

Appendix 8
Response to EPA s40(2)(a)
Request for Additional Information
(March 2022)



25 March 2022

Dr Robert Hughes
Director EPA Services
Environmental Protection Authority
Prime House
8 Davidson Terrace
JOONDALUP WA 6027

C/o: Aidan Walsh
EIA South Branch, EPA Services
Department of Water and Environmental Regulation
by email: Aidan.Walsh@DWER.wa.gov.au

Dear Robert

**EARL GREY LITHIUM PROJECT - REVISED PROPOSAL (EPA ASSESSMENT NO. 2315):
REQUEST FOR ADDITIONAL INFORMATION**

I refer to your correspondence of 9th March 2022 requesting additional information for the Earl Grey Lithium Project Revised Proposal submitted for assessment to the Environmental Protection Authority (EPA) on 30 August 2021.

Previous correspondence regarding the Revised Proposal since submission of the Environmental Review Document (ERD) include:

- 27 October 2021, EPA provided a decision notice stating the Revised Proposal was to be assessed at the level of 'Referral Information' with a 2-week public review period.
- 12 November 2021, EPA issued a Section 40(2)(a) Notice requesting additional information.
- 23 December 2021, Covalent responded with a revised Environmental Review Document (Revision 1), addressing the EPA's request for additional information.
- 9 March 2022, EPA has requested a second round of additional information.

Covalent has addressed the EPA's request for additional information dated 12 November 2021 in its response dated 23 December 2021. This second round of additional information requested on 9 March 2022 raises new matters which we believe should have been raised in November 2021. In addition, this latest request includes matters which have been with the EPA for a period now exceeding 6 months (since the 30 August 2021 submission of the Environmental Review Document).

Notwithstanding, Covalent Lithium has considered the latest additional information requests



and has revised its Environmental Review Document as outlined by Table 1 (attached). A copy of the revised Environmental Review Document (Revision 2) is also appended to this letter. Furthermore, the EPA has requested that Covalent resubmit a section 38 referral form for the revised Project, in response to this, Covalent has provided and addressed the new s38 Part B information requirements in Table 2 attached.

Covalent believes the EPA should now be able to progress the environmental assessment of the Revised Proposal, enabling the release of the Environmental Review Document for the required 2-week public comment period. Given the delays experienced in processing the application, Covalent is keen to understand the anticipated schedule for completion of the assessment for the revised proposal as this approval has now become critical to the project schedule.

Please contact me by telephone on 0409 365 133 or by email at Anthea.Pate@CovalentLithium.com, for any further enquiries.

Yours sincerely

DocuSigned by:

Anthea Pate
FD88FDB8335F44E

Manager, Approvals, Environment and Safety


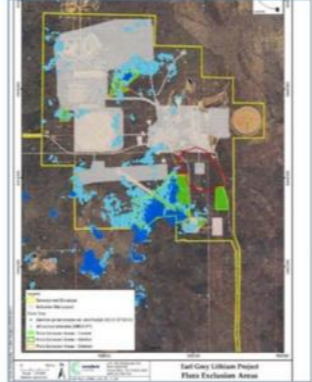
Copy to:

1. Robert Hughes, Director, EPA Service
2. Natalie McAlpine, Acting Manager, Environmental Impact Assessment

Attachments:

1. Covalent Lithium Pty Ltd (2022) Earl Grey Lithium Project Revised Proposal: Environmental Review Document. Report prepared by Hawkins S of Globe Environments Australia Pty Ltd for Strategen-JBS&G (JBS&G Australia Pty Ltd) on behalf of Covalent Lithium Pty Ltd. Revision 2. March 2022.
2. Table 1 - *Environmental Protection Act 1986* (WA) Request for Further Information
3. Table 2 – EPA Form: Part B - Assessment of Environmental Impacts for Significant Amendments Only

TABLE 1 - ENVIRONMENTAL PROTECTION ACT 1986 (WA) REQUEST FOR FURTHER INFORMATION – (RFI 2)

EPA SERVICES ADVICE	COVALENT LITHIUM RESPONSE
<p>1. Maps</p> <p>Comments</p> <p>The Conceptual Infrastructure Layout (Figure 1-1b, below) is missing an area that is present in subsequent maps (e.g. Figure 1-4a below, difference circled in red). This should be corrected on all maps throughout the Draft ERD.</p> <div style="display: flex; justify-content: space-around;"> <div data-bbox="774 667 1071 1052"> <p>Figure 1-1b</p>  </div> <div data-bbox="1115 667 1406 1052"> <p>Figure 1-4a</p>  </div> </div> <p>The figures showing the proposed changes to flora exclusion areas (Figures 1-4a and 1-4b) are difficult to interpret because the location points of the plants and, in some cases, the boundary line of the development envelope, obscure the shading and lines being used to show the proposed changes to the exclusion zones. These figures should be revised to more clearly show the boundaries proposed for change. In addition to the flora species, vegetation unit W17 should be shown on the maps.</p> <p>The figures showing recorded locations of significant flora (Figures 5-2a-5-2e) require revision to clearly show the locations of significant flora in relation to the revised proposal layout.</p> <p>Figures 5-2b and 5-2d are unreadable as the location points of some plants are obscuring others, and the shading of the points is too similar to be able to determine different species. It is recommended that they are split into multiple maps showing a smaller number of species on each map. Consideration should also be given to labelling point locations of species that only have a few records and are difficult to see (e.g. <i>Orianthera exilis</i> in Figure 5-2c).</p> <p>Vegetation type W17 was highlighted as significant in the original EPA assessment report (EPA 2019). It is not labelled in Figure 5-3a and its distribution cannot be determined using shading due to the</p>	<p>RESPONSE TO COMMENTS:</p> <p>Covalent Lithium acknowledges Figure 1-1b <i>Conceptual Infrastructure Layout</i> had a minor difference in layout compared to other figures within the Environmental Review Document (ERD). This minor difference is not of substantive environmental consequence as all environmental impacts to this area were captured in the impact tables for flora taxa, vegetation units and fauna habitat. As requested, Figure 1-1b within the ERD has been updated to amend the Indicative Site Layout. No other figures require amendment.</p> <p>Covalent Lithium notes Figure 5-3a <i>Vegetation Units</i> does not have a map label for Vegetation Unit W17. The absence of the map label is not of substantive environmental consequence, as neither the disturbance footprint for Approved Proposal nor the Revised Proposal coincide with Vegetation Unit W17. As requested, Figure 5-3a within the ERD has been amended to add a single map label for Vegetation Unit W17.</p> <p>Figures for Flora Taxa have been provided in 5 separate maps, identifying 'Threatened' flora taxa (1 map) and DBCA-classified 'priority' flora taxa (4 maps, one each for DBCA-P1 to DBCA-P4). As many of the flora taxa recorded co-exist in the same spatial areas, it is fundamentally not possible to avoid overlap of flora taxa icons and shading on the figures. The overarching purpose of the figures is to depict the general spatial locations of the flora taxa recorded; with the figures supplemented by impact tables within the ERD which specify the number of individuals of each flora taxon both within and outside of both the Development Envelope and the Indicative Site Layout. The presentation of the figures for flora taxa is consistent with the EPA's own figures used in assessment of the Approved Proposal (EPA Report 1651, October 2019) whereby the EPA had similarly notable (but unavoidable) overlap of the flora taxa icons. Whilst noting the above, Covalent Lithium has amended Figure 5-2b (DBCA-P1) into 2 figures (Figure 5-2b(i) and Figure 5-2b(ii)) with a split of the flora taxa (with 8 flora taxa on Sheet 1, and 9 flora taxa on Sheet 2) to reduce the number of flora taxa shown on this map. The icon colouring has also been adjusted to present greater colour variation between flora taxa, and with the icon layering adjusted such that flora taxa with lower abundance are placed above the flora taxa of greater abundance.</p> <p>Covalent Lithium provided all spatial data for flora taxa from the biological field surveys with the Referral of the Revised Proposal in August 2021. This spatial data will enable the EPA to consider the finer detail of the abundance and spatial distribution of each flora taxon, if such finer detail for any particular flora taxon is necessary beyond the scales presented in the flora mapping or the data presented in the impact tables.</p> <p>Covalent Lithium is disappointed the EPA has had this mapping in the ERD since August 2021 (Revision 0), and only now in March 2022 is raising concern; being > 6 months after submission. We believe any concern should have been raised in November 2021 as part of the prior s40(2)(a) Notice.</p> <p>RESPONSE TO ACTIONS:</p> <p>Covalent Lithium has updated Figure 1-1b within the ERD to amend the Indicative Site Layout.</p> <p>Covalent Lithium has updated Figure 5-3a within the ERD to add a label for Vegetation Unit W17.</p>

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	<p>similarity of the shades used for many of the vegetation units. This Figure should be revised so the location of vegetation unit W17 in relation to the indicative layout of the revised proposal is clearly discernible</p> <p>Action/s</p> <p>Address the above comments and provide revised the maps within the ERD.</p>	<p>Covalent Lithium has updated Figure 5-2b within the ERD to split into 2 figures to reduce the number of flora taxa shown, with adjustments also to icon colouring and icon layering.</p>
2. Table 5-1	<p>Comments</p> <p>Table 5-1 quantifies the impacts of the revised proposal compared to the original approved proposal. The first row of Table 5-1 shows no direct impacts on individuals of <i>Banksia sphaerocarpa</i> var. <i>dolichostyla</i> in either the original approval or the revised proposal, and up to 68 individuals indirect impacted. The original approved proposal was expected to result in the direct loss of 2 individuals, and indirect loss of 67 individuals (EPA 2019, p. 17).</p> <p>Action/s</p> <p>The discrepancy between Table 5-1 and the impacts assessed in the original approval should be explained, or Table 5-1 revised.</p>	<p>RESPONSE TO COMMENTS:</p> <p>The ERD text in Section 4.3 <i>Mitigation Hierarchy</i> (Page 67) and in Section 5 <i>Flora and Vegetation</i> (Page 85) outlines that whilst the Statement 1118 approval and the EPBC Decision 2017/7950 approval authorise the removal of up to 2 individuals of the 'Threatened' flora taxon <i>Banksia sphaerocarpa</i> var. <i>dolichostyla</i>, the current Indicative Site Layout for the Revised Proposal avoids all individuals of this taxon. Similarly, Table 5-2a identifies nil individuals of this taxon coinciding with the Indicative Site Layout. Accordingly, this matter has been previously identified and addressed within the document text and Table 5-1 is correct (i.e. no discrepancy exists). Whilst noting the above, Covalent Lithium has amended the ERD to repeat this text information as a footnote to Table 5-1.</p> <p>The EPA should note that although the Indicative Site Layout currently avoids individuals of this taxon, future changes to the Indicative Site Layout may require 2 individuals of this taxon to be removed (as authorised). To this extent, Covalent Lithium does not seek any change to the current authorisation to remove the 2 individuals of this taxon under the implementation conditions of the Statement 1118 approval or the EPBC Decision 2017/7950 approval.</p> <p>RESPONSE TO ACTIONS:</p> <p>No change to the ERD is considered necessary. Whilst noting this, Covalent Lithium has amended the ERD to repeat the previous information addressing this matter as a footnote to Table 5-1.</p>
3. Changes to conservation significant flora exclusion areas	<p>Comments</p> <p>Additional information is required to support the proposal to remove some exclusion zones and replace them with others. The current information only discusses the changes in relation to the proportion of <i>Banksia sphaerocarpa</i> var. <i>dolichostyla</i> and <i>Microcorys elatoides</i> that will be included in the exclusion zones. However, the conservation of vegetation community W17 was part of the purpose of the exclusion zones (EPA 2019, p. 17).</p> <p>Actions</p> <p>A table quantifying the numbers and proportions of all significant flora and all vegetation units protected by the approved exclusion zones and the proposed exclusion areas should be provided.</p>	<p>RESPONSE TO COMMENTS:</p> <p>Covalent Lithium notes Figure 1-4a and Figure 1-4b <i>Flora Exclusion Areas</i> does not identify Vegetation Unit W17. Neither the Approved Proposal nor the Revised Proposal coincide with Vegetation Unit W17 (nil impact); and accordingly, this matter is not of substantive environmental consequence.</p> <p>Covalent Lithium has amended Figure 1-4a and Figure 1-4b within the ERD to identify the location of Vegetation Unit W17. Covalent Lithium has additionally amended the ERD text in Section 1.2 <i>The Revised Proposal</i> to identify Vegetation Unit W17 as being covered by an exclusion area.</p> <p>RESPONSE TO ACTIONS:</p> <p>The EPA's request for "table quantifying the numbers and proportions of all significant flora and all vegetation units protected by the approved exclusion zones and the proposed exclusion areas" is not considered to be relevant as the purpose of the exclusion areas is for the conservation of <i>Banksia sphaerocarpa</i> var. <i>dolichostyla</i>, <i>Microcorys elatoides</i> and Vegetation Unit W17 (as now also identified in Figure 1-4a and Figure 1-4b). The ERD in Section 1.2 <i>The Revised Proposal</i> clearly</p>

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		<p>identifies that the proposed changes to the exclusion areas will not result in any reduction or change in the number of individuals of <i>Banksia sphaerocarpa</i> var. <i>dolichostyla</i> or <i>Microcorys elatoides</i> protected within the exclusion areas. Noting the above, the ERD has been amended in Section 1.2 <i>The Revised Proposal</i> to specify that the number of individuals recorded of <i>Banksia sphaerocarpa</i> var. <i>dolichostyla</i> within the exclusion areas remains at 5,239 individuals, and the number of individuals recorded of <i>Microcorys elatoides</i> within the exclusion areas remains at 13,549 individuals. As noted above, the ERD text in Section 1.2 <i>The Revised Proposal</i> has also been amended to also identify Vegetation Unit W17 as being covered by an exclusion area; with nil change proposed to that exclusion area (with 3 ha of Vegetation Unit W17 remaining protected). The inclusion of these values within the ERD text is considered to address the intent of the EPA's request to quantify the extent of the environmental values intended for protection within the Flora Exclusion Areas.</p> <p>Noting the purpose of the exclusion areas was specific to 2 flora taxa and 1 vegetation unit (as outlined above), it is not considered relevant to list all flora taxa and all vegetation units which coincide with the exclusion areas as this could readily lead to a misinterpretation as to the purpose of the exclusion areas. Any additional (non-target) flora taxa or vegetation units which, by chance event, fall within the boundaries of the exclusion areas should only be considered as incidental.</p>
4. Offsets	<p>Comments</p> <p>The EPA's preference for offsets strategies and environmental management plans is that they are submitted through environmental impact assessment, rather than as a requirement of a condition in a Ministerial Statement (see Instructions – How to prepare an Environmental Management Plans).</p> <p>Actions</p> <ul style="list-style-type: none"> In order to assess the proposed offsets, please provide a Residual Impact Significance Model (RISM) table and offset calculations using the WA Environmental Offsets Metric for significant residual impacts to WA values, and the Commonwealth calculator should be used for MNES. The mitigation hierarchy should also be addressed specifically in relation to the additional impacts proposed in the revised proposal. 	<p>RESPONSE TO COMMENTS:</p> <p>Whilst the EPA's preference is noted, the request to submit Management Plans through the environmental impact assessment process Covalent understands is not a requirement of the <i>Environmental Protection Act 1986</i> (WA), nor the associated procedures, guidelines, instructions or forms under the Act. This EPA preference was also not identified by in the pre-referral meeting with EPA representatives in July 2021, or in other previous correspondence from EPA.</p> <p>The various Environmental Management Plans associated with the Approved Proposal (under the existing implementation conditions) are believed to be appropriate to manage, control and monitor the environmental effects of the Revised Proposal to the identified flora and vegetation values and terrestrial fauna values. This established framework for the Approved Proposal sets out the requirements for the following environmental management plans:</p> <ol style="list-style-type: none"> Flora and Vegetation Environmental Management Plan (Condition 6 of Statement 1118) Terrestrial Fauna Environmental Management Plan (Condition 7 of Statement 1118) Threatened Fauna Land Acquisition Strategy (Condition 8 of Statement 1118) <p>As outlined within the ERD, the Flora and Vegetation EMP and the Terrestrial Fauna EMP have both previously been reviewed and approved by the EPA. The Threatened Fauna Land Acquisition Strategy has previously been reviewed by EPA, with a revised version recently resubmitted to EPA to address the EPA's review comments (with Covalent Lithium now awaiting the approval from the EPA).</p> <p>Due to the minor scale of the Revised Proposal, the current framework of EMPs applying to the Approved Proposal is considered appropriate to be adopted for the Revised Proposal as this framework was approved by the EPA less than 3 years ago. This framework has been raised and</p>

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	<p>discussed several times with representatives for the EPA (EPA Services of DWER), including pre-referral meeting (July 2021).</p> <p>Copies of the currently approved Flora and Vegetation EMP and Terrestrial Fauna EMP were included with the ERD submission to outline how the potential environmental effects to flora and vegetation values and terrestrial fauna values will be managed and monitored. These current and approved EMPs are considered adequate to inform the EPA and the public (during the public review period) of how the potential environmental effects to flora and vegetation values and terrestrial fauna values will be managed and monitored.</p> <p>As outlined within the ERD in Section 12 <i>Additional Information</i>, it is noted that the Flora and Vegetation EMP and Terrestrial Fauna EMP will require an administrative revision (calculations and mapping) to simply capture the additional areas of land disturbance resulting from the Revised Proposal, however, no changes to the environmental management actions within these plans are anticipated. Covalent Lithium anticipates the revised EMPs will be available for submission during the EPA's assessment (i.e. following public review period).</p> <p>As further outlined within the ERD in Section 12 <i>Additional Information</i>, Covalent Lithium proposes to provide an additional land acquisition environmental offset to counterbalance the effect of fauna habitat clearing associated with the Revised Proposal. Covalent Lithium has identified a number of potential privately-owned land acquisition targets which contain suitable habitat for both Malleefowl and Chuditch. Covalent Lithium has commenced initial discussions with DBCA (as the land managers of State conservation lands) as to the suitability of the potential land acquisition targets, prior to engaging with the relevant landowners. As the lands are privately owned and agreement with the landowners have yet to be made, it would not be appropriate to include details of the potential land acquisition targets within the ERD.</p> <p>As outlined above, the existing conditions of the Statement 1118 approval under Condition 8 provide a framework for a Threatened Fauna Land Acquisition Strategy to offset the effect of the clearing of fauna habitat. Condition 8 sets a time period of 12 months following approval within which Covalent Lithium is to prepare and submit a Threatened Fauna Land Acquisition Strategy; with this set time period considered similarly appropriate to apply to the limited additional clearing required for the Revised Proposal (56 ha) as this framework was also recommended by EPA to the Minister less than 3 years ago (in 2019). Covalent Lithium intends to submit a new Threatened Fauna Land Acquisition Strategy for the new land acquisition area(s) within 12 months following approval of the Revised Proposal; consistent with Condition 8 of the Statement 1118 approval.</p> <p>RESPONSE TO ACTIONS:</p> <p>Covalent Lithium notes the EPA request for a Residual Impact Significance Model (RISM) table and offset calculations. As outlined above, the ERD in Section 12 <i>Additional Information</i> identifies an additional land acquisition environmental offset is proposed to counterbalance the effect of fauna habitat clearing associated with the Revised Proposal (56 ha), with potential land acquisition targets having been identified (and with confidential discussions with DBCA being 'in-progress' on the potential sites). The existing conditions of the Statement 1118 approval under Condition 8 provides a framework for a Threatened Fauna Land Acquisition Strategy to offset the effect of the clearing of fauna habitat. The offset under this framework for the Approved Proposal</p>

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		<p>provides evidence to EPA as to how a land acquisition offset is likely to counter-balance significant residual impacts to fauna habitat; with this same approach to be applied for the Revised Proposal. Condition 8 sets a time period of 12 months within which Covalent Lithium is to prepare and submit a Threatened Fauna Land Acquisition Strategy, following environmental approval. This set time period under Condition 8 is considered similarly appropriate to apply to the limited additional clearing for the Revised Proposal. Offset calculations can only be completed once the potential land acquisition targets are confirmed, and accordingly, it is not possible for Covalent Lithium to complete offset calculations at this time. Covalent Lithium has amended the ERD in Section 8 <i>Environmental Offsets</i> to include a completed RISM table (as requested).</p> <p>Covalent Lithium notes the EPA request for the mitigation hierarchy to be addressed. The ERD in Section 4.3 <i>Mitigation Hierarchy</i> (Pages 67 - 70) addresses the Mitigation Hierarchy. Further, the Mitigation Hierarchy is also considered separately for each preliminary key environmental factor in Section 5 <i>Flora and Vegetation</i> and Section 6 <i>Terrestrial Fauna</i>. Accordingly, this matter has previously been addressed within the ERD. No change to the ERD is considered necessary for this matter.</p>
5. EP Act Amendments	<p>Comments</p> <p><i>The proponent has not used the revised s38 referral form despite submitting the s38 referral after proclamation of the EP Act amendments. Whilst flexibility is required during transition to the revised procedures suite there is information requested in "Part B: Assessment of environmental impacts for significant amendments only" that is important for consideration of the revised proposal and associated offsets.</i></p> <p>Actions</p> <ul style="list-style-type: none"> <i>The proponent should discuss whether an outcome-based condition setting arrangement can replace any objective-based management plans. This is relevant in regard to applying the mitigation hierarchy before offsets are considered; and</i> <i>The proponent should provide information about compliance status and environmental performance of the existing approved proposal noting that offset strategy documents were not submitted during the time period stated in the implementation conditions. The EPA will require confidence in the outcome of proposed offsets.</i> 	<p>RESPONSE TO COMMENTS:</p> <p>The s38 Referral for the Revised Proposal was submitted in August 2021, using the EPA's referral form in effect at that time. The amendments to the <i>Environmental Protection Act 1986 (WA)</i> came into effect in October 2021 (refer Government Gazette No. 178); being 2 months after the referral of the Revised Proposal.</p> <p>The s38 Referral was accepted by EPA as a valid referral, and the EPA made a decision to assess the Revised Proposal and set the level of assessment at 'Referral Information' based on this referral form. The Revised Proposal was submitted > 6 months ago, with the Revised Proposal awaiting environmental assessment by the EPA since that time. Noting the EPA's prior acceptance of the s38 Referral, and the time which has since passed, Covalent Lithium does not believe it necessary nor appropriate to re-submit a s38 Referral form for the Revised Proposal.</p> <p>Whilst noting the above, Covalent Lithium has completed the table titled "<i>Part B: Assessment of Environmental Impacts for Significant Amendments Only</i>" as requested by EPA, with this information included below in Table 2.</p> <p>RESPONSE TO ACTIONS:</p> <p>Covalent Lithium does not propose any amendments to the conditions imposed under the Statement 1118 approval. As outlined within the ERD in Section 11 <i>Environmental Management</i>, the suite of Environmental Management Plans applying to the Approved Proposal (under the existing conditions) are considered appropriate to manage, control and monitor the environmental effects of the Revised Proposal to the identified flora and vegetation values and terrestrial fauna values.</p> <p>This established framework for the Approved Proposal sets out requirements for the following environmental management plans:</p> <ol style="list-style-type: none"> (1) Flora and Vegetation Environmental Management Plan (Condition 6 of Statement 1118) (2) Terrestrial Fauna Environmental Management Plan (Condition 7 of Statement 1118)

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	<p>(3) Threatened Fauna Land Acquisition Strategy (Condition 8 of Statement 1118 approval)</p> <p>In consideration of the minor scale of the Revised Proposal, Covalent Lithium considers it would be appropriate to align the Revised Proposal with the current environmental management framework applying to the Approved Proposal and as discussed with EPA (EPA Services of DWER), including at pre-referral meeting (July 2021).</p> <p>Condition 8-2 of the Statement 1118 approval requires a Threatened Fauna Land Acquisition Strategy to be prepared and submitted within 12 months of the Statement 1118 publication. Condition 8-7 of the Statement 1118 approval requires a Flora Offset Strategy to be prepared and submitted within 12 months of the Statement publication. The Statement 1118 approval was granted in November 2019. The Threatened Fauna Land Acquisition Strategy (Revision 0) was submitted to EPA in April 2020, and the Flora Offset Strategy (Revision 1) submitted to EPA in May 2020; both being submitted within the 12-month time period required by Condition 8-2 and Condition 8-7. As outlined in the January 2022 correspondence to EPA, the recently submitted revisions address comments received from Government agencies on the submitted documentation, as well as changes arising from the recent s46 change to the implementation conditions. Covalent Lithium refutes the claim made by EPA that "offset strategy documents were not submitted during the time period stated in the implementation conditions". Covalent Lithium remains in full compliance with the requirements of Condition 8-2 and Condition 8-7 of the Statement 1118 approval.</p>

TABLE 2 – EPA FORM: PART B - ASSESSMENT OF ENVIRONMENTAL IMPACTS FOR SIGNIFICANT AMENDMENTS ONLY

PART B: ASSESSMENT OF ENVIRONMENTAL IMPACTS FOR SIGNIFICANT AMENDMENTS ONLY	
Type of significant amendment	<input checked="" type="checkbox"/> significant amendment to the approved proposal <input type="checkbox"/> significant amendment to the implementation conditions <input type="checkbox"/> significant amendment to both the proposal and the implementation conditions
Information of the approved proposal	Details of the Approved Proposal are outlined within the submitted Environmental Review Document (ERD) in Section 1.1 <i>The Proposal</i> and Section 2 <i>The Proposal</i> .
Combined effects of the approved proposal and significant amendment	<p>The combined effects of the Approved Proposal and the Revised Proposal for the key environmental factor of 'Flora and Vegetation' is outlined within the ERD in Section 5 <i>Flora and Vegetation</i>.</p> <p>The combined effects of the Approved Proposal and the Revised Proposal for the key environmental factor of 'Terrestrial Fauna' is outlined within the ERD in Section 6 <i>Terrestrial Fauna</i>.</p> <p>The effects of the Approved Proposal and the Revised Proposal for the EPA's other environmental factors is summarised within the ERD in Section 7 <i>Other Environmental Factors</i>.</p>
Analysis of existing implementation conditions	<p>The existing implementation condition framework for the Approved Proposal, and its applicability to the Revised Proposal, is outlined within the ERD in Section 11 <i>Environmental Management</i>, including specifically the applicability of the implementation conditions for:</p> <p>(a) Flora and Vegetation Environmental Management Plan (Condition 6 of Statement 1118)</p> <p>(b) Terrestrial Fauna Environmental Management Plan (Condition 7 of Statement 1118)</p> <p>(c) Threatened Fauna Land Acquisition Strategy (Condition 8 of Statement 1118)</p>
Previous changes to the Proposal and or implementation conditions	Previous changes to the Approved Proposal are outlined within the ERD in Section 1.5.3 <i>Previous Changes to the Approved Proposal</i> .

<p><i>Compliance</i></p>	<p>Covalent Lithium is in compliance with all environmental conditions applying to the Approved Proposal, as has been outlined in Compliance Assessment Reports submitted to EPA in February 2021 and February 2022.</p>
<p><i>Environmental Performance</i></p>	<p>Covalent Lithium has demonstrated satisfactory environmental performance in implementation of the Flora and Vegetation Environmental Management Plan and the Terrestrial Fauna Environmental Management Plan, as approved by EPA.</p>
<p><i>Control of implementation of significant amendment</i></p>	<p>As outlined within the ERD in Section 11 <i>Environmental Management</i>, the Revised Proposal can be appropriately managed in accordance with the existing implementation conditions for:</p> <ul style="list-style-type: none"> (a) Flora and Vegetation Environmental Management Plan (Condition 6 of Statement 1118) (b) Terrestrial Fauna Environmental Management Plan (Condition 7 of Statement 1118) (c) Threatened Fauna Land Acquisition Strategy (Condition 8 of Statement 1118) <p>The Flora and Vegetation Environmental Management Plan and the Terrestrial Fauna Environmental Management Plan will require will each require an administrative revision (calculations and mapping) to capture the additional areas of land disturbance resulting from the Revised Proposal. No changes to the environmental management actions within these plans are anticipated.</p> <p>A new Threatened Fauna Land Acquisition Strategy will be prepared to address the new land acquisition environmental offset area required for the Revised Proposal. Consistent with Condition 8 of the Statement 1118 approval, a new Threatened Fauna Land Acquisition will be submitted to EPA within 12 months following the approval of the Revised Proposal.</p>

