



Kemerton Project

2020 Annual Compliance Assessment Report

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			<i>CB</i>	<i>EB</i>

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1 INTRODUCTION

1.1 Project Details

The Kemerton Lithium Plant proposal is for the construction and operation of a lithium manufacturing plant, and associated infrastructure, within the Kemerton Strategic Industrial Area (KSIA), approximately 17 kilometres north-east of Bunbury, Western Australia (Figure 1: Project Site Regional Location).

The Kemerton Lithium Plant is designed to process up to 1 million tonnes of spodumene ore concentrate, sourced from the Talison Greenbushes Operation. The ore concentrate will be processed within up to five lithium hydroxide product process trains, which are proposed to be brought online one at a time as production increases. These process trains operate using a combination of pyrometallurgical and hydrometallurgical operations to produce a total of up to 100,000 tonnes of lithium hydroxide product and up to 200,000 tonnes of sodium sulfate by-product per year. Up to 1.1 million tonnes of tailings will also be produced as a waste product.

The lithium hydroxide product will be transported 155 km by road to the Port of Fremantle for export (although it could potentially be exported from the Port of Bunbury in the future). Sodium sulfate by-product will also be transported by road to either Fremantle or Bunbury for export. Tailings will be transported by road to be disposed of at an approved facility.

1.2 Purpose of Report

This Compliance Assessment Report (CAR) has been prepared to meet the requirements imposed on the Project by the Western Australian Minister for Environment, through Ministerial Statement 1085 (MS-1085) and the Commonwealth Minister for Environment, through EPBC 2017/8099.

Condition 4.6 of MS-1085 specifically states:

“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. “*

Condition 10 of EPBC 2017/8099 specifically states:

The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action, or as otherwise agreed to in writing by the Minister. The approval holder must:

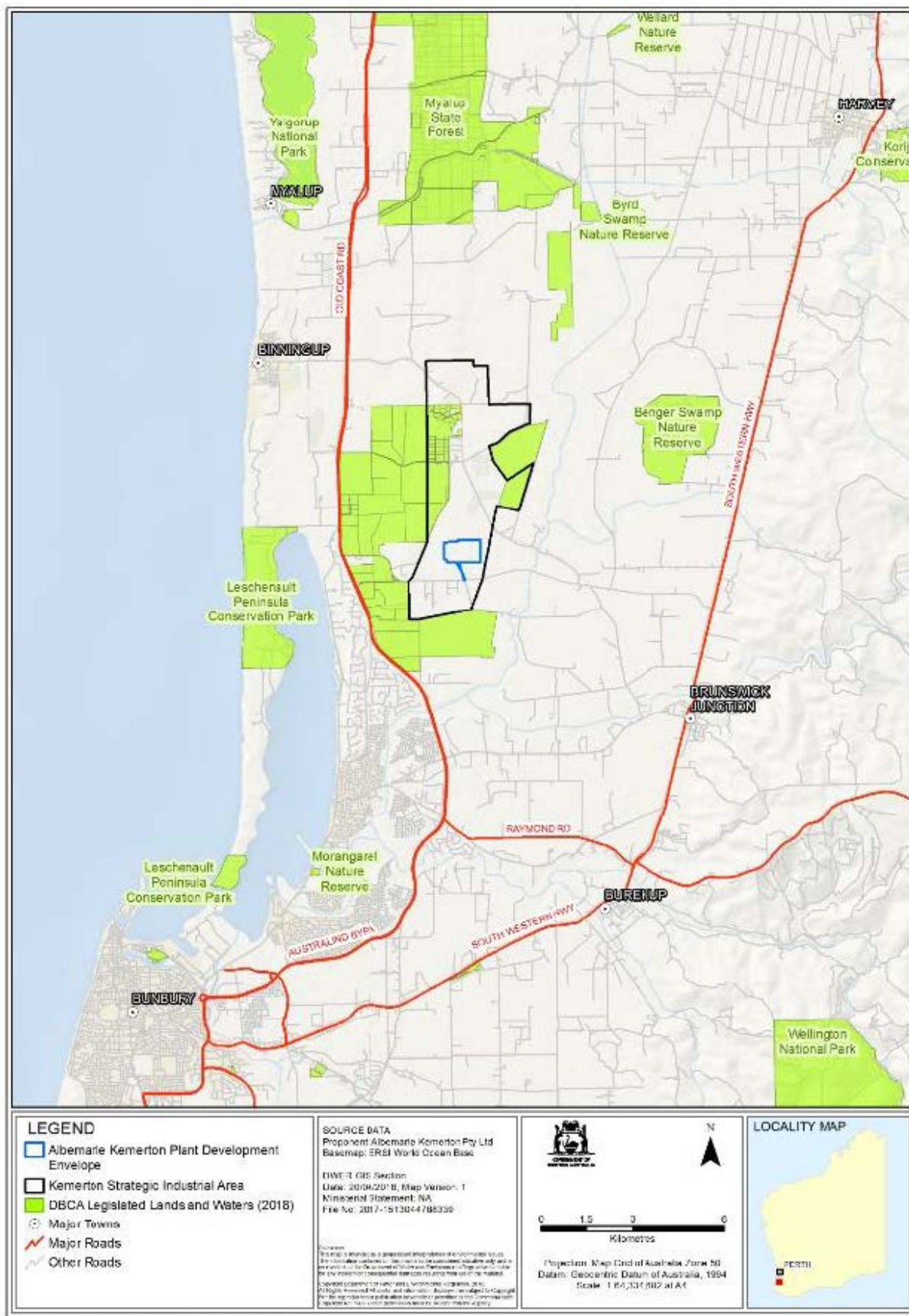
- a. *publish each compliance report on the website within 60 business days following the relevant 12 month period;*
- b. *notify the Department by email that a compliance report has been published on the website within five business days of the date of publication;*
- c. *keep all compliance reports publicly available on the website until this approval expires;*
- d. *exclude or redact sensitive ecological data from compliance reports published on the website; and*
- e. *where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication.*

This CAR provides the status of compliance against all audit elements prescribed under EPBC 2017/8099 and MS-1085 as well as an assessment of how implementation of the environmental management plans has met defined environmental objectives during the reporting period 26 October 2018 through 25 October 2019.

1.3 Report Structure

This CAR has been prepared in accordance with the former Office of the Environmental Protection Agency's (OEPA) (now Department of Water and Environmental Regulation (DWER)) Post Assessment Guideline No.3, Preparing a Compliance Assessment Report (OEPA, 2012).

Figure 1: Project Site Regional Location



2 SUMMARY OF PROPOSAL'S IMPLEMENTATION STATUS

2.1 Project Milestones

The Kemerton Lithium Plant was environmentally assessed and approved under Part IV of the *Environmental Protection Act 1986* (EP Act) by the Environmental Protection Authority (EPA) and by the Commonwealth Department of the Environment and Energy (DoEE) under sections 130(1) and 133(1) of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). A summary of Environmental approvals issued is provided in Table 1 below.

Table 1: Summary of Key Environmental Approvals History

Instrument	Description	Date
Ministerial Statement 1085	Gained environmental approval, Part IV, EP Act.	26 October 2018
Works Approval W6154/2018/1	Granted to the Works Approval Holder, subject to the prescribed conditions.	16 November 2018
EPBC 2017/8099	Granted approval for action to construct and operate a lithium hydroxide manufacturing plant	26 November 2018

In accordance with Condition 5 of approval EPBC 2017/8099, the date of the Commencement of the Action was 2nd January 2019.

2.1.1 Notice of substantial commencement

Construction commenced in January 2019 and has progressed in accordance with the defined program. This status and CAR serves to demonstrate substantial commencement of the project in accordance with Condition 3-1 and 3-2 of MS-1085.

2.2 Project Components

Non-Process Infrastructure (NPI) buildings comprise of a laboratory, site operations building, mess building, emergency building, wellness centre and gate houses. The processing plant comprises of five lithium hydroxide conversion trains that incorporate the following main areas:

- Spodumene delivery and stockpiling.
- Calcinating, acidifying and storage of acidified ore area.
- Leaching, purification, filtration and tailings collection area.
- Reactants delivery and storage area.
- Causticizing, and Sodium Sulphate Decahydrate crystallisation.
- Crude LiOH evaporation and crystallisation.
- Pure LiOH evaporation and crystallisation.
- Lithium hydroxide monohydrate drying, packaging and storage.
- Anhydrous sodium sulphate crystallisation – Li removal.
- Sodium sulphate drying, packaging and storage.

- Potassium collection building.
- Service plant and buildings including, boilers, cooling towers, raw and RO water, and air compressor building.
- Engineering Workshop/Warehouse and diesel tanks.

2.3 Project Issues

No major project issues occurred during the reporting period.

Albemarle is constructing two of the five Kemerton lithium hydroxide trains to provide a 50 ktpa lithium hydroxide conversion capacity. The two trains are currently scheduled to be commissioned in stages starting in the first half of 2021. The timing of the remaining three trains will be based on market demand.

Albemarle entered into the MARBL Lithium Operations joint venture with Mineral Resources Limited, which included sale of %40 interest in part of the Kemerton lithium hydroxide facility. Albemarle will continue to complete construction of the Kemerton lithium hydroxide facility and will then hand it over to MARBL Lithium Operations to operate.

MS-1085 authorised the clearing of 6.37 ha of the 'Low lying *Banksia attenuata* woodlands or shrublands' Priority Ecological Community. This area was originally designated for use as laydown during the construction phase of the Kemerton Plant, however Albemarle was able to utilise existing laydown areas outside of the KSIA and as such were able to avoid clearing of this area.

Since approval of MS-1085, Albemarle has explored various power supply options and is currently seeking approval to develop a dedicated power station. The power station will require an initial 29 MW capacity for two trains. As more trains are brought on line and as production increases the power requirement of the Kemerton Plant will reach up to 60MW.

A Section 45C of the EP Act has been submitted to the EPA to address the following proposed changes:

- Reduce the authorised extent of clearing by 5.51 ha (5.33 ha of native vegetation and 0.18 ha of regenerated farmland);
- Reduce the size of the Development Envelope by 5.51 ha;
- Replace Figure 1 of Schedule 1 of MS-1085 to reflect the reduced size of the Development Envelope; and
- Include the construction and operation of the power station.

An application has also been submitted under Section 46 of the EP Act to revise Condition 10-1 and Condition 10-2 (1) of MS-1085 and reflect the changes presented in the Section 45C application.

Management solutions for the Kemerton Lithium Plant by-product are yet to be finalised. Albemarle is currently negotiating with suitable waste storage providers and is actively pursuing potential waste minimisation and reuse opportunities in accordance with Condition 8-1 of MS-1085.

A discussion on Potential Non-Compliances identified during the reporting period is presented in Section 3.1.1.

3 STATEMENT OF COMPLIANCE

Table 3 presents the compliance status of applicable Ministerial Conditions and Proponent Commitments prescribed in Statement MS-1085. Refer to Appendix A for the completed Post Assessment Form (Statement of Compliance) for MS-1085.

The potential non-compliances are defined below and supported with evidence in electronic format (Appendix B).

In relation to assessing conformance to approved Management Plan commitments, the following approach has been taken. Where a particular aspect of a management plan has not been demonstrated to be fully implemented, however evidence exists that indicates the following:

- The management plan had otherwise been substantially implemented;
- The non-complaint items in their own right, are not considered to present a significant environmental risk;
- Where corrective actions have been initiated; and
- The overall environmental objectives for that factor have been met;

then the management plan conditions and commitments are considered to have been complied with.

3.1 Details of Declared Compliance Status

3.1.1 Potential Non-Compliances

A potential non-compliance against Condition 2-1 of MS-1085 was identified regarding Albemarle's postal address being the principal place of business or of the principal office in the State. Albemarle's business address on the website is in the ACT.

With the joint venture now in place, it will be confirmed whether Albemarle Lithium or MARBL Lithium Operations will be the proponent for the Kemerton Plant approvals. Once this is confirmed, the relevant changes will be made to the proponent contact and address details to ensure Condition 2-1 of MS-1085 is met. A notification of change will also be provided to DoEE as per Condition 4 of EPBC 2017/8099.

3.2 Summary of Compliance Status

Table 3 presents a summary of compliance findings and status for each Condition of MS-1085.

For the purposes of this report, compliance classifications were in accordance with EPA guidelines (EPA, 2012). The definitions of each status are summarised in Appendix C: Compliance Status Definitions.

3.3 Environmental Management Plans

This CAR presents a summary of how each management plan objective has been addressed and is supported by documentary evidence and data in the appended electronic evidence. The status of objectives for the Albemarle Operational Environmental Management Plans are listed below in Table 4.

Table 2: Audit Findings - Ministerial Statement 1085 - Conditions and Commitments

Audit Code	Subject	Requirement	Evidence	Phase	Timeframe	Status	Further information
MS1085: M1-1	Proposal implementation	When implementing the proposal, the proponent shall not exceed the authorised extent of the proposal as defined in Table 2 in Schedule 1, unless amendments to the proposal and the authorised extent of the proposal have been approved under the EP Act.		Overall	When implementing the proposal.	Refer elements below	
MS1085: M1-1-3	Proposal implementation	Table 2 Physical elements: Clearing of no more than 54.31ha of native vegetation and 33.39ha of pine plantation within the Development Envelope of 89.25ha	Post clearing survey map provided by BGC Contracting. Cleared area coordinates confirmed by Wood personnel as complying with designated clearing boundaries (email: Post Clearing Survey 11/06/2019 from Kristina Chandra to Quyen Dao).	Construction		Compliant	
MS1085: M1-1-1	Proposal implementation	Table 2 Operational elements: Process Plant Capacity: No more than 100,000 tonnes of lithium hydroxide product and no more than 200,000 tonnes of sodium sulfate by-product produced per year.		Operation		Not yet required at this stage	
MS1085: M1-1-2	Proposal implementation	Table 2 Operational elements: Tailings Capacity: No more than 1.1 million tonnes per year.		Operation		Not yet required at this stage	
MS1085: M2-1	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.	The proponents address on the website is not the same as the MS. In addition, the current contact address is in the ACT when the requirement is for it to be the principle work location or office in the state.	Overall	Within 28 days of change.	Potentially Non-Compliant	With the joint venture now in place, it will be confirmed whether Albemarle Lithium or MARBL Lithium Operations will be the proponent for the Kemerton Plant approvals. Once this is confirmed, the relevant changes will be made to the proponent contact and address details to ensure Condition 2-1 is met. A notification of change will also be provided to DoEE as per Condition 4 of EPBC 2017/8099.
MS1085: M3-1	Time limit for substantial commencement	The proposal must be substantially commenced within 5 years from the date of this Statement.	Date of commencement 2 January 2019; as per email to DoEE on 10 January 2019. Letter from DoEE acknowledging commencement sighted (ref. 2017/8099).	Construction	Substantial commencement by 26 October 2023.	Compliant	
MS1085: M3-2	Time limit for substantial commencement	The proponent must provide to the CEO documentary evidence demonstrating Albemarle Kemerton Plant that they have complied with condition 3-1 no later than 30 days after expiration of 5 years from the date of this Statement.	Although the project has commenced there is no requirement to notify the CEO of DWER until 30 days after 26 October 2023.	Construction	Substantial commencement demonstrated by 25 November 2023.	Compliant	Refer Section 2.1.1.
MS1085: M4-1	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 CAR required by condition 4- 6, or prior to implementation of the proposal, whichever is sooner.	Compliance Assessment Plan Revision 0, 12 November 2018 sighted. Email submission to DWER (Edwin Berends to Tania Liaghati) dated 13 Nov 2018 sighted.	Pre-construction	July 2019 or prior to implementation, whichever is sooner.	Compliant	
MS1085: M4-2	Compliance reporting	The CAP 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 CARs; and (6) public availability of CARs.	Compliance Assessment Plan Revision 0, 12 November 2018 sighted. Includes: (1) the frequency of compliance reporting is annual (Section 2.1); (2) the approach and timing of compliance assessments specified in Table 2-1 (Section 2.2); (3) the retention of compliance assessments defined in Section 2.3; (4) the method of reporting of potential non-compliances and corrective actions taken is defined in Section 2.4; (5) the table of contents of CARs is defined in Section 2.6; and (6) public availability of CARs is defined in Section 2.7.	Pre-construction	Compliance Assessment Plan to be submitted by 26 July 2019.	Compliant	

Audit Code	Subject	Requirement	Evidence	Phase	Timeframe	Status	Further information
MS1085: M4-3	Compliance reporting	After receiving notice in writing from the CEO that the CAP satisfies the requirements of condition 4-2 the proponent shall assess compliance with conditions in accordance with the CAP required by condition 4-1.	Letter received from DWER stating the CAP meets the requirements of Condition 4-2 on 21 Nov 2018 (ref. DWERA-001586).4-2 on 21 Nov 2018 (ref. DWERA-001586). Audit undertaken to assess compliance with Ministerial Conditions in December 2019 by Nick Croston of KASA Consulting (Exemplar registered Lead Environmental Auditor #13656).	Overall	After receiving notice in writing from the CEO.	Compliant	
MS1085: M4-4	Compliance reporting	The proponent shall retain reports of all compliance assessments described in the CAP required by condition 4-1 and shall make those reports available when requested by the CEO.		Overall	As requested by the CEO	Not yet required at this stage	This report will be the first CAR, due 26 January 2020.
MS1085: M4-5	Compliance reporting	The proponent shall advise the CEO of any potential non-compliance within seven (7) days of that non-compliance (NC) being known.	No non-compliances recorded or reported to date.	Overall	Within 7 days of NC being known	Not yet required at this stage	The Compliance Assessment Plan includes the requirement to report non compliances within 7 days as per the condition.
MS1085: M4-6	Compliance reporting	The proponent shall submit to the CEO the first CAR 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 CAR, or as otherwise agreed in writing by the CEO. The CAR shall: (1) be endorsed by the proponent's CEO 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 CAP; and (5) indicate any proposed changes to the CAP required by condition 4-1.		Overall	Initial CAR by 26 Jan 2020 then annually afterwards	Not yet required at this stage	
MS1085: M5-1	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)) relevant to the assessment of this proposal and implementation of this Statement.	In section 2.7 of the approved Compliance Assessment Plan it states that Albemarle will make documents available in accordance with PAG 4 (OEPA, 2012). PAG 4 does not define 'reasonable timeframe'; therefore, Albemarle considers that we are compliant with this requirement. Approval documents, including management plans, were publicly available via the Albemarle website.	Overall	Within a reasonable time period approved by the CEO.	Compliant	Albemarle proposes that a reasonable timeframe for making information publicly available is 9 months.
MS1085: M5-1	Public availability of data	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.		Overall	As required	Not yet required at this stage	
MS1085: M6-1	Flora and vegetation	The proponent shall ensure that the construction and ongoing operation of the proposal is undertaken in a manner that avoids direct or indirect impacts to Threatened Flora and communities, including Glossy-leafed Hammer Orchid (<i>Drakaea elastica</i>), Dwarf Bee-orchid (<i>Diuris micrantha</i>), Dwarf Hammer-orchid (<i>Drakaea micrantha</i>), Banksia Woodlands of the Swan Coastal Plain and Low lying <i>Banksia attenuata</i> woodlands or shrublands outside of the Albemarle Development Envelope, as shown in Schedule 1.	Monitoring of the Banksia Woodland TEC undertaken in August 2019 compared the vegetation condition, species richness and species density at permanently established transects and Photographic Monitoring Points (PMPs). The survey report (GHD, 2019a) identified no statistical differences ($p > 0.5$) between species richness or species densities between the base survey in 2018 (GHD, 2018) and the 2019 survey at any of the monitoring transects or control transects.	Overall	For the life of the proposal as approved by the CEO.	Compliant	Also refer to findings in Table 4.

Audit Code	Subject	Requirement	Evidence	Phase	Timeframe	Status	Further information
MS1085: M6-2	Flora and vegetation	<p>Prior to ground-disturbing activities or as otherwise agreed by the CEO, the proponent shall prepare and submit a Flora and Vegetation Monitoring and Management Plan (the Plan) to the CEO. The Plan shall:</p> <ol style="list-style-type: none"> when implemented, substantiate and ensure that condition 6-1 is being met; detail the proposed frequency, timing and indicative locations of Threatened Flora and Communities monitoring to be implemented during construction and operational phase of the Albemarle Plant; specify management actions for potential impacts including but not limited to those from weeds, <i>Phytophthora cinnamomi</i> (Dieback), increased fire risk and litter, and changes to surface water and groundwater regimes that will be implemented during construction and operations to ensure the management objective in condition 6-1 is achieved; specify trigger criteria that will trigger the implementation of contingency actions to prevent direct or indirect impacts to Threatened Flora and Communities outside of the Development Envelope; and specify management or contingency actions to be implemented in the event that the criteria identified required by condition 6-2(4) have been triggered. 	<p>Flora and Vegetation Management Plan Rev.1; 30 November 2018 (GHD,2018a) sighted (available on Albemarle website). Letter acknowledging receipt and satisfaction with the plan received from Anthony Sutton Executive Director of DWER on 3 Dec 2018 (ref. DWERA-001672).</p>	Pre-construction	Prior to ground-disturbing activities or as otherwise agreed by the CEO	Compliant	Also refer to findings in Table 4.
MS1085: M6-3	Flora and vegetation	<p>In the event that the monitoring specified in the Plan indicates that the criteria specified in the Plan have been triggered, the proponent shall:</p> <ol style="list-style-type: none"> report such findings to the CEO within 21 days of the criteria being triggered; provide evidence to the CEO which allows for determination of the likely cause of the trigger criteria being reached and to identify any additional contingency actions required to prevent the criteria being triggered in the future; and if the triggering of the criteria is determined by the CEO to be a result of activities undertaken in implementing the proposal, immediately implement the management and/or contingency actions specified in the FVMMP and continue implementation of those actions until the trigger criteria are met, or until the CEO has confirmed by notice in writing that it has been demonstrated that the objective in condition 6-1 will continue to be met and implementation of the management and/or contingency actions is no longer required. 	<p>Monitoring of the Banksia Woodland TEC undertaken in August 2019 (GHD, 2019a) identified no criteria had been triggered.</p>	Overall	Within 21 days of the criteria being triggered	Not yet required at this stage	
MS1085: M6-4	Flora and vegetation	The proponent may review and revise the FVMMP.	<p>Approved Flora and Vegetation Management Plan Rev.1; 30 November 2018 (GHD,2018a) current.</p>	Pre-construction Construction	As required	Not yet required at this stage	
MS1085: M6-5	Flora and vegetation	The proponent shall review and revise the FVMMP as and when directed by the CEO.		Pre-construction Construction	As notified by the CEO.	Not yet required at this stage	
MS1085: M6-6	Flora and vegetation	The proponent shall implement the latest version of the FVMMP, which the CEO has confirmed by notice in writing, satisfies the requirements of condition 6-2.	<p>The CEO confirmed the FVMMP satisfied the requirements of condition 6-2 in a letter dated 3 Dec 2018 (ref. DWERA-001672). Sighted records demonstrate the plan was being substantially implemented.</p>	Overall	Following receipt in writing from the CEO that the latest Plan satisfies the requirements set out in condition 6-2.	Compliant	Also refer to findings in Table 4.
MS1085: M7-1	Water Management Plan	<p>The proponent shall ensure that construction and ongoing operation of the proposal is undertaken in a manner that:</p> <ul style="list-style-type: none"> maintains the quality and quantity of off-site surface and groundwater, to the receiving environment including but not limited to the Threatened Orchid habitat. 	<p>Monitoring undertaken in accordance with the Water Management Plan Rev.1, 4 December 2018. Monitoring results</p>	Overall	For the life of the proposal as approved by the CEO.	Compliant	

Audit Code	Subject	Requirement	Evidence	Phase	Timeframe	Status	Further information
MS1085: M7-2	Water Management Plan	<p>Prior to ground-disturbing activities or as otherwise agreed by the CEO, the proponent shall prepare and submit a Water Management Plan to the CEO, on the advice of the Department of Water and Environmental Regulation. The Plan shall:</p> <ol style="list-style-type: none"> when implemented, substantiate and ensure that condition 7-1 is being met; specify management actions including but not limited to those from potential impacts from Acid Sulphate Soils, stormwater runoff and sedimentation) that will be implemented during construction and operations to ensure the management objective in condition 7-1 is achieved; detail the proposed frequency, timing and indicative locations of groundwater and surface water monitoring for potential contamination; specify trigger criteria that will trigger the implementation of contingency actions to prevent impacts to the receiving environment including Threatened Flora outside of the Development Envelope; specify management or contingency actions to be implemented in the event that the criteria identified required by condition 7-2(4) have been triggered. 	<p>The Water Management Plan Rev.1, 4 December 2018.</p> <p>Correspondence from DWER (ref DWERA-001671) indicating the submitted WMP is considered to meet the requirements of condition 7 of MS-1085.</p>	Pre-construction	Prior to ground-disturbing activities or as otherwise agreed by the CEO.	Compliant	
MS1085: M7-3	Water Management Plan	<p>In the event that the monitoring specified in the Plan indicates that the criteria specified in the Plan have been triggered, the proponent shall:</p> <ol style="list-style-type: none"> report such findings to the CEO within 21 days of the criteria being triggered; provide evidence to the CEO which allows for determination of the likely cause of the trigger criteria being reached and to identify any additional contingency actions required to prevent the criteria being triggered in the future; and if the triggering of the criteria is determined by the CEO to be a result of activities undertaken in implementing the proposal, immediately implement the management and/or contingency actions specified in the Plan and continue implementation of those actions until the trigger criteria are met, or until the CEO has confirmed by notice in writing that it has been demonstrated that the objective in condition 7-1 will continue to be met and implementation of the management and/or contingency actions is no longer required. 	<p>Some elevated parameters were detected during monitoring; however, analysis of results concluded that no identified exceedances of trigger values were considered to have been as a result of site activities therefore criteria for notifying the CEO were not triggered.</p>	Overall	Within 21 days of the criteria being triggered	Compliant	
MS1085: M7-4	Water Management Plan	The proponent may review and revise the Water Management Plan.		Pre-construction Construction	As required	Not yet required at this stage	
MS1085: M7-5	Water Management Plan	The proponent shall review and revise the Water Management Plan as and when directed by the CEO.		Pre-construction Construction	As notified by Albemarle or as and when required by the CEO.	Not yet required at this stage	
MS1085: M7-6	Water Management Plan	The proponent shall implement the latest version of the Water Management Plan, which the CEO has confirmed by notice in writing, satisfies the requirements of condition 7-2.	<p>Correspondence from DWER (ref DWERA-001671) indicating the submitted WMP is considered to meet the requirements of condition 7 of MS-1085.</p> <p>Surface and groundwater monitoring results – various Groundwater Dewatering Field Log. The evidence indicates ongoing monitoring during construction and operations is being implemented in accordance with the WMP.</p>	Overall	Following receipt in writing from the CEO that the latest Plan satisfies the requirements set out in condition 7-2.	Compliant	
MS1085: M8-1	Terrestrial Environment Quality (Waste management)	During operation of Albemarle Lithium Plant, the proponent shall ensure that all reasonable and practicable measures have been undertaken to minimise the generation of waste and its discharge into the environment.		Operation	For the life of the proposal as approved by the CEO.	Not yet required at this stage	Waste was segregated and well managed on site.

Audit Code	Subject	Requirement	Evidence	Phase	Timeframe	Status	Further information
MS1085: M8-2	Terrestrial Environment Quality (Waste management)	<p>Within 3 years of the publication of this Statement or as otherwise agreed by the CEO, the proponent shall prepare and submit a Waste Management Plan to the CEO. The Waste Management Plan shall:</p> <ol style="list-style-type: none"> 1) when implemented, substantiate and ensure that condition 8-1 is being met; 2) specify targets to be met, and detail actions undertaken to meet those targets by applying principles of Waste Management Hierarchy including Avoidance, Recovery and Disposal; 3) quantify the outcome/s of applying the principle of the "Recovery (re-use, reprocessing, recycling); and 4) provide evidence that all reasonable and practicable measures have been undertaken to Avoid and Recover waste. 		Operation	Within 3 years of the publication of the MS Statement or as otherwise agreed by the CEO	Not yet required at this stage	
MS1085: M8-3	Terrestrial Environment Quality (Waste management)	<p>After receiving notice in writing from the CEO that the Waste Management Plan satisfies the requirements of condition 8-2, the proponent shall:</p> <ol style="list-style-type: none"> 1) implement the actions in accordance with the requirements of the approved Waste Management Plan; and 2) continue to implement the approved Waste Management Plan until the CEO has confirmed by notice in writing that it has been demonstrated that the targets specified in condition 8-2 have been met and therefore the implementation of the actions is no longer required. 		Operation	After receiving notice in writing from the CEO that the Waste Management Plan satisfies the requirements of condition 8-2 and until the CEO has confirmed by notice in writing that it has been demonstrated that the targets specified in condition 8-2 have been met.	Not yet required at this stage	
MS1085: M8-4	Terrestrial Environment Quality (Waste management)	The proponent may review and revise the Waste Management Plan.		Operation	As required	Not yet required at this stage	
MS1085: M8-5	Terrestrial Environment Quality (Waste management)	The proponent shall review and revise the Waste Management Plan as and when directed by the CEO.		Operation	As notified by Albemarle or as and when required by the CEO.	Not yet required at this stage	
MS1085: M8-6	Terrestrial Environment Quality (Waste management)	The proponent shall implement the latest version of the Waste Management Plan, which the CEO has confirmed by notice in writing, satisfies the requirements of condition 8-2.		Operation	Following receipt in writing from the CEO that the latest Plan satisfies the requirements set out in condition 8-2.	Not yet required at this stage	
MS1085: M9-1	Greenhouse gas (GHG) reporting	<p>The proponent shall manage the implementation of the proposal to meet the following environmental objective:</p> <ol style="list-style-type: none"> (1) avoid, where possible, and minimise greenhouse gas emissions as far as practicable. 	<p>Greenhouse Gas Management Plan Rev.1 – 29 November 2018</p> <p>Regular vehicle inspections and maintenance were undertaken; and plant sighted on site was modern and fuel efficient.</p>	Overall	For the life of the proposal as approved by the CEO.	Compliant	<p>Note - There are only two controls referenced in the GGMP for the construction phase:</p> <ul style="list-style-type: none"> • Maintenance of vehicles; and • Selection of low emission producing plant.
MS1085: M9-2	GHG reporting	Prior to commencement of construction of the lithium processing plant the proponent shall prepare a Greenhouse Gas Management Plan to meet the objective required by condition 9-1.	Greenhouse Gas Management Plan Rev.1 – 29 November 2018.	Pre-construction	Prior to construction commencement or as otherwise agreed by the CEO	Compliant	

Audit Code	Subject	Requirement	Evidence	Phase	Timeframe	Status	Further information
MS1085: M9-3	GHG reporting	The Greenhouse Gas (GHG) Management Plan shall address the following matters: 1) benchmarking against applicable standards at the time of construction of the lithium processing plant; 2) design of the proposal to minimise greenhouse gas emissions as far as practicable; 3) monitoring and public reporting; and 4) opportunities for continuous improvement and minimising net emissions in the future within the existing design of the proposal.	Greenhouse Gas Management Plan Rev.1 – 29 November 2018 Correspondence from DWER (ref DWERA-001589) indicating the submitted WMP is considered to meet the requirements of condition 9 of MS-1085.	Overall	For the life of the proposal as approved by the CEO.	Compliant	
MS1085: M9-4	GHG reporting	The proponent may review and revise the GHG Management Plan.		Overall	As required	Not yet required at this stage	
MS1085: M9-5	GHG reporting	The proponent shall review and revise the Greenhouse Gas Management Plan as and when directed by the CEO.		Overall	As required	Not yet required at this stage	
MS1085: M9-6	GHG reporting	The proponent shall continue to implement the version of the Greenhouse Gas Management Plan most recently approved by the CEO until the CEO has confirmed by notice in writing that the plan meets the objective specified in condition 9-1.	Greenhouse Gas Management Plan Rev.1 – 29 November 2018. Correspondence from DWER (ref DWERA-001589) indicating the submitted GHGMP is considered to meet the requirements of condition 9 of MS-1085.	Overall	Until the CEO has confirmed by notice in writing that the plan meets the objective specified in condition 9-1.	Compliant	Construction activities do not require reporting as emissions don't exceed threshold levels.
MS1085: M10-1	Offsets	The proponent shall undertake an offset with the objective of counterbalancing the significant residual impact to 6.37 ha of 'low lying <i>Banksia attenuata</i> woodlands or shrublands' and 45.73 ha of foraging habitat, including 14.45 ha of potential breeding habitat for Carnaby's Black Cockatoo (<i>Calyptorhynchus latirostris</i>), Forest Red-tailed Black Cockatoo (<i>Calyptorhynchus banksii naso</i>) and Baudin's Black Cockatoo (<i>Calyptorhynchus baudinii</i>) as a result of implementation of the proposal.		Overall	As defined in the offset strategy	In progress	S46 and S45C application to change condition 10-1 of MS-1085 to remove reference to "6.37 ha of low lying <i>Banksia attenuata</i> woodlands or shrublands" Has been submitted and is currently being assessed by the EPA (Assessment 2232).

Audit Code	Subject	Requirement	Evidence	Phase	Timeframe	Status	Further information
MS1085: M10-2	Offsets	<p>Within twelve months of the publication of this Statement, the proponent shall prepare and submit an Offset Strategy to the CEO. The Offset Strategy shall:</p> <ol style="list-style-type: none"> 1) identify an initially unprotected area or areas to be protected and managed for conservation that contains the Priority Ecological Community and foraging habitat values identified in condition 10-1; 2) demonstrate how the proposed offset counterbalances the significant residual impact through consideration of the six 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 (October 2012) in conjunction with the associated Offsets assessment guide; 3) identify the environmental values of the offset area(s); 4) commit to a protection mechanism for any areas of land acquisition, being either the area is ceded to the Crown for the purpose of conservation, or the area is managed under other suitable mechanisms as agreed by the CEO; 5) if any land is to be ceded to the Crown for the purpose of conservation, the proponent will identify: <ol 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 the first 20 years after completion of purchase, and (c) an appropriate management body for the ceded land. 6) identify any threats to offset values and provide management and/or rehabilitation actions to be undertaken to address the threats including: <ol style="list-style-type: none"> (d) the objectives and targets to be achieved, including completion criteria; (e) management and/or rehabilitation actions and a timeframe for the actions to be undertaken; (f) funding arrangements and timing of funding for conservation activities; and (g) monitoring requirements for activities. 7) define the role of the proponent and/or any third parties. 	<p>Email to registrar@dwer.wa.gov.au (24/10/2019) from Gavin Edwards, Preston Consulting. The email included the following attachments: Albemarle Kemerton Plant Offset Strategy (ref- ALB-KEM-PLA-01) and appendices one, two and three. A review of the Offset Strategy identified that its content was consistent with the requirements of this condition.</p>	Construction	26 Oct 2019	Compliant	
MS1085: M10-3	Offsets	<p>After receiving notice in writing from the CEO, on advice of the Department of Biodiversity, Conservation and Attractions, that the Offset Strategy satisfies the requirements of condition 10-2, the proponent shall:</p> <ol style="list-style-type: none"> 1) implement the actions in accordance with the requirements of the approved Offsets Strategy; and 2) continue to implement the approved Offset Strategy until the CEO has confirmed by notice in writing that it has been demonstrated that the completion criteria in the Offset Strategy have been met and therefore the implementation of the actions is no longer required. 	<p>Email to registrar@dwer.wa.gov.au (24/10/2019) from Gavin Edwards, Preston Consulting. The email included the following attachments: Albemarle Kemerton Plant Offset Strategy (ref- ALB-KEM-PLA-01) and appendices one, two and three.</p>	Overall	<p>After receiving notice in writing from the CEO, that the Offset Strategy satisfies the requirements of condition 10-2 and until the CEO has confirmed by notice in writing that it has been demonstrated that the completion criteria in the Offset Strategy have been met and therefore the implementation of the actions is no longer required.</p>	In progress	Albemarle Kemerton Plant waiting response from the Department whether the Strategy satisfies the requirements of condition 10-2.
MS1085: M10-4	Offsets	The proponent shall review and revise the Offset Strategy as and when directed by the CEO.	Email to registrar@dwer.wa.gov.au (24/10/2019) from Gavin Edwards, Preston Consulting	Overall	As required	Not yet required at this stage	It is acknowledged that the Strategy will require refining through further discussions with DBCA and EPA.
MS1085: M10-5	Offsets	The proponent shall implement the latest version of the Offset Strategy, which the CEO has confirmed by notice in writing, satisfies the requirements of condition 10-2.		Overall	As defined in the offset strategy	In progress	As per condition 10-3

Table 4: Environmental Management Plans Objective's Status

EMP	Subject	Key Objectives	Target	Status	Comments
FVMMP	Orchids	<ul style="list-style-type: none"> Avoid indirect impact to known threatened orchid species 	<ul style="list-style-type: none"> No reportable decline of nearby Endangered/ Declared Rare Flora (DRF) <i>Drakaea elastica</i> individuals or habitat, attributable to the Project 	Compliant	Annual vegetation survey undertaken 6-7 August 2019. The survey identified no reportable decline of nearby Endangered/ Declared Rare Flora (DRF) <i>Drakaea elastica</i> individuals or habitat, attributable to the Project
FVMMP	TEC/PEC	<ul style="list-style-type: none"> Avoid indirect impact to vegetation and flora (<i>Banksia</i> Woodland TEC / Low lying <i>Banksia attenuata</i> woodlands or shrublands PEC) outside of the Development Envelope. 	<ul style="list-style-type: none"> No reportable decline to adjacent areas representative of the Banksia Woodlands of the Swan Coastal Plain TEC/ Low lying <i>Banksia attenuata</i> woodlands or shrublands PEC, attributable to the Project. No incidents of fire originating within, and spreading outside of, the Development Envelope. 	Compliant	Monitoring of the Banksia Woodland TEC undertaken in August 2019 compared the vegetation condition, species richness and species density at permanently established transects and Photographic Monitoring Points (PMPs). The survey report (GHD, 2019) identified no statistical differences ($p > 0.5$) between species richness or species densities between the base survey in 2018 (GHD, 2018) and the 2019 survey at any of the monitoring transects or control transects. A review of the project incident register confirmed no incidents of fire had been recorded within the development envelope.
FVMMP	Clearing	<ul style="list-style-type: none"> Avoid clearing or removal of vegetation and flora (<i>Banksia</i> Woodland TEC / Low lying <i>Banksia attenuata</i> woodlands or shrublands PEC) outside of the Development Envelope. 	<ul style="list-style-type: none"> No incidents of vegetation clearing outside of the approved Development Envelope. 	Compliant	Post clearing survey map sighted. Cleared area coordinates confirmed as complying with designated clearing boundaries.
FVMMP	Weeds	<ul style="list-style-type: none"> Prevent introduction and/or spread of weeds into adjacent areas. 	<ul style="list-style-type: none"> No new Declared Weeds or Weeds of National Significance within surrounding vegetation, attributable to the Project. No significant increase in weed cover within immediately adjacent vegetation, attributable to the Project. 	Compliant	The only plant species identified in the baseline assessment that is classified as a pest under the Biosecurity and Agriculture Management Regulations 2013 in the Shire of Harvey was <i>G. fruticosus</i> . The two plants identified were reportedly removed and no subsequent plants have been identified in subsequent quarterly surveys. All vehicles and mobile equipment coming to site are required to complete a hygiene inspection as per the Vehicles, Mobile Plant and Equipment procedure (Doc.

EMP	Subject	Key Objectives	Target	Status	Comments
					No. 606541-7400-AA00-PRO-0011). Records of inspections sighted.
FVMMP	Dieback	<ul style="list-style-type: none"> Prevent introduction and/or spread of Dieback into adjacent areas. 	<ul style="list-style-type: none"> No evidence of new Dieback infestation identified within immediately adjacent areas/vegetation resulting from the Project. 	Compliant	Phytophthora dieback occurrence survey report sighted (Doc. No. 606541-4500-DV00-RPT-0028) dated 30/11/2018.
Water MP	Water	<ul style="list-style-type: none"> To ensure that the quality and quantity of surface water and groundwater flows from the site are maintained relative to pre-development conditions, to protect the receiving environment. 	<ul style="list-style-type: none"> To not exceed trigger values for process related analytes. 	Compliant	Quarterly groundwater monitoring program implemented. The February 2019 groundwater monitoring identified numerous trigger level exceedances, which was thought to be due to elevated background concentrations of certain analytes and not due to site activities. Sighted water quality monitoring results summary for June 2019 memo indicated that a Tier 2 assessment had been undertaken on the results and that all exceedances could be attributed to background concentrations and were not associated with site activities.
GHG MP	Green-house gas emissions	<ul style="list-style-type: none"> Avoid, where possible, and minimise greenhouse gas emissions as far as practicable. 	<ul style="list-style-type: none"> The minimisation of scope 1 and scope 2 emissions arising from the construction phase and operation of the facility. 	Not yet required at this stage	It is anticipated there will be no scope 2 emissions during construction. And construction emissions are estimated to be just 3% of peak operational emissions.

4 REFERENCES

- GHD (2017) Albemarle Kemerton Plant. Environmental Management Plan, Rev 0 (November 2017).
- GHD (2018) Banksia Woodland Threatened Ecological Community and Drakaea elastica Baseline Monitoring. Unpublished report prepared for Albemarle Lithium Pty Ltd, Perth.
- GHD (2019a) Banksia Woodland Threatened Ecological Community and Drakaea elastica First Year Monitoring (November 2019). Unpublished report prepared for Albemarle Lithium Pty Ltd, Perth.
- GHD (2019b) Construction Phase Environmental Services Mosquito Management Plan, Report for Wood plc (August 2019).
- OEPA (2012) Post Assessment Guideline for Preparing a Compliance Assessment Report, Post Assessment Guideline No. 3. East Perth, WA: Office of the Environmental Protection Authority, Western Australia (August 2012).
- Wood (2018a) Albemarle Kemerton Plant. Flora and Vegetation Monitoring and Management Plan, Rev 1 (November 2018).
- Wood (2018b) Albemarle Kemerton Plant. Greenhouse Gas Management Plan, Rev 1 (November 2018).
- Wood (2018c) Albemarle Kemerton Plant. Compliance Assessment Plan, Rev 1 (November 2018).
- Wood (2018d) Albemarle Kemerton Plant. Water Management Plan, Rev 1 (December 2018).
- Wood (2019a) Albemarle Kemerton Plant. Construction Environmental Management Plan, Rev 2 (January 2019).
- Wood (2019b) Albemarle Kemerton Plant. Emergency Management Plan, Rev 1 (March 2019).

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APPENDICES

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Appendix A: Post Assessment Form for Statement of Compliance

Statement of Compliance

1. Proposal and Proponent Details

Proposal Title	The proposal is for the construction and operation of the Albemarle Kemerton Plant, and associated infrastructure, within the Kemerton Strategic Industrial Area (KSIA), approximately 17 kilometres north-east of Bunbury Western Australia. The proposal includes construction of up to five lithium hydroxide product process trains and associated infrastructure.
Statement Number	1085
Proponent Name	Albemarle Lithium Pty Ltd
Proponent's Australian Company Number <i>(where relevant)</i>	618 095 471

2. Statement of Compliance Details

Reporting Period	26/10/18 to 25/10/19
------------------	----------------------

Implementation phase(s) during reporting period (please tick ✓ relevant phase(s))							
Pre-construction	<input checked="" 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:	Section 3.2

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 3.1.1)	<input checked="" type="checkbox"/>	Yes (please proceed to Section 4)

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance.

INITIALS: 

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 3-1

Which implementation condition or procedure was non-compliant or potentially non-compliant? M2-1
Was the implementation condition or procedure non-compliant or potentially non-compliant? The finding has been marked as Potentially 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? M2-1 The proponents address on the website is not the same as the MS. In addition, the current contact address is in the ACT when the requirement is for it to be the principle work location or office in the state.
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) Administrative
What was the cause(s) of the non-compliance or potential non-compliance? Administrative errors
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? With the joint venture now in place, it will be confirmed whether Albemarle Lithium or MARBL Lithium Operations will be the proponent for the Kemerton Plant approvals. Once this is confirmed, the relevant changes will be made to the proponent contact and address details to ensure Condition 2-1 of MS-1085 is met. A notification of change will also be provided to DoEE as per Condition 4 of EPBC 2017/8099.
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?
Please provide information/documentation collected and recorded in relation to this implementation condition or procedure: <ul style="list-style-type: none"> • in the reporting period addressed in this Statement of Compliance; and

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance.

INITIALS: 

- 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.

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance.
INITIALS: 

4. Proponent Declaration

I, Edwin Mark Berends, Newerlan Project Director (full name and position title)

declare that I am authorised on behalf of Albemarle 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: [Handwritten Signature]

Date: 23/02/2020

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.

5. 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.

6. 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

7. Post Assessment Guidelines and Forms

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

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance.

INITIALS: [Handwritten Initials]

ATTACHMENT 1

Table 1 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); 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.	The term 'In Process' may not be used for any purpose other than that stated in the Definition Column. 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).

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance.

INITIALS:



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Appendix B: Documentary Evidence (Electronic)

Click OPEN below to access audit evidence and supporting documentation for the Albemarle 2020 CAR:

<https://kasaconsulting.sharepoint.com/:f:/g/EhfQtm1MDRIq3bgIHVZ9aQBrZbV5qS98loD3AN7DPbfhw?e=WFsOud>

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Appendix C: Compliance Status Definitions

Compliance Status	Definition	Notes
Compliant	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	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); The requirement has been satisfactorily completed; and The Office of the Environmental Protection Authority (EPA Services) has provided written acceptance of 'completed' status for the audit element.
Not required at this stage	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	Possible or likely failure to meet the requirements of the audit element.	This term may only be used where during the reporting period the proponent has identified a potential noncompliance and has not yet finalised its investigations to determine whether noncompliance has occurred. Where this term is used, the proponent should advise when investigations will be finalised and provide follow up advice of the outcome.
Non-compliant	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 have not been met during the reporting period and its status is not 'completed'.
In Progress	Where an audit element requires a management or monitoring plan be submitted to the EPA Services or another government agency for approval, that submission has been made and no further information or changes have been requested by the EPA Services or the other government agency and assessment by the EPA Services or other government agency for approval is still pending.	<p>The term 'In process' must only be used for the purpose stated in the definition column.</p> <p>'In process' may not be used to describe the compliance status of an implementation condition and/or procedure that requires ongoing implementation throughout the life of the project (e.g. implementation of a management plan).</p>