



Earl Grey Lithium Project Compliance Assessment Report (Ministerial Statement 1118, 1167 and 1199)

Covalent Lithium Pty Ltd

Report

64195

1 May 2023



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.



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Introduction

1.1 Purpose of this Report

This Compliance Assessment Report (CAR) addresses the status and compliance of operations at the Covalent Lithium Pty Ltd Earl Grey Lithium Project (the Project) with respect to the conditions provided within Ministerial Statement (MS) 1118. This CAR has been prepared for the purpose of meeting the requirement of Condition 4-3 of MS 1118 (1118: M4.3), which is to:

“assess compliance with conditions in accordance with the Compliance Assessment Plan (CAP) required by Condition 4-1.”

1.2 Project Background

Covalent Lithium Pty Ltd (hereafter referred to as Covalent Lithium), the appointed manager for the Mount Holland Lithium Joint Venture between subsidiaries of Wesfarmers Limited (Wesfarmers) and Sociedad Química y Minera de Chile (SQM), proposed the development of the Earl Grey Lithium Project (the Project) which is located approximately 105 kilometres (km) south of the Southern Cross township in Western Australia (WA).

The Project has been designed to maximize the use of pre-existing disturbance areas. It encompasses a total area of 667 hectares (ha), of which 386 ha is native vegetation and 281 ha is existing infrastructure or disturbed areas (the Project Area). The additional clearing is predominately required for an expansion of the existing mine pit, waste rock landforms, tailings storage facilities and ancillary infrastructure. The key components of the project are summarised in Table 1.1.

Table 1.1: Key Components of the Project

Element	Proposed Extent
Physical Elements	
Open-cut Mine Pit	Clearing a maximum of 386 ha of native vegetation, within a Disturbance Footprint of 667 ha and Development Envelope of 1,984 ha
Waste Rock Landform	
Tailings Storage Facility	
Operational Elements	
Mining operations	Earl Grey Lithium Project open-cut mine pit
Waste Rock	Maximum of 184 million cubic metres (m ³) of waste rock tailings
Tailings Disposal	Maximum of 16.5 million m ³ of coarse tailings (i.e., gravel rejects); Maximum of 32 million m ³ of fine tailings (dry stacked); and Maximum of 1.5 gigalitres (GL) per annum.

1.3 Environmental Approval to Implement the Project

The Project was referred under Part IV Section 38 of the Environmental Protection Act 1986 (WA) (EP Act) and was assessed by the Environmental Protection Authority (EPA) as requiring a Public Environmental Review (PER) Level of Assessment (LOA). The Project was granted conditional environmental approval by the Minister of Environment on 21 November 2019, subject to conditions

contained in MS 1118 (Appendix A), including requirements for Covalent Lithium to monitor and report compliances (Condition 4-3).

1.4 Ministerial Statement 1167

A section 46 amendment was made to MS 1118 to create MS 1167 which amended conditions relating to the offset strategies in May 2021.

1.5 Ministerial Statement 1199

MS1118 and MS1167 were significantly amended (replaced) by MS 1199 on 23 November 2022. MS 1199 replaces and supersedes all previous conditions and procedures of MS 1118 and MS 1167.

2. Current Status

The Project was granted environmental approval in November 2019 through the MS 1118 approval under the EP Act 1986 (WA) by the WA Minister for Environment. The Proposal was also granted environmental approval in February 2020 through the EPBC Decision 2017/7950 approval under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) (C'th) by the Commonwealth Department of Agriculture, Water and the Environment (DAWE).

Following the Financial Investment Decision (FID) that was finalised 17 February 2021 between the Joint Venture partners, Covalent Lithium commenced the construction of the Project in April 2021. Construction has been undertaken in accordance with the following State and Commonwealth-approved management plans:

- The Flora and Vegetation Management Plan (MS 1118: M6);
- The Terrestrial Fauna Management Plan (MS 1118: M7); and
- The Flora Offset and Threatened Fauna Land Acquisition Strategies (MS 1118: M8).

Under the MS 1199, the above plans are required to be revised and resubmitted to DWER by 23rd May 2023. Additionally a *Microcorys elatoides* Conservation Plan is required to be submitted to DWER for approval by 23rd November 2023.

The Flora Offset and Threatened Fauna Land Acquisition Strategies have currently not been approved by DWER.

3. Audit Methodology

3.1 Audit Plan

3.1.1 Purpose & Scope

Conditions M4-1, M4-2, M4-3, and M4-6 of MS 1118 state:

M4-1: "The proponent shall prepare and maintain a compliance assessment plan which is submitted to the CEO at least six (6) months prior to the first Compliance Assessment Report required by condition 4-6, or prior to implementation of the proposal, whichever is sooner."

M4-2 “The compliance assessment plan shall indicate:

- 1) the frequency of compliance reporting;
- 2) the approach and timing of compliance assessments;
- 3) the retention of compliance assessments;
- 4) the method of reporting of potential non-compliances and corrective actions taken;
- 5) the table of contents of compliance assessment reports; and
- 6) public availability of compliance assessment reports.”

M4-3: “After receiving notice in writing from the CEO that the Compliance Assessment Plan satisfies the requirements of Condition 4-2 the proponent shall assess compliance with conditions in accordance with the compliance assessment plan required by Condition 4-1.”

and

M4-6: “The proponent shall submit to the CEO the first Compliance Assessment Report fifteen (15) months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance assessment Report, or as otherwise agreed in writing by the CEO.

The Compliance assessment Report shall:

- 1) Be endorsed by the proponent’s Chief Executive Officer or a person delegated to sign on the Chief Executive Officer’s behalf
- 2) Include a statement as to whether the proponent has complied with the conditions;
- 3) Identify all potential non-compliances and describe corrective and preventative actions taken
- 4) Be made publicly available in accordance with the approved Compliance Assessment Plan
- 5) Indicate any proposed changes to the Compliance Assessment Plan required by Condition 4-1.”

A Compliance Assessment Plan (CAP) (Revision 0) was submitted to the Department of Water and Environmental Regulation (DWER) on 20 August 2020. The CAP was revised and then resubmitted (Revision 1) on 16 September 2020. This revision was approved by DWER on 17 December 2020. This CAR has been prepared for Covalent Lithium to fulfil the requirements of 1118: M4-3 by assessing compliance with the conditions of MS 1118 in accordance with the approved CAP.

As proposed in the 2021 CAR:

- the audit period for this compliance report is from 1 January 2022 to 31 December 2022; and
- this CAR is due to be submitted to DWER by 30 April 2023.

3.1.2 Methodology

The audit was undertaken over the course of the reporting period and included email correspondence with relevant personnel (Table 3.1) and review of relevant documents provided by the Proponent.

Table 3.1: Personnel Consulted During the Audit

Personnel	Business	Position	Purpose
Anthea Pate	Covalent Lithium	Approvals Manager	To obtain verifiable evidence to assist in determining Covalent Lithium's compliance with MS 1118, 1167, 1199 and associated management plans.
Brigitta Longbottom	Covalent Lithium	Environment Superintendent	
Andrew Winzer	Strategen-JBS&G	Principal	
Stuart Hawkins	Globe Environments	Project Manager (Associate)	

3.1.3 Audit Terminology

The 'Status' field of the audit table describes the implementation of the action and compliance with the audit element. Although the Chief Executive Officer (CEO) of DWER makes the final determination of compliance, it is necessary to update this field each reporting period, as a given project progresses. Formerly the Office of the Environmental Protection Authority (OEPA) (2012a; 2012b; 2012c; and 2012d), DWER has prepared updated guidance related to the preparation of compliance audits, including generic expressions that are used to identify the status of each action (Table 3.2).

Table 3.2: Action Implementation Status

Status	Description
Compliant	Implementation of the proposal has been carried out in accordance with requirements of the audit.
Completed	A requirement with a finite period of application has been satisfactorily completed.
Not Required At This Stage (NRATS)	The requirements of the audit element were not triggered during the reporting period.
Potentially Non-compliant	Possible or likely failure to meet the requirements of the audit element.

Source: The Office of the Environmental Protection Authority (OEPA) 2012b.

4. Audit Results

4.1 Proposed Changes to the Compliance Assessment Plan

Covalent Lithium proposes to submit a new CAP as required under MS1199:8.1.

4.2 Compliance with Ministerial Statement 1118, 1167 and 1199

The results of the audit are presented in Table 4.1, 4.2, 4.3, Appendix E and Appendix F below. A signed Statement of Compliance has been included in Appendix D.

4.2.1 Compliance with Conditions of Ministerial Statement 1118 and 1167

Of the 73 conditions of MS 1118 and 1167 (Table 4.1 and Table 4.2):

- 27 were found to be 'Compliant'
- 36 were found to be 'Completed'

- 10 were found to be 'Not Required At This Stage'
- Zero were found to be 'Potentially Non-compliant'

4.2.2 Compliance with Conditions of Ministerial Statement 1199

Of the 63 conditions of MS 1199 (Table 4.3):

- 36 were found to be 'Compliant'
- None were found to be 'Completed'
- 27 were found to be 'Not Required At This Stage'
- Zero were found to be 'Potentially Non-compliant'

4.2.3 Compliance with Commitments of FVEMP

Of the 89 conditions of the FVEMP (Appendix E):

- 76 were found to be 'Compliant'
- Four were found to be 'Completed'
- 7 were found to be 'Not Required At This Stage'
- Two were found to be 'Potentially Non-compliant'

The non-compliances relate to the Dieback Management Plan not being submitted following the completion of the baseline monitoring.

4.2.4 Compliance with Commitments of TFEMP

Of the 91 conditions of the TFEMP (Appendix F):

- 88 were found to be 'Compliant'
- None were found to be 'Completed'
- Three were found to be 'Not Required At This Stage'
- Zero were found to be 'Potentially Non-compliant'

Table 4.1: Audit Table of Compliance with Ministerial Statement 1118 and 1167

Audit Code	Subject	Requirement	How	Phase	Timeframe	Evidence	Comment	Status
M1118:1.1.	Proposal implementation	When implementing the proposal, the proponent shall not exceed the authorised extent of the proposal as defined in Table 2 of Schedule 1, unless amendments to the proposal and the authorised extent of the proposal have been approved under the EP Act.	Implement Proposal as described in Schedule 1.	Overall	Annual	Figure 1 G01_EGLP_Vegetation Clearing	The authorised extent of Schedule 1 is 386 ha, the proponent has cleared 358.96ha. The proponent has not exceeded the authorised extent of the proposal as defined in Schedule 1.	Compliant
M1118:2.1	Contact details	The proponent shall notify the CEO of any change of its name, physical address or postal address for the serving of notices or other correspondence within twenty-eight (28) days of such change. Where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State.	Notify the CEO of any change in proponent details.	Overall	Within 28 days of exchange.	Not applicable	The Proponent remains Covalent Lithium Pty Ltd.	Compliant
M1118:3.1	Time limit for proposal implementation	The proponent shall not commence implementation of the proposal after five (5) years from the date of this Statement, and any commencement, prior to this date, must be substantial.	The Proposal must be substantially commenced before 21 November 2024.	Prior to commencement	Prior to 21 November 2024.	R02_2021 CAR	Following the Financial Investment Decision that was finalised 17 February 2021 between the Joint Venture partners, Covalent Lithium commenced the construction of the Project in April 2021.	Completed
M1118:3.2	Time limit for proposal implementation	Any commencement of implementation of the proposal, on or before five (5) years from the date of this Statement, must be demonstrated as substantial by providing the CEO with written evidence, on or before the expiration of five (5) years from the date of this Statement.	Notify CEO that proposal has substantially commenced.	Prior to commencement	Prior to 21 November 2024.	R02_2021 CAR	Item complete in previous reporting period.	Completed
M1118:4.1	Compliance reporting	The proponent shall prepare and maintain a Compliance Assessment Plan which is submitted to the CEO at least six (6) months prior to the first Compliance Assessment Report required by Condition 4-6, or prior to implementation of the proposal, whichever is sooner.	Prepare and submit a Compliance Assessment Plan to the CEO.	Planning phase	Plan to be submitted before 21 August 2020 or prior to implementation of proposal whichever comes first.	R03_Covalent Lithium CAP (Rev 1) 16092020 C01_DWER Covalent Lithium EGLP CAP (Rev 1) - Approval 17122020	The CAP (Revision 1; dated 16 September 2020) was approved by DWER on 17 December 2020. The CAP requires revision to update the CAP reporting period and due date for the CAR. However a new CAP has been developed to replace the M1118 ministerial statement with the replacement MS1199 statement.	Completed
M1118:4.2	Compliance reporting	The Compliance Assessment Plan shall indicate: the frequency of compliance reporting; the approach and timing of compliance; the retention of compliance assessments; the method of reporting of potential non-compliances and corrective actions taken; the table of contents of Compliance Assessment Reports; public availability of Compliance Assessment Reports.	CAP must contain details specified in Condition 4-2	Planning phase	Plan to be submitted before 21 August 2020 or prior to implementation of proposal whichever comes first.	R03_Covalent Lithium CAP (Rev 1) 16092020 C01_DWER Covalent Lithium EGLP CAP (Rev 1) - Approval 17122020	Refer to M4.1; The approved CAP (R03) contains all the requirements of M4.2 and was approved by DWER on 17 December 2020.	Completed
M1118:4.3	Compliance reporting	After receiving notice in writing from the CEO that the Compliance Assessment Plan satisfies the requirements of Condition 4-2 the proponent shall assess compliance with conditions in accordance with the Compliance Assessment Plan required by Condition 4-1.	Assess compliance in accordance with approved CAP.	Overall	Prior to 21 Feb 2021 (first CAR due) and then annually on this date.	R03_Covalent Lithium CAP (Rev 1) 16092020 C01_DWER Covalent Lithium EGLP CAP (Rev 1) - Approval 17122020 R02_2021 CAR R01_2022 CAR	The approved CAP (R03) contains all the requirements of M4.2 and was approved by DWER on 17 December 2020 (C01). The 2021 CAR (R02) and 2022 CAR (R01) assess compliance with MS 1118 in accordance with the approved CAP.	Compliant
M1118:4.4	Compliance reporting	The proponent shall retain reports of all compliance assessments described in the Compliance Assessment Plan required by Condition 4-1 and shall make those reports available when requested by the CEO.	Retain all CARs and submit to CEO upon request.	Overall	Ongoing	R01_2022 CAR	This CAR for the 2022 audit period is the third CAR (R01) assessing compliance with MS 1118. Copies of the CAR (2022) and evidence used have been retained by the auditor (JBS&G) and provided to the proponent.	Compliant
M1118:4.5	Compliance reporting	The proponent shall advise the CEO of any potential non-compliance within seven (7) days of any non-compliance being known.	Notify the CEO of potential non-compliance.	Overall	Within seven (7) days of event identified.	R01_2022 CAR	No potential non-compliances were noted in the 2022 audit period.	Compliant
M1118:4.6	Compliance reporting	The proponent shall submit to the CEO the first Compliance Assessment Report fifteen (15) months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment Report, or as otherwise agreed in writing by the CEO. The Compliance Assessment Report shall: be endorsed by the proponent's Chief Executive Officer or a person delegated to sign on the Chief Executive Officer's behalf;	Submit CAR in accordance with approved CAP.	Overall	First CAR is due by 21 February 2021 and then annually by 30 April	R02_2021 CAR R03_Covalent Lithium CAP (Rev 1) 16092020 E02_Website Screenshot 20230424	The CAR for the 2021 audit period was the second CAR assessing compliance with MS 1118/1167 and was submitted to DWER by 21 February 2022. 1. The 2021 CAR (R02) was endorsed by the proponent's Chief Executive Officer or a person delegated to sign on the Chief Executive;	Compliant

Audit Code	Subject	Requirement	How	Phase	Timeframe	Evidence	Comment	Status
		include a statement as to whether the proponent has complied with the conditions;					2. The 2021 CAR (R02) included a statement as to whether the proponent has complied with the conditions (Appendix B);	
		identify all potential non-compliances and describe corrective and preventative actions taken;					3. The 2021 CAR (R02) identified all potential non-compliances and described corrective and preventative actions taken (Table 4.1)	
		be made publicly available in accordance with the approved Compliance Assessment Plan;					4. The 2021 CAR was made publicly available on Covalent Lithium's website (https://www.covalentlithium.com/our-project) once published.	
		indicate any proposed changes to the Compliance Assessment Plan required by Condition 4-1.					5. The 2021 CAR proposed an update to the CAP for a change to the submission date for the annual CAR.	
M1118:5.1	Public availability of data	Subject to Condition 5-2, within a reasonable time period approved by the CEO of the issue of this Statement and for the remainder of the life of the proposal the proponent shall make publicly available, in a manner approved by the CEO, all validated environmental data (including sampling design, sampling methodologies, empirical data and derived information products (e.g., maps, etc.)), management plans and reports relevant to the assessment of this proposal and implementation of this Statement.	Make validated information on the project publicly available except for sensitive and confidential information as agreed with the CEO.	Overall	Ongoing	E02_Website Screenshot 20230424	Link below https://www.covalentlithium.com/sustainability Has the following information publicly available: <ul style="list-style-type: none"> EPA Report and Recommendations TFEMP Monitoring FVEMP 2021 CAR 	Compliant
M1118:5.2	Public availability of data	If any data referred to in condition 5-1 contains particulars of: <ul style="list-style-type: none"> a secret formula or process; or confidential commercially sensitive information. The proponent may submit a request for approval from the CEO to not make these data publicly available. In making such a request the proponent shall provide the CEO with an explanation and reasons why the data should not be made publicly available.	Submit request to CEO to keep sensitive information confidential.	Overall	As required	Environmental Consultant advice provided 09/03/2023.	No request was made during the audit period.	Compliant
M1118 / MS1167:6.1.2	Flora and Vegetation Management Plan	The proponent shall implement the proposal to meet the following environmental outcome: <ul style="list-style-type: none"> The proponent shall ensure there is no proposal-related direct or adverse indirect impacts to flora and vegetation within the exclusion zones as shown on Figure 3 and delineated by coordinates in Schedule 2. The proponent shall ensure there are no proposal-related impacts to more than 9,732 individuals of <i>Microcorys elatoides</i> and 2 individuals of <i>Banksia sphaerocarpa</i> var. <i>dolichostyla</i>. 	Ensure that proposal does not have any direct or indirect impacts to flora and vegetation within the exclusion zones.	Overall	Ongoing	R01_64195 Covalent Lithium CAR 2022 (Rev 0) R10_2022 Vegetation Condition Monitoring Autumn R11_2022 Vegetation Condition Monitoring Spring	Construction of the Project commenced in April 2021; Monitoring reported that variation in plant health between surveys is likely due to variation in observers health scores and variation in rainfall.	Compliant
				Overall	Ongoing	G02_Banksia and Microcorys impact	The proponent ensured that there was no proposal related impacts on more than the thresholds. The total number of <i>Microcorys elatoides</i> directly impacted by EGLP activities: 6,559 individuals. The total number of <i>Banksia dolichostyla</i> directly impacted by EGLP activities: 0 individuals Note – updated taxonomic name, no change in conservation status.	Compliant
M1118:6.2	Flora and Vegetation Management Plan	Prior to the commencement of ground disturbing activities, the proponent must undertake pre-clearance vegetation and flora survey(s) within the development envelope in accordance with Technical Guidance – Flora and Vegetation Surveys for Environmental Impact Assessment.	Undertake vegetation and flora surveys prior to ground disturbing activities.	Planning phase	Prior to any ground disturbance activities.	R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
M1118:6.3	Flora and Vegetation Management Plan	In order to meet the requirements of Condition 6-1, the proponent shall update and submit to the CEO the Flora and Vegetation Environmental Management Plan on advice of the Department of Biodiversity, Conservation and Attractions (DBCA) within six (6) months of this Statement being issued.	Submit Flora and Vegetation Environmental Management Plan to CEO of DWER in consultation with the DBCA.	Planning phase	Submit before 21 May 2020.	R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
M1118:6.4	Flora and Vegetation Management Plan	The proponent shall not commence ground disturbing activities until such a time as the Flora and Vegetation Environmental Management Plan required by Condition 6-3 is approved by the CEO.	Undertake ground disturbing activities after approval of Flora and Vegetation Environmental Management Plan	Construction phase	Post-approval of the Flora and Vegetation Environmental Management Plan	R04_FVEMP C05_MS1199 - FVEMP approval letter	The FVEMP was approved by the CEO prior to commencement of construction in April 2021.	Compliant

Audit Code	Subject	Requirement	How	Phase	Timeframe	Evidence	Comment	Status
M1118:6.5	Flora and Vegetation Management Plan	The Flora and Vegetation Environmental Management Plan shall: include details of the timing, methods, limitations and results of the pre-clearance surveys required by Condition 6-2 and demonstrate how the findings of the survey(s) have been considered, including provision of mitigation measures.	Prepare a Flora and Vegetation Environmental Management Plan in accordance with details specified in Condition 6-5 (1).	Planning phase	Prior to 21 May 2020	R04_FVEMP	The revised Flora and Vegetation Environmental Management Plan (Rev 7) was submitted to DWER on 12/12/2022 and the 09/03/2023 approval notes that the plan "(1) include details of the timing, methods, limitations, and results of the preclearance surveys required by condition 2-3 (M1118:6.5.1) and demonstrate how the findings of the survey(s) have been considered, including provision of mitigation measures;" in section 1.3.	Compliant
		include actions to ensure that dust, weeds and fire are appropriately managed within the development envelope.	Prepare a Flora and Vegetation Environmental Management Plan in accordance with details specified in Condition 6-5 (2).	Planning phase	Prior to 21 May 2020	R04_FVEMP	The revised Flora and Vegetation Environmental Management Plan (Rev 7) was submitted to DWER on 12/12/2022 and the 09/03/2023 approval notes that the plan "(3) include actions to ensure that dust, weeds, and fire are appropriately managed within the development envelope" in section 2.2 and Table 2.3.	
		specify trigger criteria that must provide an early warning that the threshold criteria identified in Condition 6-5 (4) may not be met;	Prepare a Flora and Vegetation Environmental Management Plan in accordance with details specified in Condition 6-5 (3).	Planning phase	Prior to 21 May 2020	R04_FVEMP	The revised Flora and Vegetation Environmental Management Plan (Rev 7) was submitted to DWER on 12/12/2022 and the 09/03/2023 approval notes that the plan "(4) specify trigger criteria that must provide an early warning that the threshold criteria identified in condition 2-4(5) (MS1118:6.5.3) may not be met" in Table 2.2.	
		specify threshold criteria to demonstrate compliance with the environmental outcome specified in Condition 6-1;	Prepare a Flora and Vegetation Environmental Management Plan in accordance with details specified in Condition 6-5 (4).	Planning phase	Prior to 21 May 2020	R04_FVEMP	The revised Flora and Vegetation Environmental Management Plan (Rev 7) was submitted to DWER on 12/12/2022 and the 09/03/2023 approval notes that the plan "(5) specify threshold criteria to demonstrate compliance with the environmental outcome specified in condition 2-1 (MS1118:6.5.4)" in Table 2.2.	
		specify monitoring to determine if trigger criteria and threshold criteria are exceeded;	Prepare a Flora and Vegetation Environmental Management Plan in accordance with details specified in Condition 6-5 (5).	Planning phase	Prior to 21 May 2020	R04_FVEMP	The revised Flora and Vegetation Environmental Management Plan (Rev 7) was submitted to DWER on 12/12/2022 and the 09/03/2023 approval notes that the plan "(6) specify monitoring to determine if trigger criteria and threshold criteria are Exceeded" in Section 2.4.	
		specify trigger level actions to be implemented in the event that trigger criteria have been exceeded;	Prepare a Flora and Vegetation Environmental Management Plan in accordance with details specified in Condition 6-5 (6).	Planning phase	Prior to 21 May 2020	R04_FVEMP	The revised Flora and Vegetation Environmental Management Plan (Rev 7) was submitted to DWER on 12/12/2022 and the 09/03/2023 approval notes that the plan "(7) specify trigger level actions to be implemented in the event that trigger criteria have been exceeded" in Table 2.2.	
		specify threshold contingency actions to be implemented in the event that threshold criteria are exceeded;	Prepare a Flora and Vegetation Environmental Management Plan in accordance with details specified in Condition 6-5 (7).	Planning phase	Prior to 21 May 2020	R04_FVEMP	The revised Flora and Vegetation Environmental Management Plan (Rev 7) was submitted to DWER on 12/12/2022 and the 09/03/2023 approval notes that the plan "(8) specify threshold contingency actions to be implemented in the event that threshold criteria are exceeded" in Table 2.2.	
		provide the format and timing for the reporting of monitoring results against trigger criteria and threshold criteria to demonstrate that Condition 6-1 has been met over the reporting period in the Compliance Assessment Report required by Condition 4-6.	Prepare a Flora and Vegetation Environmental Management Plan in accordance with details specified in Condition 6-5 (8).	Planning phase	Prior to 21 May 2020	R04_FVEMP	The revised Flora and Vegetation Environmental Management Plan (Rev 7) was submitted to DWER on 12/12/2022 and the 09/03/2023 approval notes that the plan "(10) provide the format and timing for the reporting of monitoring results against trigger criteria and threshold criteria to demonstrate that the outcome of condition 2-1 and the objectives of condition 2-2 have been met over the reporting period in the Compliance Assessment Report required by condition 8-6." in Section 2.5	
M1118:6.6	Flora and Vegetation Management Plan	After receiving notice in writing from the CEO that the Flora and Vegetation Environmental Management Plan satisfies the requirements of conditions 6-3 and 6-5 the proponent shall:	Implement the Flora and Vegetation Environmental Management Plan until the CEO is satisfied that the conditions are met.	Overall	CEO of DWER notifies that objectives and targets have been met and implementation of the strategies are no longer required.	R04_FVEMP C05_MS1199 - FVEMP approval letter	The Flora and Vegetation Environmental Management Plan has been implemented as per Table 2.3 (Management-based Provisions), including internal clearing permit procedure, dust suppression on cleared areas, implement hygiene procedures, and firefighting equipment on site and in vehicles. Refer to Appendix E.	Compliant
		implement the provisions of the Flora and Vegetation Environmental Management Plan;						
		continue to implement the Flora and Vegetation Environmental Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated the objective specified in Condition 6-1 has been met.						

Audit Code	Subject	Requirement	How	Phase	Timeframe	Evidence	Comment	Status
M1118:6.7	Flora and Vegetation Management Plan	In the event that monitoring, or investigations indicates exceedance of threshold criteria specified in the Flora and Vegetation Environmental Management Plan, the proponent shall: report the exceedance in writing to the CEO within seven (7) days of the exceedance being identified;	Report exceedance to the CEO.	Overall	Within 7 days of event identified.	E06_SummaryEvents ReportListing_DustEvents	No threshold criteria were exceeded in the audit period. Exceedances of the early response trigger and management triggers occurred in reporting period. Exceedance reported to DWER in 2023 reporting period.	NRATS
		implement the threshold contingency actions specified in the Flora and Vegetation Environmental Management Plan within twenty-four (24) hours of the exceedance being reported as required by condition 6-7(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;	Implement contingency actions until the CEO has confirmed by writing that threshold criteria have been met and actions are no longer required.	Overall	Implement actions within 24 hours of event reported. Action to be continuously implemented until CEO of DWER notifies that actions are no longer required.			
		1. investigate to determine the cause of the threshold criteria being exceeded; 2. 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; 3. provide a report to the CEO within twenty-one (21) days of the exceedance being reported as required by condition 6-7(1). The report shall include: a. details of threshold contingency actions implemented; b. the effectiveness of the threshold contingency actions implemented, against the threshold criteria; c. the findings of the investigations required by conditions 6-7(3) and 6-7(4); d. measures to prevent the threshold criteria being exceeded in the future; e. measures to prevent, control or abate the environmental harm which may have occurred; and justification of the threshold remaining, or being adjusted based on better understanding, demonstrating that objectives will continue to be met	Submit Incident Report to the CEO of DWER (formerly the OEPA).	Overall				
M1118:6.8	Flora and Vegetation Management Plan	The proponent: 1. may review and revise the Flora and Vegetation Environmental Management Plan; or Shall review and revise the Flora and Vegetation Environmental Management Plan as and when directed by the CEO.	Review the management plan if required or if directed by the CEO of DWER to do so.	Overall	As required	Management Advice 13/03/2023	The FVEMP was revised in December following the issuing of MS 1199 (as required). Once approved, the current version of the FVEMP will be Rev 7.	Compliant
M1118:6.9	Flora and Vegetation Management Plan	The proponent shall implement the latest revision of the Flora and Vegetation Environmental Management Plan, which the CEO has confirmed by notice in writing, satisfies the requirements of Condition 6-4.	Always implement latest approved version of plan.	Overall	As required	R04_FVEMP C05_MS1199 - FVEMP approval letter	Refer to Appendix E	Compliant
M1118 / M1167:7.1	Terrestrial Fauna Management Plan	The proponent shall implement the proposal to meet the following environmental outcomes and objectives: 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.	Ensure that proposal has no direct or indirect impacts on Malleefowl mounds within the exclusion zones as shown in Figure 4 and by coordinates in Schedule 2.	Construction phase	During ground disturbing activities.	E07_EGLP Malleefowl Monitoring 2021-2022 E05_Fauna Pre-clearance Survey	The Project did not have any direct or indirect impacts on Malleefowl mounds within the exclusion areas (E07).	Compliant
		The proponent shall ensure there is no direct or indirect proposal-related significant adverse impacts to Malleefowl and Chuditch within the development envelope.	Ensure no direct or indirect impacts to Malleefowl and Chuditch within the development envelope.	Construction phase	During ground disturbing activities.	07_EGLP Malleefowl Monitoring 2021-2022 E08_EGLP Chuditch Monitoring 2022	Monitoring was undertaken of both malleefowl and chuditch. Neither report made any indications that there is/is not direct or indirect proposal-related significant adverse impacts to malleefowl and chuditch within the development envelope.	Compliant
		The proponent shall ensure there is no removal of active Malleefowl mounds within the development envelope.	Ensure that no active Malleefowl mounds within the development envelope is removed.	Construction phase	During ground disturbing activities.	E07_EGLP Malleefowl Monitoring 2021-2022 E05_Fauna Pre-clearance Survey	Monitoring indicated that all previously monitored malleefowl mounds had not been disturbed. Pre-clearance surveys were undertaken prior to all clearing activities.	Compliant
		The proponent shall ensure there is no proposal-related direct or adverse indirect impacts to Malleefowl from feral animals in the Development Envelope by controlling feral animals within, and a three kilometre buffer surrounding, the Development Envelope.	Ensure no impact due to predators	Construction phase	During the project	R17_IntroducedPredatorMonitoring E07_EGLP Malleefowl Monitoring 2021-2022	Monitoring has not indicated a change in malleefowl population. Introduced predator monitoring indicates that numbers of predators are not increasing. Covalent plan to implement a control program in 2023.	Compliant

Audit Code	Subject	Requirement	How	Phase	Timeframe	Evidence	Comment	Status
M1118:7.2	Terrestrial Fauna Management Plan	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.	Submit a Terrestrial Fauna Management Plan to CEO of DWER on advice with DBCA	Planning phase	Submit before 21 May 2020	R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
M1118:7.3	Terrestrial Fauna Management Plan	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.	Undertake ground disturbing activities after approval of the Terrestrial Fauna Management Plan.	Construction phase	After approval of the Terrestrial Fauna Management Plan.	R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
M1118:7.4	Terrestrial Fauna Management Plan	The Terrestrial Fauna Management Plan shall: outline how the pre-clearance surveys will be undertaken using LIDAR or similar technology;	Prepare Terrestrial Fauna Management Plan in accordance Condition 7-4 (1).	Planning phase	Submit management plan before 21 May 2020	R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
		outline the procedure for capture and release of Chuditch, and Malleefowl if required, prior to clearing of native vegetation;	Prepare Terrestrial Fauna Management Plan in accordance Condition 7-4 (2).	Planning phase	Submit management plan before 21 May 2020	R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
		specify trigger criteria that must provide an early warning that the environmental objectives identified in Condition 7-1 may not be met;	Prepare Terrestrial Fauna Management Plan in accordance Condition 7-4 (3).	Planning phase	Submit management plan before 21 May 2020	R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
		specify threshold criteria to demonstrate compliance with the environmental objectives specified in Condition 7-1;	Prepare Terrestrial Fauna Management Plan in accordance Condition 7-4 (4).	Planning phase	Submit management plan before 21 May 2020	R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
		specify monitoring to determine if trigger criteria and threshold criteria are exceeded;	Prepare Terrestrial Fauna Management Plan in accordance Condition 7-4 (5).	Planning phase	Submit management plan before 21 May 2020	R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
		specify trigger level actions to be implemented in the event that trigger criteria have been exceeded;	Prepare Terrestrial Fauna Management Plan in accordance Condition 7-4 (6).	Planning phase	Submit management plan before 21 May 2020	R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
		specify threshold contingency actions to be implemented in the event that threshold criteria are exceeded; and	Prepare Terrestrial Fauna Management Plan in accordance Condition 7-4 (7).	Planning phase	Submit management plan before 21 May 2020	R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
		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.	Prepare Terrestrial Fauna Management Plan in accordance Condition 7-4 (8).	Planning phase	Submit management plan before 21 May 2020	R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
M1118:7.5	Terrestrial Fauna Management Plan	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: implement the provisions of the Terrestrial Fauna Environmental Management Plan; and	Implement approved Terrestrial Fauna Management Plan.	Construction phases	After approval of Terrestrial Fauna Management Plan.	R05_TFEMP C06_MS1199 - TFEMP approval letter	The Covalent Lithium Terrestrial Fauna Management Plan (Revision 3) dated 16 September 2020 was approved in writing by DWER on 30 September 2020.	Compliant
		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.	Continuously implement Terrestrial Fauna Management Plan until CEO of DWER notifies that conditions have been met.	As required	The CEO of DWER notifies that objectives and targets have been met and implementation of the strategies are no longer required.	R05_Coalvent Lithium (2022) TFEMP (Rev4) C06_MS1199 - TFEMP approval letter	Refer to Appendix D.	Compliant
M1118:7.6	Terrestrial Fauna Management Plan	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: report the exceedance in writing to the CEO within seven (7) days of the exceedance being identified;	Notify CEO of DWER of any exceedance.	Overall	Within 7 days of event identified.	Management Advice 24/04/2023	No exceedance of threshold criteria occurred during the reporting period, as such no notice of exceedance was required to be submitted to the CEO.	NRATS

Audit Code	Subject	Requirement	How	Phase	Timeframe	Evidence	Comment	Status
		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;	Implement contingency actions to the satisfaction of the CEO of DWER.	Overall	Implement actions within 24 hours of the event being reported. Implement actions until CEO of DWER states that actions are no longer required.			
		<ol style="list-style-type: none"> 2. investigate to determine the cause of the threshold criteria being exceeded; 3. 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 4. 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"> a. details of threshold contingency actions implemented; b. the effectiveness of the threshold contingency actions implemented, against the threshold criteria; c. the findings of the investigations required by Conditions 7-6 (3) and 7-6 (4); d. measures to prevent the threshold criteria being exceeded in the future; e. measures to prevent, control or abate the environmental harm which may have occurred; and justification of the threshold remaining, or being adjusted based on better understanding, demonstrating that objectives will continue to be met.	Submit Incident Report to the CEO of DWER.	Overall	Within 21 days of the event reported.			
M1118:7.7	Terrestrial Fauna Management Plan	The proponent: <ol style="list-style-type: none"> 5. may review and revise the Terrestrial Fauna Environmental Management Plan; or shall review and revise the Terrestrial Fauna Environmental Management Plan as and when directed by the CEO.	Review Terrestrial Fauna Management Plan if amendment is required or if directed by the CEO of DWER to do so.	Overall	As required	Management Advice 13/03/2023	The FVEMP was revised in December following the issuing of MS 1199 (as required). Once approved, the current version of the TFEMP will be Rev 5.	Compliant
M1118:7.8	Terrestrial Fauna Management Plan	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.	Always implement latest approved version.	Overall	Ongoing	R05_TFEMP C06_MS1199 - TFEMP approval letter	Refer to Appendix D	Compliant
M1167:8.1	Offsets	The proponent shall undertake offsets with the objective of counterbalancing the significant residual impact on the following environmental values: <ol style="list-style-type: none"> (1) 386 ha of foraging and breeding habitat for malleefowl (<i>Leipoa ocellata</i>); (2) 386 ha of foraging and potential breeding habitat for chuditch (<i>Dasyurus geoffroii</i>); (3) 2 individuals of Ironcap Banksia (<i>Banksia sphaerocarpa</i> var. <i>dolichostyla</i>); and (4) 9,732 individuals of <i>Microcorys elatoides</i>, as a result of the implementation of the proposal, as defined in Table 2 of Schedule 1 and delineated by coordinates in Schedule 2.	Undertake offsets to counterbalance significant residual impacts.	Overall	Ongoing	Management Advice 13/03/2023 R06_Coalent Lithium Fauna Land Acquisition Strategy R07_Coalent Lithium Flora Offset Strategy	Offset strategies have been submitted but are yet to be approved.	NRATS
M1118:8.2	Threatened Fauna Land Acquisition Strategy	Within twelve (12) months of the publication of this Statement, the proponent shall prepare and submit a Threatened Fauna Land Acquisition Strategy to the requirements of the CEO.	Submit Threatened Fauna Land Acquisition Strategy to the CEO of DWER.	Planning	Submit by 21 November 2020.	R02_61839 Coalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
M1118:8.3	Threatened Fauna Land Acquisition Strategy	The Threatened Fauna Land Acquisition Strategy, as required by condition 8-2, shall: <p>identify an initially unprotected area, or areas, to be acquired and protected for conservation that contains Malleefowl and Chuditch foraging and breeding habitat, in consultation with the Department of Biodiversity, Conservation and Attractions;</p>	Prepare Threatened Fauna Land Acquisition Strategy in accordance with Condition 7-4 (1).	Planning phase	Submit by 21 November 2020.	R02_61839 Coalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
		demonstrate how the proposed offset counterbalances the significant residual impact to 386 ha of foraging and breeding habitat for Malleefowl, and 386 ha of foraging and potential breeding habitat for Chuditch, as identified in Condition 8-1, through application of the principles and completion of the WA Offsets Template, as described in the WA Environmental Offsets Guidelines 2014, and the <i>Environment Protection and Biodiversity Conservation Act 1999</i> Environmental Offsets Policy Assessment Guide (October 2012), or any approved updates of these guidelines, to demonstrate how the proposed offset counterbalances the significant residual impact to Malleefowl and Chuditch, as identified in Condition 8-1;	Prepare Threatened Fauna Land Acquisition Strategy in accordance with Condition 7-4 (2).	Planning phase	Submit by 21 November 2020.	R02_61839 Coalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed

Audit Code	Subject	Requirement	How	Phase	Timeframe	Evidence	Comment	Status
		demonstrate how the proposed offset aligns with the National Recovery Plan for Malleefowl (<i>Leipoa ocellate</i>) and the Chuditch (<i>Dasyurus geoffroii</i>) Recovery Plan, or any subsequent revisions of these plans;	Prepare Threatened Fauna Land Acquisition Strategy in accordance with Condition 7-4 (3).	Planning phase	Submit by 21 November 2020.	R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
		identify the environmental values of the offset area(s);	Prepare Threatened Fauna Land Acquisition Strategy in accordance with Condition 7-4 (4).	Planning phase	Submit by 21 November 2020.	R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
		identify and commit to a protection mechanism for any area(s) of land acquisition, being either the area(s) is ceded to the Crown for the purpose of management for conservation, or the area(s) is managed under other suitable mechanisms for the purpose of conservation as agreed by the CEO;	Prepare Threatened Fauna Land Acquisition Strategy in accordance with Condition 7-4 (5).	Planning phase	Submit by 21 November 2020.	R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
		6. if any land is to be ceded to the Crown for the purpose of management for conservation, the proponent will identify: <ul style="list-style-type: none"> a. the quantum of, and provide funds for, the upfront works associated with establishing the conservation area; b. the quantum of, and provide a contribution of funds for, the management of this area for seven (7) years after completion of purchase; and; can appropriate management body for the ceded land;	Prepare Threatened Fauna Land Acquisition Strategy in accordance with Condition 7-4 (6).	Planning phase	Submit by 21 November 2020.	R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
		detail the monitoring, reporting and evaluation mechanisms for management and/or rehabilitation actions; and	Prepare Threatened Fauna Land Acquisition Strategy in accordance with Condition 7-4 (7).	Planning phase	Submit by 21 November 2020.	R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
		define the role of the proponent and/or any relevant management authority.	Prepare Threatened Fauna Land Acquisition Strategy in accordance with Condition 7-4 (8).	Planning phase	Submit by 21 November 2020.	R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
M1118:8.4	Threatened Fauna Land Acquisition Strategy	Within six (6) months of receiving notice in writing from the CEO, on advice of the Department of Biodiversity, Conservation and Attractions, that the Threatened Fauna Land Acquisition Strategy satisfies the requirements of Conditions 8-2 and 8-3, the proponent shall implement the approved Threatened Fauna Land Acquisition Strategy.	Implement approved Threatened Fauna Land Acquisition Strategy.	As required	Within 6 months since approval of Threatened Fauna Land Acquisition Strategy.	R06_Coalvent Lithium Fauna Land Acquisition Strategy	The Covalent Lithium Threatened Fauna Land Acquisition Strategy has not been approved.	NRATS
M1118:8.5	Threatened Fauna Land Acquisition Strategy	The proponent: <ul style="list-style-type: none"> 7. may review and revise the Threatened Fauna Land Acquisition Strategy; or shall review and revise the Threatened Fauna Land Acquisition Strategy as and when directed by the CEO. 	Review the plan as required or if directed by the CEO of the DWER.	As required	As required	Refer to M1118:8.4	Refer to M1118:8.4	NRATS
M1118:8.6	Threatened Fauna Land Acquisition Strategy	The proponent shall implement the latest version of the Threatened Fauna Land Acquisition Strategy, which the CEO has confirmed by notice in writing, satisfies the requirements of Condition 8-3.	Always implement latest approved version of the plan.	Overall	Ongoing	Refer to M1118:8.4	Refer to M1118:8.4	NRATS
M1118:8.7	Flora Offset Strategy	Within twelve (12) months of the publication of this Statement, the proponent shall prepare and submit a Flora Offset Strategy to the requirements of the CEO.	Submit to the CEO of DWER and Ironcaps Banksia Offsets Strategy and a <i>Microcorys</i> Offset Strategy.	Planning phase	Submit before 21 November 2020.	R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
M1167:8.8	Flora Offset Strategy	The Flora Offset Strategy required by condition 8-7 shall: <ul style="list-style-type: none"> (1) identify an area, or areas, to be protected, managed and/or rehabilitated for conservation that contains the flora values identified in condition 8-1 on advice of the Department of Biodiversity, Conservation and Attractions; (2) demonstrate how the proposed offset counterbalances the significant residual impact to 2 individuals of <i>Banksia sphaerocarpa</i> var. <i>dolichostyla</i> and 9,732 individuals of <i>Microcorys elatoides</i>, as identified in condition 8-1 through application of the principles and completion of the WA Offsets Template, as described in the WA Environmental Offsets Guidelines 2014, and the Environment Protection and Biodiversity Conservation Act 1999 - Environmental Offsets Policy Assessment Guide (October 2012), or any approved updates of these guidelines;; 	Prepare Flora Offsets Strategy in accordance with Condition 8-8	Planning phase	Submit before 21 November 2020.	R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
		identify the environmental values of the offset area(s);				R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
		(4) identify and commit to a protection mechanism for any area(s) of land acquisition, being either the area(s) is ceded to the Crown for the purpose of management for conservation, or the area(s) is managed under other suitable mechanisms for the purpose of conservation as agreed by the CEO;				R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed

Audit Code	Subject	Requirement	How	Phase	Timeframe	Evidence	Comment	Status
		(5) if any land is to be ceded to the Crown for the purpose of management for conservation, the proponent will identify: (a) the quantum of, and provide funds for, the upfront works associated with establishing the conservation area; (b) the quantum of, and provide a contribution of funds for, the management of this area for seven (7) years after completion of purchase; and (c) an appropriate management body for the ceded land;				R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
		(6) where rehabilitation and/or other on-ground actions are proposed, state the objectives and targets to be achieved, including completion criteria, which demonstrate; (a) how on-ground management or rehabilitation actions will result in a tangible improvement to the environmental value(s) being offset; and (b) the consistency of the objectives and targets with the objectives of any relevant Recovery Plans or area management plans;				R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
		(7) detail the management and/or rehabilitation actions and a timeframe for the actions to be undertaken;				R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
		(8) detail any funding arrangements and timing of funding for conservation activities;				R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
		(9) detail the monitoring, reporting and evaluation mechanisms for management and/or rehabilitation actions; and				R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
		10. define the role of the proponent and/or any relevant management authority.				R02_61839 Covalent Lithium CAR 2021 (Rev 0)	This was complete in a previous audit period.	Completed
M1118:8.9	Flora Offset Strategy	Within twelve (12) months of receiving notice in writing from the CEO, on advice of the Department of Biodiversity, Conservation and Attractions, that the Flora Offset Strategy satisfies the requirements of conditions 8-7 and 8-8, the proponent shall substantially commence implementation of the actions within the approved Flora Offset Strategy.	Implement approved strategy in accordance with approved plan within 12 months of receiving notice from the CEO of DWER.	Overall	Implement the strategies within 12 months of receiving notice.	R07_Coalvent Lithium Flora Offset Strategy	The Covalent Lithium Flora Offset Strategy has not been approved.	NRATS
M1118:8.10	Flora Offset Strategy	The proponent shall continue to implement the approved Flora Offset Strategy until the CEO has confirmed by notice in writing that it has been demonstrated that the objectives and targets in the Flora Offset Strategy have been met and therefore the implementation of the actions is no longer required.	Implement approved strategies to the satisfaction of the CEO of DWER.	As required	CEO of DWER notifies that objectives and targets have been met and implementation of the strategies are no longer required.	Refer to M1118:8.9	Refer to M1118:8.9	NRATS
M1118:8.11	Flora Offset Strategy	The proponent: 8. may review and revise the Flora Offset Strategy; or shall review and revise the Flora Offset Strategy as and when directed by the CEO	Review and revise the strategy as required or if directed by the CEO of the DWER.	Overall	As required	Refer to M1118:8.9	Refer to M1118:8.9	NRATS
M1118:8.12	Flora Offset Strategy	The proponent shall implement the latest version of the Flora Offset Strategy, which the CEO has confirmed by notice in writing, satisfies the requirements of condition 8-8.	Always implement latest approved version of the strategy.	Overall	Ongoing	Refer to M1118:8.9	Refer to M1118:8.9	NRATS

Table 4.2: Audit Table of Compliance with Schedule 1 Ministerial Statement 1118

Item	Element	Description	Evidence	Comments	Status
Summary of the Project					
1.1	Proposal Summary	The proposal is to develop a pegmatite-hosted lithium deposit at the abandoned Mt Holland Mine Site, in a Development Envelope of 1,984 ha.	R01_2022 CAR (Rev 0) G01_EGLP_VegetationClearing	This proposal describes a development envelope of 1,984 ha. Construction of the Project commenced in April 2021.	Compliant
1.2	Proposal Summary	The mining proposal involves a footprint of 667 ha of land, including new clearing of up to 386 ha of native vegetation, for a mine pit, waste rock dump, integrated waste landform, processing plant, airstrip, accommodation village and associated infrastructure.	R01_2022 CAR (Rev 0) G01_EGLP_VegetationClearing	Construction of the Project commenced in April 2021.	Compliant
Location and Authorisation Extent of Physical and Operational Elements					
1.3	Mine and associated infrastructure	Clearing of no more than 386 ha of native vegetation, within a development envelope of 1,984 ha (Figure 2).	R01_2022 CAR (Rev 0) G01_EGLP_VegetationClearing	This proposal describes a development envelope of 1,984 ha. Construction of the Project commenced in April 2021. The proponent has cleared 358.96ha.	Compliant
1.4	Mining	Earl Grey open cut mine pit (Figure 2).	Not applicable	Construction of the Project commenced in April 2021.	Compliant

Table 4.3: Audit Table of Compliance with Ministerial Statement 1199

Audit Code	Subject	Requirement	How	Phase	Timeframe	Evidence	Comment	Status
M1199:1.1(1)	Limitations and Extent of Proposal	When implementing the proposal, the proponent shall ensure the proposal does not exceed the following extents: Development Envelope 2,347 ha	Implement proposal to the stated extent	Overall	Prior to November 2062	R01_2022 CAR (Rev 0) G01_EGLP_VegetationClearing Management advice 24/04/2023	The proponent has not exceeded the original development envelope of 1984 ha. This will only occur when the applicable management plans are approved.	Compliant
M1199:1.1(2)	Limitations and Extent of Proposal	When implementing the proposal, the proponent shall ensure the proposal does not exceed the following extents: Indicative Disturbance Footprint 882 ha	Implement proposal to the stated extent	Overall	Prior to November 2062	R01_2022 CAR (Rev 0) G01_EGLP_VegetationClearing Management advice 24/04/2023	The project has not increased its original disturbance footprint. This will only occur when the applicable management plans are approved.	Compliant
M1199:1.1(3)	Limitations and Extent of Proposal	When implementing the proposal, the proponent shall ensure the proposal does not exceed the following extents: Clearing Extent: Clearing of no more than 442 ha of native vegetation	Implement proposal to the stated extent	Overall	Prior to November 2062	R01_2022 CAR (Rev 0) G01_EGLP_VegetationClearing Management advice 24/04/2023	The project has not commenced any additional clearing under MS1199. This will only occur when the applicable management plans are approved.	Compliant
M1199:1.1(4)	Limitations and Extent of Proposal	When implementing the proposal, the proponent shall ensure the proposal does not exceed the following extents: Mine and associated infrastructure: Mining operations and mining infrastructure including a mine pit, waste rock landforms, tailings storage facility, processing plant, airstrip, accommodation village, water supply pipeline, solar plant, and associated infrastructure.	Implement proposal to the stated extent	Overall	Prior to November 2062	Management advice 24/04/2023	No additional works have commenced.	Compliant
M1199:1.1(5)	Limitations and Extent of Proposal	When implementing the proposal, the proponent shall ensure the proposal does not exceed the following extents: Project life: Up to 40 years from the date of this Statement	Implement proposal to the stated extent	Overall	Prior to November 2062	Management Advice 13/03/2023	The Ministerial Statement is dated 23/11/2022. The date of the audit is within the 40 year life of the proposal.	Compliant
M1199:2.1(1)	Flora and Vegetation	The proponent shall implement the proposal to meet the following environmental outcomes: (1) clearing of no more than 442 ha of native vegetation;	Implement proposal to the stated extent	Overall	Prior to November 2062	Refer to M1199:1.1(3)	Refer to M1199:1.1(3)	Compliant
M1199:2.1(2)	Flora and Vegetation	The proponent shall implement the proposal to meet the following environmental outcomes: (2) no direct or indirect disturbance to flora and vegetation in the exclusion zones as shown on Figure 3;	Implement proposal to the stated extent	Overall	Prior to November 2062	Refer to MS1118:6.1.2 / MS1167:6.1.2	Refer to MS1118:6.1.2 / MS1167:6.1.2	Compliant
M1199:2.1(3)	Flora and Vegetation	The proponent shall implement the proposal to meet the following environmental outcomes: (3) no more than 9,732 individuals of <i>Microcorys elatoides</i> and two (2) individuals of <i>Banksia sphaerocarpa</i> var. <i>dolichostyla</i> to be subject to direct disturbance inside the development envelope;	Implement proposal to the stated extent	Overall	Prior to November 2062	G02_Banksia and Microcorys impact	The proponent ensured that there was no proposal related impacts on more than the thresholds. The total number of <i>Microcorys elatoides</i> directly impacted by EGLP activities: 6,559 individuals. The total number of <i>Banksia dolichostyla</i> directly impacted by EGLP activities: 0 individuals Note – updated taxonomic name, no change in conservation status.	Compliant
M1199:2.1(4)	Flora and Vegetation	The proponent shall implement the proposal to meet the following environmental outcomes: (4) The loss of no more than: • 7% of the known population of <i>Labiichea rossii</i> ; • 7% of the known population of <i>Microcorys</i> sp. Mt Holland broad-leaf; • 5% of the known population of <i>Acacia lachnocarpa</i> ; • 2% of the known population of any other priority 1 flora species.	Implement proposal to the stated extent	Overall	Prior to November 2062	Management Advice 13/03/2023	No clearing under MS1199 has been undertaken.	Compliant
M1199:2.2(1)	Flora and Vegetation	The proponent shall implement the proposal to achieve the following environmental objectives: (1) avoid, where practicable, and otherwise minimise direct disturbance to priority flora species outside the flora exclusion zones detailed on Figure 3;	Avoid and minimise direct disturbance to priority flora species outside the flora exclusion zone	Overall	Prior to November 2062	R04_Coalent Lithium FVEMP	The proponent has implemented a Flora and Vegetation Environmental Management Plan and revised it as required to achieve the objective.	Compliant
M1199:2.2(2)	Flora and Vegetation	The proponent shall implement the proposal to achieve the following environmental objectives: (2) avoid, where practicable and otherwise minimise indirect impacts to flora and vegetation including but not limited to impacts from clearing, dust, weeds and fire.	Avoid and minimise indirect impacts to flora and vegetation from clearing, dust, weeds and fire.	Overall	Prior to November 2062	R04_Coalent Lithium FVEMP	The proponent has implemented a Flora and Vegetation Environmental Management Plan and revised it as required to achieve the objective.	Compliant
M1199:2.3	Flora and Vegetation	Prior to clearing within the areas subject to the significant amendment as described in section 1 of the proponent's section 38 Referral Supporting Document (Revision 3, April 2022), the proponent must undertake pre-clearance vegetation and flora survey(s), in accordance with Technical guidance – Flora and vegetation surveys for environmental impact assessment, or any approved updates of these guidelines.	Undertake pre-clearance vegetation and flora surveys	Planning phase	Prior to clearing within areas subject to significant amendment as described in section 1 of the proponent's Section 38 Referral Supporting Document	Management advice 24/04/2023	No clearing in the areas subject to the significant amendment has been undertaken.	Compliant
M1199:2.4	Flora and Vegetation	In order to meet the outcomes of condition 2-1, and the objectives of condition 2-2, within six (6) months of the date of this Statement, the proponent shall update the Earl Grey Lithium Project Flora and Vegetation Environmental Management Plan (July 2022). This plan shall:	Update of the EGLP Flora and Vegetation Environmental	Planning phase	By 23 May 2023	Management Advice 13/03/2023	This plan was submitted 12/12/2022.	Compliant

Audit Code	Subject	Requirement	How	Phase	Timeframe	Evidence	Comment	Status
		<p>(1) include details of the timing, methods, limitations, and results of the pre-clearance surveys required by condition 2-3 and demonstrate how the findings of the survey(s) have been considered, including provision of mitigation measures;</p> <p>(2) describe how impacts to threatened and priority flora species outside the flora exclusion zones will be avoided where possible, and/or minimised;</p> <p>(3) include actions to ensure that dust, weeds, and fire are appropriately managed within the development envelope;</p> <p>(4) specify trigger criteria that must provide an early warning that the threshold criteria identified in condition 2-4(5) may not be met;</p> <p>(5) specify threshold criteria to demonstrate compliance with the environmental outcomes specified in condition 2-1;</p> <p>(6) specify monitoring to determine if trigger criteria and threshold criteria are exceeded;</p> <p>(7) specify trigger level actions to be implemented in the event that trigger criteria have been exceeded;</p> <p>(8) specify threshold contingency actions to be implemented in the event that threshold criteria are exceeded;</p> <p>(9) provide contingency measures and adaptive management techniques to ensure the outcomes of conditions 2-1 and 2-2 are met, and include options for changes to operations and reductions in disturbance; and</p> <p>(10) provide the format and timing for the reporting of monitoring results against trigger criteria and threshold criteria to demonstrate that the outcome of condition 2-1 and the objectives of condition 2-2 have been met over the reporting period in the Compliance Assessment Report required by condition 8-6.</p>	Management Plan with details in Condition 2-4.					
M1199:2.5	Flora and Vegetation	The proponent must not commence clearing exceeding the extent of the original authorised proposal until the CEO has confirmed by notice in writing that the Earl Grey Lithium Project Flora and Vegetation Environmental Management Plan satisfies the requirements of condition 2-4.	Must not commence clearing until EGLP FVEMP has been approved.	Planning.	Prior to clearing.	Management Advice 13/03/2023	Clearing exceeding the extent of the originally approved proposal did not commence during the reporting period.	Compliant
M1199:2.6	Flora and Vegetation	The proponent must implement the most recent version of Flora and Vegetation Environmental Management Plan confirmed for implementation by the CEO, with the objective of ensuring the outcomes of condition 2-1 and objectives of condition 2-2 are achieved/met, until the CEO has confirmed by notice in writing that the proponent has demonstrated that the environmental outcomes in condition 2-1 have been achieved and the objectives of 2-2 have been met.	Implement the most recent version of the approved EGLP FVEMP.	Overall	Prior to November 2062	R04_FVEMP	The current revision of the FVEMP (Rev 6) was implemented in the reporting period.	Compliant
M1199:2.7	Flora and Vegetation	<p>In the event that monitoring, or investigations indicates exceedance of threshold criteria specified in the confirmed Flora and Vegetation Environmental Management Plan, the proponent shall:</p> <p>(1) report the exceedance in writing to the CEO within seven (7) days of the exceedance being identified;</p> <p>(2) implement the threshold contingency actions specified in the Flora and Vegetation Environmental Management Plan within twenty-four (24) hours of the exceedance being reported as required by condition 2-7 (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;</p> <p>(3) investigate to determine the cause of the threshold criteria being exceeded;</p> <p>(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</p> <p>(5) provide a report to the CEO within twenty-one (21) days of the exceedance being reported as required by condition 2-7(1). The report shall include:</p> <p>(a) details of threshold contingency actions implemented;</p> <p>(b) the effectiveness of the threshold contingency actions implemented, against the threshold criteria;</p> <p>(c) the findings of the investigations required by conditions 2-7(3) and 2-7(4);</p> <p>(d) measures to prevent the threshold criteria being exceeded in the future;</p> <p>(e) measures to prevent, control or abate the environmental harm which may have occurred; and</p> <p>(f) justification of the threshold remaining, or being adjusted based on better understanding, demonstrating that objectives will continue to be met.</p>	<p>Report exceedance to the CEO.</p> <p>Implement contingency actions until the CEO has confirmed by writing that threshold criteria have been met and actions are no longer required.</p> <p>Submit Incident Report to the CEO of DWER</p>	<p>Overall</p> <p>Overall</p> <p>Overall</p>	<p>Within 7 days of event identified</p> <p>Implement actions within 24 hours of event reported. Action to be continuously implemented until CEO of DWER notifies that actions are no longer required.</p>	<p>Management advice 24/04/2023</p>	There was no exceedance of a threshold criteria in the audit period.	Compliant

Audit Code	Subject	Requirement	How	Phase	Timeframe	Evidence	Comment	Status
M1199:2.8	Flora and Vegetation	The proponent shall make the Flora and Vegetation Environmental Management Plan required by condition 2-4 publicly available.	EGLP FVEMP shall be publicly available.	Overall	Ongoing	R04_FVEMP E02_Website Screenshot 20230424	The FVEMP is publicly available on the Covalent website.	Compliant
M1199:2.9	Flora and Vegetation	The proponent: (1) may review and revise the confirmed Flora and Vegetation Environmental Management Plan and submit it to the CEO; (2) shall review and revise the confirmed Flora and Vegetation Environmental Management Plan and submit it to the CEO as and when directed by the CEO by a notice in writing.	Review the management plan if required or if directed by the CEO of DWER to do so.	Overall	As required	Refer to MS1199:2.4	Refer to MS1199:2.4	Compliant
M1199:2.10	Flora and Vegetation	The proponent shall implement the latest revision of the Flora and Vegetation Environmental Management Plan, which the CEO has confirmed by notice in writing, satisfies the requirements of condition 2-4.	Always implement latest approved version of plan.	Overall	As required	R04_FVEMP Appendix E	The proponent has implemented Rev 6 of the FVEMP in the audit period.	Compliant
M1199:3.1(1)	Terrestrial Fauna	The proponent shall implement the proposal to meet the following environmental outcomes and objectives: (1) no direct or indirect impacts to malleefowl mounds within the exclusion areas as shown on Figure 4;	Ensure that proposal has no direct or indirect impacts on Malleefowl mounds within the exclusion zones as shown in Figure 4.	Construction phase	During ground disturbing activities.	E07_EGLP Malleefowl Monitoring 2021-2022 E05_Fauna Pre-clearance Survey	The Project did not have any direct or indirect impacts on Malleefowl mounds within the exclusion areas (E07).	Compliant
M1199:3.1(2)	Terrestrial Fauna	The proponent shall implement the proposal to meet the following environmental outcomes and objectives: (2) no direct or indirect adverse impacts to malleefowl and chuditch within the development envelope;	Ensure no direct or indirect impacts to Malleefowl and Chuditch within the development envelope.	Construction phase	During ground disturbing activities.	07_EGLP Malleefowl Monitoring 2021-2022 E08_EGLP Chuditch Monitoring 2022	Monitoring was undertaken of both malleefowl and chuditch. Neither report made any indications that there is/is not direct or indirect proposal-related significant adverse impacts to malleefowl and chuditch within the development envelope.	Compliant
M1199:3.1(3)	Terrestrial Fauna	The proponent shall implement the proposal to meet the following environmental outcomes and objectives: (3) no removal of active malleefowl mounds within the development envelope;	Ensure that no active Malleefowl mounds within the development envelope is removed.	Construction phase	During ground disturbing activities.	E07_EGLP Malleefowl Monitoring 2021-2022 E05_Fauna Pre-clearance Survey	Monitoring indicated that all previously monitored malleefowl mounds had not been disturbed. Pre-clearance surveys were undertaken prior to all clearing activities.	Compliant
M1199:3.1(4)	Terrestrial Fauna	The proponent shall implement the proposal to meet the following environmental outcomes and objectives: (4) minimise proposal-related direct or adverse indirect impacts to malleefowl from feral animals within the development envelope.	Ensure no direct or indirect impacts on malleefowl from feral animals within the development envelope	Overall	Ongoing	R17_IntroducedPredatorMonitoring E07_EGLP Malleefowl Monitoring 2021-2022	Monitoring has not indicated a change in malleefowl population. Introduced predator monitoring indicates that numbers of predators are not increasing. Covalent plan to implement a control program in 2023.	Compliant
M1199:3.2	Terrestrial Fauna	In order to meet the requirements of condition 3-1, within six (6) months of approval of this Statement, the proponent shall update the Earl Grey Lithium Project Terrestrial Fauna Environmental Management Plan (April 2022). This plan shall: (1) outline how the pre-clearance surveys will be undertaken using LIDAR or similar technology; (2) outline the procedure for capture and release of chuditch, and malleefowl if required, prior to clearing of native vegetation; (3) specify trigger criteria that must provide an early warning that the environmental outcomes and objectives identified in condition 3-1 may not be met; (4) specify threshold criteria to demonstrate compliance with the environmental outcomes and objectives specified in condition 3-1; (5) specify monitoring to determine if trigger criteria and threshold criteria are exceeded; (6) specify trigger level actions to be implemented in the event that trigger criteria have been exceeded; (7) specify threshold contingency actions to be implemented in the event that threshold criteria are exceeded; (8) provide contingency measures and adaptive management techniques to ensure the outcomes of conditions 3-1 are met, and include options for changes to operations and reductions in disturbance; and (9) provide the format and timing for the reporting of monitoring results against trigger criteria and threshold criteria to demonstrate that condition 3-1 has been met over the reporting period in the Compliance Assessment Report required by condition 8-6.	Update of the EGLP Terrestrial Fauna Environmental Management Plan with details in Condition 3-2.	Planning phase	By 23 May 2023	Management Advice 13/03/2023 C04_Earl Grey Lithium Project (Statement 1199) EMP Revisions	The TFEMP was resubmitted following the approval of MS 1199 on 12/12/2022.	Compliant
M1199:3.3	Terrestrial Fauna	The proponent must not commence clearing exceeding the extent of the original authorised proposal until the CEO has confirmed by notice in writing that the Earl Grey Lithium Project Terrestrial Fauna Environmental Management Plan satisfies the requirements of condition 3-2.	Must not commence clearing until EGLP TFEMP has been approved.	Planning.	Prior to clearing.	Management Advice 13/03/2023	Clearing exceeding the extent of the originally approved proposal did not commence during the reporting period.	Compliant

Audit Code	Subject	Requirement	How	Phase	Timeframe	Evidence	Comment	Status
M1199:3.4	Terrestrial Fauna	The proponent must implement the most recent version of Terrestrial Fauna Environmental Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated that the environmental outcomes and objectives in condition 3-1 have been met.	Implement the most recent version of the approved EGLP TFEMP.	Overall	Prior to November 2062	R05_TFEMP	The current revision of the TFEMP (Rev 4) was implemented in the reporting period.	Compliant
M1199:3.5	Terrestrial Fauna	In the event that monitoring or investigations indicate exceedance of threshold criteria specified in the Terrestrial Fauna Environmental Management Plan, the proponent shall: (1) report the exceedance in writing to the CEO within seven (7) days of the exceedance being identified;	Report exceedance to the CEO.	Overall	Within 7 days of event identified	Management advice 24/04/2023	There was no exceedance of a threshold criteria in the audit period.	Compliant
		(2) implement the threshold contingency actions specified in the Terrestrial Fauna Environmental Management Plan within twenty-four (24) hours of the exceedance being reported as required by condition 3-5(1) and continue implementation of those actions until the CEO has confirmed by notice in writing that it has been demonstrated that the threshold criteria are being met and the implementation of the threshold contingency actions is no longer required;	Implement contingency actions until the CEO has confirmed by writing that threshold criteria have been met and actions are no longer required.	Overall	Implement actions within 24 hours of event reported. Action to be continuously implemented until CEO of DWER notifies that actions are no longer required.			
		(3) investigate to determine the cause of the threshold criteria being exceeded; (4) investigate to provide information for the CEO to determine potential environmental harm or alteration of the environment that occurred due to threshold criteria being exceeded; (5) provide a report to the CEO within twenty-one (21) days of the exceedance being reported as required by condition 3-5(1). The report shall include: (a) details of threshold contingency actions implemented; (b) the effectiveness of the threshold contingency actions implemented, against the threshold criteria; (c) the findings of the investigations required by conditions 3-5(3) and 3-5(4); (d) measures to prevent the threshold criteria being exceeded in the future; (e) measures to prevent, control or abate the environmental harm which may have occurred; and (f) justification of the threshold remaining, or being adjusted based on better understanding, demonstrating that objectives will continue to be met.	Submit Incident Report to the CEO of DWER	Overall				
M1199:3.6	Terrestrial Fauna	The proponent: (1) may review and revise the Terrestrial Fauna Environmental Management Plan; (2) shall review and revise the Terrestrial Fauna Environmental Management Plan as and when directed by the CEO.	Review the management plan if required or if directed by the CEO of DWER to do so.	Overall	As required	Refer to MS1199:3.2	Refer to MS1199:3.2	Compliant
M1199:3.7	Terrestrial Fauna	The proponent shall implement the latest revision of the Terrestrial Fauna Environmental Management Plan, which the CEO has confirmed by notice in writing, satisfies the requirements of condition 3-2.	Always implement latest approved version of plan.	Overall	As required	R05_TFEMP Appendix F	The proponent has implemented Rev 4 of the TFEMP in the audit period.	Compliant
M1199:4.1	Offsets	The proponent must implement offsets to counterbalance the significant residual impacts of the proposal on the following environmental values: (1) 436 ha of foraging and breeding habitat for malleefowl (<i>Leipoa ocellata</i>); (2) 442 ha of foraging and potential breeding habitat for chuditch (<i>Dasyurus geoffroii</i>); (3) 2 individuals of Ironcap Banksia (<i>Banksia sphaerocarpa</i> var. <i>dolichostyla</i>); and (4) 9,732 individuals of <i>Microcorys elatoides</i> , as a result of the implementation of the proposal and the significant amendment to the approved proposal described in section 1 of the proponent's section 38 Referral Supporting Document.	Undertake offsets to counterbalance significant residual impacts.	Overall	Ongoing	Management Advice 13/03/2023	The Strategies have not been approved by DWER to date.	NRATS
M1199:4.2	Threatened Fauna Land Acquisition Strategy	In order to meet the requirements of conditions 4-1 (1) and 4-1(2), the proponent shall submit for approval, the Earl Grey Lithium Project Fauna Offset Strategy within six (6) months of the date of this Statement. This strategy shall:	Submit Threatened Fauna Land Acquisition Strategy to the CEO of DWER.	Planning	Submit by 23 May 2023.	Management Advice 13/03/2023	A new Threatened Flora Land Acquisition Strategy will be submitted by 23/5/2023.	NRATS
		(1) identify an initially unprotected area, or areas, to be acquired and protected for conservation that contains malleefowl and chuditch foraging and breeding habitat, in consultation with the Department of Biodiversity, Conservation and Attractions;						

Audit Code	Subject	Requirement	How	Phase	Timeframe	Evidence	Comment	Status	
		<p>(2) demonstrate how the proposed offset counterbalances the significant residual impact to 436 ha of foraging and breeding habitat for malleefowl, and 442 ha of foraging and potential breeding habitat for chuditch, as identified in condition 4-1, through application of the principles and completion of the WA Offsets Template, as described in the WA Environmental Offsets Guidelines 2014, and the Environment Protection and Biodiversity Conservation Act 1999 Environmental Offsets Policy Assessment Guide (October 2012), or any approved updates of these guidelines, to demonstrate how the proposed offset counterbalances the significant residual impact to malleefowl and chuditch, as identified in condition 4-1;</p> <p>(3) demonstrate how the proposed offset aligns with the National Recovery Plan for Malleefowl (<i>Leipoa ocellata</i>) and the Chuditch (<i>Dasyurus geoffroii</i>) Recovery Plan, or any subsequent revisions of these plans;</p> <p>(4) identify the environmental values of the offset area(s);</p> <p>(5) identify and commit to a protection mechanism for any area(s) of land acquisition, being either the area(s) is ceded to the Crown for the purpose of management for conservation, or the area(s) is managed under other suitable mechanisms for the purpose of conservation as agreed by the CEO;</p> <p>(6) identify how the ongoing performance of the offset measures, and whether they are achieving the outcomes in conditions 4-1(1) and 4-1(2), will periodically be made publicly available;</p> <p>(7) if any land is to be ceded to the Crown for the purpose of management for conservation, the proponent will identify:</p> <p>(a) the quantum of, and provide funds for, the upfront works associated with establishing the conservation area;</p> <p>(b) the quantum of, and provide a contribution of funds for, the management of this area for seven (7) years after completion of purchase; and</p> <p>(c) an appropriate management body for the ceded land;</p> <p>(8) detail the monitoring, reporting and evaluation mechanisms for management and/or rehabilitation actions; and</p> <p>(9) define the role of the proponent and/or any relevant management authority.</p>							
M1199:4.3	Threatened Fauna Land Acquisition Strategy	Within six (6) months of receiving notice in writing from the CEO, on advice of the Department of Biodiversity, Conservation and Attractions, that the Threatened Fauna Land Acquisition Strategy satisfies the requirements of conditions 4-1 and 4-2, the proponent shall implement the approved Threatened Fauna Land Acquisition Strategy.	Implement approved Threatened Fauna Land Acquisition Strategy.	As required	Within 6 months since approval of Threatened Fauna Land Acquisition Strategy.	Refer to 4.2	Refer to 4.2	NRATS	
M1199:4.4	Threatened Fauna Land Acquisition Strategy	The proponent: (1) may review and revise the Threatened Fauna Land Acquisition Strategy; or (2) shall review and revise the Threatened Fauna Land Acquisition Strategy as and when directed by the CEO.	Review the plan as required or if directed by the CEO of the DWER.	As required	As required	Refer to 4.2	Refer to 4.2	NRATS	
M1199:4.5	Threatened Fauna Land Acquisition Strategy	The proponent shall implement the latest version of the Threatened Fauna Land Acquisition Strategy, which the CEO has confirmed by notice in writing, satisfies the requirements of condition 4-2.	Always implement latest approved version of the plan.	Overall	Ongoing	Management Advice 13/03/2023	No TFLAS has been approved to date.	NRATS	
M1199:4.6	Flora Offset Strategy	The proponent must, in consultation with Department of Biodiversity, Conservation and Attractions, prepare a Flora and Vegetation Offset Strategy that demonstrates how the following environmental outcome will be achieved, and how this achievement will be substantiated, and submit it to the CEO: (1) counterbalance the significant residual impacts listed in conditions 4-1(3) and 4-1(4).	Submit to the CEO of DWER a Flora and Vegetation Offset Strategy.	Planning phase	Submit by 23 May 2023.	Management Advice 13/03/2023	A new Flora Offset Strategy will be submitted by 23/5/2023.	NRATS	
M1199:4.7	Flora Offset Strategy	The Flora and Vegetation Offset Management Plan must: (1) identify an area, or areas, to be protected, managed and/or rehabilitated for conservation that contains the flora values identified in conditions 4-1(3) and 4-1(4) on advice of the Department of Biodiversity, Conservation and Attractions; (2) identify an area, or areas for on-ground management; (3) demonstrate how the environmental values within the Proposed Offset Conservation Areas will be maintained and improved in order to counterbalance the significant residual impact to the environmental values in condition 4-1 and achieve the environmental outcomes in condition 4-6(1); (4) demonstrate application of the principles of the WA Environmental Offsets Policy, the WA Environmental Offsets Metric and the WA Offsets Template, as described in the WA Environmental Offsets Guidelines, and the Environment Protection and Biodiversity Conservation Act 1999 Environmental Offsets Policy Assessment Guide, or any subsequent revisions of these documents;				Management Advice 13/03/2023	The Flora Offset Strategy will include the requirements specified.	NRATS	

Audit Code	Subject	Requirement	How	Phase	Timeframe	Evidence	Comment	Status
		<p>(5) identify how the ongoing performance of the offset measures, and whether they are achieving the outcomes in condition 4-6, will periodically be made publicly available;</p> <p>(6) identify how the Proposed Offset Conservation Areas will be protected, being either the sites are ceded to the Crown for the purpose of management for conservation, or the sites are managed under other suitable mechanism for the purpose of conservation as agreed by the CEO by notice in writing; and</p> <p>(7) for offsets acquired specify:</p> <p>(a) a timeframe and works associated with establishing the Proposed Offset Conservation Areas, including a contribution for maintaining the offset for at least twenty (20) years after completion of purchase;</p> <p>(b) identify the relevant management body for the ongoing management of the Proposed Offset Conservation Areas, including its role, and the role of the proponent, and confirmation in writing that the relevant management body accepts responsibility for its role.</p>						
M1199:4.8	Microcorys elatoides Conservation Plan	<p>The proponent shall fund and undertake an offset for <i>Microcorys elatoides</i> to meet the following outcome:</p> <p>(1) ensure the long-term viability of <i>Microcorys elatoides</i>.</p>	Fund and undertake offsets	Ongoing	Ongoing	Management Advice 13/03/2023	The <i>Microcorys elatoides</i> Conservation Plan is being established to ensure the long-term viability of <i>Microcorys elatoides</i> .	NRATS
M1199:4.9	Microcorys elatoides Conservation Plan	<p>Within twelve (12) months of the date of this Statement, or as otherwise agreed in writing by the CEO, as part of the Flora Offset Strategy, the proponent shall prepare and submit to the CEO a <i>Microcorys elatoides</i> Conservation Plan, for the offset required by condition 4-8, which identifies on-ground conservation and research projects to be undertaken that contribute to long-term conservation outcomes for the species. The plan shall be to the satisfaction of the CEO on advice of the Department of Biodiversity, Conservation and Attractions.</p>	Submit to the CEO of DWER a <i>Microcorys elatoides</i> Conservation Plan	Planning phase	Submit by 23/11/2023	Management Advice 13/03/2023	The <i>Microcorys elatoides</i> Conservation Plan will be submitted by 23/11/2023	NRATS
M1199:4.10(1)	Microcorys elatoides Conservation Plan	<p>The <i>Microcorys elatoides</i> Conservation Plan shall:</p> <p>(1) On ground management</p> <p>(a) state the targets to be achieved, including completion criteria, which will result in a tangible improvement to the environmental values being offset;</p> <p>(b) demonstrate the consistency of the targets with environmental outcomes in conditions 4-6(1) and 4-8, and the objectives of any relevant guidance, including but not limited to, recovery plans or area management plans;</p> <p>(c) detail the on-ground management actions, with associated timeframes for implementation and completion, to achieve the targets identified in conditions 4-6(1) and 4-8; and</p> <p>(d) detail the monitoring, reporting and evaluation mechanisms for the targets and actions identified under condition 4-10(1)(a).</p>	Submit to the CEO of DWER a <i>Microcorys elatoides</i> Conservation Plan	Planning phase	Submit by 23/11/2023	Refer to 4.9	Refer to 4.9	NRATS

Audit Code	Subject	Requirement	How	Phase	Timeframe	Evidence	Comment	Status
M1199:4.10(2)	<i>Microcorys elatoides</i> Conservation Plan	The <i>Microcorys elatoides</i> Conservation Plan shall: (2) Where research is proposed, prepare a research program that: (a) identifies the objectives and intended outcomes, and specifies the deliverables and competition criteria; (b) identifies how the research will result in a positive conservation outcome, and will either improve management and protection, address priority knowledge gaps that have been identified as a research priority needed to improve management and protection, for the environmental values identified in condition 4-1(4); (c) demonstrate consistency of the objectives in condition 4-10(2) with any relevant guidance, including but not limited to, recovery plans or area management plans, the principles of the WA Environmental Offsets Policy, the WA Environmental Offsets Guidelines, or any subsequent revisions of these documents; (d) identifies and justifies the proportion and allocation of resources for each specific offset addressed by the Flora and Vegetation Offset Strategy; (e) provides an implementation and reporting schedule, including an outline of key activities, all deliverables, stages of implementation, reporting of research results (including interim results), reporting on implementation status, and milestones towards completion criteria; (f) identifies the governance arrangements including responsibilities for implementing, and oversight of, the research program, agreements with government agencies, agreements with any third parties, and contingency measures; (g) identify how a research program summary, and the results (including interim results) of the research program will be communicated and/or published in an open access format; and (h) identifies the third party to carry out the work required to meet the outcomes of conditions 4-1(4) and 4-8 who is satisfactory for the role to the CEO. In applying to the CEO for endorsement of the selected third parties, the proponent shall provide: • demonstration of the track record, experience, qualifications and competencies of the proposed third party to carry out the work and achieve the outcomes.	Submit to the CEO of DWER a <i>Microcorys elatoides</i> Conservation Plan	Planning phase	Submit by 23/11/2023	Refer to 4.9	Refer to 4.9	NRATS
M1199:4.11	<i>Microcorys elatoides</i> Conservation Plan	Within six (6) months of receiving notice in writing from the CEO that the <i>Microcorys elatoides</i> Conservation Plan satisfies the requirements of conditions 4-9 to 4-10, the proponent shall commence the implementation of the conservation plan.				Refer to 4.9	Refer to 4.9	NRATS
M1199:4.12	<i>Microcorys elatoides</i> Conservation Plan	The proponent shall make the <i>Microcorys elatoides</i> Conservation Plan required by condition 4-10 publicly available.				Refer to 4.9	Refer to 4.9	NRATS
M1199:5.1(1)	Rehabilitation	The proponent must implement the proposal to ensure the following environmental outcomes are achieved: (1) rehabilitated areas are capable of sustaining the long-term viability of <i>Banksia sphaerocarpa</i> var. <i>dolichostyla</i> and <i>Microcorys elatoides</i> impacted from the proposal;				Management Advice 24/04/2023	There are no areas under rehabilitation or planned for rehabilitation at the current time.	NRATS
M1199:5.1(2)	Rehabilitation	The proponent must implement the proposal to ensure the following environmental outcomes are achieved: (2) rehabilitated landforms are stable and do not cause pollution or environmental harm;				Refer to MS1199:5.1(1)	Refer to MS1199:5.1(1)	NRATS
M1199:5.1(3)	Rehabilitation	The proponent must implement the proposal to ensure the following environmental outcomes are achieved: (3) rehabilitated vegetation is self-sustaining; and				Refer to MS1199:5.1(1)	Refer to MS1199:5.1(1)	NRATS
M1199:5.1(4)	Rehabilitation	The proponent must implement the proposal to ensure the following environmental outcomes are achieved: (4) rehabilitated areas are consistent with the species diversity and abundance of native vegetation within comparative analogue or reference sites.				Refer to MS1199:5.1(1)	Refer to MS1199:5.1(1)	NRATS
M1199:5.2	Rehabilitation	In order demonstrate the outcomes of condition 5-1 can be met, the proponent shall commence rehabilitation trials within twelve (12) months of the date of this Statement, or as otherwise agreed in writing by the CEO.				Management advice	Audit period is less than 12 months from the date of the statement.	NRATS

Audit Code	Subject	Requirement	How	Phase	Timeframe	Evidence	Comment	Status
M1199:5.3	Rehabilitation	The proponent shall submit annually to the CEO, with the annual compliance assessment report required by condition 8-6, a rehabilitation trial progress report, which identifies: (1) results of rehabilitation trials; and (2) contingency measures and actions in the event trials indicate the rehabilitation objective may not be achieved.				Refer to MS1199:5.1(1)	Refer to MS1199:5.1(1)	NRATS
M1199:5.4	Rehabilitation	The proponent shall continue to implement the rehabilitation trials required by condition 5-2 until the proponent has demonstrated that the outcomes of condition 5-1 will be met, or as otherwise agreed by the CEO.				Refer to MS1199:5.2	Refer to MS1199:5.2	NRATS
M1199:6.1	Environmental Performance Report	The proponent shall submit an Environmental Performance Report to the Minister every five (5) years.				Management Advice 24/04/2023	Ministerial date is 23/11/2022, Environmental Performance Report is due in 2027.	NRATS
M1199:6.2	Environmental Performance Report	The first Environmental Performance Report shall be submitted within three months after five (5) years from substantial commencement, or such other time as may be approved by the CEO.				Refer to 6.1	Refer to 6.1	NRATS
M1199:6.3	Environmental Performance Report	Each Environmental Performance Report shall report on proposal impacts on the following environmental values: (1) state of flora and vegetation; (2) state of terrestrial fauna; and (3) state of the holistic environment.				Refer to 6.1	Refer to 6.1	NRATS
M1199:6.4	Environmental Performance Report	The Environmental Performance Report must include: (1) a comparison of the environmental values identified in condition 6-3 at the end of the five (5) year period; against the state of each environmental value at the beginning of the five (5) year period; (2) a comparison of the environmental values identified in condition 6-3 at the end of the five (5) year period; against the state of the environmental values identified in first Environmental Performance Report submitted in accordance with condition 6-2; and (3) proposed adaptive management and continuous improvement strategies.				Refer to 6.1	Refer to 6.1	NRATS
M1199:6.5	Environmental Performance Report	The Environmental Performance Report may be in whole, or part prepared in conjunction with other proponents where there are cumulative impacts from their proposals.				Refer to 6.1	Refer to 6.1	NRATS
M1199:7.1	Contact Details	The proponent shall notify the CEO of any change of its name, physical address, or postal address for the serving of notices or other correspondence within twenty-eight (28) days of such change. Where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State.				Management Advice 13/03/2023	There is no change to the name, physical address or postal address of the proponent.	Compliant
M1199:8.1	Compliance Reporting	The proponent shall prepare and maintain a Compliance Assessment Plan which is submitted to the CEO at least six (6) months prior to the first Compliance Assessment Report required by condition 8-6, or prior to implementation of the proposal, whichever is sooner.	Prepare and submit a Compliance Assessment Plan to the CEO.	Planning phase	Plan to be submitted before 23 July 2023.	R18_CAP for MS1199	The Compliance Assessment Plan is being compiled along with this CAR.	Compliant
M1199:8.2	Compliance Reporting	The Compliance Assessment Plan shall indicate: (1) the frequency of compliance reporting; (2) the approach and timing of compliance assessments; (3) the retention of compliance assessments; (4) the method of reporting of potential non-compliances and corrective actions taken; (5) the table of contents of Compliance Assessment Reports; and (6) public availability of Compliance Assessment Reports.	CAP must contain details specified in Condition 8-2	Planning phase	Plan to be submitted before 23 July 2023.	R18_CAP for MS1199	The CAP addresses all of the following: (1) the frequency of compliance reporting; (2) the approach and timing of compliance assessments; (3) the retention of compliance assessments; (4) the method of reporting of potential non-compliances and corrective actions taken; (5) the table of contents of Compliance Assessment Reports; and (6) public availability of Compliance Assessment Reports.	Compliant
M1199:8.3	Compliance Reporting	After receiving notice in writing from the CEO that the Compliance Assessment Plan satisfies the requirements of condition 8-2 the proponent shall assess compliance with conditions in accordance with the Compliance Assessment Plan required by condition 8-1.	Assess compliance in accordance with approved CAP.	Overall	Prior to 23 Feb 2024 (first CAR due) and then annually on this date.		The CAP is required to be submitted prior to the 23/07/2023.	NRATS
M1199:8.4	Compliance Reporting	The proponent shall retain reports of all compliance assessments described in the Compliance Assessment Plan required by condition 8-1 and shall make those reports available when requested by the CEO.	Retain all CARs and submit to CEO upon request.	Overall	Ongoing	R01_Covalent Lithium CAR 2022 (Rev 0)	This compliance report is the first compliance report for MS1199. The report is publicly available.	Compliant
M1199:8.5	Compliance Reporting	The proponent shall advise the CEO of any potential non-compliance within seven (7) days of that non-compliance being known.	Notify the CEO of potential non-compliance.	Overall	Within seven (7) days of event identified.	Management advice 24/04/2023	No reported potential non-compliances.	Compliant

Audit Code	Subject	Requirement	How	Phase	Timeframe	Evidence	Comment	Status
M1199:8.6	Compliance Reporting	<p>The proponent shall submit to the CEO the first Compliance Assessment Report fifteen (15) months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment Report, or as otherwise agreed in writing by the CEO.</p> <p>The Compliance Assessment Report shall:</p> <p>(1) be endorsed by the proponent's Chief Executive Officer or a person delegated to sign on the Chief Executive Officer's behalf;</p> <p>(2) include a statement as to whether the proponent has complied with the conditions;</p> <p>(3) identify all potential non-compliances and describe corrective and preventative actions taken;</p> <p>(4) be made publicly available in accordance with the approved Compliance Assessment Plan; and</p> <p>(5) indicate any proposed changes to the Compliance Assessment Plan required by condition 8-1.</p>	Submit CAR in accordance with approved CAP.	Overall	First CAR is due by 23 February 2024 and then annually by 30 April	R01_Coalent Lithium CAR 2022 (Rev 0) Appendix D Section 4.1	This compliance report is being submitted within 15 months of the issue of the statement. Appendix D contains items 1 to 4 and Section 4.1 indicates proposed changes to the CAR.	Compliant
M1199:9.1	Public Availability of Data	Subject to condition 9-2, within a reasonable time period approved by the CEO of the issue of this Statement and for the remainder of the life of the proposal, the proponent shall make publicly available, in a manner approved by the CEO, all validated environmental data (including sampling design, sampling methodologies, empirical data and derived information products (e.g. maps)), management plans and reports relevant to the assessment of this proposal and implementation of this Statement.	Make validated information on the project publicly available except for sensitive and confidential information as agreed with the CEO.	Overall	Ongoing	E02_Website Screenshot 20230424	<p>Link below https://www.covalentlithium.com/sustainability</p> <p>Has the following information publicly available:</p> <ul style="list-style-type: none"> • EPA Report and Recommendations • TFEMP • Monitoring • FVEMP <p>2021 CAR</p>	Compliant
M1199:9.2	Public Availability of Data	If any data referred to in condition 9-1 contains particulars of: (1) a secret formula or process; or (2) confidential commercially sensitive information, the proponent may submit a request for approval from the CEO to not make these data publicly available. In making such a request the proponent shall provide the CEO with an explanation and reasons why the data should not be made publicly available.	Submit request to CEO to keep sensitive information confidential.	Overall	As required	Management advice 13/03/2023	There has been no request to not make data publicly available.	NRATS

5. Monitoring Results

Monitoring data results are contained in Appendix G, H, I, J and K.

1.1 Summary of Monitoring Results

1.1.1 Chuditch Monitoring

Ecoscope undertook monitoring in the Chuditch breeding season (May to July) for 2022 which included monitoring three control sites more than five kilometres outside of the development envelope and three sites within the development envelope. Results for 2022:

- No captures in traps were recorded at the control site for the entire monitoring event.
- One Chuditch of undetermined sex was recorded on a trail camera in the control site. This record indicates that Chuditch were present during the survey but not captured in traps.
- The 2022 Chuditch was recorded in a Mallee woodland habitat that is regenerating from a fire disturbance which took place approximately 4-5 years ago. Chuditch habitat is typically older woodlands with an abundance fallen, hollow logs, therefore, this habitat is non-typical for Chuditch and may be utilised as foraging habitat only or the image may be of a dispersing juvenile animal.
- No analysis was able to be performed as there was only a single Chuditch recorded.

1.1.2 Malleefowl Monitoring

Monitoring of Malleefowl mounds was undertaken by Ecoscope during the mound building and egg laying summer season in 2021-22. Mounds identified as Annual monitoring were revisited and remeasured. Trail cameras were deployed on mounds to capture activity of Malleefowl and other fauna species including feral predators. Results for 2021-22:

- Fifteen new Malleefowl mounds were identified from LiDAR results and added to the list of known Malleefowl mounds.
- The 2021-22 monitoring period recorded one active mound within the development envelope (DE) and three active mounds outside the DE.
- The review of trail camera footage identified that at least six chicks have hatched from MM 53.
- Activity patterns are compared over the years that indicate an ongoing increase in activity during 2021-22 from previous monitoring. An activity analysis indicates that there is potentially four distinct breeding pairs within the monitoring area. One breeding pair within the DE and another three close by (< than 900 m from the DE boundary).

1.1.3 Dust Monitoring

MAXY Engineering was contracted to monitor the dust concentrations at the Covalent Lithium mine site located in Western Australia. Dust monitoring is a requirement of Earl Grey Lithium Project Ministerial Statement 1118 (condition 6-5 (2)) and the associated Flora and Vegetation Environmental Management Plan.

Dust deposition gauges are considered the most appropriate means by which to measure dust fall on flora and vegetation. Dust deposition gauges were installed and monitored in accordance with Australian Standard AS/NZS 3580.10.1:2003 methods for sampling and analysis of ambient air.

The measurements were performed using two methods:

- Realtime PM10 concentration at two locations
- Realtime wind speed and wind direction measurements at one location
- Monthly dust composition at the two Realtime monitoring locations
- Monthly average dust concentrations and composition at 9 locations using dust deposition gauges

Monitoring occurred between July 2021 and September 2022:

- Seven sampling events occurred over the reporting period for each transect.
- None of the PM10 Realtime monitor samples recorded any measurable metals concentrations.
- The February 2022 Dust Deposition samples showed measurable levels of Barium, Boron and Zinc also, and this was the period which recorded the highest Total Solids average concentrations. Sampling locations T18, T10 and T14 recorded the highest levels during this period.
- All dust deposition gauge results were equal to the EQL for most of the measurements, the only exception being Aluminium which was measurable in all the samples.

1.1.4 Vegetation Monitoring Autumn

Mattiske undertook vegetation condition monitoring in March 2022 with the intent of ensuring that pre-construction baseline data is gathered across seasons and years to enable any changes to plant conditions to meaningfully be assessed over the longer operational phases. Results were:

- A total of 222 species were recorded across the 18 transects surveyed. No introduced (exotic) species were recorded at any of the transects surveyed.
- The vegetation condition in impact transects, best represented by the mean canopy health score, were all less than 20% different to the corresponding control transects and thereby complying with the threshold as defined in the FVMP (Covalent 2020).
- All paired transects have a less than 18% difference between their control and impact transects, which falls below the 20% trigger value, specified within the FVMP (Covalent 2020).
- None of the other positive (epicormic growth, new tip growth, reproductive state) or negative (leaf die-off, insect leaf damage) attributes measured (Appendix C) were demonstrably correlated with the canopy health.
- A total of twenty individual plants were tagged at each transect. All paired transects have a less than 18% difference between their control and impact transects, which falls below the 20% trigger value, specified within the FVMP (Covalent 2020).
- The changes observed between this survey and the last spring survey in September 2021 can likely be attributed to the variation in different observers' qualitative canopy health scores.

1.1.5 Vegetation Monitoring Spring

Mattiske undertook vegetation condition monitoring in September 2022 with the intent of ensuring that pre-construction baseline data is gathered across seasons and years to enable any changes to plant conditions to meaningfully be assessed over the longer operational phases. Results were:

- A total of 197 species were recorded across the 18 transects surveyed.
- A total of twenty individual plants were tagged at each transect for more detailed plant condition assessment. All paired transects have a less than 18% difference between their

control and impact transects, which falls below the 20% trigger value, specified within the FVMP (Covalent 2020).

- None of the other positive (epicormic growth, new tip growth, reproductive state) or negative (leaf die-off, insect leaf damage) attributes measured were demonstrably correlated with the canopy health.
- All paired transects have a less than 18% difference between their control and impact transects, which falls below the 20% trigger value, specified within the FVMP (Covalent 2020).
- None of the other positive (epicormic growth, new tip growth, reproductive state) or negative (leaf die-off, insect leaf damage) attributes measured were demonstrably correlated with the canopy health.
- The changes observed between this survey and the last Autumn survey in March 2022 can likely be attributed to the variation in different observers' qualitative canopy health scores.

1.2 Trigger and Threshold Criteria

Table 5.1 presents the status of compliance with criteria in the Management Plans for 2022. No criteria were exceeded in the period.

Table 5.1: Determination of Criteria Exceedance

Environmental objective	Environmental criteria	Determination
No proposal related direct impact to flora and vegetation within a VEZ (Figure 1-2)	Trigger criteria: <ul style="list-style-type: none"> • Vegetation clearing without an authorised internal permit within the Development Envelope, but outside of the VEZs Trigger criteria: <ul style="list-style-type: none"> • Unauthorised access by personnel to a VEZ 	Trigger criteria has not been exceeded
	Threshold criteria: Proposal related direct vegetation disturbance of any kind or extent within a VEZ resulting in the mortality of flora and vegetation. For example, vegetation clearing initiated by the proponents mining activities.	Threshold criteria has not been exceeded
No proposal related indirect impact to flora and vegetation within a VEZ resulting in an adverse impact (Figure 1-2)	Trigger criteria: Statistically significant reduction in mean condition ratings (more than 20% difference for qualitative or quantitative) of vegetation health within a VEZ in comparison to control sites, or a mean Fv/FM <0.6 (index of chlorophyll inflorescence)	This criteria has not been determined as quantitative vegetation health measurements have not been undertaken.
	Threshold criteria: <ul style="list-style-type: none"> • Flora and vegetation within a VEZ experiences a statistically significant higher mortality rate than that of control sites (where that mortality is not attributed to direct or Project impacts). • Conservation significant species within a VEZ experiences a statistically significant higher foliage cover loss rate than that of control sites (where that foliage cover loss is not attributed to direct or Project impacts). 	Threshold criteria has not been exceeded
MS1118 condition 7-1 (1) – Ensure there is no proposal related direct or adverse indirect impacts to malleefowl mounds within the exclusion areas (Figure 2.1).	Trigger Criteria: <ul style="list-style-type: none"> • clearing without an authorised internal permit within the Development Envelope, but outside of the Malleefowl Mound Exclusion Zone (MMEZ) 	Trigger criteria has not been exceeded
	Trigger Criteria: <ul style="list-style-type: none"> • Unauthorised access by personnel to a MMEZ 	Trigger criteria has not been exceeded

Environmental objective	Environmental criteria	Determination
MS1118 Condition 7-1(3) – Ensure there is no removal of active malleefowl mounds within the Development Envelope.	Threshold Criteria: <ul style="list-style-type: none"> Clearing or disturbance of vegetation within 100 m of any newly identified active malleefowl mounds and / or the MMEZs. 	Threshold criteria has not been exceeded
MS1118 condition 7-1 (2) The proponent shall ensure there is no direct or indirect proposal- related significant adverse impacts to malleefowl and chuditch within the Development Envelope	Chuditch Trigger Criteria: <ul style="list-style-type: none"> A 25% decrease at impact sites in female abundance for two consecutive monitoring events. Malleefowl Trigger Criteria <ul style="list-style-type: none"> A 25% decrease in the estimated local population number (based on temporal analysis) over a consecutive two year period. 	Trigger criteria has not been exceeded
	Chuditch Threshold Criteria: <ul style="list-style-type: none"> A 50% decrease at impact sites in female abundance for two consecutive monitoring events. Malleefowl Threshold Criteria: <ul style="list-style-type: none"> A project related 50% decrease in the estimated local population (based on temporal analysis) over a consecutive two year period. 	Trigger criteria has not been exceeded

Appendix A MS 1118

THIS DOCUMENT

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Published on: 21 November 2019

Statement No. 1118

STATEMENT THAT A PROPOSAL MAY BE IMPLEMENTED
(*Environmental Protection Act 1986*)

EARL GREY LITHIUM PROJECT

Proposal: Proposal to develop a pegmatite-hosted lithium deposit at the abandoned Mt Holland mine site, located 105 km south-southeast of Southern Cross, Shire of Yilgarn.

Proponent: Covalent Lithium Pty Ltd
Australian Company Number 623 090 139

Proponent Address: Level 18, 109 St Georges Terrace, Perth WA 6000

Assessment Number: 2123

Report of the Environmental Protection Authority: 1651

Pursuant to section 45 of the *Environmental Protection Act 1986*, it has been agreed that the proposal described and documented in Table 2 of Schedule 1 may be implemented and that the implementation of the proposal is subject to the following implementation conditions and procedures:

1 Proposal Implementation

1-1 When implementing the proposal, the proponent shall not exceed the authorised extent of the proposal as defined in Table 2 of Schedule 1, unless amendments to the proposal and the authorised extent of the proposal have been approved under the EP Act.

2 Contact Details

2-1 The proponent shall notify the CEO of any change of its name, physical address or postal address for the serving of notices or other correspondence within twenty-eight (28) days of such change. Where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State.

3 Time Limit for Proposal Implementation

- 3-1 The proponent shall not commence implementation of the proposal after five (5) years from the date of this Statement, and any commencement, prior to this date, must be substantial.
- 3-2 Any commencement of implementation of the proposal, on or before five (5) years from the date of this Statement, must be demonstrated as substantial by providing the CEO with written evidence, on or before the expiration of five (5) years from the date of this Statement.

4 Compliance Reporting

- 4-1 The proponent shall prepare, and maintain a Compliance Assessment Plan which is submitted to the CEO at least six (6) months prior to the first Compliance Assessment Report required by condition 4-6, or prior to implementation of the proposal, whichever is sooner.
- 4-2 The Compliance Assessment Plan shall indicate:
 - (1) the frequency of compliance reporting;
 - (2) the approach and timing of compliance assessments;
 - (3) the retention of compliance assessments;
 - (4) the method of reporting of potential non-compliances and corrective actions taken;
 - (5) the table of contents of Compliance Assessment Reports; and
 - (6) public availability of Compliance Assessment Reports.
- 4-3 After receiving notice in writing from the CEO that the Compliance Assessment Plan satisfies the requirements of condition 4-2 the proponent shall assess compliance with conditions in accordance with the Compliance Assessment Plan required by condition 4-1.
- 4-4 The proponent shall retain reports of all compliance assessments described in the Compliance Assessment Plan required by condition 4-1 and shall make those reports available when requested by the CEO.
- 4-5 The proponent shall advise the CEO of any potential non-compliance within seven (7) days of any non-compliance being known.
- 4-6 The proponent shall submit to the CEO the first Compliance Assessment Report fifteen (15) months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then

annually from the date of submission of the first Compliance Assessment Report, or as otherwise agreed in writing by the CEO.

The Compliance Assessment Report shall:

- (1) be endorsed by the proponent's Chief Executive Officer or a person delegated to sign on the Chief Executive Officer's behalf;
- (2) include a statement as to whether the proponent has complied with the conditions;
- (3) identify all potential non-compliances and describe corrective and preventative actions taken;
- (4) be made publicly available in accordance with the approved Compliance Assessment Plan; and
- (5) indicate any proposed changes to the Compliance Assessment Plan required by condition 4-1.

5 Public Availability of Data

5-1 Subject to condition 5-2, within a reasonable time period approved by the CEO of the issue of this Statement and for the remainder of the life of the proposal the proponent shall make publicly available, in a manner approved by the CEO, all validated environmental data (including sampling design, sampling methodologies, empirical data and derived information products (e.g. maps)), management plans and reports relevant to the assessment of this proposal and implementation of this Statement.

5-2 If any data referred to in condition 5-1 contains particulars of:

- (1) a secret formula or process; or
- (2) confidential commercially sensitive information;

the proponent may submit a request for approval from the CEO to not make these data publicly available. In making such a request the proponent shall provide the CEO with an explanation and reasons why the data should not be made publicly available.

6 Flora and Vegetation Environmental Management Plan

6-1 The proponent shall implement the proposal to meet the following environmental outcome:

- (1) The proponent shall ensure there is no proposal-related direct or adverse indirect impacts to flora and vegetation within the exclusion zones as shown on Figure 3 and delineated by coordinates in Schedule 2.

- 6-2 Prior to the commencement of ground disturbing activities, the proponent must undertake pre-clearance vegetation and flora survey(s) within the development envelope in accordance with *Technical Guidance – Flora and Vegetation Surveys for Environmental Impact Assessment*.
- 6-3 In order to meet the requirements of condition 6-1, the proponent shall update and submit to the CEO the Flora and Vegetation Environmental Management Plan on advice of the Department of Biodiversity, Conservation and Attractions within six (6) months of this Statement being issued.
- 6-4 The proponent shall not commence ground disturbing activities until such a time as the Flora and Vegetation Environmental Management Plan required by condition 6-3 is approved by the CEO.
- 6-5 The Flora and Vegetation Environmental Management Plan shall:
- (1) include details of the timing, methods, limitations and results of the pre-clearance surveys required by condition 6-2 and demonstrate how the findings of the survey(s) have been considered, including provision of mitigation measures.
 - (2) include actions to ensure that dust, weeds and fire are appropriately managed within the development envelope.
 - (3) specify trigger criteria that must provide an early warning that the threshold criteria identified in condition 6-5(4) may not be met;
 - (4) specify threshold criteria to demonstrate compliance with the environmental outcome specified in condition 6-1;
 - (5) specify monitoring to determine if trigger criteria and threshold criteria are exceeded;
 - (6) specify trigger level actions to be implemented in the event that trigger criteria have been exceeded;
 - (7) specify threshold contingency actions to be implemented in the event that threshold criteria are exceeded; and
 - (8) provide the format and timing for the reporting of monitoring results against trigger criteria and threshold criteria to demonstrate that condition 6-1 has been met over the reporting period in the Compliance Assessment Report required by condition 4-6.
- 6-6 After receiving notice in writing from the CEO that the Flora and Vegetation Environmental Management Plan satisfies the requirements of conditions 6-3 and 6-5 the proponent shall:

- (1) implement the provisions of the Flora and Vegetation Environmental Management Plan; and
- (2) continue to implement the Flora and Vegetation Environmental Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated the objective specified in condition 6-1 has been met.

6-7 In the event that monitoring, or investigations indicates exceedance of threshold criteria specified in the Flora and Vegetation Environmental Management Plan, the proponent shall:

- (1) report the exceedance in writing to the CEO within seven (7) days of the exceedance being identified;
- (2) implement the threshold contingency actions specified in the Flora and Vegetation Environmental Management Plan within twenty-four (24) hours of the exceedance being reported as required by condition 6-7(1) and continue implementation of those actions until the CEO has confirmed by notice in writing that it has been demonstrated that the threshold criteria are being met and the implementation of the threshold contingency actions is no longer required;
- (3) investigate to determine the cause of the threshold criteria being exceeded;
- (4) investigate to provide information for the CEO to determine potential environmental harm or alteration of the environment that occurred due to threshold criteria being exceeded; and
- (5) provide a report to the CEO within twenty-one (21) days of the exceedance being reported as required by condition 6-7(1). The report shall include:
 - (a) details of threshold contingency actions implemented;
 - (b) the effectiveness of the threshold contingency actions implemented, against the threshold criteria;
 - (c) the findings of the investigations required by conditions 6-7(3) and 6-7(4);
 - (d) measures to prevent the threshold criteria being exceeded in the future;
 - (e) measures to prevent, control or abate the environmental harm which may have occurred; and

- (f) justification of the threshold remaining, or being adjusted based on better understanding, demonstrating that objectives will continue to be met.

6-8 The proponent:

- (1) may review and revise the Flora and Vegetation Environmental Management Plan, or
- (2) shall review and revise the Flora and Vegetation Environmental Management Plan as and when directed by the CEO.

6-9 The proponent shall implement the latest revision of the Flora and Vegetation Environmental Management Plan, which the CEO has confirmed by notice in writing, satisfies the requirements of condition 6-4.

7 Terrestrial Fauna Environmental Management Plan

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.

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.

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.

7-4 The Terrestrial Fauna Environmental Management Plan shall:

- (1) outline how the pre-clearance surveys will be undertaken using LIDAR or similar technology;
- (2) outline the procedure for capture and release of chuditch, and malleefowl if required, prior to clearing of native vegetation;

- (3) specify trigger criteria that must provide an early warning that the environmental objectives identified in condition 7-1 may not be met;
- (4) specify threshold criteria to demonstrate compliance with the environmental objectives specified in condition 7-1;
- (5) specify monitoring to determine if trigger criteria and threshold criteria are exceeded;
- (6) specify trigger level actions to be implemented in the event that trigger criteria have been exceeded;
- (7) specify threshold contingency actions to be implemented in the event that threshold criteria are exceeded; and
- (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.

7-5 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:

- (1) implement the provisions of the Terrestrial Fauna Environmental Management Plan; and
- (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.

7-6 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:

- (1) report the exceedance in writing to the CEO within seven (7) days of the exceedance being identified;
- (2) implement the threshold contingency actions specified in the Terrestrial Fauna Environmental Management Plan within twenty-four (24) hours of the exceedance being reported as required by condition 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;

- (3) investigate to determine the cause of the threshold criteria being exceeded;
- (4) investigate to provide information for the CEO to determine potential environmental harm or alteration of the environment that occurred due to threshold criteria being exceeded; and
- (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:
 - (a) details of threshold contingency actions implemented;
 - (b) the effectiveness of the threshold contingency actions implemented, against the threshold criteria;
 - (c) the findings of the investigations required by conditions 7-6(3) and 7-6(4);
 - (d) measures to prevent the threshold criteria being exceeded in the future;
 - (e) measures to prevent, control or abate the environmental harm which may have occurred; and
 - (f) justification of the threshold remaining, or being adjusted based on better understanding, demonstrating that objectives will continue to be met.

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.

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.

8 Offsets

8-1 The proponent shall undertake offsets with the objective of counterbalancing the significant residual impact on the following environmental values:

- (1) 386 ha of foraging and breeding habitat for malleefowl (*Leipoa ocellata*);
- (2) 386 ha of foraging and potential breeding habitat for chuditch (*Dasyurus geoffroi*);

(3) 69 individuals of Ironcap Banksia (*Banksia sphaerocarpa* var. *dolichostyla*); and

(4) 6,957 individuals of *Microcorys* sp. Mt Holland (D. Angus DA2397),

as a result of the implementation of the proposal, as defined in Table 2 of Schedule 1 and delineated by coordinates in Schedule 2.

Threatened Fauna Land Acquisition Strategy

8-2 Within twelve (12) months of the publication of this Statement, the proponent shall prepare and submit a Threatened Fauna Land Acquisition Strategy to the requirements of the CEO.

8-3 The Threatened Fauna Land Acquisition Strategy, as required by condition 8-2, shall:

(1) identify an initially unprotected area, or areas, to be acquired and protected for conservation that contains malleefowl and chuditch foraging and breeding habitat, in consultation with the Department of Biodiversity, Conservation and Attractions;

(2) demonstrate how the proposed offset counterbalances the significant residual impact to 386 ha of foraging and breeding habitat for malleefowl, and 386 ha of foraging and potential breeding habitat for chuditch, as identified in condition 8-1, through application of the principles and completion of the WA Offsets Template, as described in the WA Environmental Offsets Guidelines 2014, and the *Environment Protection and Biodiversity Conservation Act 1999* Environmental Offsets Policy Assessment Guide (October 2012), or any approved updates of these guidelines, to demonstrate how the proposed offset counterbalances the significant residual impact to malleefowl and chuditch, as identified in condition 8-1;

(3) demonstrate how the proposed offset aligns with the *National Recovery Plan for Malleefowl *Leipoa ocellata** and the *Chuditch (*Dasyurus geoffroii*) Recovery Plan*, or any subsequent revisions of these plans;

(4) identify the environmental values of the offset area(s);

(5) identify and commit to a protection mechanism for any area(s) of land acquisition, being either the area(s) is ceded to the Crown for the purpose of management for conservation, or the area(s) is managed under other suitable mechanisms for the purpose of conservation as agreed by the CEO;

(6) if any land is to be ceded to the Crown for the purpose of management for conservation, the proponent will identify:

- (a) the quantum of, and provide funds for, the upfront works associated with establishing the conservation area;
 - (b) the quantum of, and provide a contribution of funds for, the management of this area for seven (7) years after completion of purchase; and
 - (c) an appropriate management body for the ceded land;
- (7) detail the monitoring, reporting and evaluation mechanisms for management and/or rehabilitation actions; and
- (8) define the role of the proponent and/or any relevant management authority.
- 8-4 Within six (6) months of receiving notice in writing from the CEO, on advice of the Department of Biodiversity, Conservation and Attractions, that the Threatened Fauna Land Acquisition Strategy satisfies the requirements of conditions 8-2 and 8-3, the proponent shall implement the approved Threatened Fauna Land Acquisition Strategy.
- 8-5 The proponent:
- (1) may review and revise the Threatened Fauna Land Acquisition Strategy; or
 - (2) shall review and revise the Threatened Fauna Land Acquisition Strategy as and when directed by the CEO.
- 8-6 The proponent shall implement the latest version of the Threatened Fauna Land Acquisition Strategy, which the CEO has confirmed by notice in writing, satisfies the requirements of condition 8-3.

Flora Offset Strategy

- 8-7 Within twelve (12) months of the publication of this Statement, the proponent shall prepare and submit a Flora Offset Strategy to the requirements of the CEO.
- 8-8 The Flora Offset Strategy required by condition 8-7 shall:
- (1) identify an area, or areas, to be protected, managed and/or rehabilitated for conservation that contains the flora values identified in condition 8-1 on advice of the Department of Biodiversity, Conservation and Attractions;
 - (2) demonstrate how the proposed offset counterbalances the significant residual impact to 69 individuals of *Banksia sphaerocarpa* var. *dolichostyla* and 6,957 individuals of *Microcorys* sp. Mt Holland (D. Angus DA2397), as identified in condition 8-1 through application of

the principles and completion of the WA Offsets Template, as described in the WA Environmental Offsets Guidelines 2014, and the *Environment Protection and Biodiversity Conservation Act 1999* Environmental Offsets Policy Assessment Guide (October 2012), or any approved updates of these guidelines;

- (3) identify the environmental values of the offset area(s);
- (4) identify and commit to a protection mechanism for any area(s) of land acquisition, being either the area(s) is ceded to the Crown for the purpose of management for conservation, or the area(s) is managed under other suitable mechanisms for the purpose of conservation as agreed by the CEO;
- (5) if any land is to be ceded to the Crown for the purpose of management for conservation, the proponent will identify:
 - (a) the quantum of, and provide funds for, the upfront works associated with establishing the conservation area;
 - (b) the quantum of, and provide a contribution of funds for, the management of this area for seven (7) years after completion of purchase; and
 - (c) an appropriate management body for the ceded land;
- (6) where rehabilitation and/or other on-ground actions are proposed, state the objectives and targets to be achieved, including completion criteria, which demonstrate:
 - (a) how on-ground management or rehabilitation actions will result in a tangible improvement to the environmental value(s) being offset; and
 - (b) the consistency of the objectives and targets with the objectives of any relevant Recovery Plans or area management plans;
- (7) detail the management and/or rehabilitation actions and a timeframe for the actions to be undertaken;
- (8) detail any funding arrangements and timing of funding for conservation activities;
- (9) detail the monitoring, reporting and evaluation mechanisms for management and/or rehabilitation actions; and
- (10) define the role of the proponent and/or any relevant management authority.

- 8-9 Within twelve (12) months of receiving notice in writing from the CEO, on advice of the Department of Biodiversity, Conservation and Attractions, that the Flora Offset Strategy satisfies the requirements of conditions 8-7 and 8-8, the proponent shall substantially commence implementation of the actions within the approved Flora Offset Strategy.
- 8-10 The proponent shall continue to implement the approved Flora Offset Strategy until the CEO has confirmed by notice in writing that it has been demonstrated that the objectives and targets in the Flora Offset Strategy have been met and therefore the implementation of the actions is no longer required.
- 8-11 The proponent:
- (1) may review and revise the Flora Offset Strategy; or
 - (2) shall review and revise the Flora Offset Strategy as and when directed by the CEO.
- 8-12 The proponent shall implement the latest version of the Flora Offset Strategy, which the CEO has confirmed by notice in writing, satisfies the requirements of condition 8-8.

[signed on 21 November 2019]

Hon Stephen Dawson MLC
MINISTER FOR ENVIRONMENT

Schedule 1

Table 1: Summary of the Proposal

Proposal Title	Earl Grey Lithium Project
Short Description	<p>The proposal is to develop a pegmatite-hosted lithium deposit at the abandoned Mt Holland Mine Site, in a Development Envelope of 1,984 ha.</p> <p>The mining proposal involves a footprint of 667 ha of land, including new clearing of up to 386 ha of native vegetation, for a mine pit, waste rock dump, integrated waste landform, processing plant, airstrip, accommodation village and associated infrastructure.</p>

Table 2: Location and authorised extent of physical and operational elements

Column 1 Element	Column 2 Location	Column 3 Authorised Extent
Physical elements		
Mine and associated infrastructure	Figure 2	Clearing of no more than 386 ha of native vegetation, within a development envelope of 1,984 ha
Operational elements		
Mining	Figure 2	Earl Grey open cut pit

Table 3: Abbreviations and Definitions

Acronym or Abbreviation	Definition or Term
Adverse	Impacts likely to change the conservation status or significantly change the local population numbers of a species.
CEO	The Chief Executive Officer of the Department of the Public Service of the State responsible for the administration of section 48 of the <i>Environmental Protection Act 1986</i> , or his delegate.
EP Act	<i>Environmental Protection Act 1986</i>
ha	Hectare
Ground disturbing activities	Activities that are associated with the substantial implementation of a proposal including but not limited to, digging (with mechanised equipment), blasting, earthmoving, vegetation clearance, grading, gravel extraction, construction of new or widening of existing roads and tracks.
km	kilometres
LIDAR	A remote sensing technology which uses the pulse from a laser to collect measurements which can then be used to create 3D models and maps of objects and environments. LIDAR is an acronym of Light Detection and Ranging.
m	Metre
Threatened Flora and Fauna	Flora and Fauna listed as Threatened under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> or <i>Biodiversity Conservation Act 2016</i> .

Figures (attached)

Figure 1 Regional Location

Figure 2 Earl Grey Lithium Project development envelope and proposal footprint

Figure 3 Conservation Significant Flora Exclusion Zones

Figure 4 Malleefowl Mound Exclusion Zones

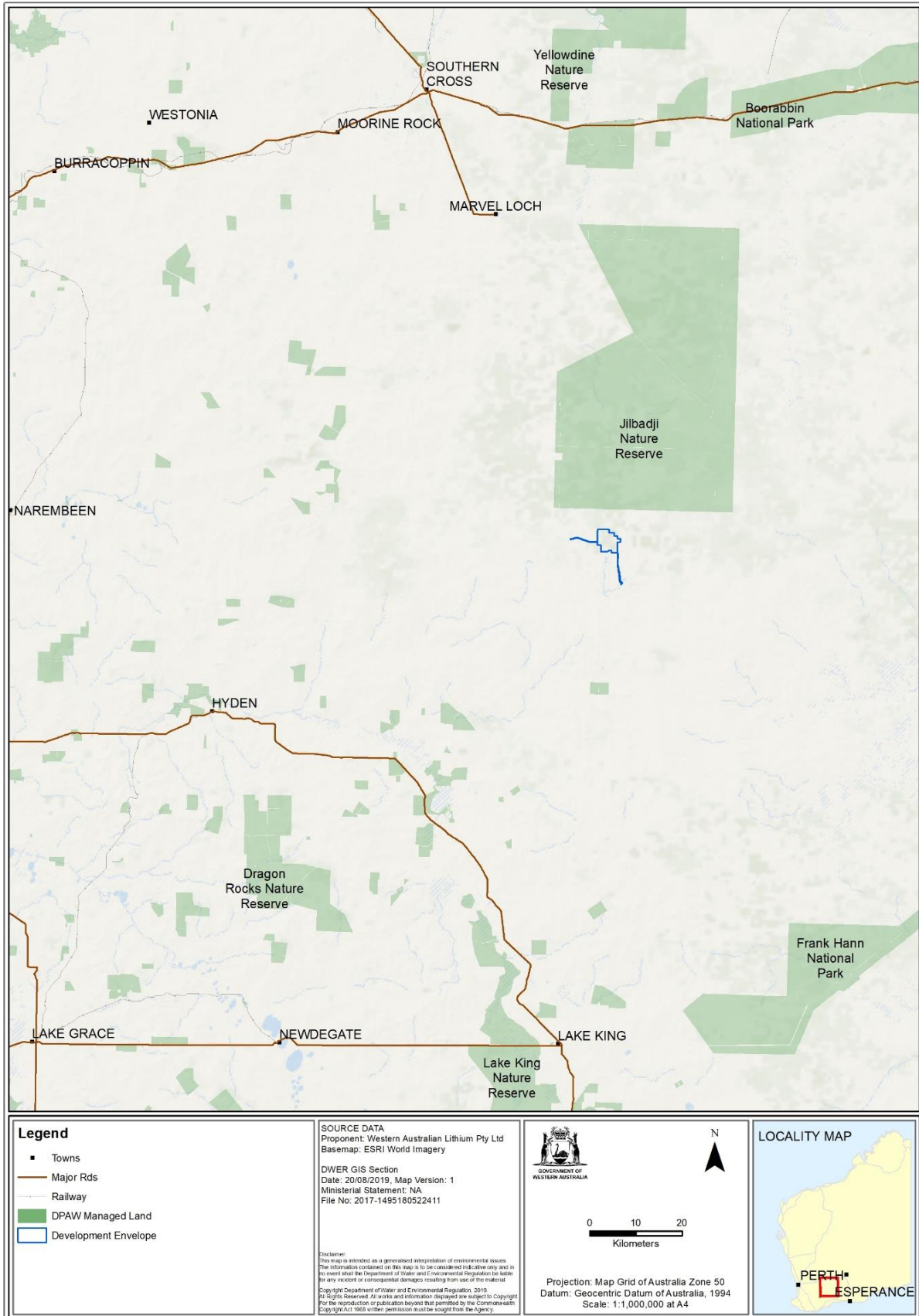


Figure 1: Regional Location



Figure 2: Earl Grey Lithium Project development envelope and indicative footprint

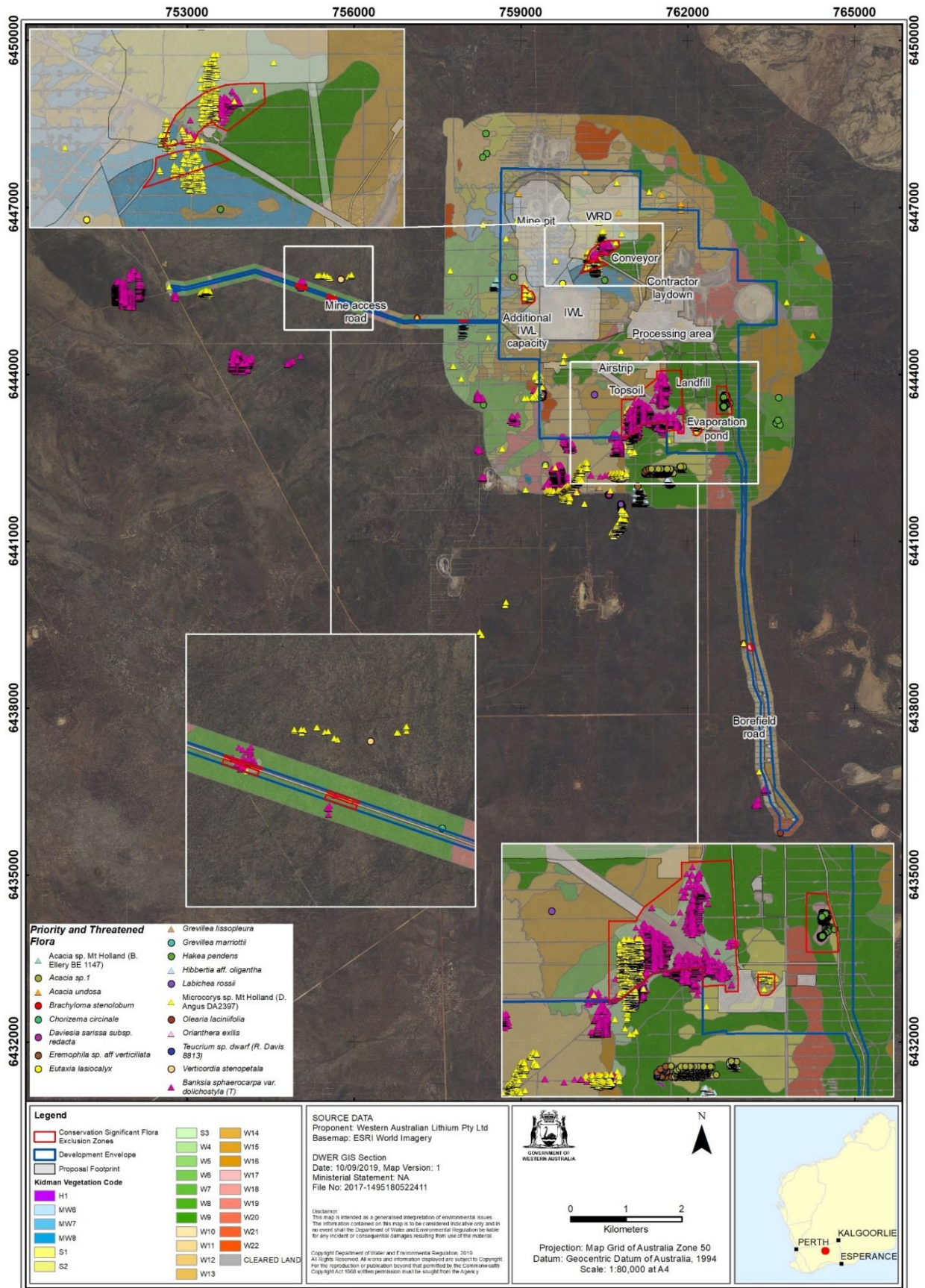


Figure 3: Conservation Significant Flora Exclusion Zones

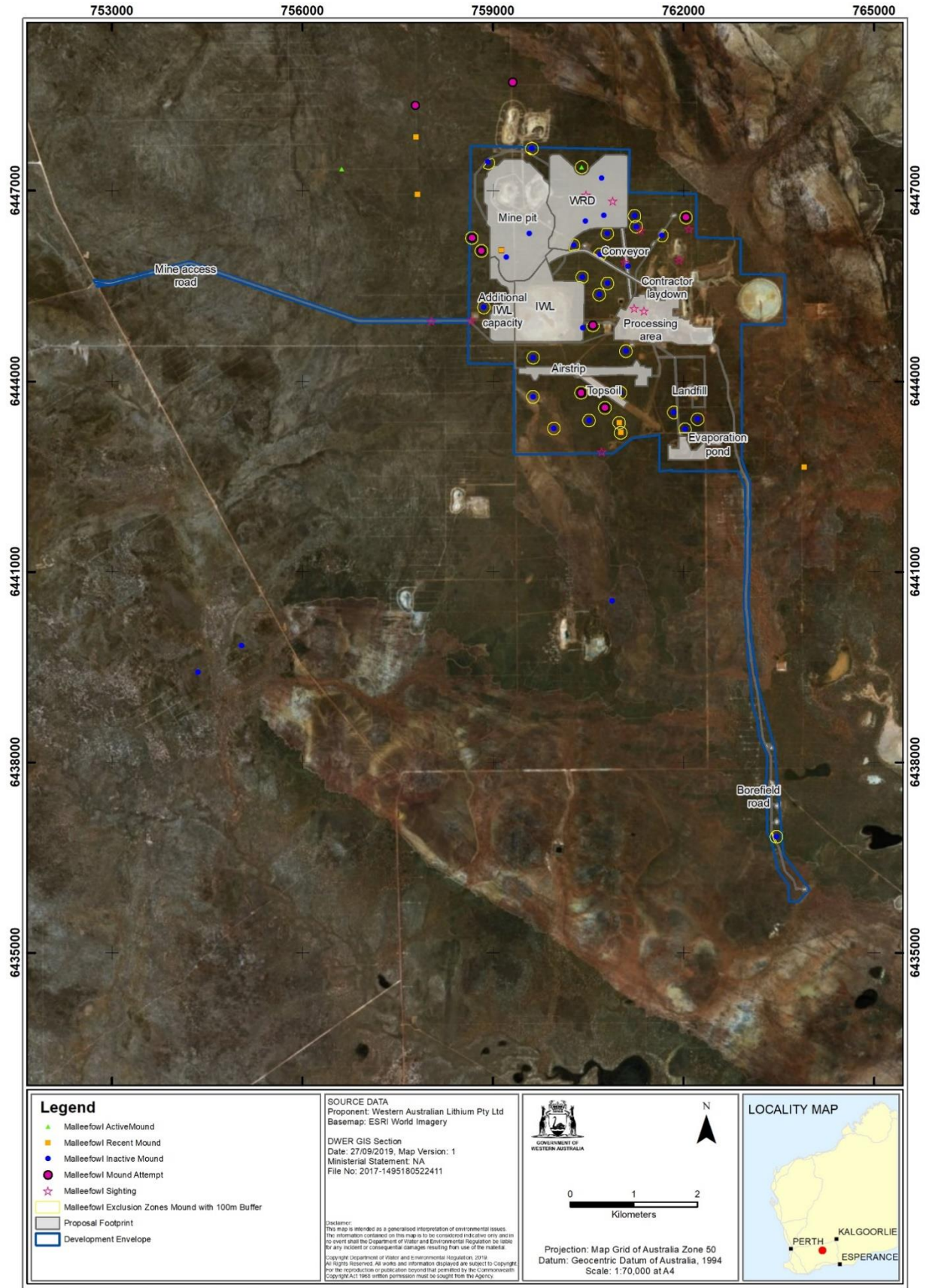


Figure 4: Malleefowl Mound Exclusion Zones

Schedule 2

All coordinates are in metres, listed in Map Grid of Australia Zone 50 (MGA Zone 50), datum of Geocentric Datum of Australia 1994 (GDA94).

Coordinates defining the areas shown in Figures 3 and 4 of Schedule 1, and referred to in Ministerial Conditions 6 and 7 are held by the Department of Water and Environmental Regulation under the following reference numbers:

Development Envelope DWERDT199591

Conservation Significant Flora Exclusion Zones DWERDT199595

Malleefowl Mound Exclusion Zones DWERDT208081

Attachment 1 to Ministerial Statement 1118

Change to proposal approved under section 45C of the
Environmental Protection Act 1986

This Attachment replaces Schedule 1 and Schedule 2 of Ministerial Statement 1118

Proposal: Earl Grey Lithium Project

Proponent: Covalent Lithium Pty Ltd

Changes:

- Addition of a water supply pipeline between Moorine Rock and the Earl Grey Lithium Project
- Change to the Development Envelope to accommodate pipeline infrastructure
- Amendment to the total footprint but no additional clearing.

Table 1: Summary of the Proposal

Proposal Title	Earl Grey Lithium Project
Short Description	<p>The proposal is to develop a pegmatite-hosted lithium deposit at the abandoned Mt Holland Mine Site, in a Development Envelope of 2,347 ha.</p> <p>The mining proposal involves a footprint of 755 ha of land, including new clearing of up to 386 ha of native vegetation, for a mine pit, waste rock dump, integrated waste landform, processing plant, air strip, accommodation village, water supply pipeline and associated infrastructure.</p>

Table 2: Location and authorised extent of physical and operational elements

Element	Location	Previously Authorised Extent	Authorised Extent
Physical elements			
Mine and associated infrastructure	Figure 1	Clearing of no more than 386 ha of native vegetation, within a development envelope of 1,984 ha	Clearing of no more than 386 ha of native vegetation within a development envelope of 2,347 ha
Operational elements			
Mining	Figure 2	Earl Grey open cut pit	Earl Grey open cut pit

Note: Text in **bold** in Table 1 and 2 indicates a change to the proposal.

Table 3: Abbreviations

Abbreviation	Term
Adverse	Impacts likely to change the conservation status or significantly change the local population numbers of a species
CEO	The Chief Executive Officer of the Department of the Public Service of the State responsible for the administration of section 48 of the <i>Environmental Protection Act 1986</i> , or his delegate.
EP Act	<i>Environmental Protection Act 1986</i>
ha	Hectare
Ground disturbing activities	Activities that are associated with the substantial implementation of a proposal including but not limited to, digging (with mechanised equipment), blasting, earthmoving, vegetation clearance, grading, gravel extraction, construction of new or widening of existing roads and tracks.
km	kilometres
LIDAR	A remote sensing technology which uses the pulse from a laser to collect measurements which can then be used to create 3D models and maps of objects and environments. LIDAR is an acronym of Light Detection and Ranging.
m	Metre
Threatened Flora and Fauna	Flora and Fauna listed as Threatened under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> or <i>Biodiversity Conservation Act 2016</i> .

Figures (attached)

- Figure 1 Regional Location
- Figure 2 Earl Grey Lithium Project development envelope and indicative footprint
- Figure 3 Conservation Significant Flora Exclusion Zones
- Figure 4 Malleefowl Mound Exclusion Zones

[Signed 18 May 2021]

Professor Matthew Tonts

CHAIR

Environmental Protection Authority
under delegated authority

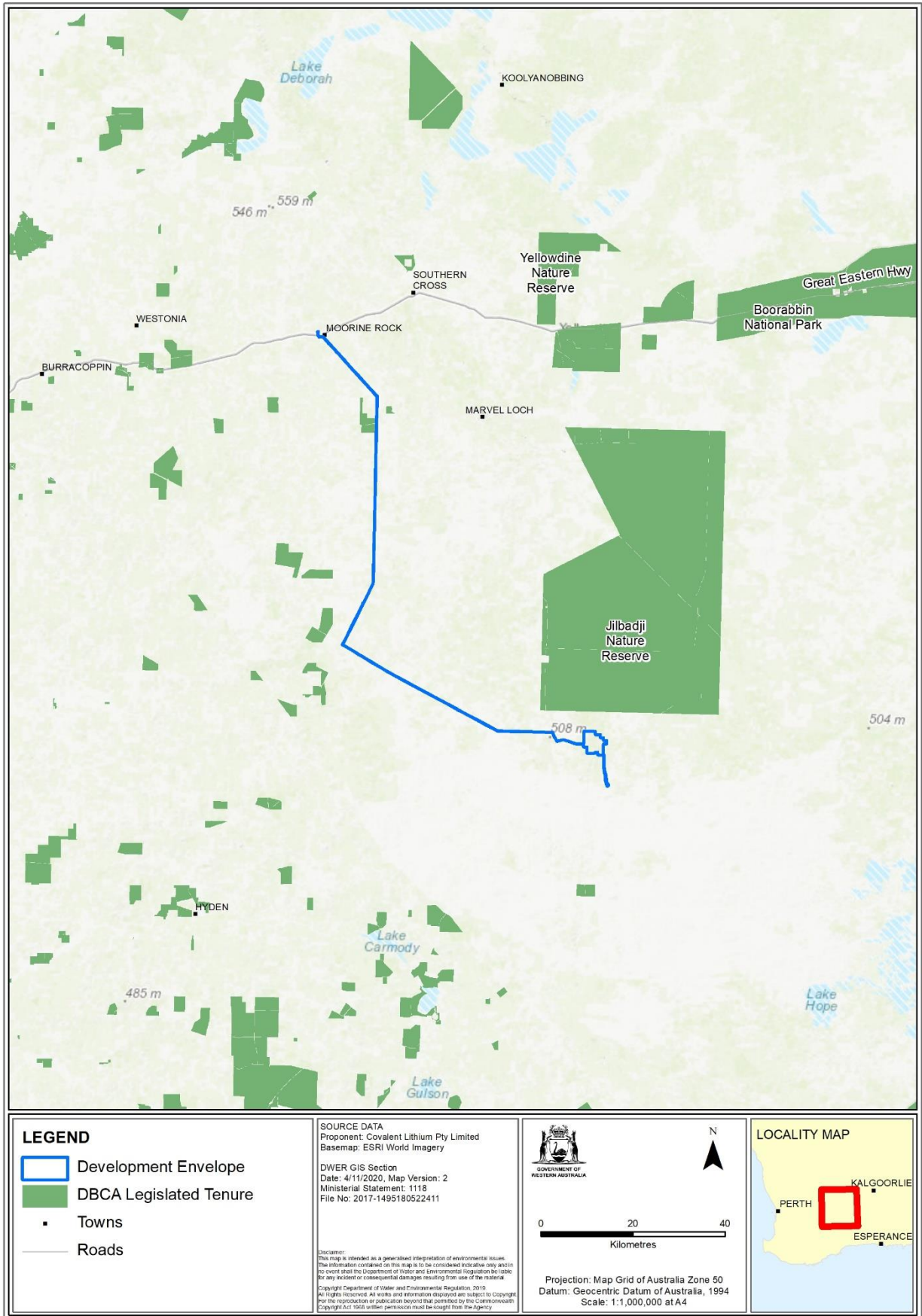


Figure 1 Regional Location

S:\Projects\FA\382017_1495180522411_Ear\Grey\lithiumProject\5_PostAssessments\45c_AH01_Water\Pipeline\Ear\Grey\lithiumProject_MS1118_s45c_AH1_Figure1_Regional.mxd



Figure 2 Earl Grey Lithium Project development envelope and indicative footprint

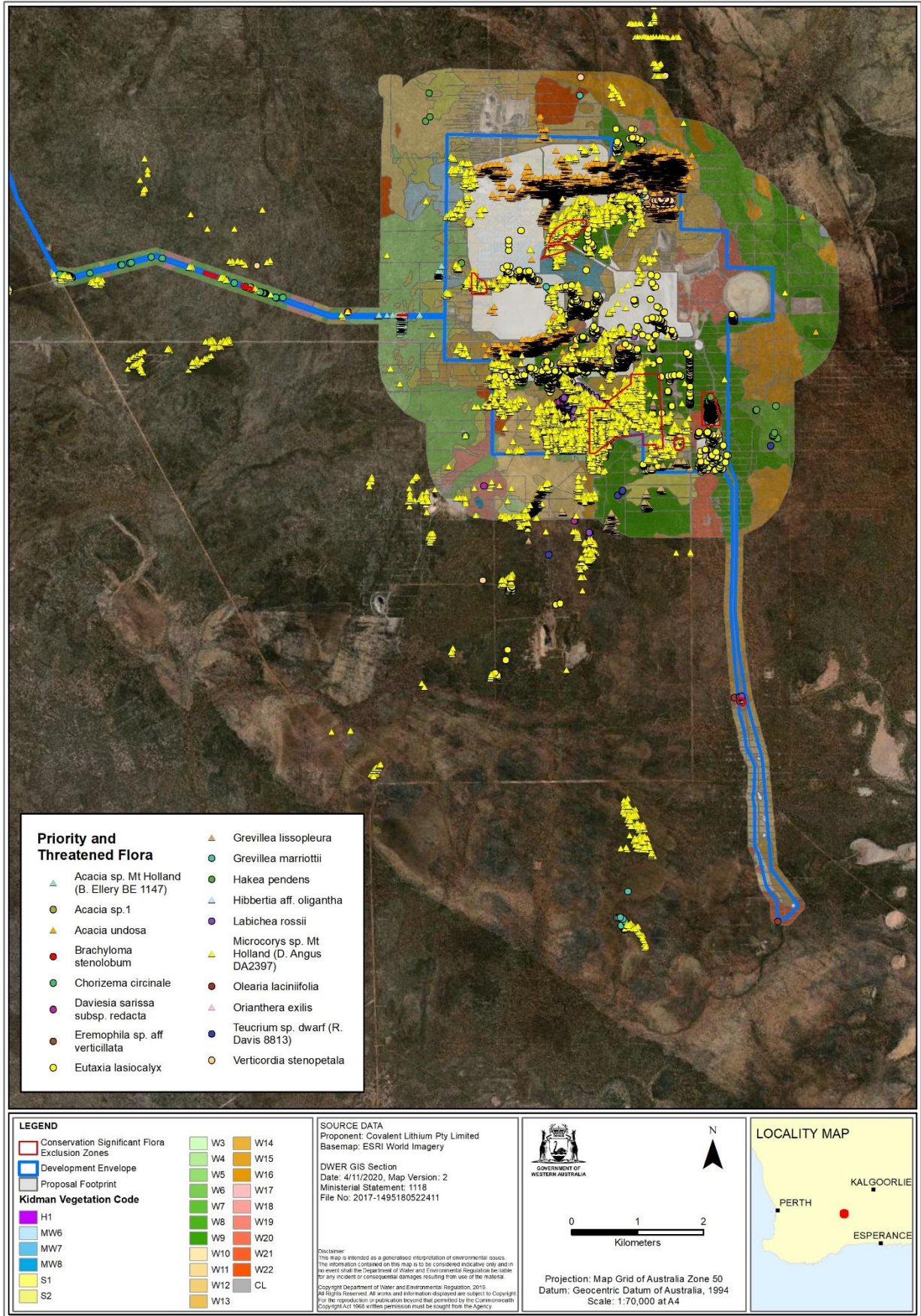


Figure 3 Conservation Significant Flora Exclusion Zones



Figure 4 Malleefowl Mound Exclusion Zones

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Schedule 2

All coordinates are in metres, listed in Map Grid of Australia Zone 50 (MGA Zone 50), datum of Geocentric Datum of Australia 1994 (GDA94).

Coordinates defining the areas shown in Figures 3 and 4 of Schedule 1, and referred to in Ministerial Conditions 6 and 7 are held by the Department of Water and Environmental Regulation under the following reference numbers:

Development Envelope DWERDT364304

Conservation Significant Flora Exclusion Zones DWERDT199595

Malleefowl Mound Exclusion Zones DWERDT355557

Appendix B MS 1167

THIS DOCUMENT

This document has been produced by the Office of the Appeals Convenor as an electronic version of the original Statement for the proposal listed below as signed by the Minister and held by this Office. Whilst every effort is made to ensure its accuracy, no warranty is given as to the accuracy or completeness of this document.

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Published on: 14 May 2021

Statement No. 1167

**STATEMENT TO CHANGE THE IMPLEMENTATION CONDITIONS
APPLYING TO A PROPOSAL
(Section 46 of the *Environmental Protection Act 1986*)**

EARL GREY LITHIUM PROJECT

Proposal: Proposal to develop a pegmatite-hosted lithium deposit at the abandoned Mt Holland mine site, located 105 km south-southeast of Southern Cross, Shire of Yilgarn.

Proponent: Covalent Lithium Pty Ltd
Australian Company Number 623 090 139

Proponent Address: Level 18, 109 St Georges Terrace, Perth WA 6000

Report of the Environmental Protection Authority: 1697

Previous Report Relating to this Proposal: 1651

Preceding Statement/s Relating to this Proposal: 1118

Pursuant to section 45 of the *Environmental Protection Act 1986*, as applied by section 46(8), it has been agreed that the implementation conditions set out in Ministerial Statement No 1118, be changed as specified in this Statement.

Condition 6-1 of Ministerial Statement 1118 is amended by adding 6-1(2):

6-1(2) The proponent shall ensure there are no proposal-related impacts to more than 9,732 individuals of *Microcorys elatoides* and 2 individuals of *Banksia sphaerocarpa var. dolichostyla*.

Condition 7-1 of Ministerial Statement 1118 is amended by adding 7-1(4):

7-1(4) The proponent shall ensure there is no proposal-related direct or adverse indirect impacts to Malleefowl from feral animals in the Development Envelope by controlling feral animals within, and a three kilometre buffer surrounding, the Development Envelope.

Condition 8-1 of Ministerial Statement 1118 is deleted and replaced with:

8-1 The proponent shall undertake offsets with the objective of counterbalancing the significant residual impact on the following environmental values:

- (1) 386 ha of foraging and breeding habitat for malleefowl (*Leipoa ocellata*);
- (2) 386 ha of foraging and potential breeding habitat for chuditch (*Dasyurus geoffroi*);
- (3) 2 individuals of Ironcap Banksia (*Banksia sphaerocarpa var. dolichostyla*);
and
- (4) 9,732 individuals of *Microcorys elatoides*,

as a result of the implementation of the proposal, as defined in Table 2 of Schedule 1 and delineated by coordinates in Schedule 2.

Condition 8-8 of Ministerial Statement 1118 is deleted and replaced with:

8-8 The Flora Offset Strategy required by condition 8-7 shall:

- (1) identify an area, or areas, to be protected, managed and/or rehabilitated for conservation that contains the flora values identified in condition 8-1 on advice of the Department of Biodiversity, Conservation and Attractions;
- (2) demonstrate how the proposed offset counterbalances the significant residual impact to 2 individuals of *Banksia sphaerocarpa var. dolichostyla* and 9,732 individuals of *Microcorys elatoides*, as identified in condition 8-1 through application of the principles and completion of the WA Offsets Template, as described in the *WA Environmental Offsets Guidelines 2014*, and the *Environment Protection and Biodiversity Conservation Act 1999 - Environmental Offsets Policy Assessment Guide (October 2012)*, or any approved updates of these guidelines;
- (3) identify the environmental values of the offset area(s);
- (4) identify and commit to a protection mechanism for any area(s) of land acquisition, being either the area(s) is ceded to the Crown for the purpose of management for conservation, or the area(s) is managed under other suitable mechanisms for the purpose of conservation as agreed by the CEO;
- (5) if any land is to be ceded to the Crown for the purpose of management for conservation, the proponent will identify:
 - (a) the quantum of, and provide funds for, the upfront works associated with establishing the conservation area;

- (b) the quantum of, and provide a contribution of funds for, the management of this area for seven (7) years after completion of purchase; and
 - (c) an appropriate management body for the ceded land;
- (6) where rehabilitation and/or other on-ground actions are proposed, state the objectives and targets to be achieved, including completion criteria, which demonstrate:
 - (a) how on-ground management or rehabilitation actions will result in a tangible improvement to the environmental value(s) being offset; and
 - (b) the consistency of the objectives and targets with the objectives of any relevant Recovery Plans or area management plans;
- (7) detail the management and/or rehabilitation actions and a timeframe for the actions to be undertaken;
- (8) detail any funding arrangements and timing of funding for conservation activities;
- (9) detail the monitoring, reporting and evaluation mechanisms for management and/or rehabilitation actions; and
- (10) define the role of the proponent and/or any relevant management authority.

[signed on 14 May 2021]

HON AMBER-JADE SANDERSON MLA
MINISTER FOR ENVIRONMENT; CLIMATE ACTION



Figure 4: Malleefowl Mound Exclusion Zones

Schedule 2

All coordinates are in metres, listed in Map Grid of Australia Zone 50 (MGA Zone 50), datum of Geocentric Datum of Australia 1994 (GDA94).

Coordinates defining the areas shown in Figures 3 and 4 of Schedule 1, and referred to in Ministerial Conditions 6 and 7 are held by the Department of Water and Environmental Regulation under the following reference numbers:

Development Envelope DWERDT199591

Conservation Significant Flora Exclusion Zones DWERDT199595

Malleefowl Mound Exclusion Zones DWERDT355557

Appendix C MS 1199

Appendix D Statement of Compliance

Statement of Compliance

1. Proposal and Proponent Details

Proposal Title	<i>Earl Grey Lithium Project</i>
Statement Number	<i>1118, 1167, 1199</i>
Proponent Name	<i>Covalent Lithium Pty Ltd</i>
Proponent's Australian Company Number <i>(where relevant)</i>	623 090 139

2. Statement of Compliance Details

Reporting Period	<i>1/01/22 to 31/12/22</i>
------------------	----------------------------

Implementation phase(s) during reporting period (please tick ✓ relevant phase(s))							
Pre-construction	<input type="checkbox"/>	Construction	<input checked="" type="checkbox"/>	Operation	<input type="checkbox"/>	Decommissioning	<input type="checkbox"/>

Audit Table for Statement addressed in this Statement of Compliance is provided at Attachment:	Table 4.1
<p>An audit table for the Statement addressed in this Statement of Compliance must be provided as Attachment 2 to this Statement of Compliance. The audit table must be prepared and maintained in accordance with the Department of Water and Environmental Regulation (DWER) <i>Post Assessment Guideline for Preparing an Audit Table</i>, as amended from time to time. The 'Status Column' of the audit table must accurately describe the compliance status of each implementation condition and/or procedure for the reporting period of this Statement of Compliance. The terms that may be used by the proponent in the 'Status Column' of the audit table are limited to the Compliance Status Terms listed and defined in Table 1 of Attachment 1.</p>	

Were all implementation conditions and/or procedures of the Statement complied with within the reporting period? (please tick ✓ the appropriate box)			
No (please proceed to Section 3)	<input checked="" type="checkbox"/>	Yes (please proceed to Section 4)	<input type="checkbox"/>

3. Details of Non-compliance(s) and/or Potential Non-compliance(s)

The information required Section 3 must be provided for each non-compliance or potential non-compliance identified during the reporting period covered by this Statement of Compliance.

Non-compliance/potential non-compliance 6-1

Which implementation condition or procedure was non-compliant or potentially non-compliant?	
Flora and Vegetation Environmental Management Plan (FVEMP 32), FVEMP 62	
Was the implementation condition or procedure non-compliant or potentially non-compliant?	
Non-compliant	
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?	
Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
<input type="checkbox"/> Yes <input type="checkbox"/> Reported to DWER verbally Date _____ <input type="checkbox"/> Reported to DWER in writing Date _____	<input checked="" type="checkbox"/> No
What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?	
A Dieback Management Plan was required to be produced and provided to DBCA, following the completion of baseline monitoring.	
What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)	
What was the cause(s) of the non-compliance or potential non-compliance?	
A Dieback Management Plan has not been produced or submitted to the DBCA	
What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance?	
A Dieback Management Plan will be drafted and submitted to the DBCA in the next reporting period	
What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?	
Covalent Lithium currently implements an operational hygiene procedure to manage dieback. This procedure forms part of the EGLP Environmental Management Plan (COV-0000-ENPLN-0001)	

Please provide information/documentation collected and recorded in relation to this implementation condition or procedure:

- in the reporting period addressed in this Statement of Compliance; and
- as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance.

(the above information may be provided as an attachment to this Statement of Compliance)

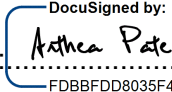
For additional non-compliance or potential non-compliance, please duplicate this page as required.

4. Proponent Declaration

I, **Anthea Pate, Environment Manager** (*full name and position title*)

declare that I am authorised on behalf of **Covalent Lithium Pty Ltd**

(*being the person responsible for the proposal*) to submit this form and that the information contained in this form is true and not misleading.

Signature:  Date: 1 May 2023
FDBBFDD8035F44E...

Please note that:

it is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give or cause to be given information that to his knowledge is false or misleading in a material particular; and

the Chief Executive Officer of the DWER has powers under section 47(2) of the *Environmental Protection Act 1986* to require reports and information about implementation of the proposal to which the statement relates and compliance with the implementation conditions.

- **Submission of Statement of Compliance**

One hard copy and one electronic copy (preferably PDF on CD or thumb drive) of the Statement of Compliance are required to be submitted to the Chief Executive Officer, DWER, marked to the attention of Manager, Compliance (Ministerial Statements).

Please note, the DWER has adopted a procedure of providing written acknowledgment of receipt of all Statements of Compliance submitted by the proponent, however, the DWER does not approve Statements of Compliance.

- **Contact Information**

Queries regarding Statements of Compliance, or other issues of compliance relevant to a Statement may be directed to Compliance (Ministerial Statements), DWER:

Manager, Compliance (Ministerial Statements)

Department of Water and Environmental Regulation

Postal Address: Locked Bag 10
 Joondalup DC
 WA 6919

Phone: (08) 6364 7000

Email: compliance@dwer.wa.gov.au

- **Post Assessment Guidelines and Forms**

Post assessment documents can be found at www.epa.wa.gov.au

ATTACHMENT 1

Table 2 Compliance Status Terms

Compliance Status Terms	Abbrev.	Definition	Notes
Compliant	C	Implementation of the proposal has been carried out in accordance with the requirements of the audit element.	This term applies to audit elements with: <ul style="list-style-type: none"> ongoing requirements that have been met during the reporting period; and requirements with a finite period of application that have been met during the reporting period, but whose status has not yet been classified as 'completed'.
Completed	CLD	A requirement with a finite period of application has been satisfactorily completed.	This term may only be used where: <ul style="list-style-type: none"> audit elements have a finite period of application (e.g., construction activities, development of a document, etc.); the action has been satisfactorily completed; and the DWER has provided written acceptance of 'completed' status for the audit element.
Not required at this stage	NR	The requirements of the audit element were not triggered during the reporting period.	This should be consistent with the 'Phase' column of the audit table.
Potentially Non-compliant	PNC	Possible or likely failure to meet the requirements of the audit element.	This term may apply where during the reporting period the proponent has identified a potential non-compliance and has not yet finalized its investigations to determine whether non-compliance has occurred.
Non-compliant	NC	Implementation of the proposal has not been carried out in accordance with the requirements of the audit element.	This term applies where the requirements of the audit element are not "complete" have not been met during the reporting period.
In Process	IP	Where an audit element requires a management or monitoring plan be submitted to the DWER or another government agency for approval, that submission has been made and no further information or changes have been requested by the DWER or the other government agency and assessment by the DWER or other government agency for approval is still pending.	<p>The term 'In Process' may not be used for any purpose other than that stated in the Definition Column.</p> <p>The term 'In Process' may not be used to describe the compliance status of an implementation condition and/or procedure that requires implementation throughout the life of the project (e.g., implementation of a management plan, etc.).</p>

Appendix E Flora and Vegetation Environmental Management Plan Compliance Assessment

Table E.1: Flora and Vegetation Environmental Management Plan audit table (Rev 5)

Reference	Action	Timing	Conformance status	Evidence	Findings
FVEMP 01	Management targets <ul style="list-style-type: none"> no unauthorised clearing of native vegetation 	Overall	C	Management advice 24/04/2023	There was no unauthorised clearing of native vegetation.
FVEMP 02	Management targets <ul style="list-style-type: none"> no unauthorised access within the Vegetation Exclusion Zones (VEZ's) 	Overall	C	Management advice 24/04/2023 E04_GDP0066 Example - Primero Road Construction	There was no reported unauthorised access within the Vegetation Exclusion Zones.
FVEMP 03	Management targets <ul style="list-style-type: none"> minimise dust deposition from mining and related activities 	Overall	C	E09_2022-2023 Dust Results E06_SummaryEventsReportListing_DustEvents	Dust monitoring indicates that dust deposition is minimised from mining and related activities. The events register (E06) documents five breaches of the early response trigger.
FVEMP 04	Management targets <ul style="list-style-type: none"> minimise spread of weeds or dieback 	Overall	C	E10_August 2022 EGLP Weed Hygiene Register R14_CEMP Weed and Pathogen Management	Hygiene protocols are implemented to minimise the spread of weeds and dieback.
FVEMP 05	Management targets <ul style="list-style-type: none"> minimise alteration of fire regimes or surface hydrology 	Overall	C	Management advice 24/04/2023	No fires or surface flooding events as a result of the proposal have occurred during the reporting period.
FVEMP 06	The internal vegetation clearing procedure and permit will be utilised to control clearing within the Development Envelope.	Overall	C	E03_Ground Disturbance Permit Procedure E04_GDP0066 Example - Primero Road Construction	Clearing for the Primero Road Construction was completed in accordance with the ground disturbance permit procedure.
FVEMP 07	Furthermore, the VEZs will be surveyed and delineated by an appropriate means (for example flagging tape, fencing or signage) to prevent unauthorised access.	Overall	C	P01_Exclusion Signage 1 P02_Exclusion Signage 2 P03_Exclusion Signage 3 P04_Exclusion Tape	VEZ is delineated by signage and tape to prevent unauthorised access.
FVEMP 08	Access will be limited to foot access only or vehicle access only to existing cleared tracks and controlled by a procedure and permitting process. This will aim to ensure the area is only accessed for monitoring or rehabilitation activities to meet the requirement of this FVMP.	Overall	C	E03_Ground Disturbance Permit Procedure	The GDP Procedure outlines access control.
FVEMP 09	All personnel will be made aware of the requirement to avoid the VEZS through the site induction process.	Overall	C	E11_Coalent Mt Holland Induction	Slide 79 of the induction covers exclusion zones.
FVEMP 10	No proposal related direct impact to flora and vegetation within a VEZ	Overall	C	R10_2022 Vegetation Condition Monitoring Autumn R11_2022 Vegetation Condition Monitoring Spring	Vegetation monitoring report indicates that variations reported were due to differences in observers' health rating scores and variation in rainfall.
FVEMP 11	If there is vegetation clearing without an authorised internal permit within the Development Envelope, but outside of the VEZs: <ul style="list-style-type: none"> Report internally as an incident in accordance with internal procedures. 	Overall	C	Management advice 24/04/2023	There was no unauthorised clearing of native vegetation.
FVEMP 12	If there is vegetation clearing without an authorised internal permit within the Development Envelope, but outside of the VEZs: <ul style="list-style-type: none"> Review management strategies and implement changes to prevent future occurrences. Management measures may include: 	Overall	C	Refer to FVEMP 10	Refer to FVEMP 10

Reference	Action	Timing	Conformance status	Evidence	Findings
	<ul style="list-style-type: none"> o Undertake incident investigation o Review proximity of potential disturbance within/to VEZ. Should disturbance occur to threatened or Priority flora as a result of unauthorised access, report to DWER within 7 days of identification o Review and upgrade VEZ signage/delineation where appropriate o Audit and review of training and staff inductions (ie. Increase in staff training and awareness to include information on VEZ's, legislative requirements, appropriate clearing procedures) o Ground disturbance permit training competency training o Review impact of unauthorised clearing and report any noncompliance to DWER within 7 days of identification o Undertake rehabilitation of unauthorised clearing (ie disturbance from vehicle tracks, vegetation clearing) by appropriately qualified personnel as required, in accordance with rehabilitation procedure. 				
FVEMP 13	If there is unauthorised access by personnel to a VEZ: <ul style="list-style-type: none"> • Report internally as an incident in accordance with internal procedures. 	Overall	C	Management advice 24/04/2023	No incidents of unauthorised access by personnel to VEZ.
FVEMP 14	If there is unauthorised access by personnel to a VEZ: <ul style="list-style-type: none"> • Review management strategies and implement changes to prevent future occurrences. Management measures may include: <ul style="list-style-type: none"> o Undertake incident investigation o Review proximity of potential disturbance within/to VEZ. Should disturbance occur to threatened or Priority flora as a result of unauthorised access, report to DWER within 7 days of identification o Review and upgrade VEZ signage/delineation where appropriate o Audit and review of training and staff inductions (ie. Increase in staff training and awareness to include information on VEZ's, legislative requirements, appropriate clearing procedures) o Ground disturbance permit training competency training o Review impact of unauthorised clearing and report any noncompliance to DWER within 7 days of identification o Undertake rehabilitation of unauthorised clearing (ie disturbance from vehicle tracks, vegetation clearing) by appropriately qualified personnel as required, in accordance with rehabilitation procedure. 	Overall	C	Refer to FVEMP 13	Refer to FVEMP 13
FVEMP 15	If there is Statistically significant reduction in mean condition ratings (more than 20% difference for		C	R10_ 2022 Vegetation Condition Monitoring Autumn	The monitoring conducted did not include measurements of chlorophyll fluorescence however qualitative measurements

Reference	Action	Timing	Conformance status	Evidence	Findings
	<p>qualitative or quantitative) of vegetation health within a VEZ in comparison to control sites, or a mean Fv/FM <0.6 (index of chlorophyll inflorescence):</p> <ul style="list-style-type: none"> • Report internally as an incident in accordance with site procedures. • 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 proposal related impacts. • Review dust, weather and weed monitoring to compare VEZ and control sites. Determine whether the changes observed in the impact sites are comparable to the observations in the reference sites. • Investigate potential causes for the observed decline in vegetation health which may include but are not limited to: <ul style="list-style-type: none"> • seasonal conditions (e.g., rainfall and temperatures) • effectiveness of weed control • spatial variation (near-impact areas) versus sites located further from impact • Develop strategies based on the outcomes of the investigation to prevent a recurrence and if necessary or possible reverse the decline in health of the VEZ flora and vegetation. Management measures may include the following: <ul style="list-style-type: none"> • Change in frequency of vegetation health monitoring Increase in staff training and awareness on factors which have implications to vegetation health for example dust, changes to hydrology 			R11_ 2022 Vegetation Condition Monitoring Spring	did not indicate more than 20% difference of vegetation health. Report (R11) has identified that quantitative monitoring is required going forward.
FVEMP 16	<p>Flora and vegetation within a VEZ experiences a statistically significant higher mortality rate than that of control sites (where that mortality is not attributed to direct or Project impacts).</p> <ul style="list-style-type: none"> • Report internally as an incident • Investigate cause and extent of mortality and if it is likely to result in the key environmental outcome not being achieved • If necessary (deemed to be proposal related) consider measures to prevent a reoccurrence of the incident and/or remediation strategies to address the impact • Notification to DAWE, EPA and DBCA within 7 days • Engagement with key stakeholders including DBCA, and relevant specialists where required to determine key actions. 		C	R10_ 2022 Vegetation Condition Monitoring Autumn R11_ 2022 Vegetation Condition Monitoring Spring	Vegetation monitoring did not report a statistically higher mortality rate within VEZ than that of control sites.

Reference	Action	Timing	Conformance status	Evidence	Findings
	<ul style="list-style-type: none"> Provide a report of the incident to EPA as detailed by condition 6-7(5) of MS1118 within 21 days. 				
FVEMP 17	<p>Conservation significant species within a VEZ experiences a statistically significant higher foliage cover loss rate than that of control sites (where that foliage cover loss is not attributed to direct or Project impacts).</p> <ul style="list-style-type: none"> Report internally as an incident Investigate cause and extent of mortality and if it is likely to result in the key environmental outcome not being achieved If necessary (deemed to be proposal related) consider measures to prevent a reoccurrence of the incident and/or remediation strategies to address the impact Notification to DAWE, EPA and DBCA within 7 days Engagement with key stakeholders including DBCA, and relevant specialists where required to determine key actions. Provide a report of the incident to EPA as detailed by condition 6-7(5) of MS1118 within 21 days. 		C	R10_ 2022 Vegetation Condition Monitoring Autumn R11_ 2022 Vegetation Condition Monitoring Spring	Vegetation monitoring did not report a statistically higher foliage cover loss rate within VEZ than that of control sites.
FVEMP 18	No proposal related indirect impact to flora and vegetation within a VEZ resulting in an adverse impact (Figure 1-1)	Overall	C	R10_ 2022 Vegetation Condition Monitoring Autumn R11_ 2022 Vegetation Condition Monitoring Spring	Vegetation monitoring report indicates that variations reported were due to differences in observers' health rating scores and variation in rainfall.
FVEMP 19	Survey records of all clearing undertaken during operation of the Project to be kept.	Overall	C	G01_EGLP_VegetationClearing	Survey records of all clearing undertaken during the reporting period were maintained (G01).
FVEMP 20	<p>Objective: No unauthorised clearing of vegetation within the Development Envelope or personnel access within the VEZs</p> <p>Target: No unauthorised clearing within the Development Envelope or VEZs. No unauthorised access to a VEZ.</p> <p>Action: Implementation of an internal clearing permit procedure</p>	Overall	C	E03_Ground Disturbance Permit Procedure E04_GDP0066 Example - Primero Road Construction Management advice 24/04/2023	Ground disturbance permit 66 v5 (E04) documents implementation of the clearing permit procedure (E03).
FVEMP 21	<p>Objective: No unauthorised clearing of vegetation within the Development Envelope or personnel access within the VEZs</p> <p>Target: No unauthorised clearing within the Development Envelope or VEZs. No unauthorised access to a VEZ.</p> <p>Action: Implementation of an internal procedure limiting access to VEZs by foot only or only by car where there is an existing track.</p>	Overall	C	E03_Ground Disturbance Permit Procedure E04_GDP0066 Example - Primero Road Construction Management advice 24/04/2023	Ground disturbance permit 66 v5 documents avoiding access to VEZ.
FVEMP 22	Objective: No unauthorised clearing of vegetation within the Development Envelope or personnel access within the VEZs	Overall	C	P01_Exclusion Signage 1 P02_Exclusion Signage 2 P03_Exclusion Signage 3	VEZ is delineated by signage and tape to prevent unauthorised access.

Reference	Action	Timing	Conformance status	Evidence	Findings
	Target: No unauthorised clearing within the Development Envelope or VEZs. No unauthorised access to a VEZ. Action: VEZs to be delineated with flagging tape, physical barrier, signage or similar to alert all personnel of their location			P04_Exclusion Tape	
FVEMP 23	Objective: No unauthorised clearing of vegetation within the Development Envelope or personnel access within the VEZs Target: No unauthorised clearing within the Development Envelope or VEZs. No unauthorised access to a VEZ Action: Inductions of all site personnel to include information on the location of VEZs, management targets, measures and expectations.	Overall	C	E11_Coalent Mt Holland Induction	Slide 79 of the induction covers exclusion zones and requirements to avoid them. Slide 81 covers unlawful clearing and the requirement to adhere to permit conditions.
FVEMP 24	Dust deposition rates will be measured monthly using dust deposition gauges for the first 24 months from implementation of the proposal. The dataset gained will be reviewed to inform the dust monitoring regime for the next revision of the FVMP.	Overall	C	R15_Maxy Engineering Dust Report R04_Coalent Lithium FVEMP	Dust deposition gauges were in place from 2021. Review of the regime is pending quantitative measurements of vegetation condition monitoring.
FVEMP 25	Objective: Minimise dust deposition on vegetation from mining and related activities Target: Dust deposition (present as insoluble solids) at any gauge in excess of 10 g/m ² /month. Action: dust suppression on cleared areas	Overall	C	Management advice 24/04.2023	Dust suppression of cleared unsealed roads and laydown areas was undertaken by water carts.
FVEMP 26	Objective: Minimise dust deposition on vegetation from mining and related activities Target: Dust deposition (present as insoluble solids) at any gauge in excess of 10 g/m ² /month. Action: maximise efficiency of loads when transporting ore or concentrate (including haul trucks and conveyers)	Overall	C	Refer to FVEMP 24	Refer to FVEMP 24
FVEMP 27	Objective: Minimise dust deposition on vegetation from mining and related activities Target: Dust deposition (present as insoluble solids) at any gauge in excess of 10 g/m ² /month. Action: use dust covers on machinery and dust suppressants on exposed areas where possible	Overall	NRATS	Management advice 24/04.2023	The use of dust covers is not yet applicable to the operation.
FVEMP 28	Objective: Minimise dust deposition on vegetation from mining and related activities Target: Dust deposition (present as insoluble solids) at any gauge in excess of 10 g/m ² /month. Action: minimise open area footprint and rehabilitate or cover (using vegetation, rock, water and/or dust suppressant) exposed areas as soon as practicable.	Overall	NRATS	Management advice 24/04.2023	There are no areas that are no longer required for mining but yet to be rehabilitated.
FVEMP 29	Objective: Minimise dust deposition on vegetation from mining and related activities	Overall	C	R15_Maxy Engineering Dust Report E09_2022-2023 Dust Results	While results show breaches of early response trigger levels, the overall objective to minimise dust emissions to VEZ has been

Reference	Action	Timing	Conformance status	Evidence	Findings
	Target: Dust deposition (present as insoluble solids) at any gauge in excess of 10 g/m ² /month. Action: design the mine layout to minimise dust emissions to VEZs where practicable				achieved across the mine site vegetation condition health below the 20% trigger.
FVEMP 30	Objective: Minimise dust deposition on vegetation from mining and related activities Target: Dust deposition (present as insoluble solids) at any gauge in excess of 10 g/m ² /month. Action: access roads will be sealed with an emulsion or suitable alternative, as shown in Figure 2-1	Overall	C	Management advice 24/04/2023	The access roads shown in Figure 2-1 are not sealed with emulsion or a suitable alternative however this was completed in February 2023 (outside the audit period). Water carts were utilised to apply fresh water in the audit period to minimise dust.
FVEMP 31	Annual weed monitoring to be conducted across Development Envelope.	Overall	C	R13_Mattiske Introduced Flora (Weed) survey Management advice 24/04/2023 R10_ 2022 Vegetation Condition Monitoring Autumn R11_ 2022 Vegetation Condition Monitoring Spring	The 2019-2020 weed survey was conducted across the development envelopment. Management report that annual monitoring requirement is met during the vegetation monitoring in autumn and spring The monitoring reports (R10, R11) state that “no exotic species were identified”
FVEMP 32	A Dieback Management Plan will be produced and provided to DBCA, following the completion of baseline monitoring.	Overall	PNC	Management advice 24/04/2023 R12_2022_GlevanConsulting_EGLP_DiebackAssessment	The dieback baseline monitoring has been completed in 2019 (R12) however the Dieback Management Plan is in development and will be submitted to DBCA when complete.
FVEMP 33	Dieback monitoring programme to be developed.	Overall	C	R12_2022_GlevanConsulting_EGLP_DiebackAssessment R19_2023_GlevanConsulting_EGLP_DiebackAssessment_DRAFT	Dieback Monitoring Programme in place.
FVEMP 34	Objective: Minimise spread of weeds / dieback Target: Minimise new weeds introduced to site. Prevent spread of weeds to VEZs. Prevent spread of dieback onsite. Action: implementation of a vehicle hygiene procedure, dieback management procedure and weed control	Overall	C	Management advice 24/04/2023 E10_August 2022 EGLP Weed Hygiene Register R14_CEMP Weed and Pathogen Management	Vehicle and Material hygiene inspections are conducted on all vehicles and materials that enter the Mt Holland Project (E10). Management Controls for Weeds and Pathogens are detailed in the Environmental Management Plan (R14).
FVEMP 35	Objective: Minimise spread of weeds / dieback Target: Minimise new weeds introduced to site. Prevent spread of weeds to VEZs. Prevent spread of dieback onsite. Action: 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	Overall	C	Refer to FVEMP 31	Refer to FVEMP 31
FVEMP 36	Objective: Minimise spread of weeds / dieback Target: Minimise new weeds introduced to site. Prevent spread of weeds to VEZs. Prevent spread of dieback onsite. Action: Phytophthora (dieback) controls including signage, cleandown points, vehicle hygiene shall be implemented.	Overall	C	Refer to FVEMP 34	Refer to FVEMP 34
FVEMP 37	Fire incidents to be reported.	Overall	C	Management advice 24/04/2023	No fire incidents attributable to proposal.
FVEMP 38	Objective: Avoid alteration of fire regimes Target: Prevent fires attributed to mining and associated Project activities.	Overall	C	R16_Mt Holland Emergency Management Plan	The Emergency Management Plan is in place and Section 7 outlines emergency response including fire, emergency response teams and training.

Reference	Action	Timing	Conformance status	Evidence	Findings
	Action: 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 fire fighting equipment).				
FVEMP 39	Objective: Avoid alteration of fire regimes Target: Prevent fires attributed to mining and associated Project activities. Action: implement fire management procedures (e.g. maintenance of fire breaks, Hot Work Permit system, firefighting training, Emergency Response Plan)	Overall	C	Management advice 24/04/2023 E12_Mt Holland Hot Works Procedure R16_Mt Holland Emergency Management Plan	Section 4.1 of the hot works procedure outlines that no or minimal flammable and combustible materials are to be kept in designated hot works areas. Section 9 addresses training.
FVEMP 40	Objective: Avoid alteration of fire regimes Target: Prevent fires attributed to mining and associated Project activities Action: firefighting equipment will be located on site and in vehicles.	Overall	C	Management advice 24/04/2023 P05_Fire Extinguisher	All light and medium rigid vehicles are fitted with fire fighting extinguishers (P05). Heavy mobile plant is fitted with AFFF equipment that is activated by the operator when required.
FVEMP 41	Objective: Avoid alteration of fire regimes Target: Prevent fires attributed to mining and associated Project activities Action: lightning protection equipment will be installed as part of Project design where necessary.	Overall	C	Management advice 24/04/2023	Lightning protection infrastructure is installed on buildings and concentrator infrastructure to redirect and minimise potential lightning caused fires.
FVEMP 42	Objective: Avoid alteration of fire regimes Target: Prevent fires attributed to mining and associated Project activities Action: coordination with DBCA and Department of Fire and Emergency Services (DFES) to undertake prescribed burns.	Overall	C	Management advice 24/04/2023	No prescribed burns were undertaken during the audit period.
FVEMP 43	Objective: Avoid alteration surface hydrology Target: Prevent changes to surface water hydrology attributed to mining and associated Project activities. Action: Drainage measures designed and constructed to minimise changes to natural surface water flow, including diversion drains, rock cladding and contouring as required.	Overall	C	P06_Surface Water Drainage 1 P07_Surface Water Drainage 2	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.
FVEMP 44	Objective: Avoid alteration surface hydrology Target: Prevent changes to surface water hydrology attributed to mining and associated Project activities. Action: Rehabilitation and closure to follow contours of natural landforms	Overall	NRATS	Management advice 24/04/2023	No rehabilitation monitoring was undertaken during the audit period.
FVEMP 45	Covalent will undertake consultation with DBCA's Species and Communities Program if activities related to seeding, germinating or planting <i>Banksia sphaerocarpa</i> var. <i>dolichostyla</i> are being considered.	Overall	C	C07_DBCA Correspondance - <i>Banksia sphaerocarpa</i> proposal	Activities relating to translocation of <i>Banksia sphaerocarpa</i> are being considered and proposal sent to DBCA for endorsement by Regional Manager, Narrogin.
FVEMP 46	The preparation and approval of a translocation proposal as required in Part 7 of the Biodiversity Conservation Regulations 2018 will be undertaken,	Overall	C	Refer to FVEMP 45	Refer to FVEMP 45

Reference	Action	Timing	Conformance status	Evidence	Findings
	including consultation with DBCA's Species and Communities Program.				
FVEMP 47	Damage to all or any part of a threatened flora individual shall require a section 40 authorisation. Impact to threatened flora as outlined in the Biodiversity Conservation Act 2016 is defined as 'taking all or part of an individual'.	Overall	C	E13_Section 4 Permit	A Regulation 4 Permit was issued by DBCA for the purposes of taking priority or threatened flora for survey purposes.
FVEMP 48	The Proponent will require all workers, both during construction and operation of the mine, to attend a worker awareness training/environmental induction covering the following topics. <ul style="list-style-type: none"> • Conservation significance of the flora and vegetation within the VEZs • Compliance and legislative requirements of the VEZs • Management measures and expectations of all personnel to ensure the key environmental outcome is achieved 	Overall	C	E11_Coalent Mt Holland Induction	Slide 79 of the induction covers exclusion zones, conservation significance and requirements to avoid them. Slide 81 covers unlawful clearing and the requirement to adhere to permit conditions.
FVEMP 49	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.	Overall	C	E06_SummaryEventsReportListing_DustEvents	Dust breaches were reported to the Environmental Manager. Applicable incidents were reported to DWER.
FVEMP 50	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.	Overall	C	Refer to FVEMP 49	Refer to FVEMP 49
FVEMP 51	The monitoring program will involve monitoring of plant condition, dust deposition and weed monitoring in order to: <ul style="list-style-type: none"> • determine if there are any changes occurring to flora and vegetation condition and health in the VEZs • assess whether any changes in flora and vegetation are due to the Project or external/natural factors • provide a methodology for ongoing monitoring to enable time-based comparisons. 	Overall	C	R10_ 2022 Vegetation Condition Monitoring Autumn R11_ 2022 Vegetation Condition Monitoring Spring R15_2022 Maxy Engineering Dust Report	Ongoing monitoring program involves monitoring of plant condition, weeds and dust deposition.
FVEMP 52	2.4.1 Plant condition monitoring 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. Each monitoring site will consist of a quadrat 10 m by 40 m arranged linearly with four sub quadrats of 10m x 10m, thereby providing an area equivalent to 20m x 20m and conforming to the recommended quadrat size for the bioregion (EPA Technical Guidance 2016). The locations of monitoring quadrats have been reviewed based on recommendations provided by DBCA and locations were revised to monitor the following sub-	Overall	C	R10_ 2022 Vegetation Condition Monitoring Autumn R11_ 2022 Vegetation Condition Monitoring Spring	Monitoring reports indicate that each monitoring site consists of a quadrat 10 m by 40 m arranged linearly with four sub quadrats of 10m x 10m. The qualitative assessments are being conducted at the DBCA recommended locations with the exception of transect 6 which was part of the mine expansion.

Reference	Action	Timing	Conformance status	Evidence	Findings
	set of conservation significant species individuals in the monitoring program				
FVEMP 53	2.4.2 Quarterly observations of plant health at vegetation quadrats within VEZs and control sites on commencement of Proposal for first 12 months.	Overall	Completed	R02_61839 Covalent Lithium CAR 2021 (Rev 0)	Observations were made October 2020 to October 2021.
FVEMP 54	2.4.2 Following the development of a robust dataset over the first 12 months, the monitoring methodology, frequency and monitoring sites will be reviewed.	Overall	Completed	R02_61839 Covalent Lithium CAR 2021 (Rev 0)	Undertaken in previous audit period. Monitoring to be undertaken 6-monthly.
FVEMP 55	2.4.2 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.	Overall	C	Refer to FVEMP 31	Refer to FVEMP 31
FVEMP 56	2.4.3 Dust deposition rates will be measured with dust deposition gauges (DDGs) in accordance with AS/NZS 3580.10.1:2003. Data will be recorded monthly, commencing prior to construction or production enabling a baseline level to be established.	Overall	Completed	R02_61839 Covalent Lithium CAR 2021 (Rev 0)	Undertaken in previous audit period.
FVEMP 57	2.4.3 Nine DDGs will be installed at the select monitoring quadrats as detailed by Table 2-5 and shown by Figure 2-1. This will enable a comparison of results between VEZs and control sites and assist with determining any proposal related indirect effects.	Overall	C	R15_2022 Maxy Engineering Dust Report R04_Covalent Lithium FVEMP	DDGs are installed as per Figure 2-1.
FVEMP 58	2.4.3 The management target of 10 g/m ² has been adopted for this FVMP, however, this will be reviewed based on monitoring of the health and condition of the keystone species and may be reduced or increased after the initial 24 months of monitoring. As detailed by section 4.1 an early response trigger of 5 g/m ² has also been adopted.	Overall	C	E09_2022-2023 Dust Results R15_2022 Maxy Engineering Dust Report	Results of dust monitoring are being compared to the early response trigger and management target.
FVEMP 59	2.4.4 In order to increase understanding as to the degree of potential long term impacts of the Project on conservation significant species, a census of the highest ranked conservation significant species will be undertaken in 10 years if a Proposal related decline is identified at VEZ monitoring locations. This census will be designed in consultation with an appropriate flora specialist consistent with monitoring undertaken within this plan.	Overall	NRATS	N/A	Proposal not 10 years from implementation.
FVEMP 60	2.4.5 Weed and dieback monitoring will be undertaken in conjunction with plant condition monitoring, as outlined in section 2.4.1 at both VEZs and control sites. This will allow for quarterly monitoring for the first 12 months, with the frequency to be reviewed following this period.	Overall	Completed	R02_61839 Covalent Lithium CAR 2021 (Rev 0)	Undertaken in previous audit period.
FVEMP 61	2.4.5 Furthermore, annual monitoring across the Development Envelope will be undertaken for the occurrence of new weeds, the spread of existing weeds and evidence of dieback.	Overall	C	Management advice 24/04/2023 R10_2022 Vegetation Condition Monitoring Autumn R11_2022 Vegetation Condition Monitoring Spring	Weed and dieback monitoring undertaken in 2022.

Reference	Action	Timing	Conformance status	Evidence	Findings
				R19_2023_GlevanConsulting_EGLP_DiebackAssessment_DRAFT	
FVEMP 62	2.4.5 A Dieback Management Plan will be produced and provided to DBCA following the completion of baseline monitoring. This plan will include Phytophthora (dieback) management controls such as signage, clean down points, vehicle hygiene and the inspection and monitoring of dieback infested areas.	Overall	PNC	R12_2022_GlevanConsulting_EGLP_DiebackAssessment	Baseline monitoring was completed in 2019 and DMP has not been submitted.
FVEMP 63	2.4.6 Monitoring of flora and vegetation as outlined in (sections 2.4.1 and 2.4.2) will be continued during rehabilitation and closure to confirm that rehabilitation and closure activities and outcomes are not contributing to any increased impacts on conservation significant flora species. Populations of conservation significant flora and vegetation within protection areas (Table 2-5) will continue for a suitable time period after mining has ceased and whilst rehabilitation and closure actions are ongoing.	Overall	NRATS	Management advice 24/04/2023	No rehabilitation undertaken in the audit period.
FVEMP 64	A summary of all monitoring results against trigger and threshold criteria will be provided within the Annual Compliance Assessment Report.	Overall	C	R01_Coalent Lithium CAR 2022 (Rev 0)	Refer to Section 5.
FVEMP 65	The summary of monitoring will detail if any trigger or threshold criteria has been exceeded and the actions taken to prevent a recurrence and/or remediation strategies.	Overall	C	R01_Coalent Lithium CAR 2022 (Rev 0)	Refer to Section 5
FVEMP 66	The summary of data will also contain raw monitoring data against management measures such as dust deposition, weeds, fire and climate (such as annual rainfall and temperature) will also be provided for comparison to flora and vegetation health and condition monitoring.	Overall	C	R10_2022 Vegetation Condition Monitoring Autumn R11_2022 Vegetation Condition Monitoring Spring R15_2022 Maxy Engineering Dust Report	Refer to Appendix G.H and I.
FVEMP 68	Reporting of exceedances of threshold criteria will be undertaken to meet condition 6-7 of MS1118. This shall include: <ul style="list-style-type: none"> • A report on the exceedance in writing to the EPA within seven (7) days of the exceedance being identified; • An investigation to determine the cause of the threshold criteria being exceeded; • An investigation to provide information to the EPA to determine potential environmental harm or alteration of the environment that occurred due to threshold criteria being exceeded; and • a report to the EPA within twenty-one (21) days of the exceedance being reported as required by condition 6-7(1) of MS1118. The report shall include: <ul style="list-style-type: none"> o details of threshold contingency actions implemented; 	Overall	C	Management advice	No threshold was exceeded

Reference	Action	Timing	Conformance status	Evidence	Findings
	<ul style="list-style-type: none"> o the effectiveness of the threshold contingency actions implemented, against the threshold criteria; o the findings of the investigations required by conditions 6-7(3) and 6-7(4) of MS1118; o measures to prevent the threshold criteria being exceeded in the future; o measures to prevent, control or abate the environmental harm which may have occurred; and o justification of the threshold remaining, or being adjusted based on better understanding, demonstrating that objectives will continue to be met. 				
FVEMP 69	<p>In the event that pre-clearance surveys identify additional species, individuals or an increase in population impacts, apply mitigation measures:</p> <p>Measure: 1. Adjust site layout to ensure population impact target is not exceeded</p> <p>Action: Investigate alternate site layouts whereby the project may still be feasible, but reduces direct and potential indirect impacts.</p>	As required	C	E03_Ground Disturbance Permit Procedure E04_GDP0066 Example - Primero Road Construction	As part of the GDP Clearing Process, the disturbance footprint is assessed against the vegetation spatial dataset in GIS to determine the number of priority flora impacted by the clearing. GDP conditions are developed to minimise impact.
FVEMP 70	<p>In the event that pre-clearance surveys identify additional species, individuals or an increase in population impacts, apply mitigation measures:</p> <p>Measure: 1. Adjust site layout to ensure population impact target is not exceeded</p> <p>Action: A review of the Proposed Layout shall be undertaken to ensure population impact targets (Section 3.2) are not exceeded. If any clearing is planned outside of the Proposed Layout, revised population impacts (as per Table 3-3) will be undertaken to ensure Population Impact Targets are met.</p>	Prior to clearing	C	Refer to FVEMP 69	Refer to FVEMP 69
FVEMP 71	<p>In the event that pre-clearance surveys identify additional species, individuals or an increase in population impacts, apply mitigation measures:</p> <p>Measure: 1. Adjust site layout to ensure population impact target is not exceeded</p> <p>Action: Implementation of an internal clearing permit procedure which includes demarcation of clearing area to ensure accurate clearing boundaries</p>	Prior to clearing	C	E03_Ground Disturbance Permit Procedure E04_GDP0066 Example - Primero Road Construction	GDP Procedure requires demarcation of clearing area.
FVEMP 72	<p>In the event that pre-clearance surveys identify additional species, individuals or an increase in population impacts, apply mitigation measures:</p> <p>Measure: 2. Undertake further surveys within local and regional areas to reduce the direct impact to an acceptable level against impact assessment criteria</p> <p>Action: Identify areas locally and regionally which may provide habitat for the species</p>	As required	C	Management advice	Additional species or increased population impacts not identified.

Reference	Action	Timing	Conformance status	Evidence	Findings
FVEMP 73	In the event that pre-clearance surveys identify additional species, individuals or an increase in population impacts, apply mitigation measures: Measure: 2. Undertake further surveys within local and regional areas to reduce the direct impact to an acceptable level against impact assessment criteria Action: Undertake further surveys in accordance with relevant technical guidance (EPA 2016a) and within the appropriate season.	Within 12 months of identifying further survey areas	C	Refer to FVEMP 72	Refer to FVEMP 72
FVEMP 74	In the event that pre-clearance surveys identify additional species, individuals or an increase in population impacts, apply mitigation measures: Measure: 2. Undertake further surveys within local and regional areas to reduce the direct impact to an acceptable level against impact assessment criteria Action: Develop and present survey report (including impact assessment against management targets) to EPA and DBCA	Within two months of completing surveys	C	Refer to FVEMP 72	Refer to FVEMP 72
FVEMP 75	In the event that pre-clearance surveys identify additional species, individuals or an increase in population impacts, apply mitigation measures: Measure: 2. Undertake further surveys within local and regional areas to reduce the direct impact to an acceptable level against impact assessment criteria Action: EPA and DBCA review and accept report	Within three months of receiving final survey report	C	Refer to FVEMP 72	Refer to FVEMP 72
FVEMP 76	In the event that pre-clearance surveys identify additional species, individuals or an increase in population impacts, apply mitigation measures: Measure: 3. Minimise indirect impacts through implementation of FVMP Action: Implement FVMP management measures, including monitoring requirements	Ongoing	C	Refer to FVEMP 72	Refer to FVEMP 72
FVEMP 77	In the event that pre-clearance surveys identify additional species, individuals or an increase in population impacts, apply mitigation measures: Measure: 4. Develop research programs for species revegetation Action: In consultation with research institutions, investigate programs to research and develop a greater scientific understanding of the species for the purpose of revegetation. Develop proposal and scope for the research program. Potential topics may include: <ul style="list-style-type: none"> • Habitat modelling and necessary biotic and abiotic factors for establishment and long-term survival • Seed ecology including germination cues • Seedling establishment via the collection and growth of cuttings 	Within three months of Mitigation Measures 1, 2 and 3 proving to be unfeasible	C	Refer to FVEMP 72	Refer to FVEMP 72

Reference	Action	Timing	Conformance status	Evidence	Findings
	<ul style="list-style-type: none"> Revegetation trials 				
FVEMP 78	In the event that pre-clearance surveys identify additional species, individuals or an increase in population impacts, apply mitigation measures: Measure: 4. Develop research programs for species revegetation Action: Submit research proposal to DBCA for review and acceptance.	Within one month of receiving research proposal.	C	Refer to FVEMP 72	Refer to FVEMP 72
FVEMP 79	In the event that pre-clearance surveys identify additional species, individuals or an increase in population impacts, apply mitigation measures: Measure: 4. Develop research programs for species revegetation Action: Implement research proposal and produce report on the outcomes.	Complete within 24 months of receiving DBCA acceptance.	C	Refer to FVEMP 72	Refer to FVEMP 72
FVEMP 80	In the event that pre-clearance surveys identify additional species, individuals or an increase in population impacts, apply mitigation measures: Measure: 4. Develop research programs for species revegetation Action: Submit report to EPA and DBCA on research outcomes for acceptance.	Review and accept within three months of receiving report.	C	Refer to FVEMP 72	Refer to FVEMP 72
FVEMP 81	In the event that pre-clearance surveys identify additional species, individuals or an increase in population impacts, apply mitigation measures: Measure: 4. Develop research programs for species revegetation Action: Implement research program outcomes.	Within one month of accepting the report.	C	Refer to FVEMP 72	Refer to FVEMP 72
FVEMP 82	In the event that pre-clearance surveys identify additional species, individuals or an increase in population impacts, apply mitigation measures: Measure: 5. Apply the Residual Significant Impact Model (RSIM) Action: Apply the RSIM as per the WA Environmental Offset Guidelines (2014)	Within three months of Mitigation Measures 1, 2 and 3 proving to be unfeasible	C	Refer to FVEMP 72	Refer to FVEMP 72
FVEMP 83	In the event that pre-clearance surveys identify additional species, individuals or an increase in population impacts, apply mitigation measures: Measure: 5. Apply the Residual Significant Impact Model (RSIM) Action: Liaise with EPA and DBCA on the outcomes of the RISM and further actions required.	Within one month of applying the model.	C	Refer to FVEMP 72	Refer to FVEMP 72
FVEMP 84	If dust deposition results at a single VEZ site exceeds 5 g/m ² for two consecutive months, the proponent will: <ul style="list-style-type: none"> Report internally that early response trigger has been met in accordance with internal procedures. 	Overall	C	Management advice 24/04/2023 E09_2022-2023 Dust Results	Breaches of early warning trigger triggered reporting and responses include: <ul style="list-style-type: none"> Dust suppression with fresh water increased at peak times.

Reference	Action	Timing	Conformance status	Evidence	Findings
	<ul style="list-style-type: none"> Review dust monitoring program. Determine whether the changes observed in the VEZ are comparable with control monitoring sites. Review dust mitigation measures Investigate and determine improvement strategy Investigate the cause of the exceedance to determine if it is attributable to proposal related activities. Where the trigger is attributed to clearing, construction or operational activities, report the exceedance to DWER within 7 days of the exceedance being identified. 				- Plan for road closure.
FVEMP 85	<p>If one new weed species sighted during annual monitoring but with limited to negligible coverage, the proponent will:</p> <ul style="list-style-type: none"> Report internally that early response trigger has been met in accordance with internal procedures. Review weed control programme and amend as required. Staff training and awareness to include information on weed species and preventative measures such as vehicle/ weed hygiene procedures. Review weed monitoring program. Trigger response actions may include the following: <ul style="list-style-type: none"> Review monitoring frequency (quarterly for initial 12 months then annually), adjust accordingly. Adjust timing of monitoring if appropriate, so that infestations of invasive species that establish can be eradicated before the plants can flower and set seed. Review suitability of weed monitoring locations, adjust accordingly. Determine whether the changes observed are comparable with control monitoring sites. If after the two consecutive monitoring events, a threshold exceedance has not been identified, resume standard monitoring. 	Overall	C	R10_ 2022 Vegetation Condition Monitoring Autumn R11_ 2022 Vegetation Condition Monitoring Spring	Vegetation monitoring reports (R10, R11) that no exotic species were observed.
FVEMP 86	<p>If there is a fire occurrence within the Development Envelope that impacts on native vegetation, the proponent will:</p> <ul style="list-style-type: none"> Report internally that early response trigger has been met in accordance with internal procedures. Internal audit of fire management plan Review fire mitigation strategies to limit spread of fire. Staff training and awareness to include information on the prevention and management of fires. Investigate the cause of the exceedance to determine if it is attributable to proposal related activities. 	Overall	C	Management advice 24/04/2023	No fires in the development envelope in the audit period.

Reference	Action	Timing	Conformance status	Evidence	Findings
FVEMP 87	<p>If pre-clearance surveys result in total impacts to a conservation significant species population impact exceeding 10%, the proponent will:</p> <ul style="list-style-type: none"> • Apply the Mitigation Measures detailed in Section 3.4 • Undertake consultation with EPA and DBCA regarding outcome of mitigation measures • Project activities which may exceed the regional population total impact target will not proceed. 	Prior to clearing	C	Management advice 24/04/2023	The disturbance footprint has not exceeded more than 10% of the known distribution of any conservation significant species, as such consultation with the EPA and DBCA regarding additional mitigation measures has yet to be required.
FVEMP 88	The proponent will update this Management Plan 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 EPA for review. If the Proponent has gathered sufficient information through research and long-term monitoring to propose revisions to management targets, the plan may be revised and resubmitted to the EPA for approval.	Overall	C	Refer to MS1118:6.8	Refer to MS1118:6.8
FVEMP 89	Furthermore, in accordance with condition 6-8(2) of MS1118, the proponent will update this FVMP as and when directed by the EPA.	Overall	C	Refer to MS1118:6.8	Refer to MS1118:6.8

Appendix F Terrestrial Fauna Environmental Management Plan Compliance Assessment

Table F.2: Terrestrial Fauna Environmental Management Plan audit table (Rev 3)

Reference	Action	Timing	Conformance status	Evidence	Findings
TFEMP 01	Management targets: <ul style="list-style-type: none"> Avoid clearing of vegetation within 100 m of malleefowl mounds. 	Ongoing	C	E05_Fauna Pre-clearance Survey E07_EGLP Malleefowl Monitoring 2021-2022	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.
TFEMP 02	Management targets: <ul style="list-style-type: none"> Avoid removal of any active malleefowl mounds. 	Ongoing	C	Refer to TFEMP 01	Refer to TFEMP 01
TFEMP 03	Management targets: <ul style="list-style-type: none"> Minimise mortality of malleefowl or chuditch from clearing activity, entrapment, vehicle strike or mining related fire. 	Ongoing	C	Management advice 24/04/2023 R05_Coalent Lithium TFEMP C08_Injured_Deceased Malleefowl DBCA Notification	The TFEMP is implemented to minimise mortality of malleefowl or chuditch from clearing activity, entrapment, vehicle strike or mining related fire. There was one incident involving mortality of one malleefowl by vehicle strike in the audit period. Impact does not breach trigger or threshold criteria.
TFEMP 04	Management targets: <ul style="list-style-type: none"> Minimise decline in population due to predation from introduced predators. 	Ongoing	C	R17_IntroducedPredatorMonitoring E07_EGLP Malleefowl Monitoring 2021-2022 E08_EGLP Chuditch Monitoring 2022	Monitoring has not indicated a change in malleefowl or chuditch population. Introduced predator monitoring indicates that numbers of predators are not increasing. Coalent plan to implement a control program in 2023.
TFEMP 05	Management targets: <ul style="list-style-type: none"> Minimise decline in population due to dust, noise, light, vibration and displacement. 	Ongoing	C	E07_EGLP Malleefowl Monitoring 2021-2022 E08_EGLP Chuditch Monitoring 2022	Monitoring has not indicated a change in malleefowl or chuditch population.
TFEMP 06	Management targets: <ul style="list-style-type: none"> Minimise decline in fauna habitat condition due to change in fire regime. 	Ongoing	C	Management advice 24/04/2023	There were no fires in the development envelope in the audit period.
TFEMP 07	If Trigger Criteria is met: <ul style="list-style-type: none"> clearing without an authorised internal permit within the Development Envelope, but outside of the Malleefowl Mound Exclusion Zone (MMEZ) Proponent will take response actions: <ul style="list-style-type: none"> Report internally as an incident in accordance with internal procedures. Review management strategies and implement changes to prevent future occurrences which may include the following: <ul style="list-style-type: none"> Audit and review of training and staff inductions (ie. Increase in staff training and awareness to include information on MMEZ, legislative requirements, appropriate clearing procedures). Ground Disturbance Permit competency training. Review impact of unauthorised clearing and report any noncompliance to DWER within 7 days of identification. Installation of signage where appropriate. Review of effectiveness of 10 m trigger response criteria for unauthorised clearing approaching a MMEZ and update FMP appropriately. 	Ongoing	C	Management advice 24/04/2023	There were no incidents of unauthorised clearing in the audit period.

Reference	Action	Timing	Conformance status	Evidence	Findings
	<ul style="list-style-type: none"> Undertake rehabilitation of unauthorised clearing (ie disturbance from vehicle tracks, vegetation clearing) by appropriately qualified personnel as required, in accordance with rehabilitation procedure. 				
TFEMP 08	<p>If Trigger Criteria is met:</p> <ul style="list-style-type: none"> Unauthorised access by personnel to a MMEZ <p>Proponent will take response actions:</p> <ul style="list-style-type: none"> Report internally as an incident in accordance with internal procedures. Consult with a fauna specialist to review management strategies and implement changes to prevent future occurrences which may include the following: <ul style="list-style-type: none"> Review proximity of potential of disturbance to malleefowl mounds within the MMEZ. Should disturbance occur to an active malleefowl mound as a result of unauthorised access, report to DWER within 7 days of identification. Undertake rehabilitation of unauthorised access (ie disturbance from vehicle tracks) as required in accordance with internal rehabilitation procedures. 	Ongoing	C	Management advice 24/04/2023	No unauthorised access to a Malleefowl mound exclusion zone occurred during the reporting period.
TFEMP 09	<p>If Trigger Criteria is met:</p> <ul style="list-style-type: none"> Clearing or disturbance of vegetation within 100 m of any newly identified active malleefowl mounds and / or the MMEZs. <p>Proponent will take response actions:</p> <ul style="list-style-type: none"> Cease clearing activities. Undertake investigation to determine source of disturbance. If disturbance is attributed to Proposal activities, undertake a review of layout to determine if impact can be minimised, development actions to prevent a recurrence and communicate findings to relevant personnel Suitably qualified fauna specialist to undertake an assessment of impact If potential impacts to eggs are expected, consultation with DBCA will occur to determine if egg removal is required Rehabilitation of vegetation disturbance to be considered to re-instate fauna habitat Any impacts to mounds to be rehabilitated following consultation with DBCA and a suitably qualified fauna specialist Report as a non-compliance to DWER within 7 days of identification Investigate and report in accordance with condition 7-6 of MS1118. Report submitted to DWER with remediation actions proposed. 	Ongoing	C	Management advice 24/04/2023	There was no clearing and/or disturbance of vegetation within 100m of a newly identified active malleefowl mound occurred during the reporting period.
TFEMP 10	Conduct internal audit of recorded malleefowl mounds against areas of clearing.	Ongoing	C	G03_2022 CAR Malleefowl Disturbance Audit	No clearing of active Malleefowl mounds occurred during the reporting period.
TFEMP 11	Undertake monitoring of incident reports for over clearing, light and noise disturbance and fire.	Ongoing	C	Management advice 24/04/2023	No incidents of over clearing, light or noise disturbance or fire.

Reference	Action	Timing	Conformance status	Evidence	Findings
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"> • Report internally as an incident. • 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 proposal related impacts. • Determine whether the changes observed in the impact sites for chuditch are comparable to the observations in the reference sites. • Investigate potential causes for the observed decrease in female chuditch abundance or decrease in local malleefowl population which may include but are not limited to: <ul style="list-style-type: none"> • seasonal conditions (e.g. rainfall and temperatures) • effectiveness of introduced predator control • changes in mound usage patterns by malleefowl (i.e. use of mounds that are not surveyed) • spatial variation (near-impact areas) versus sites located further from impact • reliability of observations obtained from the sightings register • fauna deaths reported • Seek advice from a suitably qualified fauna specialist as required. • If proposal 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"> • Review of annual malleefowl and chuditch monitoring where required • Review and increase effectiveness of pre-clearance monitoring (for example timing/ duration of surveys) • Review and refine remote camera monitoring for introduced predators (foxes and cats). • A proportionate increase in trapping/ baiting intensity may be required for introduced predator control in areas where increased sightings occur • Increase in the frequency of introduced predator control undertaken may be required • Increase internal audits and inspections for incident reports relating to vehicle interactions, unauthorised clearing, light and noise disturbance and fire. • Fauna death register may require review and locations of deaths examined to identify areas where a decrease in speed limits, alteration to roads and extra signage may be required. 	Ongoing	C	<p>Management advice 24/04/2023</p> <p>E07_EGLP Malleefowl Monitoring 2021-2022</p> <p>E08_EGLP Chuditch Monitoring 2022</p>	Trigger criteria was not met.

Reference	Action	Timing	Conformance status	Evidence	Findings
	<ul style="list-style-type: none"> Increase in staff training and awareness to include information on feral species (e.g. impact of feral predators 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). 				
TFEMP 13	Undertake pre-clearance monitoring	Prior to clearing	C	E05_Fauna Pre-clearance Survey	Pre-clearance monitoring being undertaken.
TFEMP 14	Annual monitoring of malleefowl activity using motion sensor cameras	Ongoing	C	E07_EGLP Malleefowl Monitoring 2021-2022	Annual monitoring with motion sensor cameras undertaken in the reporting period.
TFEMP 15	Annual monitoring of malleefowl as per NMRT (2019) guidelines	Ongoing	C	Refer to TFEMP 14	Refer to TFEMP 14
TFEMP 16	Annual monitoring of chuditch using cage trapping	Ongoing	C	E08_EGLP Chuditch Monitoring 2022	Annual monitoring of chuditch using cage trapping undertaken in the reporting period.
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"> Report as a non-compliance to DWER within 7 days of identification Investigate and report in accordance with condition 7-6 of MS1118. Report submitted to DWER with remediation actions proposed. Review all monitoring data (including control sites) in relation to management measures (Table 2.3) and any other available data such as weather and climate to determine if the decrease is due to proposal related impacts. Seek advice from a suitably qualified fauna specialist as required. If proposal related impact is suspected, increase management measures on advice from a suitably qualified fauna specialist to reduce the exceedance below threshold criteria. <p>Management measures may include but are not limited to the following:</p> <ul style="list-style-type: none"> Review of annual malleefowl and chuditch monitoring where required and threshold criteria and early response triggers Review and increase effectiveness of pre-clearance monitoring (for example timing/ duration of surveys) Review and refine remote camera monitoring for introduced predators (foxes and cats), for example trapping effort, survey timing and frequency, location and placement of cameras. A proportionate increase in trapping/ baiting intensity may be required for introduced fauna control coinciding with regional control programs. Increase in the frequency of introduced predator control undertaken may be required 	Ongoing	C	<p>Management advice 24/04/2023</p> <p>E07_EGLP Malleefowl Monitoring 2021-2022</p> <p>E08_EGLP Chuditch Monitoring 2022</p>	Trigger criteria was not met.

Reference	Action	Timing	Conformance status	Evidence	Findings
	<ul style="list-style-type: none"> Increased frequency of internal audits and inspections for incident reports relating to vehicle interactions, unauthorised clearing, light and noise disturbance and fire. Fauna death register may require review and locations of deaths examined to identify areas where a decrease in speed limits, alteration to roads and extra signage may be required. Increase in staff training and awareness to include information on feral species (e.g. impact of feral animals on malleefowl and chudditch populations, no feeding of feral species, reducing availability of food waste to feral animals and all sightings of feral species to be reported). Further regional surveys and monitoring to determine impacts to population 				
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	C	E03_Ground Disturbance Permit Procedure E04_GDP0066 Example - Primero Road Construction	Implementation of GDP Procedure requires demarcation and notification and limits access to MMEZ.
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	C	P02_Exclusion Signage 2	MMEZ is delineated by signage and tape to prevent unauthorised access.
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	C	E11_Coalent Mt Holland Induction	Slide 79 of the induction covers exclusion zones and requirements to avoid them. Slide 81 covers unlawful clearing and the requirement to adhere to permit conditions.
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	C	E03_Ground Disturbance Permit Procedure E04_GDP0066 Example - Primero Road Construction	Item 28 of the GDP66 v5 covers conducting activities to minimise harm to fauna.
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	NRATS	Management advice 24/04/2023	No areas ready for rehabilitation.
TFEMP 23	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p>	Ongoing	C	Management advice 24/04/2023	Clearing has been undertaken during periods operationally suitable. Where possible this is outside the windows.

Reference	Action	Timing	Conformance status	Evidence	Findings
	Action (clearing management controls): Preferential clearing outside of the egg incubation season (September to February) and potentially the mound building season (June to August).				
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 eight mounds (MM03, MM05, MM06, MM13, MM25, MM30, MM31, MM32) within the Proposed Layout provided in the final approved Covalent Lithium – Earl Grey Lithium Project Response to Submissions (August 2019, Covalent Lithium) will occur between March to May, outside of the mound building, breeding and incubation season (June to February).</p>	Ongoing	C	<p>Management advice 24/04/2023</p> <p>E07_EGLP Malleefowl Monitoring 2021-2022</p>	The vegetation clearing is undertaken under the supervision of the Project Fauna Specialist (Ecoscape) who checked the mounds prior to clearing. Seven mounds were removed.
TFEMP 25	<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	C	E14_Mt Holland Fauna Register	<p>The fauna register includes malleefowl sightings.</p> <p>OFI</p> <p>The fauna register does not include observer name. If this is not relevant, amend the TFEMP.</p>
TFEMP 26	<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	C	<p>E05_Fauna Pre-clearance Survey</p> <p>E07_EGLP Malleefowl Monitoring 2021-2022</p>	Pre-clearance surveys and annual surveys are being undertaken. Five year population monitoring is not due yet.
TFEMP 27	<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 monitoring term defined. Pre-clearance surveys will be conducted in accordance with the National Malleefowl Mound Monitoring Manual and utilise LiDAR technology (NMRT 2019).</p>	Ongoing	C	<p>E05_Fauna Pre-clearance Survey</p> <p>E07_EGLP Malleefowl Monitoring 2021-2022</p>	Monitoring post initial LiDAR survey is being undertaken.
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): Following the initial one-year period, LiDAR surveys will be undertaken as required depending on the size and scale of the clearing area. If</p>	Ongoing	C	E05_Fauna Pre-clearance Survey	Pre-clearance survey employs LiDAR.

Reference	Action	Timing	Conformance status	Evidence	Findings
	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.				
TFEMP 29	Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike. Action (pre-clearance surveys - malleefowl): Pre-clearance surveys will be undertaken as described by section 2.4.2.	Ongoing	C	E05_Fauna Pre-clearance Survey E07_EGLP Malleefowl Monitoring 2021-2022	Pre-clearance survey was undertaken in accordance with Section 2.4.2.
TFEMP 30	Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike. Action (pre-clearance surveys - malleefowl): Pre-clearance walk throughs will be undertaken to identify and displace fauna prior to clearing. Pre-clearance walk throughs will be undertaken the morning before clearing / disturbance to displace individuals and will include searching and checking refugia sites. In the event malleefowl are found in the area to be cleared and there are no new active mounds, fauna specialists will implement a displacement method to allow the malleefowl to egress on their own but remain within their home range.	Ongoing	C	E05_Fauna Pre-clearance Survey	Pre-clearance walk throughs undertaken in conjunction with chuditch trapping when 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.
TFEMP 31	Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike. Action (pre-clearance surveys - malleefowl): Active mounds will be avoided as per MS1118 7-1 (3) and a 100m buffer will be applied to active mounds to be flagged in the field as no-go zones (Figure 2.1).	Ongoing	C	Management advice 24/04/2023	No active mounds were cleared.
TFEMP 32	Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike. Action (pre-clearance surveys - malleefowl): Suitably qualified fauna personnel will be present during clearing activities, in the unlikely event that malleefowl or fauna are injured during clearing. The person will hold a permit to handle and move conservation significant fauna under the Biodiversity Conservation Act 2016, and have access to a care facility that can be used to rehabilitate injured fauna and a procedure in place developed in consultation with DBCA.	Ongoing	C	Management advice 24/04/2023	Fauna Pre-clearance surveys were completed by licence fauna handlers from Ecoscape during the reporting period.
TFEMP 33	Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike. Action (chuditch controls): Clearing will be avoided between the months of September to November where possible to mitigate impacts to denning females.	Ongoing	C	Management advice 24/04/2023	Clearing has been undertaken during periods operationally suitable. Where possible this is outside the windows.
TFEMP 34	Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.	Ongoing	C	Management advice 24/04/2023	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

Reference	Action	Timing	Conformance status	Evidence	Findings
	Action (chuditch controls): Vegetation clearing will be undertaken during the day time only, when chuditch are generally less active.				clearing area undertaken prior to approval being given for clearing to commence.
TFEMP 35	Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike. Action (pre-clearance surveys - chuditch): Pre-clearance surveys will be undertaken as described by section 2.4.2 to record the presence/absence of chuditch in the area to be cleared.	Ongoing	C	E05_Fauna Pre-clearance Survey	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 E05.
TFEMP 36	Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike. Action (pre-clearance surveys - chuditch): The procedure will involve pre-clearance walk throughs to be undertaken the morning before clearing / disturbance to displace 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.	Ongoing	C	Management advice 24/04/2023	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. Chuditch are released into nearby area following the completion of daytime clearing activities.
TFEMP 37	Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike. 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 slightly 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 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 not be cleared until such time as it appears the female and young have left the den. A fauna handling procedure will be developed in consultation with DBCA.	Ongoing	C	E05_Fauna Pre-clearance Survey	The requirement to apply a radio collar and create a 100m exclusion zone is documented on the fauna clearance survey record.
TFEMP 38	Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike. Action (pre-clearance surveys - chuditch): Suitably qualified fauna personnel will be present for clearing activities to undertake capture and release activities. The person will hold a permit to handle and move significant fauna under the Biodiversity Conservation Act 2016 and have access to a care facility that can be used to rehabilitate injured fauna and a procedure in place developed in consultation with DBCA.	Ongoing	C	Management advice 24/04/2023	Fauna pre-clearance surveys were completed by licence fauna handlers from Ecoscape during the reporting period.

Reference	Action	Timing	Conformance status	Evidence	Findings
TFEMP 39	<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	C	E11_Coalent Mt Holland Induction	Slide 83 of the induction outlines keeping to designated tracks, limited driving between dusk and dawn, driving to road and weather conditions and limiting speeds to protect conservation significant fauna.
TFEMP 40	<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	C	E14_Mt Holland Fauna Register	There is a fauna register which would include chuditch sightings if there were some.
TFEMP 41	<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	C	Management advice 24/04/2023	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.
TFEMP 42	<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	C	E11_Coalent Mt Holland Induction	Slide 83 of the induction outlines keeping to designated tracks, limited driving between dusk and dawn, driving to road and weather conditions and limiting speeds to protect conservation significant fauna.
TFEMP 43	<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 thoroughly for wildlife by a qualified fauna specialist or properly trained on-site personnel before the pipe is buried, capped, used, or moved.</p>	Ongoing	C	E15_Fauna Trench Clearing Procedure E16_Fauna Trench Clearing Example - Primero	The fauna trench clearing procedure outlines the requirements for inspection by personnel before the pipe is buried, capped, used, or moved.
TFEMP 44	<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	C	E15_Fauna Trench Clearing Procedure	The fauna trench clearing procedure outlines in Section 3.7 the requirements for conservation significant fauna.
TFEMP 45	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (fauna entrapment controls): To prevent pit lake entrapment, a pit lake ramp will be put in place as part of the</p>	Ongoing	NRATS	Management advice 24/04/2023	Site is not under closure.

Reference	Action	Timing	Conformance status	Evidence	Findings
	closure plan. The ramp will enable fauna to exit the pit lake and avoid entrapment.				
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 more than one meter deep 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"> • construction holes and trenches will be securely covered (no gaps) with plywood or similar materials at the close of each working day, or any time the opening will be left unattended for more than one hour. • in the absence of covers, the excavation will be provided with escape ramps constructed of earth or untreated wood, sloped no steeper than 2:1, and located no farther than 100 m apart. • in situations where escape ramps are unfeasible, the hole or trench will be surrounded by filter fabric fencing or a similar barrier with the bottom edge buried to prevent entry as appropriate, or • If a trench with a greater distance than 100 m is required to be left open for more than one 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. 	Ongoing	C	E15_Fauna Trench Clearing Procedure E16_Fauna Trench Clearing Example - Primero P08_Fauna Egress 1 P09_Fauna Egress 2	Steep walled holes and trenches are secured against animal entry.
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	C	Management advice 24/04/2023	All waste is currently collected and processed offsite, until the Mt Holland putrescible landfill is constructed.
TFEMP 48	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (fauna entrapment controls): Containers to have doors closed securely when not in use.</p>	Ongoing	C	P10_Waste Management Bins	Skip bins are closed when not in use.
TFEMP 49	<p>Management Target: Minimise Incidental mortality of Malleefowl and Chuditch from clearing activity, entrapment, vehicle strike.</p> <p>Action (fauna entrapment controls): Permanent water sources (tanks, ponds and dams) to be fenced and / or have fauna egress mats installed.</p>	Ongoing	C	P08_Fauna Egress 1 P09_Fauna Egress 2	Permanent water sources (tanks, ponds and dams) to be fenced and / or have fauna egress mats installed.
TFEMP 50	Management Target: Minimise decline in population due to predation from introduced predators.	Ongoing	C	E14_Mt Holland Fauna Register	In traduced predators are recorded on the fauna register.

Reference	Action	Timing	Conformance status	Evidence	Findings
	Action (introduced predator control management): Introduced predators identified will be reported to Environmental personnel and recorded to monitor occurrences.				
TFEMP 51	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	C	Management advice 24/04/2023 P10_Waste Management Bins	All waste is currently collected and processed offsite, until the Mt Holland putrescible landfill is constructed. Putrescible waste is covered with secure lids on bins.
TFEMP 52	Management Target: Minimise decline in population due to predation from introduced predators. Action (introduced predator control management): Introduced predator control will be undertaken on site in cooperation with regional control programs.	Ongoing	C	Management advice 24/04/2023	Details of Introduced Predator sightings were captured during the 2022 audit period that will inform a feral animal control program to commence during the 2023 reporting period.
TFEMP 53	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	C	E11_Coalent Mt Holland Induction	Slide 88 of the induction covers waste management.
TFEMP 54	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 2.4.1.	Ongoing	C	R17_IntroducedPredatorMonitoring E07_EGLP Malleefowl Monitoring 2021-2022 E08_EGLP Chuditch Monitoring 2022	Monitoring has not indicated a change in malleefowl or chuditch population. Introduced predator monitoring indicates that numbers of predators are not increasing. Coalent plan to implement a control program in 2023.
TFEMP 55	Management Target: Minimise decline in population due to predation from introduced predators. Action (introduced predator control management): Predator density by monitoring activity will be monitored 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	C	Management advice 24/04/2023 R17_IntroducedPredatorMonitoring E07_EGLP Malleefowl Monitoring 2021-2022 E08_EGLP Chuditch Monitoring 2022	Monitoring has not indicated a change in malleefowl or chuditch population. Introduced predator monitoring indicates that numbers of predators are not increasing. Coalent plan to implement a control program in 2023.
TFEMP 56	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	C	E11_Coalent Mt Holland Induction	Traffic control measures are implemented to reduce the speed of traffic.
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 such as the use of watercarts will be used during dry and windy conditions, as required.	Ongoing	C	n/a	Dust suppression of cleared unsealed roads and laydown areas was undertaken by water carts in the audit period.
TFEMP 58	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	C	Management advice 24/04/2023	Machinery and equipment meets health and safety requirements for noise and vibration.

Reference	Action	Timing	Conformance status	Evidence	Findings
TFEMP 59	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	C	Management advice 24/04/2023	Lighting towers both fixed and temporary are utilised in operational areas of the Mine and Concentrator only, lighting is only directed on operational areas and not into adjacent vegetated areas.
TFEMP 60	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	C	Management advice 24/04/2023	All equipment and machinery is designed and tested to comply with Australian Noise Limit Standards. Periodical Occupational Noise and Dust exposure monitoring is conducted by Occupational Hygiene Consultants.
TFEMP 61	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	C	Management advice 24/04/2023 E12_Mt Holland Hot Works Procedure R16_Mt Holland Emergency Management Plan	Section 4.1 of the hot works procedure outlines that no or minimal flammable and combustible materials are to be kept in designated hot works areas. Section 9 addresses training.
TFEMP 62	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	C	Management advice 24/04/2023 R16_Mt Holland Emergency Management Plan P05_Fire Extinguisher	Firefighting equipment is located on site and in vehicles.
TFEMP 63	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	C	Management advice 24/04/2023	Lightning protection infrastructure is installed on buildings and concentrator infrastructure to redirect and minimise potential lightning caused fires.
TFEMP 64	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	C	E11_Coalent Mt Holland Induction Management advice 24/04/2023	The induction outlines staying on access tracks and cleared areas. There were no incidents of vehicles leaving access tracks or cleared areas.
TFEMP 65	Management Target: Minimise decline in fauna habitat condition due to changed fire regimes. Action: Coordination with DBCA and Department of Fire and Emergency Services (DFES) to undertake prescribed burns.	Ongoing	C	Management advice 24/04/2023	No prescribed burns were undertaken during the audit period.
TFEMP 66	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. <ul style="list-style-type: none"> • Malleefowl and chuditch (e.g. how to identify it, conservation status, the importance of minimising impacts on the species, requirements of personnel including adherence to speed limits and staying on roads as well as locations and incidents, reporting to Environmental personnel) • information on other potential significant fauna • information on introduced predators and the impact on malleefowl and chuditch (no feeding of introduced predators and all sightings to be reported) • information on the prevention and management of fires. 	Ongoing	C	E11_Coalent Mt Holland Induction	Slide 82 and 83 of the induction cover conservation significant fauna.
TFEMP 67	Environmental incidents are defined as breaches or non-adherences to objectives and procedures applied to the Project and prescribed in the TFEMP. Environmental incidents are to be	Ongoing	C	Management advice 24/04/2023	There were no breaches or non adherences to objectives and procedures.

Reference	Action	Timing	Conformance status	Evidence	Findings
	reported to the Covalent Environmental Manager by the person responsible for the incident or the first person at the site of an incident.				
TFEMP 68	The Covalent Environmental Manager will assess the type and severity of the incident in accordance with internal procedures. Relevant personnel shall be notified and consulted whether the incident requires notification to regulatory agencies.	Ongoing	C	Refer to TFEMP 67	Refer to TFEMP 67
TFEMP 69	Annual Population monitoring of Malleefowl and Chuditch as per Section 2.4.1	Annual	C	E07_EGLP Malleefowl Monitoring 2021-2022 E08_EGLP Chuditch Monitoring 2022	Annual monitoring is undertaken in accordance with Section 2.4.1.
TFEMP 70	Pre-Clearance Surveys <ul style="list-style-type: none"> • Malleefowl pre-clearance surveys during incubation period of September to February • Chuditch pre-clearance surveys the night immediately prior to ground disturbing activities • As described by section 2.4.2 	Ongoing	C	E05_Fauna Pre-clearance Survey	Pre-clearance surveys undertaken as per Section 2.4.2.
TFEMP 71	Mortality monitoring Monitoring of incident reports for malleefowl and chuditch predation, vehicle strike, speeding and night driving.	Ongoing and annual review	C	Management advice 24/04/2023 C08_Injured_Deceased Malleefowl DBCA Notification	Light vehicle impact with malleefowl reported.
TFEMP 72	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	C	R17_IntroducedPredatorMonitoring	Introduced predator monitoring has been undertaken.
TFEMP 73	Clearing monitoring <ul style="list-style-type: none"> • Monitoring of clearing register for compliance to approvals. • Review of clearing footprint to determine clearing proximity to active malleefowl mounds. 	Ongoing and annual review	C	G01_EGLP_VegetationClearing E17_Internal Inspection of Primero G03_2022 CAR Malleefowl Disturbance Audit	Monitoring of clearing is being undertaken.
TFEMP 74	Clearing monitoring Internal audit and inspection of areas of clearing, areas of potential entrapment, speeding and night driving.	Ongoing and annual review	C	E17_Internal Inspection of Primero E18_Internal Inspection of WWTP + NRW	Internal auditing being undertaken (sections 42 to 44 cover ground disturbance).
TFEMP 75	Fauna habitat monitoring Annual monitoring of vegetation condition as an indicator of fauna habitat quality.	As FVEMP	C	R10_2022 Vegetation Condition Monitoring Autumn R11_2022 Vegetation Condition Monitoring Spring	Vegetation health is reported in the vegetation monitoring reports.
TFEMP 76	Preparation annually of a Compliance Assessment Report (CAR) to be submitted to the appropriate regulatory authorities. The CAR will include: <ul style="list-style-type: none"> o a summary of compliance requirements o summary of compliance during the reporting period o non-compliances and corrective / preventative actions o compliance assessment table o documentary evidence o provision of data (annually) from monitoring programs to relevant regulatory authorities 	Ongoing	C	R01_Coalvent Lithium CAR 2022 (Rev 0) R02_Coalvent Lithium CAR 2021 (Rev 0)	Previous CAR (R02) submitted in 2022.

Reference	Action	Timing	Conformance status	Evidence	Findings
TFEMP 77	In the event a management target is exceeded (or not met), the relevant regulatory authorities will be notified within seven days of identification of the exceedance, including information on remediation actions that have been or will be implemented. The requirements of condition 7-6 of MS1118 will also be implemented and a report submitted to the EPA within 21 days of the exceedance covering: <ul style="list-style-type: none"> – details of contingency actions implemented, – effectiveness of the actions against threshold criteria, – findings of investigations, – measures to prevent a recurrence and prevent, control or abate any impacts, and – justification the objective will continue to be met. 	Ongoing	C	Management advice 24/04/2023	No management target has been exceeded
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	C	Management advice 24/04/2023	No trigger was exceeded
TFEMP 79	If a threshold is exceeded then action will be: Investigate and report as per condition 7-6 of MS1118. Reduce the exceedance below the trigger criteria.	Within 7 days of event	C	Management advice 24/04/2023	No threshold was exceeded
TFEMP 80	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	C	R01_Coalent Lithium 2022 ACR (Rev 0) C08_Injured_Deceased Malleefowl DBCA Notification	A malleefowl was hit by a light vehicle on 02/03/2022. It was transported to WA Wildlife but died in transit.
TFEMP 81	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	C	Management advice 24/04/2023 R01_Coalent Lithium 2022 ACR (Rev 0)	An offer for the specimen was provided to the WA Museum and/or DNA Zoo Project.
TFEMP 82	Evaluation and revision of the TFEMP Review and submit to regulator as per condition 7-7(1) of MS1118.	As required.	C	Refer to M1118:7.7	Refer to M1118:7.7
TFEMP 83	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	C	E07_EGLP Malleefowl Monitoring 2021-2022 E08_EGLP Chuditch Monitoring 2022	Trigger not met.
TFEMP 84	Trigger: 25% increase in malleefowl or chuditch sightings within or adjacent to mining activity areas over two consecutive years. Action: Due diligence check to ensure the following is adequate: <ul style="list-style-type: none"> • Internal audit of waste management facilities • Review of traffic management controls to determine management action amendments • Refresher training on malleefowl, chuditch and associated controls and injured animal management. 	Ongoing	C	E07_EGLP Malleefowl Monitoring 2021-2022 E08_EGLP Chuditch Monitoring 2022	Trigger not met.

Reference	Action	Timing	Conformance status	Evidence	Findings
TFEMP 85	<p>Trigger: 25% increase in malleefowl or chuditch sightings within or adjacent to mining activity areas over two consecutive years. Early response trigger contingency actions may include but are not limited to:</p> <ul style="list-style-type: none"> • Avoid clearing September to November to mitigate any potential risk to breeding and denning female chuditch. • Near miss of fauna on roads or during clearing and mining activities reported. • Warning signs erected in areas of increased malleefowl or chuditch records • Increase in frequency of internal audits and inspections of vehicle speeds. • Increased presence of malleefowl or chuditch on site discussed in staff induction programs • Staff training and awareness to provide information on malleefowl (e.g. how to identify adults, chicks and mounds, conservation status, the importance of minimising impacts on the species, adherence to speed limits, reporting to Environmental personnel). • Staff training and awareness to include information on the prevention and management of fires. • Domestic waste facilities will be fenced and putrescible wastes will be regularly covered. • Containers to have doors closed securely when not in use. 	Ongoing	C	E07_EGLP Malleefowl Monitoring 2021-2022 E08_EGLP Chuditch Monitoring 2022	Trigger not met.
TFEMP 86	<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	C	E07_EGLP Malleefowl Monitoring 2021-2022	Monitoring identified slight reduction in feral cat activity compared to previous monitoring event.
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: Review introduced predators control programme and amend as required.</p>	Ongoing	C	Refer to TFEMP 86	Refer to TFEMP 86
TFEMP 88	<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"> • A proportionate increase in trapping/ baiting intensity for introduced predators in areas where increased sightings of foxes and/ or cats have occurred. • If after the two consecutive monitoring events, a threshold exceedance has not been identified, resume standard monitoring. • Installation of signage: Feeding animals prohibited, minimise availability of food waste. 	Ongoing	C	Refer to TFEMP 86	Refer to TFEMP 86

Reference	Action	Timing	Conformance status	Evidence	Findings
	<ul style="list-style-type: none"> Review and refine remote camera monitoring for introduced predators (foxes and cats) across the DE should it be required. Staff training and awareness to include information on feral species (e.g. impact of feral animals on malleefowl and chudditch populations, no feeding of feral species, reducing availability of food waste to feral animals and all sightings of feral species to be reported). 				
TFEMP 89	<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: Determine whether the changes observed in the impact sites are comparable to the observations in the reference sites.</p>	Ongoing	C	E07_EGLP Malleefowl Monitoring 2021-2022 E08_EGLP Chuditch Monitoring 2022	Trigger not met.
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>Action: Investigate potential causes for population decrease: Factors that may affect populations of threatened fauna are varied and it is difficult to determine the exact factors as a decline in sightings could be associated with</p> <ul style="list-style-type: none"> seasonal conditions (e.g. rainfall and temperatures) changes in mound usage patterns by malleefowl (i.e., use of mounds that are not surveyed) effectiveness of introduced predator control spatial variation (near-impact areas) versus sites located further from impact); and reliability of the results obtained from the fauna sightings register attributable to clearing, construction, operation activities. <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	C	E07_EGLP Malleefowl Monitoring 2021-2022 E08_EGLP Chuditch Monitoring 2022	Trigger not met.
TFEMP 91	The proponent will amend the TFEMP in accordance with condition 7-7 (1) and (2) of MS1118 as required and this may include any adaptive management updates. These amendments will be submitted to the EPA for revision. If the Proponent has gathered sufficient information through research and long-term monitoring to propose revisions to management targets, a formal request for amendment of an approved condition may be submitted to the relevant authority.		C	Refer to M1118:7.7	Refer to M1118:7.7



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