where increased sightings of foxes and/ or cats have occurred.</li> <li>• If after the two consecutive monitoring events, a threshold exceedance has not been identified, resume standard monitoring.</li> <li>• Installation of signage: Feeding animals prohibited, minimise availability of food waste.</li> <li>• Review and refine remote camera monitoring for introduced predators (foxes and cats) across the DE should it be required.</li> <li>• 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).</li> </ul>	Ongoing	Refer to TFEMP 87	Refer to TFEMP 87	Not applicable
TFEMP 90	<p>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.</p> <p>Review monitoring program for adequacy:</p> <p>Determine whether the changes observed in the impact sites are comparable to the observations in the reference sites.</p>	Ongoing	R04_20230725 ECO 2022_23 Malleefowl Monitoring R05_20240216 ECO 2023 Mt Holland Chuditch Monitoring	Trigger not met.	Not applicable



Commitment	Requirement	Timing	Evidence	Assessment	Status
TFEMP 91	<p>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.</p> <p>Consider changes to the mining operations (for example, change in the location, duration and/or method(s) of mining operations).</p>	Ongoing	R04_20230725 ECO 2022_23 Malleefowl Monitoring R05_20240216 ECO 2023 Mt Holland Chuditch Monitoring	Trigger not met.	Not applicable
TFEMP 92	<p>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.</p> <p>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).</p>	Ongoing	R04_20230725 ECO 2022_23 Malleefowl Monitoring R05_20240216 ECO 2023 Mt Holland Chuditch Monitoring	Trigger not met.	Not applicable
TFEMP 93	<p>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:</p> <p>Action: Investigate potential causes for population decrease:</p> <p>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</p> <ul style="list-style-type: none"> <li>seasonal conditions (e.g. rainfall and temperatures)</li> <li>changes in mound usage patterns by malleefowl (i.e., use of mounds that are not surveyed)</li> <li>effectiveness of introduced predator control</li> <li>spatial variation (near-impact areas) versus sites located further from impact); and</li> <li>reliability of the results obtained from the fauna sightings register</li> <li>attributable to clearing, construction, operation activities.</li> </ul> <p>Where the trigger is attributed to clearing, construction or operational activities, report the exceedance to DWER within 7 days of the exceedance being identified.</p>	Ongoing	R04_20230725 ECO 2022_23 Malleefowl Monitoring R05_20240216 ECO 2023 Mt Holland Chuditch Monitoring	Trigger not met.	Not applicable
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	Refer to M1199:3.2	Refer to M1199:3.2	Compliant
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	Refer to M1199:3.2	Refer to M1199:3.2	Compliant

## Appendix E Ironcaps Banksia Conservation Plan Compliance Assessment

Table E.2: Ironcaps Banksia Conservation Plan Audit Table (Rev 2)

Condition	Reference	Requirement	Timing	Evidence	Assessment	Status
<b>Management Actions</b>						
IBCP 01	Section 3.2	Ensuring no proposal-related direct or adverse indirect impacts to flora and vegetation within the VEZs	Overall	R06_Mattiske Veg Condition Monitoring Spring 2023	Spring monitoring (R06) does not report proposal related direct impact to flora and vegetation within a VEZ	Compliant
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	R11_Flora and Vegetation Management Plan C04_MS1199 - FVEMP Rev 7 approval	As specified in the FVEMP approval (C04) the FVEMP (R11) contains threshold criteria and trigger criteria that must provide an early warning that the threshold criteria may not be met.	Compliant
IBCP 03	Section 3.2	Reporting and investigations of any threshold criteria exceedance of the Flora and Vegetation Environmental Management Plan	Overall	R03_Coalent Lithium CAR 2023 (Rev 0) M02_Coalent ACR Evidence Request Response Rev 0	No trigger criteria or threshold criteria has been exceeded in the reporting year.	Not applicable
IBCP 04	Section 3.2	Clear no more than the approved two (2) <i>Banksia dolichostyla</i> individuals by direct effects (clearing for mining operations).	Clearing	R03_Coalent Lithium CAR 2023 (Rev 0) G02_CAR23 Calcs 20240429 M02_Coalent ACR Evidence Request Response Rev 0 E22_2023-2024 MTH Environmental Incident Register from INX	No Ironcaps Banksia ( <i>Banksia dolichostyla</i> ) individuals had been cleared within the Development Envelope since commencement of the project.	Compliant
IBCP 05	Section 3.2	Have indirect impact on no more than 67 known individuals of <i>B. sphaerocarpa var. dolichostyla</i> located in close proximity ( $\leq 50$ meters (m)) to the Project. Indirect effects may include: <ul style="list-style-type: none"> <li>• fire</li> <li>• introduction / spread of weeds and dieback (Phytophthora cinnamomi)</li> <li>• changed hydrology / salinisation.</li> <li>• fragmentation</li> <li>• dust generation.</li> <li>• spills of hydrocarbons or hypersaline water</li> </ul>	Overall	R06_Mattiske Veg Condition Monitoring Spring 2023 E22_2023-2024 MTH Environmental Incident Register from INX M02_Coalent ACR Evidence Request Response Rev 0	Monitoring of indirect impacts has shown: <ul style="list-style-type: none"> <li>• No fire in the reporting period</li> <li>• No introduction/spread of weeds in the reporting period (R06)</li> <li>• No suspect plant deaths (potential dieback)</li> <li>• No changes in hydrology</li> <li>• No fragmentation</li> <li>• Vegetation health within 20% (nil effect from dust deposition)</li> <li>• Spring vegetation monitoring report (R06) has not detected any indirect impact on <i>B. sphaerocarpa var. dolichostyla</i> from reported incident on 8 May 2023 "Salts from hypersaline water applied to TSF construction materials (material conditioning) has leached out during rainfall and impacted vegetation outside of Mining Proposal disturbance footprint."</li> </ul>	Compliant
IBCP 06	Table 3.1	Management Objective: No proposal related direct impact to flora and vegetation within a VEZ. Avoidance: <b>implementation of an internal clearing permit procedure</b> Management Target: <ul style="list-style-type: none"> <li>• No unauthorized clearing within the Development Envelope or VEZs.</li> <li>• No unauthorized access to a VEZ.</li> </ul> Monitoring: <ul style="list-style-type: none"> <li>• Clearing register.</li> <li>• Survey records of all clearing undertaken during operation of the Project.</li> </ul>	Ongoing	P01_COV-000-EN-PRO-0012.2.IFU GDP Procedure E29_GDP0060_V9_SWRL_ExistingTSF2	Vegetation clearing for the development of SWRL was undertaken in accordance with the Coalent Lithium Ground Disturbance Procedure (GDP0060).	Compliant

Condition	Reference	Requirement	Timing	Evidence	Assessment	Status
IBCP 07	Table 3.1	<p>Management Objective: No proposal related direct impact to flora and vegetation within a VEZ.</p> <p>Avoidance: <b>implementation of an internal procedure limiting access to VEZs by foot only or only by car where there is an existing track.</b></p> <p>Management Target:</p> <ul style="list-style-type: none"> <li>No unauthorized clearing within the Development Envelope or VEZs.</li> <li>No unauthorized access to a VEZ.</li> </ul> <p>Monitoring:</p> <ul style="list-style-type: none"> <li>Clearing register.</li> <li>Survey records of all clearing undertaken during operation of the Project.</li> </ul>	Ongoing	E07_Mt Holland Environmental Induction E22_2023-2024 MTH Environmental Incident Register from INX	<p>Slide 78 of the Earl Grey Lithium Project induction highlights the Vegetation Exclusion Zones.</p> <p>The incident register does not report any unauthorized access to a vegetation exclusion zone in the reporting period.</p>	Compliant
IBCP 08	Table 3.1	<p>Management Objective: No proposal related direct impact to flora and vegetation within a VEZ.</p> <p>Avoidance: <b>VEZs to be delineated with flagging tape, physical barrier, signage or similar to alert all personnel of their location</b></p> <p>Management Target:</p> <ul style="list-style-type: none"> <li>No unauthorized clearing within the Development Envelope or VEZs.</li> <li>No unauthorized access to a VEZ.</li> </ul> <p>Monitoring:</p> <ul style="list-style-type: none"> <li>Clearing register.</li> <li>Survey records of all clearing undertaken during operation of the Project.</li> </ul>	Overall	E07_Mt Holland Environmental Induction E04_Exclusion Signage 1 E05_Exclusion Signage 2 E06_Exclusion Signage 3 E22_2023-2024 MTH Environmental Incident Register from INX	<p>Vegetation Exclusion Zones are delineated via bunting and signage within the Development Envelope (E04, E05, E06).</p> <p>Slide 78 of the Earl Grey Lithium Project induction highlights the Vegetation Exclusion Zones.</p> <p>The incident register does not report any unauthorized access to a vegetation exclusion zone in the reporting period.</p>	Compliant
IBCP 09	Table 3.1	<p>Management Objective: No proposal related direct impact to flora and vegetation within a VEZ.</p> <p>Avoidance: <b>Inductions of all site personnel to include information on the location of VEZs, management targets, measures and expectations</b></p> <p>Management Target:</p> <ul style="list-style-type: none"> <li>No unauthorized clearing within the Development Envelope or VEZs.</li> <li>No unauthorized access to a VEZ.</li> </ul> <p>Monitoring:</p> <ul style="list-style-type: none"> <li>Clearing register.</li> <li>Survey records of all clearing undertaken during operation of the Project.</li> </ul>	Ongoing	E07_Mt Holland Environmental Induction	Slide 78 of the Earl Grey Lithium Project induction highlights the Vegetation Exclusion Zones.	Compliant
IBCP 10	Table 3.1	<p>Management Objective: Minimise dust deposition on vegetation from mining and related activities.</p> <p>Avoidance: <b>The Proponent will minimise dust deposition on vegetation through:</b></p> <ul style="list-style-type: none"> <li>dust suppression on cleared areas</li> <li>maximise efficiency of loads when transporting ore or concentrate (including haul trucks and conveyers)</li> <li>use dust covers on machinery and dust suppressants on exposed areas where possible</li> <li>minimise open area footprint and rehabilitate or cover (using vegetation, rock, water and/or dust suppressant) exposed areas as soon as practicable</li> <li>design the mine layout to minimise dust emissions to VEZs where practicable</li> </ul> <p>Management Target: Dust deposition (present as insoluble solids) at any gauge in excess of 10 g/m<sup>2</sup>/month.</p> <p>Monitoring: Dust deposition rates will be measured monthly using dust deposition gauges for the first 24 months from implementation of the proposal.</p>	Monthly	R08_20230915_Maxxy Engineering_Dust Report R06_Mattiske Veg Condition Monitoring Spring 2023 E12_Dust Suppression FY23	<p>Dust deposition on vegetation has been minimised in the reporting period by:</p> <ul style="list-style-type: none"> <li>Dust suppression of cleared unsealed roads, cleared areas and active stockpiles was undertaken by water carts as per water volumes (E12).</li> <li>Haul trucks and road haulage trucks are operated at or near capacity to maximise efficiency.</li> <li>The access road has been sealed in 2023.</li> </ul> <p>Note:</p> <ul style="list-style-type: none"> <li>The use of dust covers is not yet applicable to the operation.</li> <li>There are no areas that are no longer required for mining but yet to be rehabilitated.</li> </ul>	Compliant

Condition	Reference	Requirement	Timing	Evidence	Assessment	Status
IBCP 11	Table 3.1	<p>Management Objective: Minimise spread of weeds / dieback.</p> <p>Avoidance: <b>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</b></p> <p>Management Target</p> <ul style="list-style-type: none"> <li>• Minimise new weeds introduced to site.</li> <li>• Prevent spread of weeds to VEZs.</li> <li>• Prevent spread of dieback onsite.</li> </ul> <p>Monitoring:</p> <ul style="list-style-type: none"> <li>• Annual weed monitoring across Development Envelope.</li> <li>• A Dieback Management Plan will be produced and provided to DBCA, following the completion of baseline monitoring.</li> <li>• Dieback monitoring programme to be developed.</li> <li>• 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.</li> <li>• 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.</li> </ul>		<p>R14_COV-0000-EN-PLN-0001_1 Construction EMP E10_Weed Hygiene_Register E11_Example Vehicle Hygiene Record</p>	<p>All equipment, machinery and vehicles are required to be clean on entry from the Development Envelope which is documented on the hygiene record and hygiene register. Other management controls for introduced flora (weeds) and soil-borne pathogens such as <i>Phytophthora</i> sp. (Dieback) are detailed within the Covalent Lithium Construction Environmental Management Plan.</p>	Compliant

Condition	Reference	Requirement	Timing	Evidence	Assessment	Status
IBCP 12	Table 3.1	<p>Management Objective: Minimise spread of weeds / dieback.</p> <p>Avoidance: <b>The Proponent will minimise the risk of introduction of invasive species and spread of dieback through 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</b></p> <p>Management Target</p> <ul style="list-style-type: none"> <li>• Minimise new weeds introduced to site.</li> <li>• Prevent spread of weeds to VEZs.</li> <li>• Prevent spread of dieback onsite.</li> </ul> <p>Monitoring:</p> <ol style="list-style-type: none"> <li>1. Annual weed monitoring across Development Envelope.</li> <li>2. A Dieback Management Plan will be produced and provided to DBCA, following the completion of baseline monitoring.</li> <li>3. Dieback monitoring programme to be developed.</li> <li>4. 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.</li> <li>5. 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.</li> </ol>		<p>R06_Mattiske Veg Condition Monitoring Spring 2023</p> <p>R14_COV-0000-EN-PLN-0001_1</p> <p>Construction EMP</p> <p>R03_Coalent Lithium CAR 2023 (Rev 0)</p>	<p>Compliance audit found that:</p> <ol style="list-style-type: none"> <li>1. Annual weed monitoring found no weed species were identified in the Spring 2023 monitoring (R06).</li> <li>2. <b>Dieback monitoring (R03) was undertaken in 2019 and 2022 however the Dieback Management Plan has not been developed or provided to DBCA.</b></li> <li>3. The Weed and Pathogens Management section of the CEMP (R14) does not specify the requirement or timing for dieback monitoring (Dieback monitoring programme).</li> <li>4. Baseline observations of plan health were made October 2020 to October 2021 (R03). Monitoring methodology, frequency and monitoring sites were reviewed with monitoring to be undertaken Spring and Summer.</li> <li>5. Spring monitoring report (R06) includes observations for all taxa.</li> </ol>	Potentially non-compliant

Condition	Reference	Requirement	Timing	Evidence	Assessment	Status
IBCP 13	Table 3.1	<p>Management Objective: Minimise spread of weeds / dieback.</p> <p>Avoidance: <b>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.</b></p> <p>Management Target</p> <ul style="list-style-type: none"> <li>Minimise new weeds introduced to site.</li> <li>Prevent spread of weeds to VEZs.</li> <li>Prevent spread of dieback onsite.</li> </ul> <p>Monitoring:</p> <ul style="list-style-type: none"> <li>Annual weed monitoring across Development Envelope.</li> <li>A Dieback Management Plan will be produced and provided to DBCA, following the completion of baseline monitoring.</li> <li>Dieback monitoring programme to be developed.</li> <li>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.</li> <li>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.</li> </ul>	Construction	<p>R14_COV-0000-EN-PLN-0001_1</p> <p>Construction EMP</p> <p>E10_Weed Hygiene_Register</p> <p>E11_Example Vehicle Hygiene Record</p>	<p>Management Controls for Weeds and Pathogens are detailed in the Construction Environmental Management Plan (R05). Vehicle and Material hygiene inspections are conducted on all vehicles and materials prior to entry to the Mt Holland Project (E36). All equipment, machinery and vehicles are required to be clean on entry from the Development Envelope which is documented on the hygiene record and hygiene register.</p> <p>No Dieback signage or clean down points additional to site entry in place. Requirement for additional measures would be determined if there was a Dieback Management Plan in place.</p>	Not applicable
IBCP 14	Table 3.1	<p>Management Objective: Avoid alteration of fire regimes</p> <p>Avoidance: <b>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).</b></p> <p>Management Target: Prevent fires attributed to mining and associated Project activities.</p> <p>Monitoring:</p> <ul style="list-style-type: none"> <li>Incident reports of fire.</li> <li>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.</li> </ul>	At all times	<p>M02_Coalent ACR Evidence Request Response Rev 0</p> <p>R15_COV-M000-HS-PLN-0005.1.IFU MTH Emergency Management Plan</p> <p>E20_Fire Hydrants_Hose Reels</p> <p>E19_Fire Extinguisher Workshop</p> <p>E16_Fire Equipment Service register</p> <p>E13_Truck Example Fire Suppression System Photo 1</p> <p>E14_Dozer Example Fire Suppression System Photo 1</p> <p>E15_Dozer Example Fire Suppression System Photo 2</p> <p>E17_Fire Extinguisher Workshop Vehicle Example</p> <p>E18_Fire Extinguisher Workshop Vehicles Tag</p>	<p>No fire incidents attributable to proposal in the reporting period. The Emergency Management Plan is in place and Section 7 outlines emergency response including fire, emergency response teams and training.</p> <p>Firefighting equipment is located on site (E20, E19, E16) and in vehicles (E13, E14, E15, E17, E18).</p>	Compliant

Condition	Reference	Requirement	Timing	Evidence	Assessment	Status
IBCP 15	Table 3.1	<p>Management Objective: Avoid alteration of fire regimes</p> <p>Avoidance: <b>The Proponent will contribute to fire management at the mine site and in the region through the implementing fire management procedures (e.g. maintenance of fire breaks, Hot Work Permit system, firefighting training, Emergency Response Plan)</b></p> <p>Management Target: Prevent fires attributed to mining and associated Project activities.</p> <p>Monitoring:</p> <ul style="list-style-type: none"> <li>• Incident reports of fire.</li> <li>• 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.</li> </ul>	Ongoing	<p>M02_Coalent ACR Evidence Request Response Rev 0</p> <p>R15_COV-M000-HS-PLN-0005.1.IFU MTH Emergency Management Plan</p>	<p>Management controls for fire events are detailed within the Coalent Lithium Emergency Management Plan. Further to this, Coalent Lithium have a Hot Work Procedure, of which Section 4.1 stipulates that no (or minimal) combustible material is to enter or be stored within or in proximity to designated 'hot work' areas.</p>	Compliant
IBCP 16	Table 3.1	<p>Management Objective: Avoid alteration of fire regimes</p> <p>Avoidance: <b>The Proponent will contribute to fire management at the mine site and in the region with firefighting equipment to be located on site and in vehicles</b></p> <p>Management Target: Prevent fires attributed to mining and associated Project activities.</p> <p>Monitoring:</p> <ul style="list-style-type: none"> <li>• Incident reports of fire.</li> <li>• 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.</li> </ul>		<p>E20_Fire Hydrants_Hose Reels</p> <p>E19_Fire Extinguisher Workshop</p> <p>E16_Fire Equipment Service register</p> <p>E13_Truck Example Fire Suppression System Photo 1</p> <p>E14_Dozer Example Fire Suppression System Photo 1</p> <p>E15_Dozer Example Fire Suppression System Photo 2</p> <p>E17_Fire Extinguisher Workshop Vehicle Example</p> <p>E18_Fire Extinguisher Workshop Vehicles Tag</p>	<p>Firefighting equipment is located on site (E20, E19, E16) and in vehicles (E13, E14, E15, E17, E18).</p>	Compliant
IBCP 17	Table 3.1	<p>Management Objective: Avoid alteration of fire regimes</p> <p>Avoidance: <b>The Proponent will contribute to fire management at the mine site and in the region through the lightning protection equipment installation as part of Project design where necessary</b></p> <p>Management Target: Prevent fires attributed to mining and associated Project activities.</p> <p>Monitoring:</p> <ul style="list-style-type: none"> <li>• Incident reports of fire.</li> <li>• 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.</li> </ul>		<p>E02_Lightning Protection Infrastructure</p>	<p>Lightning protection infrastructure is installed on buildings and infrastructure (E02) to redirect and minimise potential lightning caused fires.</p>	Compliant
IBCP 18	Table 3.1	<p>Management Objective: Avoid alteration of fire regimes</p> <p>Avoidance: <b>The Proponent will contribute to fire management at the mine site and in the region through the coordination with DBCA and Department of Fire and Emergency Services (DFES) to undertake prescribed burns.</b></p> <p>Management Target: Prevent fires attributed to mining and associated Project activities.</p> <p>Monitoring:</p> <ul style="list-style-type: none"> <li>• Incident reports of fire.</li> <li>• 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.</li> </ul>	As required	Not required	<p>No prescribed burns within or in proximity to the Development Envelope occurred this reporting period.</p>	Not applicable

Condition	Reference	Requirement	Timing	Evidence	Assessment	Status
IBCP 19	Table 3.1	<p>Management Objective: Avoid alteration of surface hydrology</p> <p>Avoidance: The Proponent will ensure the appropriate design of infrastructure including:</p> <ul style="list-style-type: none"> <li>• Drainage measures designed and constructed to minimise changes to natural surface water flow, including diversion drains, rock cladding and contouring as required.</li> <li>• Rehabilitation and closure to follow contours of natural landforms.</li> </ul> <p>Management Target: Prevent changes to surface water hydrology attributed to mining and associated Project activities.</p> <p>Monitoring:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Quarterly health monitoring at vegetation quadrats within VEZs and control sites</li> </ul>	Quarterly	<p>M01_Coalent CAR Evidence Request Response Rev 0</p> <p>R06_Mattiske Veg Condition Monitoring Spring 2023</p>	<p>Drainage measures have been designed and installed to maintain surface water hydrology and water quality across the project. Infrastructure includes culverts, basins, sediment traps, diversion drains and contouring. The water from the TSF diversion drain in the northern section is currently held in a sump. In a later phase it will be released to the environment which will include drainage with rock armoring.</p> <p>Vegetation monitoring did not identify any impacts associated with the alteration of surface hydrology.</p>	Compliant
<b>Management Triggers</b>						
IBCP 20	Section 3.5	Where monitoring indicates that unauthorised impacts to <i>B. sphaerocarpa</i> var. <i>dolichostyla</i> are not being avoided (or are unlikely to be), Coalent 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 Coalent Environment Manager).	On Trigger	R06_Mattiske Veg Condition Monitoring Spring 2023	Monitoring (R06) does not indicate that unauthorised impacts to <i>B. sphaerocarpa</i> var. <i>dolichostyla</i> are not being avoided (or are unlikely to be).	Not applicable
IBCP 21	Section 3.5	Where monitoring indicates that unauthorised impacts to <i>B. sphaerocarpa</i> var. <i>dolichostyla</i> are not being avoided (or are unlikely to be), Coalent will implement additional actions which may include (as appropriate) notification to DAWE and other stakeholders if considered a non-compliance or incident (potential to impact on <i>B. sphaerocarpa</i> var. <i>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.	On Trigger	R06_Mattiske Veg Condition Monitoring Spring 2023	Monitoring (R06) does not indicate that unauthorised impacts to <i>B. sphaerocarpa</i> var. <i>dolichostyla</i> are not being avoided (or are unlikely to be).	Not applicable
IBCP 22	Section 3.5	Where monitoring indicates that unauthorised impacts to <i>B. sphaerocarpa</i> var. <i>dolichostyla</i> are not being avoided (or are unlikely to be), Coalent will implement additional actions which may include (as appropriate) review monitoring data.	On Trigger	R06_Mattiske Veg Condition Monitoring Spring 2023	Monitoring (R06) does not indicate that unauthorised impacts to <i>B. sphaerocarpa</i> var. <i>dolichostyla</i> are not being avoided (or are unlikely to be).	Not applicable
IBCP 23	Section 3.5	Where monitoring indicates that unauthorised impacts to <i>B. sphaerocarpa</i> var. <i>dolichostyla</i> are not being avoided (or are unlikely to be), Coalent will implement additional actions which may include (as appropriate) review management strategies and implement changes to prevent future occurrences, which will include: <ul style="list-style-type: none"> <li>• Investigation (to identify cause) is completed within 21 days;</li> <li>• 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</li> <li>• Review and upgrade signage/delineation.</li> </ul>	On Trigger	R06_Mattiske Veg Condition Monitoring Spring 2023	Monitoring (R06) does not indicate that unauthorised impacts to <i>B. sphaerocarpa</i> var. <i>dolichostyla</i> are not being avoided (or are unlikely to be).	Not applicable
IBCP 24	Section 3.5	Where monitoring indicates that unauthorised impacts to <i>B. sphaerocarpa</i> var. <i>dolichostyla</i> are not being avoided (or are unlikely to be), Coalent will implement additional actions which may include (as appropriate) review/update of management and monitoring measures/frequency.	On Trigger	R06_Mattiske Veg Condition Monitoring Spring 2023	Monitoring (R06) does not indicate that unauthorised impacts to <i>B. sphaerocarpa</i> var. <i>dolichostyla</i> are not being avoided (or are unlikely to be).	Not applicable
IBCP 25	Section 3.5	Where monitoring indicates that unauthorised impacts to <i>B. sphaerocarpa</i> var. <i>dolichostyla</i> are not being avoided (or are unlikely to be), Coalent will implement additional actions which may include (as appropriate) establish additional <i>B. sphaerocarpa</i> var. <i>dolichostyla</i> in a VEZ to offset additional impacts, at a 35:1 ratio.	On Trigger	R06_Mattiske Veg Condition Monitoring Spring 2023	Monitoring (R06) does not indicate that unauthorised impacts to <i>B. sphaerocarpa</i> var. <i>dolichostyla</i> are not being avoided (or are unlikely to be).	Not applicable



Condition	Reference	Requirement	Timing	Evidence	Assessment	Status
IBCP 26	Section 3.5	Where monitoring indicates that unauthorised impacts to <i>B. sphaerocarpa var. dolichostyla</i> are not being avoided (or are unlikely to be), Covalent will implement additional actions which may include (as appropriate) reporting of monitoring outcomes against Management Targets with Annual Compliance Report to DAWE (as per Condition 12) within 12 months following date of commencement.	On Trigger	R06_Mattiske Veg Condition Monitoring Spring 2023	Monitoring (R06) does not indicate that unauthorised impacts to <i>B. sphaerocarpa var. dolichostyla</i> are not being avoided (or are unlikely to be).	Not applicable
IBCP 27	Section 3.5	Where monitoring indicates that unauthorised impacts to <i>B. sphaerocarpa var. dolichostyla</i> are not being avoided (or are unlikely to be), Covalent will implement additional actions which may include (as appropriate) revise this plan and submit the revised plan for EPBC Act approval.	On Trigger	R06_Mattiske Veg Condition Monitoring Spring 2023	Monitoring (R06) does not indicate that unauthorised impacts to <i>B. sphaerocarpa var. dolichostyla</i> are not being avoided (or are unlikely to be).	Not applicable
IBCP 28	Table 3.2	<p>Management Targets:</p> <ul style="list-style-type: none"> <li>No unauthorised clearing within the Development Envelope or VEZs.</li> <li>No unauthorised access to a VEZ</li> </ul> <p>Management Trigger:</p> <ul style="list-style-type: none"> <li>Vegetation clearing without an authorized internal permit within the Development Envelope, but outside of the VEZs.</li> <li>Unauthorised access by personnel to a VEZ</li> </ul> <p>Corrective Action:</p> <ul style="list-style-type: none"> <li>Report internally as Management Trigger Exceedance in accordance with internal procedures (within 24 hours of identification to the Covalent Environment Manager).</li> <li>Review proximity of potential disturbance within/to VEZ.</li> <li>Should disturbance or potential impact occur to <i>B. sphaerocarpa var. 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.</li> <li>Complete investigation within 21 days of identification</li> <li>Review management strategies and implement changes to prevent future occurrences. Further management measures to be considered will include: <ul style="list-style-type: none"> <li>Review and upgrade VEZ signage/delineation where appropriate.</li> <li>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)</li> <li>Ground disturbance permit training competency training.</li> <li>Undertake rehabilitation of unauthorised clearing (i.e. disturbance from vehicle tracks, vegetation clearing) by appropriately qualified personnel as required, in accordance with rehabilitation procedure.</li> </ul> </li> </ul>	On Trigger	<p>M01_Coalent CAR Evidence Request Response Rev 0</p> <p>E22_2023-2024 MTH Environmental Incident Register from INX</p>	In the reporting period there was no reported unauthorised access to a VEZ.	Not applicable

Condition	Reference	Requirement	Timing	Evidence	Assessment	Status
IBCP 29	Table 3.2	<p>Management Targets: Minimisation of dust emissions Management Trigger: Dust deposition results at a single VEZ site exceed 5 g/m<sup>2</sup> for two consecutive months.</p> <p>Corrective Action:</p> <ul style="list-style-type: none"> <li>Report internally that Management Trigger Exceedance has been met in accordance with internal procedures (within 24 hours of identification to the Covalent Environment Manager).</li> <li>Should disturbance or potential impact occur to <i>B. sphaerocarpa var. 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.</li> <li>Complete investigation within 21 days of identification</li> <li>Investigate and determine improvement strategy.</li> <li>Investigate the cause of the exceedance to determine if it is attributable to proposal related activities.</li> <li>Review dust monitoring program. Determine whether the changes observed in the VEZ are comparable with control monitoring sites.</li> <li>Review dust mitigation measures</li> </ul>	On Trigger	<p>R08_20230915_Max Engineering_Dust Report</p> <p>E42_Dust Event16-01-2023</p> <p>E43_Dust Event23-02-2023</p> <p>E44_Dust Event20-03-2023</p> <p>C06_DWER correspondence - Dust compliance query</p> <p>E12_Dust Suppression FY23</p>	<p>Dust deposition results at a single VEZ site exceeded 5 g/m<sup>2</sup> on four occasions in 2023; 16/01/2023, 23/02/2023, 20/03/2023,26/04/2023.</p> <p>Trigger criteria (two consecutive months) were exceeded three times.</p> <p>Management actions were implemented:</p> <ul style="list-style-type: none"> <li>Exceedance of trigger was reported internally as an incident.</li> <li>Dust suppression at peak times was increased using fresh water.</li> <li>The results of the Spring 2022 Vegetation Health Monitoring were reviewed and found that canopy health at D10 was still below the 20% trigger set out in the FVEMP</li> <li>It was determined that there was no disturbance or potential impact to <i>B. sphaerocarpa var. dolichostyla</i> as a result of Management Trigger exceedance so report to DAWE within two business days of identification with further details within 10 business days was not required.</li> <li>Cause was investigated and found to be traffic on Blue Vein Road</li> <li>Planned road closure of Blue Vein Road was completed 30 March 2023</li> </ul>	Compliant
IBCP 30	Table 3.2	<p>Management Targets: Minimise new weeds introduced to site. Management Trigger: One new weed species sighted during annual monitoring but with limited to negligible coverage.</p> <p>Corrective Action:</p> <ul style="list-style-type: none"> <li>Report internally that Management Trigger Exceedance has been met in accordance with internal procedures (within 24 hours of identification to the Covalent Environment Manager).</li> <li>Should disturbance or potential impact occur to <i>B. sphaerocarpa var. 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.</li> <li>Complete investigation within 21 days of identification</li> <li>Review weed monitoring and control program and amend as required.</li> <li>Response actions to be considered will include the following: <ul style="list-style-type: none"> <li>Review monitoring frequency (quarterly for initial 12 months then annually), adjust accordingly.</li> <li>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.</li> <li>Review suitability of weed monitoring locations, adjust accordingly.</li> <li>Determine whether the changes observed are comparable with control monitoring sites.</li> <li>If after the two consecutive monitoring events, a threshold exceedance has not been identified, resume standard monitoring.</li> <li>Develop and implement of a Weed Management Plan</li> <li>Staff training and awareness to include information on weed species and preventative measures such as vehicle/ weed hygiene procedures.</li> <li>Undertake further weed control</li> </ul> </li> </ul>	On Trigger	R06_Mattiske Veg Condition Monitoring Spring 2023	No new weed species were sighted during annual monitoring (R06).	Not applicable

Condition	Reference	Requirement	Timing	Evidence	Assessment	Status
IBCP 31	Table 3.2	<p>Management Targets: Prevent fires attributed to mining and associated activities.</p> <p>Management Trigger: A fire occurrence within the Development Envelope that impacts on native vegetation.</p> <p>Corrective Action:</p> <ul style="list-style-type: none"> <li>Report internally that Management Trigger Exceedance has been met in accordance with internal procedures (within 24 hours of identification to the Covalent Environment Manager).</li> <li>Should disturbance or potential impact occur to <i>B. sphaerocarpa var. 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.</li> <li>Complete investigation within 21 days of identification</li> <li>Internal audit of fire management plan</li> <li>Review fire mitigation strategies to limit the spread of fire.</li> <li>Staff training and awareness to include information on the prevention and management of fires.</li> <li>Investigate the cause of the exceedance to determine if it is attributable to proposal related activities.</li> </ul>	On Trigger	M01_Coalent CAR Evidence Request Response Rev 0	No fire incidents attributable to proposal in the reporting period.	Not applicable
<b>Monitoring Actions</b>						
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	Not applicable	This was completed in a previous reporting period.	Compliant (complete)
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	Not applicable	Plant condition monitoring of Vegetation Exclusion Zones were undertaken on a quarterly basis for 12 months following the commencement of the Action. The results of the monitoring program informed the future plant condition monitoring requirements, which are presented below in Condition 30 (B).	Compliant (complete)
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	Not applicable	The dataset was reviewed, and plant condition monitoring has been reduced to autumn and spring.	Compliant (complete)
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	R06_Mattiske Veg Condition Monitoring Spring 2023 R03_Coalent Lithium CAR 2023 (Rev 0)	Plant health triggers have not been exceeded.	Not applicable
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	R06_Mattiske Veg Condition Monitoring Spring 2023	The Spring monitoring report contains comparison across species and sites to determine statistically significant differences between VEZ and control sites.	Compliant
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	M01_Coalent CAR Evidence Request Response Rev 0 E45_PEA Order Confirmation OA00047164 E46_Kings Park Science Restoration Research	Testing of control sites with a plant pigment efficiency analyser has not been undertaken. Covalent have purchased PEA, however, have not found a consultant that supports the use of this equipment. Investigations are in progress to find a consultant who can use the PEA to demonstrate that objective can be achieved.	Not applicable
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	Refer to IBCP 34	Refer to IBCP 34	Compliant (complete)
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	R08_20230915_Maxy Engineering_Dust Report	Dust deposition monitoring is currently being undertaken on a monthly basis.	Compliant
IBCP 40	Section 3.6.3	Comparison dust deposition results between VEZs and control sites to determine any proposal related indirect effects.	As required	Refer to IBCP 29	Refer to IBCP 29	Compliant

Condition	Reference	Requirement	Timing	Evidence	Assessment	Status
<b>Restoration Plan</b>						
IBCP 41	Section 4.1	Establish at least 69 <i>B. sphaerocarpa</i> var. <i>dolichostyla</i> plants within the Development Envelope to mitigate significant impacts to the species	Within 10 years of Project commencement	M02_Coalent ACR Evidence Request Response Rev 0	The <i>B. sphaerocarpa</i> var. <i>dolichostyla</i> restoration program has not commenced.	Not applicable
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 (2022)	Refer to IBCP 41	Refer to IBCP 41	Not applicable
IBCP 43	Section 4.3.1	Collect 1,340 <i>Banksia dolichostyla</i> seeds from more than 50 individuals to ensure genetic representation/variation.	Year 1 (2021)	M02_Coalent ACR Evidence Request Response Rev 0	No seed collection events have occurred since the commencement of the Action.	Not applicable
IBCP 44	Section 4.3.1	Germinate 400 <i>Banksia dolichostyla</i> seeds to plant 1-year after collection at a designated nursery.	Year 2+	Refer to IBCP 43	Refer to IBCP 43	Not applicable
IBCP 45	Section 4.3.1	Target <i>Banksia dolichostyla</i> seeds to be broadcast 1-year after collection.	Year 2+	Refer to IBCP 43	Refer to IBCP 43	Not applicable
IBCP 46	Section 4.3.2	Remove the airstrip hardstand.	Year 2 (2022)	M02_Coalent ACR Evidence Request Response Rev 0	As per the Ironcaps Banksia Conservation Plan, land that is currently a part of the abandoned Mt. Holland Mine Site airstrip will become a 'restoration site' for <i>Banksia dolichostyla</i> . The removal of the airstrip hardstand has not commenced at this stage; therefore, no restoration actions have been implemented.	Not applicable
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 (2022)	Refer to IBCP 46	Refer to IBCP 46	Not applicable
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 (2022)	Refer to IBCP 46	Refer to IBCP 46	Not applicable
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 (2022)	Refer to IBCP 46	Refer to IBCP 46	Not applicable
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 (2022)	Refer to IBCP 46	Refer to IBCP 46	Not applicable
IBCP 51	Section 4.3.3	Install guards around seedlings to prevent grazing	Planting	Refer to IBCP 46	Refer to IBCP 46	Not applicable
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	Refer to IBCP 46	Refer to IBCP 46	Not applicable
IBCP 53	Section 4.4	Inspection and maintenance of the fence to ensure exclusion of feral animals	Ongoing	Refer to IBCP 42	Refer to IBCP 46	Not applicable
IBCP 54	Section 4.4	Inspection and maintenance of irrigation infrastructure;	Ongoing	Refer to IBCP 46	Refer to IBCP 46	Not applicable
IBCP 55	Section 4.4	Weed inspection and weed control programmes are required	Ongoing	M01_Coalent CAR Evidence Request Response Rev 0 E08_Weed Control Register	Weed control is undertaken based on inspections of disturbed areas undertaken by personnel.	Compliant
IBCP 56	Section 4.4	Maintenance of Project site fire breaks to minimise risk of fire	Ongoing	Refer to IBCP 41	Refer to IBCP 41	Not applicable
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): <ul style="list-style-type: none"> <li>• additional site preparation works.</li> <li>• additional seed collection, seeding and/or seedling planting; and/or</li> <li>• additional irrigation of seeds and seedlings.</li> </ul> Additional actions will be taken as soon as practical; however, action implementation will occur within 12 months of confirming action requirement.	Overall	Refer to IBCP 41	Refer to IBCP 41	Not applicable

Condition	Reference	Requirement	Timing	Evidence	Assessment	Status
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. sphaerocarpa</i> var. <i>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	Refer to IBCP 41	Refer to IBCP 41	Not applicable
IBCP 59	Table 4.2	Establishment Criteria: Establish at least 69 individuals of <i>Banksia dolichostyla</i> within the Development Envelope within ten (10) years of the implementation of the Action. Establishment criteria of the <i>Banksia dolichostyla</i> are as follows: <ul style="list-style-type: none"> <li>• The health of vegetation is 'Good' (or higher) for at least two (2) consecutive years after irrigation has ceased; and</li> <li>• Reproductive capability is observed.</li> </ul> Contingency Actions: <ul style="list-style-type: none"> <li>• Additional seed collection and seeding/seedling planting.</li> <li>• Soil analysis to determine any soil deficiencies and development of a remediation plan (soil amelioration or further soil preparation trials)</li> <li>• Review of environmental conditions and investigate additional irrigation requirements</li> </ul>	Ongoing	Refer to IBCP 41	Refer to IBCP 41	Not applicable
IBCP 60	Table 4.3	Restoration Schedule <ul style="list-style-type: none"> <li>• Collection of seed material (approximately September to December 2021)</li> <li>• Germination of seedlings in nursery</li> </ul>	Year 1 (2021)	M02_Coalvent ACR Evidence Request Response Rev 0	The IBCP is a standalone document approved under EPBC 2017/7950. The IBCP schedules seed collection for 2021. No seed collection events have occurred since the commencement of the Action. No correspondence or updated approval has been provided by the proponent altering the schedule for the seed collection.	Potentially non-compliant
IBCP 61	Table 4.3	Restoration Schedule <ul style="list-style-type: none"> <li>• Restoration site preparation: <ul style="list-style-type: none"> <li>• fencing of adjacent vegetation</li> <li>• removal of airstrip hard cap</li> <li>• crosshatch deep ripping.</li> </ul> </li> <li>• Site rehabilitation works (approximately March – April): <ul style="list-style-type: none"> <li>• spreading of topsoil/subsoil materials from mining area</li> <li>• establishment and operation of irrigation system</li> </ul> </li> <li>• Planting of seeds and seedlings (early winter)</li> <li>• Twice yearly monitoring of site rehabilitation success (to confirm site suitability)</li> <li>• Weed control of restoration site (if necessary)</li> <li>• Irrigation commences immediately after planting (as required)</li> <li>• <i>B. sphaerocarpa</i> var. <i>dolichostyla</i> monitoring commences every two months.</li> <li>• Collection of additional seed material</li> <li>• Germination of additional seedlings in nursery</li> </ul>	Year 2 (2022)	M02_Coalvent ACR Evidence Request Response Rev 0	The IBCP is a standalone document approved under EPBC 2017/7950. The IBCP restoration program is scheduled to commence in 2022. It has not commenced. No correspondence or updated approval has been provided by the proponent altering the schedule for the restoration program.	Potentially non-compliant
IBCP 62	Table 4.3	Restoration Schedule <ul style="list-style-type: none"> <li>• <i>B. sphaerocarpa</i> var. <i>dolichostyla</i> monitoring continues every four months.</li> <li>• Irrigation continues.</li> <li>• Weed control (if necessary)</li> <li>• Supplementary seeding / seedling planting (if necessary)</li> </ul>	Year 3	Refer to IBCP 61	Refer to IBCP 61	Not applicable
IBCP 63	Table 4.3	Restoration Schedule <ul style="list-style-type: none"> <li>• <i>B. sphaerocarpa</i> var. <i>dolichostyla</i> monitoring continues every six months.</li> <li>• Implementation of contingency actions (if necessary)</li> <li>• Irrigation ceases</li> </ul>	Year 4	Refer to IBCP 61	Refer to IBCP 61	Not applicable

Condition	Reference	Requirement	Timing	Evidence	Assessment	Status
IBCP 64	Table 4.3	Restoration Schedule <ul style="list-style-type: none"> <li>• <i>B. sphaerocarpa</i> var. <i>dolichostyla</i> monitoring continues every six months.</li> <li>• Implementation of contingency actions (if necessary)</li> </ul>	Year 5 +	Refer to IBCP 61	Refer to IBCP 61	Not applicable
IBCP 65	Section 4.7	For each restored individual of <i>B. sphaerocarpa</i> var. <i>dolichostyla</i> (whether from germinated seed or planted seedling) the following information will be recorded annually: <ul style="list-style-type: none"> <li>• survival (number live/dead);</li> <li>• size (height/width);</li> <li>• health condition, similar to the methodology presented in Table 3-5;</li> <li>• reproductive status (flowering/fruitletting/setting seed);</li> <li>• photograph;</li> <li>• GPS location (for future locating); and</li> <li>• observations of health/growth constraints (e.g. grazing, weeds).</li> </ul> The purpose of the environmental monitoring will be to demonstrate if the Establishment Criteria have been met.	Annual	Refer to IBCP 41	Refer to IBCP 41	Not applicable
IBCP 66	Table 4.4	Risk Factor: No or insufficient seed germination. Trigger: <ul style="list-style-type: none"> <li>• Year 1 – 2: • Germination of &lt;80% of seed</li> <li>• Year 2-3: Seed and tube stock survival &lt;70% following one year after germination.</li> </ul> Contingency Action / Response: <ul style="list-style-type: none"> <li>• Review initial germination and survival numbers to determine if further seed collection is required.</li> <li>• If required, re-collect seed and undertake an investigation into potential seed germination failure and survival.</li> <li>• Consider other methods of germination to rehabilitate the species.</li> <li>• Consider alternate treatments.</li> <li>• Liaise with experts (e.g. Botanic Gardens and Parks Authority research division) to develop further trials trial.</li> <li>• Consider supplementary planting of seedlings.</li> </ul>	On trigger	Refer to IBCP 41	Refer to IBCP 41	Not applicable
IBCP 67	Table 4.4	Risk Factor: No or insufficient establishment. Trigger: Year 2-4: <ul style="list-style-type: none"> <li>• Survival of &lt;50% of each year's plants beyond their first summer</li> <li>• Survival of &lt;40% of all plants planted beyond their first three summers.</li> </ul> Contingency Action / Response: <ul style="list-style-type: none"> <li>• Consider other methods of germination to rehabilitate the species.</li> <li>• Consider alternate treatments.</li> <li>• Liaise with experts (e.g. Botanic Gardens and Parks Authority research division) to develop further trials trial.</li> <li>• Consider supplementary planting of seedlings.</li> </ul>	On trigger	Refer to IBCP 41	Refer to IBCP 41	Not applicable

Condition	Reference	Requirement	Timing	Evidence	Assessment	Status
IBCP 68	Table 4.4	<p>Risk Factor: Ongoing survival without irrigation does not occur.</p> <p>Trigger:</p> <p>Year 5+:</p> <ul style="list-style-type: none"> <li>Survival of &lt;30% of all plants planted.</li> <li>&lt;80% of surviving plants are producing viable seed at a rate similar to that of plants in natural populations.</li> <li>Plant survivorship and fully formed (effectively pollinated) fruit production is statistically less than that of the adjacent established <i>B. sphaerocarpa</i> var. <i>dolichostyla</i> in undisturbed vegetation.</li> </ul> <p>Year 10+:</p> <ul style="list-style-type: none"> <li><i>B. sphaerocarpa</i> var. <i>dolichostyla</i> healthy individual average heights &lt; 1 m in height after 10 years</li> </ul> <p>Contingency Action / Response:</p> <ul style="list-style-type: none"> <li>Consider other methods of germination to rehabilitate the species.</li> <li>Consider alternate treatments.</li> <li>Liaise with experts (e.g. Botanic Gardens and Parks Authority research division) to develop further trials trial.</li> <li>Consider supplementary planting of seedlings.</li> </ul>	On trigger	Refer to IBCP 41	Refer to IBCP 41	Not applicable
IBCP 69	Table 4.4	<p>Risk Factor: Clearing impacts to established individuals.</p> <p>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.</p>	On trigger	Refer to IBCP 41	Refer to IBCP 41	Not applicable
IBCP 70	Table 4.4	<p>Risk Factor: Proposal related indirect impacts to established individuals.</p> <p>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.</p>	On trigger	Refer to IBCP 41	Refer to IBCP 41	Not applicable
IBCP 71	Table 5.1	All personnel (including employees, contractors, and/or subcontractors) must be inducted/reinducted on the key requirements of the Ironcaps Banksia Conservation Management Plan prior to commencement of work onsite.	Annual	E07_Mt Holland Environmental Induction	The environmental induction outlines conservation significant flora and the requirement for personnel to adhere to the GDP.	Compliant
IBCP 72	Section 5.2	Funding of the implementation of this Conservation Plan will be provided by Covalent as the proponent for the Project.	Overall	M02_Coalent ACR Evidence Request Response Rev 0	Covalent will fund the implementation of this plan.	Compliant
<b>Reporting</b>						
IBCP 73	Section 5.3	<p><u>Environmental Management</u></p> <p>Report the implementation status of management actions to DAWE annually in the ACR.</p>	Annual	R01_EGLP Annual Compliance Report (2024)(Rev 0) R02_EGLP Annual Compliance Report (2023)(Rev 0)	As part of this annual compliance report to the DCCEEW under EPBC Decision 2017/7950 (R01), this table documents the implementation status of management actions in relation to the Ironcaps Banksia Conservation Plan. The implementation status of the Ironcaps Banksia Conservation Plan for the period 1 January 2022 to 31 December 2022 was reported in 2023 (R02).	Compliant
IBCP 74	Section 5.3	<p><u>Environmental Management</u></p> <p>Report the results of the environmental monitoring to DAWE annually in the ACR.</p>	Annual	R06_Mattiske Veg Condition Monitoring Spring 2023 R08_20230915_Maxy Engineering Dust Report	As part of this annual compliance report to the DCCEEW under EPBC Decision 2017/7950, Appendix I (R06) and Appendix J (R08) contain the monitoring results presented in this table.	Compliant
IBCP 75	Section 5.3	<p><u>Environmental Management</u></p> <p>Report the implementation of the outcomes of any contingency actions (if required) to DAWE annually in the ACR.</p>	As required	Not applicable	No contingency actions were required to be implemented this reporting period.	Not applicable
IBCP 76	Section 5.3	<p><u>Restoration Management</u></p> <p>Report the implementation of restoration actions to DAWE annually in the ACR.</p>	Annual	Not applicable	No restoration actions ( <i>i.e.</i> , seed collection events) have occurred since the commencement of the Action.	Not applicable
IBCP 77	Section 5.3	<p><u>Restoration Management</u></p> <p>Report the results of the environmental monitoring to DAWE annually in the ACR.</p>	Annual	Not applicable	There was no restoration management environmental monitoring in the reporting period.	Not applicable

Condition	Reference	Requirement	Timing	Evidence	Assessment	Status
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	No restoration actions ( <i>i.e.</i> , seed collection events) have occurred since the commencement of the Action.	Not applicable
IBCP 79	Section 5.3	Report any potential/non-compliances or incidents to the DCCEE 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	M02_Coalent ACR Evidence Request Response Rev 0	No potential/non-compliances or incidents related to the Ironcaps Banksia Conservation Plan occurred within the reporting period.	Not applicable



## Appendix F Threatened Fauna Offset Management Plan Compliance Assessment

Table F.3: Threatened Fauna Offset Management Plan Audit Table (Rev 0)

Condition	Reference	Requirement	Timing	Evidence	Assessment	Status
<b>Management Actions</b>						
TFOMP 01	Section 1.2	Clear no more than the approved 386 ha of remnant native vegetation/fauna habitat within the Development Envelope.	Clearing	G01_a2765 CAR23 f01 03 - Fig3 Clearing	Spatial data provided by Covalent Lithium illustrating clearing to-date indicates that 384.7 ha of native vegetation had been cleared within the Development Envelope at this stage (20.5 ha during the reporting period).	Compliant
TFOMP 02	Table 1.2	Implement each approved Fauna Offset Management Plan(s) at least until the end date of the period of effect of the approval.	Upon approval	C02_DWER TFOS Review 20231026	<p>The Fauna Offset Management Plan was submitted to the DCCEEW on 26 March 2021 and approved on 31 March 2021. As of 29 April 2024, Covalent Lithium are awaiting approval of the Fauna Offset Management Plan from the WA Minister for Environment; therefore, the management and monitoring components of the Fauna Offset Management Plan have not commenced at this stage.</p> <p>DWER have provided feedback (26/10/2023) on the offset strategy submission including the requirement to meet new conditions under an additional Ministerial Statement (MS1199) and Covalent are compiling an updated document.</p> <p>The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.</p>	Not applicable
TFOMP 03	Table 2.2	Retain and improve habitat critical to the survival of the Chuditch in-line with the ' <i>Chuditch (Dasyurus geoffroii) National Recovery Plan.</i> '	Ongoing	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 04	Table 2.2	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	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 05	Table 2.2	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	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 06	Table 2.2	Undertake feral cat ( <i>Felis catus</i> ) control activities in-line with the ' <i>Threat Abatement Plan for predation by feral cats.</i> '	Ongoing	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 07	Section 3.2.1	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	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 08	Table 3.2	Detect Chuditch within the acquired offset area(s), between May and July, each year over three (3) consecutive years. Performance and completion criteria include: <ul style="list-style-type: none"> <li>In 0 to 5 years, Chuditch are detected in two (2) annual monitoring events;</li> <li>In 5 to 10 years, Chuditch are in two (2) consecutive annual monitoring events; and</li> <li>In 10 to 15 years, Chuditch are detected in three (3) consecutive annual monitoring events.</li> </ul>	Annual	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 09	Table 3.2	Detect Malleefowl within the acquired offset area(s), each year, over three (3) consecutive years. Performance and completion criteria include: <ul style="list-style-type: none"> <li>In 0 to 5 years, Malleefowl are detected in two (2) annual monitoring events;</li> <li>In 5 to 10 years, Malleefowl are detected in over two (2) consecutive annual monitoring events; and</li> <li>In 10 to 15 years, Malleefowl are detected in over three (3) consecutive annual monitoring events.</li> </ul>	Annual	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable

Condition	Reference	Requirement	Timing	Evidence	Assessment	Status
TFOMP 10	Table 3.2	Detect a recently active (1 to 2 year-old) Malleefowl mound within the acquired offset area(s). Performance and completion criteria include: <ul style="list-style-type: none"> <li>In 0 to 5 years, a recently active Malleefowl mound is detected; and</li> <li>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.</li> </ul>	Annual	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 11	Table 3.2	Detect Chuditch and Malleefowl within 5 km of the acquired offset area(s). Performance and completion criteria include: <ul style="list-style-type: none"> <li>Chuditch and Malleefowl are detected within 5 km, in each five-year period.</li> </ul>	Annual	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 12	Table 3.2	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: <ul style="list-style-type: none"> <li>In 0 to 5 years, vegetation condition is averaged as 'Good' across all baseline assessment locations; and</li> <li>In 5 to 10 and 10 to 15 years, vegetation condition is averaged as 'Very Good' or higher across all baseline assessment locations.</li> </ul> <p><b>Note:</b> 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.</p>	Annual	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 13	Table 3.2	Record hollow fallen trees within the acquired offset area(s). Performance and completion criteria include: <ul style="list-style-type: none"> <li>In 0 to 5 years, suitable hollow fallen trees are recorded at four (4) or more baseline habitat assessment locations; and</li> <li>In 5 to 10 and 10 to 15 years, suitable hollow fallen trees are recorded at eight (8) or more baseline habitat assessment locations.</li> </ul>	Annual	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 14	Table 3.2	Record the presence of prey species of the Chuditch within the acquired offset area(s). Performance and completion criteria include: <ul style="list-style-type: none"> <li>In 0 to 5 years, Chuditch prey species are recorded at greater than six (6) baseline habitat assessment locations; and</li> <li>In 5 to 10 and 10 to 15 years, Chuditch prey species are recorded at eight (8) or more baseline habitat assessment locations.</li> </ul>	Annual	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 15	Table 3.2	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: <ul style="list-style-type: none"> <li>In 0 to 5 years, sufficient leaf litter to build a mound is recorded at four (4) or more habitat assessment locations; and</li> <li>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.</li> </ul>	Annual	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 16	Table 3.2	Record the presence of foraging resources of the Malleefowl within the acquired offset area(s). Performance and completion criteria include: <ul style="list-style-type: none"> <li>In 0 to 5 years, Malleefowl foraging resources are recorded at six (6) or more baseline habitat assessment locations; and</li> <li>In 5 to 10 and 10 to 15 years, Malleefowl foraging resources are recorded at eight (8) or more baseline habitat assessment locations.</li> </ul>	Annual	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 17	Section 3.2.4	Achieve all completion criteria within twenty (20) years from the approval of the Fauna Offset Management Plan.	Ongoing	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
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	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 19	Table 3.5	Install firebreaks within and around the acquired offset area(s) to minimise likelihood of uncontrolled fires impacting on conservation values.	As required	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 20	Table 3.5	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	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable

Condition	Reference	Requirement	Timing	Evidence	Assessment	Status
TFOMP 21	Table 3.5	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	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 22	Table 3.5	Remove waste and unwanted infrastructure.	As required	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 23	Table 3.5	Undertake predator control in consultation with the Department of Biodiversity, Conservation and Attractions and other relevant stakeholders to reduce predation on	As required	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 24	Section 3.3.4	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	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 25	Table 4.3	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: <ul style="list-style-type: none"> <li>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: <ul style="list-style-type: none"> <li>Feral cat trapping as determined by monitoring results</li> <li>Fox baiting as determined by monitoring results</li> <li>Additional habitat quality improvement through weed control, fire management or improved fencing</li> </ul> </li> <li>Continue annual monitoring</li> <li>Assess if increase in monitoring effort is required</li> <li>Undertake research programmes to improve likelihood of species presence</li> </ul>	If trigger criteria met	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 26	Table 4.3	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: <ul style="list-style-type: none"> <li>As per 5 Year Performance Criteria</li> <li>Investigate requirements for additional or alternative offset site through consultation with DAWE and DWER</li> <li>Provide additional or alternative offset, as required by DAWE and DWER, and revise and submit OMP for approval</li> </ul>	If trigger criteria met	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 27	Table 4.3	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: <ul style="list-style-type: none"> <li>As per 10 Year Performance Criteria</li> <li>Investigate feasibility of translocation or reintroduction programmes in consultation with DBCA and specialist groups (National Malleefowl Recovery Team, Perth Zoo)</li> </ul>	If trigger criteria met	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 28	Table 4.3	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: <ul style="list-style-type: none"> <li>Review of impacts on species presence as determined through monitoring</li> <li>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)</li> </ul>	If trigger criteria met	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable

Condition	Reference	Requirement	Timing	Evidence	Assessment	Status
TFOMP 29	Table 4.3	<p>Event: Offsite development activities displace species</p> <p>Trigger: Offsite development approval within 1 km of Offset Site</p> <p>Contingency Action / Response:</p> <ul style="list-style-type: none"> <li>• Review adjacent development activities and consult with proponent to minimise species displacement</li> <li>• Review monitoring programme to detect any potential population changes</li> <li>• Investigate and implement requirement for additional management measures, such as noise barriers, improved fencing or feral predator management controls</li> </ul>	If trigger criteria met	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 30	Table 4.3	<p>Event: Presence of Chuditch during breeding season is not confirmed during monitoring activities</p> <p>Trigger: 0 - 5 Year Performance Criteria not met as per Table 3.2</p> <p>Contingency Action / Response:</p> <ul style="list-style-type: none"> <li>• 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: <ul style="list-style-type: none"> <li>o Feral cat trapping as determined by monitoring results</li> <li>o Fox baiting as determined by monitoring results</li> <li>o Additional habitat quality improvement through weed control, fire management or improved fencing</li> </ul> </li> <li>• Continue annual monitoring</li> <li>• Assess if increase in monitoring effort is required</li> <li>• Undertake research programmes to improve likelihood of species presence and breeding habitat (for example artificial den creation)</li> </ul>	If trigger criteria met	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 31	Table 4.3	<p>Event: Presence of Chuditch during breeding season is not confirmed during monitoring activities</p> <p>Trigger: 5 - 10 and 10 - 15 Year Performance Criteria not met as per Table 3.2</p> <p>Contingency Action / Response:</p> <ul style="list-style-type: none"> <li>• As per 5 Year Performance Criteria</li> <li>• Investigate feasibility of translocation or reintroduction programmes in consultation with DBCA and specialist groups (Perth Zoo)</li> <li>• Investigate requirements for additional or alternative offset site through consultation with DAWE and DWER</li> <li>• Provide additional or alternative offset, as required by DAWE and DWER, and revise and submit OMP for approval</li> </ul>	If trigger criteria met	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable

Condition	Reference	Requirement	Timing	Evidence	Assessment	Status
TFOMP 32	Table 4.3	<p>Event: Presence of recently active Malleefowl mounds is not confirmed during monitoring activities</p> <p>Trigger: 0 - 5 Year Performance Criteria not met as per Table 3.2</p> <p>Contingency Action / Response:</p> <ul style="list-style-type: none"> <li>• 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: <ul style="list-style-type: none"> <li>o Feral cat trapping as determined by monitoring results</li> <li>o Fox baiting as determined by monitoring results</li> <li>o Additional habitat quality improvement through weed control, fire management or improved fencing</li> </ul> </li> <li>• Continue annual monitoring</li> <li>• Assess if increase in monitoring effort is required</li> <li>• Undertake research programmes to improve likelihood of species presence and breeding habitat (for example artificial mound creation)</li> </ul>	If trigger criteria met	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 33	Table 4.3	<p>Event: Presence of recently active Malleefowl mounds is not confirmed during monitoring activities</p> <p>Trigger: 5 - 10 and 10 - 15 Year Performance Criteria not met as per Table 3.2</p> <p>Contingency Action / Response:</p> <ul style="list-style-type: none"> <li>• As per 5 Year Performance Criteria</li> <li>• Investigate feasibility of translocation or reintroduction programmes in consultation with DBCA and specialist groups (National Malleefowl Recovery Team)</li> <li>• Investigate requirements for additional or alternative offset site through consultation with DAWE and DWER</li> <li>• Provide additional or alternative offset, as required by DAWE and DWER, and revise and submit OMP for approval</li> </ul>	If trigger criteria met	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 34	Table 4.3	<p>Event: Presence of species surrounding Site 10 is not confirmed during monitoring activities</p> <p>Trigger: Performance Criteria not met as per Table 3.2</p> <p>Contingency Action / Response:</p> <ul style="list-style-type: none"> <li>• 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: <ul style="list-style-type: none"> <li>o Feral cat trapping as determined by monitoring results</li> <li>o Fox baiting as determined by monitoring results</li> <li>o Additional habitat quality improvement through fire management</li> </ul> </li> <li>• Continue monitoring at current frequency</li> <li>• Assess if increase in monitoring effort is required</li> <li>• Undertake research programmes to improve likelihood of species presence and breeding habitat (for example artificial mound creation)</li> </ul>	If trigger criteria met	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable

Condition	Reference	Requirement	Timing	Evidence	Assessment	Status
TFOMP 35	Table 4.3	<p>Event: Evidence of Chuditch prey species or Malleefowl foraging resources is not confirmed during monitoring activities</p> <p>Trigger: 5 year Performance Criteria not met as per Table 3.2</p> <p>Contingency Action / Response:</p> <ul style="list-style-type: none"> <li>• 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: <ul style="list-style-type: none"> <li>o Feral cat trapping as determined by monitoring results</li> <li>o Additional habitat quality improvement through weed control, fire management or improved fencing</li> </ul> </li> <li>• Continue annual monitoring</li> <li>• Assess if increase in monitoring effort is required</li> <li>• Investigate rehabilitation practices which may improve habitat quality, such as seeding programmes and implement if required</li> </ul>	If trigger criteria met	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 36	Table 4.3	<p>Event: Evidence of Chuditch prey species or Malleefowl foraging resources is not confirmed during monitoring activities</p> <p>Trigger: 10 and 15 year Performance Criteria not met as per Table 3.2</p> <p>Contingency Action / Response:</p> <ul style="list-style-type: none"> <li>• As per 5 Year Performance Criteria</li> <li>• Investigate requirements for additional or alternative offset site through consultation with DAWE and DWER</li> <li>• Provide additional or alternative offset, as required by DAWE and DWER, and revise and submit OMP for approval</li> </ul>	If trigger criteria met	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 37	Table 4.3	<p>Event: Evidence of numerous hollow fallen trees and sufficient leaf litter is not confirmed during monitoring activities</p> <p>Trigger: 5 year Performance Criteria not met as per Table 3.2</p> <p>Contingency Action / Response:</p> <ul style="list-style-type: none"> <li>• Review of monitoring (habitat quality) and management measures to determine any potential contributions and amend as required, which may include: <ul style="list-style-type: none"> <li>o Additional habitat quality improvement through weed control, fire management or improved fencing</li> </ul> </li> <li>• Continue annual monitoring</li> <li>• Assess if increase in monitoring effort is required</li> <li>• Undertake research programmes to improve quality of breeding habitat (for example artificial den or mound creation)</li> </ul>	If trigger criteria met	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable

Condition	Reference	Requirement	Timing	Evidence	Assessment	Status
TFOMP 38	Table 4.3	<p>Event: Evidence of numerous hollow fallen trees and sufficient leaf litter is not confirmed during monitoring activities</p> <p>Trigger: 10 and 15 year Performance Criteria not met as per Table 3.2</p> <p>Contingency Action / Response:</p> <ul style="list-style-type: none"> <li>• As per 5 Year Performance Criteria</li> <li>• Investigate requirements for additional or alternative offset site through consultation with DAWE and DWER</li> <li>• Provide additional or alternative offset, as required by DAWE and DWER, and revise and submit OMP for approval</li> </ul>	If trigger criteria met	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 39	Table 4.3	<p>Event: Vegetation condition is not classified as Very Good during monitoring activities</p> <p>Trigger: 5 year Performance Criteria not met – Vegetation condition is averaged as Good (Keighery scale) across all assessment locations</p> <p>Contingency Action / Response:</p> <ul style="list-style-type: none"> <li>• Review of monitoring and management measures to determine any potential contributions and amend as required, which may include: <ul style="list-style-type: none"> <li>o Additional habitat quality improvement through weed control, fire management or improved fencing</li> </ul> </li> <li>• Continue annual monitoring</li> <li>• Assess if increase in monitoring effort is required</li> <li>• Investigate rehabilitation practices which may improve habitat quality, such as seeding programmes and implement if required</li> </ul>	If trigger criteria met	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 40	Table 4.3	<p>Event: Vegetation condition is not classified as Very Good during monitoring activities</p> <p>Trigger: 10 and 15 year Performance Criteria not met – Vegetation condition is averaged as Very Good (Keighery scale) across all assessment locations</p> <p>Contingency Action / Response:</p> <ul style="list-style-type: none"> <li>• As per 5 Year Performance Criteria</li> <li>• Investigate requirements for additional or alternative offset site through consultation with DAWE and DWER</li> <li>• Provide additional or alternative offset, as required by DAWE and DWER, and revise and submit OMP for approval</li> </ul>	If trigger criteria met	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 41	Table 4.3	<p>Event: Unplanned fires result in vegetation condition and breeding habitat decline</p> <p>Trigger: Unplanned fire identified</p> <p>Contingency Action / Response:</p> <ul style="list-style-type: none"> <li>• Review of monitoring and management measures to determine any improvement and amend as required, which may include: <ul style="list-style-type: none"> <li>o Maintenance or improvement to fire management tracks</li> <li>o Prescribed burns</li> <li>o Weed control</li> <li>o Involvement in regional fire management measures with local shire, DFES and DBCA to prevent recurrence</li> </ul> </li> <li>• Review vegetation condition monitoring programme to determine if amendments are required</li> </ul>	If trigger criteria met	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable

Condition	Reference	Requirement	Timing	Evidence	Assessment	Status
TFOMP 42	Table 4.3	<p>Event: Prescribed burns detrimentally impact vegetation condition and breeding habitat decline</p> <p>Trigger: Prescribed burn considered necessary</p> <p>Contingency Action / Response:</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• 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</li> <li>• Review Fauna habitat assessment monitoring programme to determine if amendments are required</li> </ul>	If trigger criteria met	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 43	Table 4.3	<p>Event: Unauthorised site access or grazing result in vegetation condition and breeding habitat decline</p> <p>Trigger: Evidence of unauthorised access or stock grazing is identified</p> <p>Contingency Action / Response:</p> <ul style="list-style-type: none"> <li>• Review of monitoring and management measures to determine any improvement and amend as required, which may include: <ul style="list-style-type: none"> <li>o Repair, maintenance or improvement to perimeter fencing and gates</li> <li>o Consultation with adjacent landowners to exclude stock</li> </ul> </li> <li>• Review vegetation condition monitoring programme to determine if amendments are required</li> </ul>	If trigger criteria met	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 44	Table 4.3	<p>Event: Increase in weed invasion result in vegetation condition and breeding habitat decline</p> <p>Trigger: Vegetation condition monitoring identifies an increase in weed species and cover</p> <p>Contingency Action / Response:</p> <ul style="list-style-type: none"> <li>• Review of monitoring and management measures to determine any improvement and amend as required, which may include: <ul style="list-style-type: none"> <li>o Weed spraying programmes</li> <li>o Targeted weed controls programmes</li> <li>o Review and improvement of vehicle entry and hygiene procedures</li> </ul> </li> <li>• Review vegetation condition monitoring programme to determine if amendments are required</li> </ul>	If trigger criteria met	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 45	Table 4.3	<p>Event: Land unavailable for purchase</p> <p>Trigger: Land unavailable for purchase</p> <p>Contingency Action / Response:</p> <ul style="list-style-type: none"> <li>• If acquisition is delayed, revised timeframes will be confirmed with DAWE and DWER.</li> <li>• If acquisition is unsuccessful, alternative offset sites will be proposed and revised OMP submitted</li> </ul>	If trigger criteria met	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable



Condition	Reference	Requirement	Timing	Evidence	Assessment	Status
TFOMP 46	Table 4.3	Event: <ul style="list-style-type: none"> <li>Conversion to conservation estate is unsuccessful</li> <li>Exclusion of exploration, mining and grazing is unsuccessful</li> </ul> Trigger: Conversion to conservation reserve does not occur within five years following site acquisition Contingency Action / Response: <ul style="list-style-type: none"> <li>If conservation reserve creation is delayed, revised timeframes will be confirmed with DAWE and DWERs.</li> <li>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</li> </ul>	If trigger criteria met	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 47	Table 6.1	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	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
<b>Monitoring Actions</b>						
TFOMP 48	Section 5.1	Inspect and, if required, maintain perimeter fencing of the acquired offset area(s)	As required	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 49	Section 5.1	Inspect and, if required, control introduced flora (weed) cover and density within the acquired offset area(s)	As required	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 50	Section 5.1	Inspect and, if required, control feral animal occurrences and frequency within the acquired offset area(s)	As required	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 51	Section 5.1	Inspect and, if required, maintain firebreaks of the acquired offset area(s)	As required	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 52	Section 5.1	Inspect and, if required, control any unauthorised access incidents and/or livestock grazing within the acquired offset area(s)	As required	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 53	Section 5.2	Undertake vegetation monitoring within the acquired offset area(s) to determine the following: <ul style="list-style-type: none"> <li>Dominant three (3) vascular flora species in each strata;</li> <li>Percent cover of native vegetation in each strata;</li> <li>Percent cover of bare ground in each strata;</li> <li>Percent cover of leaf litter;</li> <li>Percent cover of introduced flora species</li> <li>Flora species composition in each strata;</li> <li>Condition/health of each strata; and</li> <li>Disturbances (if any), disturbance type and their estimated frequency;</li> </ul>	Annual	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 54	Section 5.3	Undertake fauna habitat assessments within the acquired offset area(s) to determine the following: <ul style="list-style-type: none"> <li>Number of hollow fallen trees;</li> <li>Presence of prey species of the Chuditch;</li> <li>Sufficient leaf litter to be utilised by Malleefowl to build a mound; and</li> <li>Presence of foraging resources of the Malleefowl.</li> </ul>	Annual	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 55	Section 5.4	Undertake Chuditch presence monitoring within the acquired offset area(s) as follows: <ul style="list-style-type: none"> <li>Monitor in Chuditch breeding season (May to July);</li> <li>Use cameras at static locations with a minimum of two arrays of 20 cameras with 200 m between cameras as per Rayner <i>et al.</i> (2011); and</li> <li>Record opportunistic evidence of Chuditch, including tracks, scats, scratching and/or sightings.</li> </ul>	Annual	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable

Condition	Reference	Requirement	Timing	Evidence	Assessment	Status
TFOMP 56	Section 5.4	Undertake Malleefowl presence monitoring within the acquired offset area(s) as follows: <ul style="list-style-type: none"> <li>Monitor in Malleefowl mound-building season (September to December);</li> <li>Use LiDAR imagery to identify potential mounds with field verification or field verification of previously identified mounds;</li> <li>Record opportunistic evidence of Malleefowl, including additional mounds, feathers, tracks, scats, scratching and/or sightings;</li> <li>Align fauna monitoring with the with the 'National Malleefowl Monitoring Manual' (2019) including mound activity status; and</li> <li>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.</li> </ul>	Annual	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
TFOMP 57	Section 5.4	Provide an estimate of local population numbers for Chuditch, Malleefowl and feral animals based on evidence collated and temporal analysis.	Annual	Refer to TFOMP 02	The implementation of the TFOMP will not commence until it is approved by both DCCEEW and DWER.	Not applicable
<b>Reporting</b>						
TFOMP 58	Section 7.1	Report the progress of the acquisition of the offset area(s).	Annual	R12_Threatened Fauna Offset Management Plan	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 geoffroii</i> ). The offset property is located in Skeleton Rock, within the Shire of Yilgarn in WA. The property itself is 1,788 ha, consisting of 1,510 ha of woodland and shrubland fauna habitat and 135 ha of granite habitat. The remaining 143 ha of area is cleared land which Covalent Lithium will utilise for fencing and firebreaks.	Compliant
TFOMP 59	Section 7.1	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	M02_Coalent ACR Evidence Request Response Rev 0	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.	Compliant
TFOMP 60	Section 7.1	Report the implementation status of management actions.	Annual	R01_EGLP Annual Compliance Report (2024)(Rev 0)	This ACR (R01) reports that the TFOMP will be implement once it is approved by both DCCEEW and DWER.	Compliant
TFOMP 61	Section 7.1	Report the results of the environmental monitoring.	Annual	M02_Coalent ACR Evidence Request Response Rev 0	No environmental monitoring has been undertaken.	Compliant
TFOMP 62	Section 7.1	Report the implementation of the outcomes of any contingency actions (if required).	As required	M02_Coalent ACR Evidence Request Response Rev 0	No contingency actions have been taken.	Compliant
TFOMP 63	Section 7.1	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	M02_Coalent ACR Evidence Request Response Rev 0	No potential/non-compliances or incidents related to the Threatened Fauna Offset Management Plan occurred within the reporting period.	Not applicable

## Appendix G Malleefowl Monitoring 2022-23

## Appendix H Chuditch Monitoring 2023

## Appendix I    Vegetation Condition Monitoring Spring 2023

## **Appendix J    Fauna Pre-clearance Survey March 2023**

## **Appendix K    Introduced Predator Monitoring 2022**

## Appendix L    Dust Report 2023



## Appendix M Evidence Register

**Table M.4: Evidence Register**

Code	Reference	Author	Electronic	Hard-copy	Topic
C01	C01_Notice of EPBC Act Approval 2017_7950 2022 Annual Compliance Report for Covalent Earl Grey Lithium Project _SEC_OFFICIAL_	DCCEEW	X		Email acknowledgement 23/10/2023 from DCCEEW on receipt of 2023 ACR.
C02	C02_DWER TFOS Review 20231026	DWER	X		DWER review of the TFOMP 26/10/2023
C03	C03_MS1199 - TFEMP Rev 5 approval	DWER	X		DWER approval letter for the TFEMP under MS1199
C04	C04_MS1199 - FVEMP Rev 7 approval	DWER	X		DWER approval letter for the FVEMP under MS1199
C05	C05_Covalent Reconciliation of clearing	Covalent	X		Correspondence from Covalent to JBS&G auditor clarifying that the clearing figures in G01 are correct in December 2022 plus the March 2023 new clearing.
C06	C06_DWER correspondence - Dust compliance query	DWER	X		Letter from Covalent to DWER (incorrect address) notifying DWER of dust deposition trigger criteria exceedance.
C07	C07_20230713 Covalent Lithium EGLP EPBC Decision 20177950 Approval - Notice to DCCEEW	Covalent	X		Condition 13 notification dated 13/07/2023 to DCCEEW of potential non-compliance with conditions 6 and 12.
C08	C08_2017_7950 - 240313 - Show cause	DCCEEW	X		DCCEEW show cause notice dated 21/03/2024 regarding potential non-compliances with conditions 6, 12 and 14.
C09	C10_2017_7950 CR 23 003265 240502 Earl Grey Lithium Project Close out letter_non-compliant_NFA C09_Covalent Response to DCCEEW Show Cause	DCCEEW	X		DCCEEW warning letter dated 06/06/2024 in regard to non-compliances with conditions 6, 12 and 14.
E01	E01_Website Screenshot 2024-06-10	JBS&G	X		Screenshot of Covalent website:

Code	Reference	Author	Electronic	Hard-copy	Topic
					<a href="https://www.covalentlithium.com/sustainability">https://www.covalentlithium.com/sustainability</a>
E02	E02_Lightning Protection Infrastructure	Covalent	X		Photo of Lightning Protection Infrastructure
E03	E03_GDP60_V7_SWRL Fauna Preclearance	Covalent	X		Fauna Pre-clearance Survey Form for GDP0060_V7 (16/03/2023)
E04	E04_Exclusion Signage 1	Covalent	X		Photo of EEZ Signage "Please Keep Out"
E05	E05_Exclusion Signage 2	Covalent	X		Photo of EEZ Signage "Please Keep Out"
E06	E06_Exclusion Signage 3	Covalent	X		Photo of Protected Vegetation Zone "Start"
E07	E07_Mt Holland Environmental Induction	Covalent	X		Environmental Section of the Mt Holland Induction
E08	E08_Weed Control Register	Covalent	X		Register of weed control undertaken in 2023
E09	E09_Ministerial Statement MS1199	EPA	X		Ministerial Statement 1199 Earl Grey Lithium Project (Significant Amendment) dated 23/11/2022
E10	E10_Weed Hygiene Register	Covalent	X		Weed hygiene register for vehicles and mobile equipment
E11	E11_Example Vehicle Hygiene Record	Covalent	X		Vehicle hygiene inspection record for Cat Model 980 on 31/10/2023
E12	E12_Dust Suppression FY23	Covalent	X		Register of water use for dust suppression in 2023 FY
E13	E13_Truck Example Fire Suppression System Photo 1	Covalent	X		Photo of Fire Suppression System on Truck
E14	E14_Dozer Example Fire Suppression System Photo 1	Covalent	X		Photo of Fire Suppression System on Dozer
E15	E15_Dozer Example Fire Suppression System Photo 2	Covalent	X		Photo of Fire Suppression System on Dozer
E16	E16_Fire Equipment Service register	Covalent	X		Service Register for Mine Site Fire Equipment
E17	E17_Fire Extinguisher Workshop Vehicle Example	Covalent	X		Photo of Fire Extinguisher in Workshop Vehicle

Code	Reference	Author	Electronic	Hard-copy	Topic
E18	E18_Fire Extinguisher Workshop Vehicles Tag	Covalent	X		In service tag on Fire Extinguisher in Workshop Vehicles
E19	E19_Fire Extinguisher Workshop	Covalent	X		Photo of Fire Extinguisher in Workshop Building
E20	E20_Fire Hydrants Hose Reels	Covalent	X		Schematic of locations of fire hydrants and hose reels on mine site
E21	E21_Fauna Register as at 240531	Covalent	X		Register of fauna conservation significant fauna interactions and all fauna injuries and fauna fatalities.
E22	E22_2023-2024 MTH Environmental Incident Register from INX	Covalent	X		Covalent Environmental Incident Register for 2023
E23	E23_Landfill inspection Nov 2023	Covalent	X		Landfill inspection record from Nov 2023
E24	E24_Putrescible skip	Covalent	X		Photo of Putrescible waste skip
E25	E25_2023_MtHollandGDPAwarenessScript	Covalent	X		Ground Disturbance Permit Training Online Induction Script
E26	E26_Landfill Fencing	Covalent	X		Photo of Landfill Fencing
E27	E27_Landfill Fencing	Covalent	X		Photo of Landfill Fencing
E28	E28_Landfill Fencing	Covalent	X		Photo of Landfill Fencing
E29	E29_GDP0060_V9_SWRL_ExistingTSF2	Covalent	X		South Waste Rock Landform footprint (SWRL) Ground Disturbance Permit No. 60 V9
E30	E30_GDP0071_TSFCOnstruction_V1	Covalent	X		TSF Construction Ground Disturbance Permit No. 71 V1
E31	E31_DMIRS 2023_Fauna Egress	Covalent	X		Covalent Fauna Egress Matting Plan for Lined Ponds [RA-484-5594] (In line with DMIRS ENV-MEB-212 Fauna Egress Matting and Ramps)
E32	E32_20230321_Environmental Inspection	Covalent	X		Environmental Inspection Record of LV Wash Bay on 21/03/2023
E33	E33_20230903_Environmental Inspection	Covalent	X		Environmental Inspection Record of Village on 03/09/2023
E34	E34_20230116 TBT Reporting Fauna Sightings	Covalent	X		Toolbox talk on Reporting Fauna Sightings

Code	Reference	Author	Electronic	Hard-copy	Topic
E35	E35_20230823 Reporting Fauna Sightings	Covalent	X		Toolbox talk on Reporting Fauna Sightings
E36	E36_20230912 TBT Site Speed Limits	Covalent	X		Toolbox talk on TBT Site Speed Limits
E37	E37_20231203 TBT Protect Our Malleefowl	Covalent	X		Toolbox talk on TBT Protect Our Malleefowl
E38	E38_20230418 Introduced Predator Control	Covalent	X		Toolbox talk on Introduced Predator Control
E39	E39_20230809 TBT Malleefowl Breeding Season	Covalent	X		Toolbox talk on TBT Malleefowl Breeding Season
E40	E40_20230903 TBT Snake Awareness	Covalent	X		Toolbox talk on TBT Snake Awareness
E41	E41_20230907 TBT Threatened Species Day	Covalent	X		Toolbox talk on TBT Threatened Species Day
E42	E42_Dust Event16-01-2023	Covalent	X		Incident report for exceedance of dust deposition trigger criteria 16/01/2023
E43	E43_Dust Event23-02-2023	Covalent	X		Incident report for exceedance of dust deposition trigger criteria 23/02/2023
E44	E44_Dust Event20-03-2023	Covalent	X		Incident report for exceedance of dust deposition trigger criteria 20/03/2023
E45	E45_PEA Order Confirmation OA00047164	John Morris Group	X		Order confirmation for PEA analyser
E46	E46_Kings Park Science Restoration Research	King's Park	X		Kings Park Research Proposal including investigation of the viability of the use of the PEA
G01	G01_a2765 CAR23 f01 03 - Fig3 Clearing	CAD Resources	X		Figure 3 for EGLP CAR 2023 showing Clearing within the Development Envelope
G02	G02_CAR23 Calcs 20240429	CAD Resources	X		Calculations of Priority listed flora impacted by the proposal
M01	M01_Coalvent CAR Evidence Request Response Rev 0	M01	X		Covalent response to JBS&G's request for evidence to undertake the compliance assessment for 2023 associated with 2023 MS1199 Compliance Assessment Report.
M02	M02_Coalvent ACR Evidence Request Response Rev 0	JBS&G / Covalent	X		Covalent response to JBS&G's request for evidence to undertake the compliance assessment for 2023/24 EPBC Annual Compliance Report.

Code	Reference	Author	Electronic	Hard-copy	Topic
P01	P01_COV-000-EN-PRO-0012.2.IFU GDP Procedure	Covalent	X		Ground Disturbance Permit (GDP) Procedure Rev 2 (11/03/2022)
P02	P02_COV-M000-EN-PRO-0001 Fauna Management Trench Clearing Procedure	Covalent	X		Covalent Fauna Management and Trench Clearing Procedure Rev 1 (22/08/2022)
P03	P03_COV-M000-EN-PRO-0003.1.IFU Landfill Facility Management Procedure	Covalent	X		Mt Holland Landfill Facility Management Procedure Rev 1 (27/03/2024)
R01	R01_EGLP Annual Compliance Report (2024)(Rev 0)	JBS&G	X		This Report
R02	R02_EGLP Annual Compliance Report (2023)(Rev 0)	JBS&G	X		Previous EPBC 2017/7950 Annual Compliance Report for the period 1 January 2022 to 31 December 2022.
R03	R03_Coalvent Lithium CAR 2023 (Rev 0)	Covalent	X		Covalent Lithium Pty Ltd Earl Grey Lithium Project Compliance Assessment Report 2023 (Ministerial Statement 1199) Rev 0
R04	R04_20230725 ECO 2022_23 Malleefowl Monitoring	ecoscape	X		ecoscape Covalent Lithium 2022-23 Malleefowl Monitoring (25/07/2023)
R05	R05_20240216 ECO 2023 Mt Holland Chuditch Monitoring	ecoscape	X		ecoscape Covalent Lithium 2023 Mt Holland Chuditch Monitoring (16/02/2024)
R06	R06_Mattiske Veg Condition Monitoring Spring 2023	Mattiske	X		Earl Grey Lithium Project Vegetation Condition Monitoring Spring 2023 V2 (08/12/2023)
R07	R07_20230720_ECO_2022 Predator Monitoring	ecoscape	X		2022 Predator Monitoring
R08	R08_20230915_Maxy Engineering Dust Report		X		Maxy Engineering Covalent Lithium dust report – 2022-2023 Version 2
R09	R09_Terrestrial Fauna Management Plan Rev 5	Covalent	X		Covalent Lithium Earl Grey Lithium Project Terrestrial Fauna Environmental Management Plan Rev 5 (29/11/2022)
R10	R10_Ironcaps Banksia Conservation Plan (Rev2)	Covalent	X		Covalent Lithium Earl Grey Lithium Project Conservation Plan for Ironcaps Banksia ( <i>Banksia sphaerocarpa</i> var. <i>dolichostyla</i> ) EPBC Approval 2017/7950 (Revision 2) 01/02/2021.

Code	Reference	Author	Electronic	Hard-copy	Topic
R11	R11_Flora and Vegetation Management Plan	Covalent	X		Covalent Lithium Earl Grey Lithium Project Flora and Vegetation Environmental Management Plan Rev 7 (20/07/2022)
R12	R12_Threatened Fauna Offset Management Plan	Covalent	X		Covalent Lithium Earl Grey Lithium Project Threatened Fauna Offset Management Plan EPBC Approval 2017/7950 and EPA Ministerial Statement 1118 (Revision 0) 26/03/2021.
R13	R13_Covalent Lithium CAR 2022 (Rev 0)	JBS&G	X		Covalent Lithium Pty Ltd Earl Grey Lithium Project Compliance Assessment Report (Ministerial Statement 1199) Rev 0 (30 April 2024)
R14	R14_COV-0000-EN-PLN-0001_1 Construction EMP	Covalent	X		Covalent Lithium Earl Grey Lithium Project Construction Environmental Management Plan Rev 1 (24/09/2021)
R15	R15_COV-M000-HS-PLN-0005.1.IFU MTH Emergency Management Plan	Covalent	X		Mt Holland Emergency Management Plan Rev 1 (30/09/2023)
R16	R16_20230425_APAS_Feral Cat Control Program Report	Alpha Pest Animal Solutions	X		ALPHA Pest Animal Solutions report on feral cat control at Covalent Lithium Mt Holland April 2023
R17	R17_IntroducedPredatorMonitoring 2021	ecoscape	X		2021 Predator Monitoring


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