

REPORT

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2024 ANNUAL COMPLIANCE ASSESSMENT REPORT




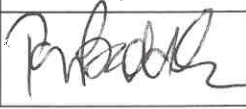
ALBEMARLE KEMERTON PLANT

MINISTERIAL STATEMENTS 1085 & 1187

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REVISION HISTORY

Rev.	Date	Status	Prepared By	Reviewed By	Operations Approval	Ext Affairs Approval
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Signature						

AMENDMENT HISTORY FOR LATEST REVISION

Clause(s)	Details of Change:

EXECUTIVE SUMMARY

This Compliance Assessment Report (CAR) has been prepared by KASA Consulting on behalf of Albemarle Lithium Pty Ltd (ACN 618 095 471). The purpose of this CAR is to satisfy the requirements of Condition 4.6 of Ministerial Statement 1085 (MS-1085) for the Albemarle Kemerton Lithium Plant proposal (the Project).

The approved action is to construct and operate a lithium hydroxide product manufacturing plant located in Kemerton Strategic Industrial Area (KSIA), approximately 17 km north-east of Bunbury, Western Australia. The Project commenced in January 2019.

It is noted that, following assessment of a section 46 application to amend implementation conditions under the WA Environmental Protection Act 1986 (EP Act), Ministerial Statement 1187 (MS-1187) was approved on 14 March 2021. Under this approval, Conditions 9 and 10 of MS 1085 have been replaced by Conditions 9 and 10 of MS 1187.

A review of Project compliance against the conditions of MS 1085 and MS 1187 identified no non-compliances (NC) or potential non-compliances during the reporting period. There were no notifiable incidents during the reporting period.

Environmental Management Plans (EMPs) were being implemented as required and EMP objectives had been met. Vegetation and water monitoring programs have detected no material impacts.

Monitoring of the Banksia Woodland threatened ecological community (TEC) undertaken in August 2024 to compare the vegetation condition, species richness and species density at permanently established transects and Photographic Monitoring Points (PMPs) identified vegetation to be in very good condition, with no change evident compared to the 2018 baseline survey. Species richness and species density in the 2024 survey was considered on a par with previous years.

Ongoing quarterly surface water and groundwater monitoring programs for water quality and annual vegetation surveys have confirmed that the quality and quantity of off-site surface and groundwater has been maintained and there has been no adverse impact on the receiving environment.

Regarding Greenhouse Gas (GHG) emissions, Albemarle received a letter from DWER/EPA Services on 26 November 2024 advising that the Minister for Environment has requested the Environmental Protection Authority (EPA) to inquire into, and report on the matter of changing the implementation conditions relating to the Albemarle Kemerton Plant, pursuant to section 46(1) of the Environmental Protection Act 1986 (EP Act).

On completing its inquiry and in accordance with section 46(6) of the EP Act, the EPA will prepare and give to the Minister a report that includes a recommendation on whether or not the conditions to which the inquiry relates, or any of them, should be changed, and any other recommendations that it thinks appropriate. The EPA's inquiry into GHG conditions is expected to take 3-6 months and was still in process at the time of report preparation.

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GLOSSARY

Term	Definition
CAP	Compliance Assessment Plan
CAR	Compliance Assessment Report
DBCA	Department of Biodiversity, Conservation and Attractions
DBS	Delithiated Beta Spodumene
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DEMIRS	Department of Energy, Mines, Industry Regulation and Safety
DoEE	Department of the Environment and Energy
DRF	Declared Rare Flora
DWER	Department of Water and Environmental Regulation
EMP	Environmental Management Plan
EP Act	<i>Environmental Protection Act 1986</i>
EPA	Environmental Protection Authority
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
FVMMP	Flora and Vegetation Management and Monitoring Plan
GHG	Greenhouse Gas
Ha	Hectare
KSIA	Kemerton Strategic Industrial Area
LiOH	Lithium Hydroxide
MS-1085	Ministerial Statement 1085
MS-1187	Ministerial Statement 1187
NC	Non-compliance
NPI	Non-Process Infrastructure
OEPA	Office of the Environmental Protection Agency
PMP	Photographic Monitoring Point
Project, the	Kemerton Lithium Plant Proposal
SWIS	South West Interconnected System
TEC	Threatened Ecological Community
WMP	Water Management Plan
WoNS	Weed of National Significance

1 INTRODUCTION

1.1 Project Details

The Kemerton Lithium Plant proposal (the Project) refers to the construction and operation of a lithium manufacturing plant and associated infrastructure, within the Kemerton Strategic Industrial Area (KSIA), located approximately 17 kms north-east of Bunbury, Western Australia (Figure 1-1: 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 is processed within up to five lithium hydroxide product process trains, which are proposed to be brought online progressively as production demand increases. These process trains operate using a combination of pyrometallurgical and hydrometallurgical operations to produce up to a total of 100,000 tonnes of lithium hydroxide product and up to 200,000 tonnes of sodium sulphate by-product per year (five train capacity). Up to 1.1 million tonnes of tailings (known as delithiated beta spodumene (DBS) will also be produced. At time of report preparation, two processing trains had been built, with train 1 operational whilst train 2 was placed in to care and maintenance in August 2024.

The lithium hydroxide product is transported 155 km by road to the Port of Fremantle for export. Sodium sulphate co-product is transported by road to either Fremantle or Bunbury for export. During the reporting period, some DBS was also sold as an alternative to freshly quarried (virgin) sand for use in cement-related applications and as fill (manufactured sand).

1.2 Purpose of Report

This Compliance Assessment Report (CAR) has been prepared to meet Project requirements specified by the Western Australian Minister for Environment, through Ministerial Statements MS-1085 and MS-1187.

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:

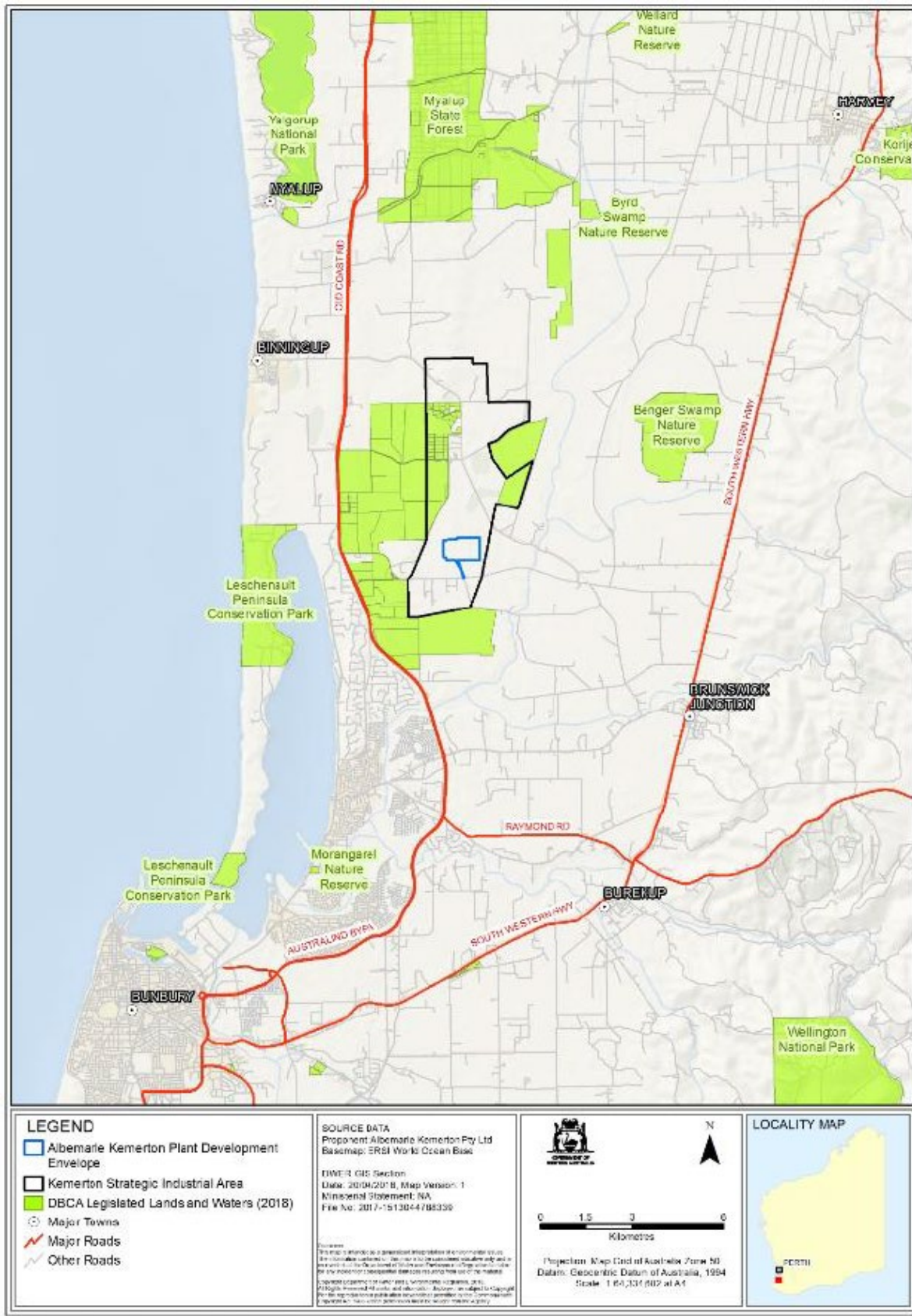
1. be endorsed by the proponent’s Chief Executive Officer or a person delegated to sign on the Chief Executive Officer’s behalf;
2. include a statement as to whether the proponent has complied with the conditions;
3. identify all potential non-compliances and describe corrective and preventative actions 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.”

This CAR provides the status of compliance against all audit elements prescribed under MS-1085 and, where applicable, the compliance status of amended Conditions 9 and 10, as approved in MS-1187. The CAR also provides a summary of how implementation of the Environmental Management Plans (EMPs) has met defined environmental objectives during the reporting period. The reporting period for this CAR covers the period 1 January 2024 through 31 December 2024.

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, 2012b).

Figure 1-1: Project Site Regional Location



2 SUMMARY OF PROPOSAL'S IMPLEMENTATION STATUS

2.1 Project Milestones

The Kemerton Lithium Plant was environmentally assessed and approved in 2018 under Part IV of the EP Act by the Environmental Protection Authority (EPA) and by the Commonwealth Department of the Environment and Energy (DoEE) (now Department of Climate Change, Energy, Environment and Water (DCCEEW)) under sections 130(1) and 133(1) of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

MS-1187, which superseded the original implementation Conditions 9 and 10 of MS-1085, was approved in March 2022. The Compliance Assessment Plan (CAP) was updated in November 2023 (ALB-KEM-PLA-04) to reflect the changes to Conditions 9 and 10. The updated CAP was approved by DWER on 9 January 2024 and has been used as the basis for the CAR.

A summary of Environmental approvals issued is provided in Table 2-1 below.

Table 2-1: Summary of Key Environmental Approvals History

Instrument	Description	Approval 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
Works Approval Amendment W6154/2018/1	Amendment to works approval W6154/2018/1 in respect of product capacity, premises boundary and clarifications to design specifications.	10 March 2021
Ministerial Statement 1187	Conditions 9 and 10 of Ministerial Statement 1085 (Greenhouse Gas Management and Offsets) deleted and replaced with implementation conditions set out in MS-1187.	14 March 2022
Ministerial Statement – 1085, amendment via section 45 C	Amendment to the proposal to reduce the clearing area and associated biodiversity offset requirement and allow for the construction of an on-site power station.	14 March 2022
Works Approval Amendment W6154/2018/1	Amendment to works approval W6154/2018/1 to update infrastructure and legal address, construct and operate waste transfer station.	23 June 2022
Works Approval Amendment W6154/2018/1	Amendment to update street address and change authorised duration and sample frequency for environmental commissioning for train 1.	09 June 2023

Instrument	Description	Approval Date
Works Approval Amendment W6154/2018/1	Works approval holder-initiated amendment to update legal address, change duration and sampling time frames for environmental commissioning and time limited operations, extend reporting periods in environmental commissioning and time limited operations, change requirement for consecutive air emission sampling runs, update premise map, update calciner stack heights, update reference terms and descriptive wording of infrastructure, and change expiry date. CEO initiated amendment to update time limited operation duration and sampling requirements and notification for recommencement of train 2 commissioning.	10 October 2024

2.1.1 Notice of Substantial Commencement

Construction commenced in January 2019 and this substantial commencement status of the Project was formally communicated to DWER via submission of the 2020 CAR, in accordance with Conditions 3-1 and 3-2 of MS 1085.

2.2 Project Components

Non-Process Infrastructure (NPI) buildings comprise a laboratory, site operations building, mess building, emergency building, wellness centre and gate houses. The processing plant will comprise up to five lithium hydroxide conversion trains (one currently in operation and one currently in care and maintenance) 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.
- Causticising, and Sodium Sulphate Decahydrate crystallisation.
- Crude Lithium Hydroxide (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.
- Waste transfer station.

2.3 Project Issues during the reporting period

Albemarle commenced construction of Trains 3 and 4 of the Kemerton Plant in late 2023; however, in August 2024 Albemarle took the decision to halt their construction and put Train 2 into care and maintenance, due to the weak global lithium commodity price.

As of 31 December 2024, Albemarle was operating Train 1 and was clearing inventory from Train 2 to place it into care and maintenance.

Albemarle has explored various power supply options and is currently connected to the South West Interconnected System (SWIS). The plant has a current 29 MW supply which is sufficient for the currently constructed two trains. In the future, if more trains are brought online and production increases the power requirement of the Kemerton Plant could reach up to 58MW.

Albemarle is also actively pursuing potential co-product development opportunities in accordance with Condition 8-1 of MS-1085. DBS is currently sold and reused as a construction material or cement-related component where possible, with excess volume transported by road to the Sandy Ridge Waste Disposal facility or Koolyanobbing for in-pit backfill to support closure objectives.

3 STATEMENT OF COMPLIANCE

Table 3-1 presents the compliance status of applicable Ministerial Conditions prescribed in MS-1085 and MS-1187. Refer to Appendix A for the completed Post Assessment Form (Statement of Compliance).

The findings are 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, the management plan conditions and commitments are considered to have been complied with if sufficient evidence exists to demonstrate:

- The management plan had otherwise been substantially implemented.
- Non-compliant items do not present a significant environmental risk and corrective actions have been initiated.
- The overall environmental objectives for that factor have been met.

3.1 Summary of Compliance Status

No non-compliances or potential non-compliances were identified against the Conditions of MS-1085 or MS-1187 during the reporting period.

Table 3-1 presents a summary of compliance findings and status for each Condition of MS-1085 and MS-1187.

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

3.2 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 Environmental Management Plans (EMPs) are listed in Table 3-2.

Table 3-1: Audit Findings – MS-1085 and MS-1187 – Conditions

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1085: M1-1	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 the proposal as per Attachment 1 to Statement 1085, Schedule 1.	CAR.	Overall	When implementing the proposal.	Compliant	The authorised extent of the proposal as defined in Table 2 of Schedule 1 of MS-1085 has not been exceeded (see below).
MS-1085: M1-1	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					Completed	Extent of clearing was 48.8 ha of native vegetation and 33.39 ha of pine plantation. Post clearing survey map provided by BGC Contracting. Cleared area coordinates confirmed by Wood personnel as complying with designated clearing boundaries. Development site fully fenced and cleared; no further clearing required.
MS-1085: M1-1	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 sulphate by-product produced per year.					Compliant	Output is well below proposed process plant capacity.
MS-1085: M1-1	Proposal implementation	Table 2 Operational elements: Tailings Capacity: No more than 1.1 million tonnes per year.					Compliant	As above.
MS-1085: 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.	Provide written correspondence indicating any change of name, physical or postal address.	Copy of written notification to CEO of change of address.	Overall	If any change to name, physical address or postal address occurs.	Compliant	EPA Services have been notified of the WA address for all correspondence via email and Environment Online enquiry in September 2024.
MS-1085: M3-1	Time limit for substantial commencement	The proposal must be substantially commenced within 5 years from the date of this Statement.	Commence activity.	Provide evidence to the CEO in writing to demonstrate the proposal has substantially commenced.	Construction	Substantial commencement by 26 October 2023.	Completed	Date of commencement 2 January 2019; as per email to DOEE on 10 January 2019.
MS-1085: 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.	Provide written evidence to the CEO to demonstrate the proposal has substantially commenced.	Copy of written notification to CEO of substantial Commencement.	Construction	Substantial commencement demonstrated by 25 November 2023.	Completed	Section 2.2.1 of 2020 Compliance Assessment Report (CAR) notified DWER of substantial commencement occurring in January 2019.
MS-1085: 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.	Prepare & submit a CAP in accordance with Post assessment guidelines and to the requirements of the CEO.	Acknowledgement of receipt from CEO.	Pre-construction	July 2019 or prior to implementation, whichever is sooner.	Compliant	Compliance Assessment Plan, Revision 0, 12 November 2018 (Wood, 2018c) approved by DWER on 21 November 2018 (ref. 2018-1542934967508). The CAP was updated in November 2023 (ALB-KEM-PLA-04) and submitted to DWER. DWER Executive Director Compliance and Enforcement (for the CEO) approved the updated CAP on 09 January 2024 (Ref. DWERA-001586).

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1085: 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.	Prepare & submit a CAP in accordance with Post assessment guidelines and to the requirements of the CEO.	Approval letter.	Pre-construction	Compliance Assessment Plan to be submitted by 26 July 2019.	Compliant	The updated CAP was approved by DWER Executive Director Compliance and Enforcement (for the CEO) on 09 January 2024 (Ref. DWERA-001586). The Annual CAR is now due for submission by 31 March.
MS-1085: 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.	Conduct compliance assessment in accordance with the CAP.	CAR	Overall	Jan 2020 for first CAR and annually thereafter until 2024. From 2024 onward CAR will be submitted by 31 March annually.	Compliant	The updated CAP was approved by DWER Executive Director Compliance and Enforcement (for the CEO) on 09 January 2024 (Ref. DWERA-001586). Quarterly audits undertaken to assess compliance with Ministerial Conditions by KASA Consulting (Nick Croston Exemplar registered Lead Environmental Auditor #13656). Annual compliance assessments undertaken in January 2025 for preparation of the 2024 CAR.
MS-1085: 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.	Retain CAR's and make available when requested.	CARs.	Overall	As requested by the CEO.	Compliant	Albemarle Kemerton Project 2022-23 annual CAR (P-74211-0000-BA00-RPT-0282) prepared and submitted to CEO on 28 March 2024 (ALB-NA-LET-0313). Albemarle Kemerton Project Annual CARs were available on the Albemarle website; including the 2022-23 CAR.
MS-1085: 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.	Notify the CEO of potential non-compliances in writing and verbally.	<ul style="list-style-type: none"> Copy of written notification. CAR. 	Overall	Within 7 days of NC being known.	Compliant	No non-compliances against the requirements of MS-1085 or MS-1187 were known to have occurred during the 2024 reporting period.
MS-1085: 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.	Prepare and submit a CAR within the required reporting timeframe.	<ul style="list-style-type: none"> CAR. Acknowledgement of receipt from CEO. Evidence of documents available on Project website. 	Overall	Jan 2020 for first CAR and annually thereafter until 2024. From 2024 onward CAR will be submitted by 31 March annually.	Compliant	Albemarle Kemerton Project 2022-2023 annual CAR (P-74211-0000-BA00-RPT-0282) prepared and submitted to CEO on 28 March 2024. Albemarle Kemerton Project Annual CARs available on the Albemarle website. The CAR for reporting period 2022-2023 was available on the Albemarle website as specified in the Compliance Assessment Plan (606541-4500-DV00-PLN-0004). Albemarle requested a change to compliance reporting dates in May 2023 and this was approved on 16 November 2023 via email. The reporting period is now 1 January – 31 December each year (the 2022-23 report covered the period 26 October 2022 to 31 December 2023).
ThMS-1085: 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.	All environmental plans and reports required by MS No. 1085 and MS No. 1187 are made publicly available.	CAR.	Overall	Within a reasonable time period approved by the CEO.	Compliant	Approval documents, including management plans with associated appended datasets relevant to the proposal assessment are publicly available via the Albemarle website. CAR and all associated compliance data available via Albemarle website (data link in CAR Appendix).

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1085: M5-2	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.	Submit a request for approval from the CEO to not make sensitive information publicly available, if applicable.	<ul style="list-style-type: none"> Copy of written request to CEO. CEO approval. 	Overall	As required.	Not required at this stage	No environmental data considered confidential or commercially sensitive.
MS-1085: 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.	Prepare and implement the FVMMP.	Annual Flora and vegetation monitoring report submitted with the CAR.	Overall	For the life of the proposal as approved by the CEO.	Compliant	Albemarle ensures avoidance of direct and indirect impacts to Threatened Flora and communities through implementation of the Albemarle Kemerton Plant FVMMP. Monitoring of the Banksia Woodland threatened ecological community (TEC) is undertaken annually at permanently established transects and Photographic Monitoring Points (PMPs). Monitoring of the Banksia Woodland in 2024 (Ecoedge, 2025) indicated that species richness and density was equal or greater than those identified in the baseline survey of 2018.
MS-1085: M6-2	Flora and vegetation	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: 1. when implemented, substantiate and ensure that condition 6-1 is being met; 2. 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; 3. 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; 4. 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 5. specify management or contingency actions to be implemented in the event that the criteria identified required by condition 6-2(4) have been triggered.	Prepare and submit the FVMMP.	<ul style="list-style-type: none"> Receipt acknowledgement from CEO. CEO approval. 	Pre-construction	Prior to ground disturbing activities or otherwise agreed by the CEO.	Compliant	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). Also refer to findings in Table 3-2. An update of the FVMMP (Rev. 3) was submitted to DWER in December 2024 and, although outside of the current reporting period, it is noted that approval of the updated plan was received on 14 January 2025 (DWER ref. APP-0000253). The approval letter stated that DWER was satisfied that Condition 6-2 of MS1085 had been met.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1085: M6-3	Flora and vegetation	In the event that the monitoring specified in the Plan indicates that the criteria specified in the Plan have been triggered, the proponent shall: <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 Flora and Vegetation Management and Monitoring Plan (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. 	Implement and comply with reporting requirements in FVMMP if criteria are triggered	<ul style="list-style-type: none"> CAR. Written notification/ reports to CEO. 	Overall	Within 21 days of the criteria being triggered.	Not required at this stage	<p>No criteria had been triggered.</p> <p>Year 5 monitoring was undertaken in November 2023 and the survey report specified that vegetation was found to be in very good condition, with no change evident from the 2018 baseline or subsequent surveys. The report concluded that as per the management objectives stated in the FVMMP, the following management targets were met:</p> <ol 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. No reportable decline to adjacent areas representative of the Banksia Woodlands of the Swan Coastal Plain TEC/ PEC, attributable to the Project. No incidents of fire originating within, and spreading outside of, the Development Envelope. No incidents of vegetation clearing outside of the approved Development Envelope.
MS-1085: M6-4	Flora and vegetation	The proponent may review and revise the FVMMP.	Review and revise FVMMP.	<ul style="list-style-type: none"> Revised FVMMP (as required). CEO approval. 	Pre-construction Construction	As required.	Compliant	An update of the FVMMP (Rev. 3) was submitted to DWER in December 2024 and, although outside of the current reporting period, it is noted that approval of the updated plan was received on 14 January 2025 (DWER ref. APP-0000253).
MS-1085: M6-5	Flora and vegetation	The proponent shall review and revise the FVMMP as and when directed by the CEO.	Revise and submit FVMMP as and when required by the CEO.	<ul style="list-style-type: none"> Revised FVMMP submitted (as required). CEO approval. 	Pre-construction Construction	As notified by Albemarle or as and when required by the CEO.	Not required at this stage	The CEO has not requested that the FVMMP be reviewed. An update of the FVMMP (Rev 2) was initiated by Albemarle; however, Albemarle has consulted closely with DWER and further updated the FVMMP (Rev 3) to address their comments and feedback. See M6-4 above.
MS-1085: 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.	Latest version of the FVMMP implemented.	<ul style="list-style-type: none"> CEO approval. CAR. 	Overall	Following receipt in writing from the CEO that the latest Plan satisfies the requirements set out in condition 6-2.	Compliant	The CEO confirmed the FVMMP (Rev 1) satisfied the requirements of condition 6-2 in a letter dated 3 December 2018 (ref. DWERA-001672). An update of the FVMMP (Rev. 3) was submitted to DWER in December 2024 and, although outside of the current reporting period, it is noted that approval of the updated plan was received on 14 January 2025 (DWER ref. APP-0000253). The FVMMP (Rev 1) (Wood, 2018a) has been implemented. (see Table 3-2). Also refer to findings in Table 3-2.
MS-1085: M7-1	Water Management Plan	The proponent shall ensure that construction and ongoing operation of the proposal is undertaken in a manner that: <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. 	Prepare and implement the Water Management Plan.	Water monitoring report submitted with the CAR.	Overall	For the life of the proposal as approved by the CEO.	Compliant	Ongoing monitoring programs for water quality and vegetation has confirmed that the quality and quantity of off-site surface and groundwater has been maintained and there has been no adverse impact on the receiving environment (see detailed findings below).

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1085: 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.</p> <p>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. 	Prepare and submit the Water Management Plan.	<ul style="list-style-type: none"> Receipt acknowledgement from CEO. CEO approval. 	Pre-construction	Prior to ground-disturbing activities or as otherwise agreed by the CEO.	Compliant	<p>Water Management Plan (WMP) Rev. 1, 4 December 2018. (Doc. No. 606541-4500-DV00-PLN-0004) (Wood, 2018d) was prepared and submitted to DWER.</p> <p>Correspondence from DWER (ref DWERA-001671) specified the submitted WMP was considered to have met the requirements of condition 7 of MS-1085.</p> <p>An update of the WMP was in progress as of 31 December 2024.</p>
MS-1085: 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. 	Implement and comply with reporting requirements in Water Management Plan if criteria are triggered.	<ul style="list-style-type: none"> CAR. Written notification/ reports to CEO. 	Overall	Within 21 days of the criteria being triggered.	Not required at this stage	<p>Quarterly groundwater and monthly surface water monitoring reports to date have concluded that no criteria have been triggered because the concentrations of process related analytes recorded are consistent with historical levels and observed variations in some parameter concentrations are attributed to background levels and are not considered to be related to construction or operational activities.</p>
MS-1085: M7-4	Water Management Plan	The proponent may review and revise the Water Management Plan.	Review and revise the Water Management Plan.	<ul style="list-style-type: none"> Revised Water Management Plan (as required). CEO approval. 	Pre-construction Construction	As required.	Compliant	<p>A revised WMP with proposed trigger levels was submitted to DWER on 17 Jan 2022. Response from DWER received 15 June 2022 with requirement for amendments. As of 31 Dec 2024, the WMP update to address DWER comments was still in progress.</p>
MS-1085: M7-5	Water Management Plan	The proponent shall review and revise the Water Management Plan as and when directed by the CEO.	Revise and submit the Water Management Plan as and when required by the CEO.	<ul style="list-style-type: none"> Revised Water Management Plan (as required). CEO approval. 	Pre-construction Construction	As notified by Albemarle or as and when required by the CEO.	Not Required at this stage	<p>The CEO has not formally requested the WMP be reviewed and revised; however, Albemarle has consulted closely with DWER and is updating the WMP to address their comments and feedback (see finding above).</p>

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1085: 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.	Latest version of the Water Management Plan implemented.	<ul style="list-style-type: none"> CEO approval. CAR. 	Overall	As and when confirmed by the CEO	Compliant	<p>The current approved WMP is Rev.1, 4 Dec 2018 (Doc. No. 606541-4500-DV00-PLN-0004). Correspondence from DWER (ref DWERA-001671) indicating this WMP meets the requirements of condition 7.2 of MS-1085. Ongoing quarterly compliance audits have confirmed the WMP is being implemented, including the quarterly groundwater and monthly surface water monitoring programs.</p> <p>Also refer to findings in Table 3-2.</p>
MS-1085: 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.	<ul style="list-style-type: none"> Comply with Waste Management Plan. Develop and implement waste minimisation program. 	<ul style="list-style-type: none"> CAR. Waste register. 	Overall	For the life of the proposal as approved by the CEO.	Compliant	<p>A Waste Management Plan (Albemarle, 2022) had been prepared detailing measures have been undertaken to improve co-product market opportunities.</p> <p>Key projects related to this in the reporting period included:</p> <ul style="list-style-type: none"> In Jan/Feb 2024 – 667 (wet) tonnes of DBS were transported from Kemerton and delivered to the Bunbury Outer Ring Road (BORR) project as embankment fill (the tonnage is the DBS component of the Manufactured Sand – 1,500 tonnes of Manufactured Sand were used plus a 500 tonne control of natural sand) In June to July 2024, 36.3 m³ (wet) tonnes of DBS were transported from Kemerton and have been delivered to the BORR project (Busse Highway section) (the tonnage is the DBS component of the Stabilised Sand) In October 2024, approximately 0.57 m³ (wet) tonnes of DBS were transported to the BORR project for use in N25 footpath cement. In December 2024, approximately 7.74 m³ (wet) tonnes of DBS were transported to the Armadale Line Upgrade Alliance (ALUA) project for use in embankment fill and 5.81 m³ for use in N32 footpath cement. During 2023/24 FY – shipments of SSA totalling 1,020 tonnes have occurred (with unsold or off-specification SSA going to Tellus Sandy Ridge); including: <ul style="list-style-type: none"> Export to China = 240 tonnes. Export to Thailand = 600 tonnes. Domestic shipment to Victoria (Australia) = 120 tonnes.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1085: 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"> when implemented, substantiate and ensure that condition 8-1 is being met; 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; quantify the outcome/s of applying the principle of the "Recovery (re-use, reprocessing, recycling); and provide evidence that all reasonable and practicable measures have been undertaken to Avoid and Recover waste. 	Prepare and submit the Waste Management Plan.	<ul style="list-style-type: none"> Receipt acknowledgement from CEO. CEO approval. 	Operation	Within 3 years of the publication of the MS Statement or as otherwise agreed by the CEO.	Compliant	Revision 1 of the Waste Management Plan (Albemarle, 2022) was submitted to DWER on 28 September 2022.
MS-1085: 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"> implement the actions in accordance with the requirements of the approved Waste Management Plan; and 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. 	Implement the Waste Management Plan.	<ul style="list-style-type: none"> CEO approval. CAR. 	Operation	After receiving notice in writing from the CEO that the WMP 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 and therefore the implementation of the actions is no longer required.	Compliant	An internal waste management audit was undertaken in September 2024 (QA-AUD-KEM-2024-002) that identified no non-compliances. Three observations were identified that were being addressed through the Kemerton corrective action system.
MS-1085: M8-4	Terrestrial Environment Quality (Waste management)	The proponent may review and revise the Waste Management Plan.	Review and revise the Waste Management Plan.	<ul style="list-style-type: none"> Revised Waste Management Plan (as required). CEO approval. 	Operation	As required.	In progress	An update of the WMP was being finalised in Q4 of 2024 but it had not been submitted to DWER for approval at the time of preparing this CAR.
MS-1085: M8-5	Terrestrial Environment Quality (Waste management)	The proponent shall review and revise the Waste Management Plan as and when directed by the CEO.	Revise and submit as and when required by the CEO.	<ul style="list-style-type: none"> Revised Waste Management Plan submitted (as required). CEO approval. 	Operation	As notified by Albemarle or as and when required by the CEO.	Not required at this stage	At the time of preparing this CAR no formal request to review the Waste Management Plan had been received from the CEO.
MS-1085: 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.	<ul style="list-style-type: none"> Latest version submitted and is available to project personnel. Waste Management Plan is referenced in the CEMP. 	<ul style="list-style-type: none"> CEO approval. CAR. 	Operation	Following receipt in writing from the CEO that the latest Plan satisfies the requirements set out in condition 8-2.	Compliant	<p>In accordance with the proposed Waste Management Plan an area by area baseline site waste assessment was undertaken by Veolia and a 'Site Waste Service Plan – Albemarle' had been established.</p> <p>An internal waste management audit was undertaken in Sept 2024 (QA-AUD-KEM-2024-002) that identified no non-compliances. Three observations were identified that will be addressed through the Kemerton corrective action system.</p>

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1187: M9-1	Greenhouse gas (GHG) management	Subject to condition 9-3, the proponent shall take measures to ensure the PS Net GHG Emissions do not exceed: 1. 956,000 tCO ₂ -e for the period 1 January 2021 to 31 Dec 2024; 2. 1,195,000 tCO ₂ -e for the period 1 January 2025 to 31 Dec 2029; 3. 1,186,000 tCO ₂ -e for the period 1 January 2030 to 31 Dec 2034; 4. 1,110,000 tCO ₂ -e for the period 1 January 2035 to 31 Dec 2039; 5. 960,000 tCO ₂ -e for the period 1 January 2040 to 31 Dec 2044; 6. 700,000 tCO ₂ -e for the period 1 January 2045 to 31 Dec 2049; 7. zero tonnes of CO ₂ -e for every five year period from 1 January 2050 onwards.	Implement the GHGMP.	<ul style="list-style-type: none"> CAR. GHG monitoring records. 	Overall	For the life of the proposal as approved by the CEO.	Not required at this stage	Due to the scaling back of the project there are currently no plans to construct a power station.
MS-1187: M9-2	GHG management	Subject to condition 9-3, the proponent shall take measures to ensure the Plant Net GHG Emissions do not exceed: 1. 1,240,000 tCO ₂ -e for the period 1 January 2021 to 31 Dec 2024; 2. 1,550,000 tCO ₂ -e for the period 1 January 2025 to 31 Dec 2029; 3. 1,000,000 tCO ₂ -e for the period 1 January 2030 to 31 Dec 2034; 4. 1,000,000 tCO ₂ -e for the period 1 January 2035 to 31 Dec 2039; 5. 1,000,000 tCO ₂ -e for the period 1 January 2040 to 31 Dec 2044; 6. 740,000 tCO ₂ -e for the period 1 January 2045 to 31 Dec 2049; 7. zero tonnes of CO ₂ -e for every five (5) year period from 1 January 2050 onwards.	Implement the GHGMP.	<ul style="list-style-type: none"> CAR. GHG monitoring records. 	Overall	For the life of the proposal as approved by the CEO.	Compliant	Routine construction and operational activities during the reporting period resulted in emissions well below the specified limits. Reported emissions in the Kemerton Lithium Plant Greenhouse Gas Summary report 2023 CY (Greenbase, 2024) for the 2022 and 2023 reporting periods are as follows: <ul style="list-style-type: none"> 2022 - Scope 1 emissions were 9,500 tCO₂-e and Scope 2 was 13,548 tCO₂-e. 2023 - Scope 1 emissions were 18,088 tCO₂-e and Scope 2 was 24,935 tCO₂-e.
MS-1187: M9-3	GHG management	Where the times between the Commencement of Operations and the end of a period specified in conditions 9-1 and 9-2 is less than five years, the PS Net GHG Emissions or Plant Net GHG Emissions limit for that period is to be determined in accordance with the following formula: $\text{Reduced Net GHG Emissions limit} = \frac{A}{B} * C$ Where: A is the relevant Net GHG Emissions limit for the periods as specified in condition 9-1 or 9-2. B is the time (in days) in the relevant period. C is the days remaining between the Commencement Date and the end of the relevant period.	Implement the GHGMP.	<ul style="list-style-type: none"> CAR. GHG monitoring records. 	Overall	For the life of the proposal as approved by the CEO.	Compliant	The Kemerton Lithium Plant Greenhouse Gas Summary report 2023 CY (Greenbase, 2024) did not include a calculation for the period from commencement of operations to the end of 2023 using the specified formula because calculated emissions were a level of magnitude below the specified emissions limit (1,240,000 tCO ₂ -e).

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1187: M9-4	GHG management	<p>The proponent shall implement the Albemarle Kemerton Plant Greenhouse Gas Management Plan (Final Version, 8 October 2021) which includes the following:</p> <ol style="list-style-type: none"> is consistent with the achievement of the PS Net GHG Emissions and Plant Net GHG Emissions limits in conditions 9-1 and 9-2 subject to the adjustment provided for in condition 9-3 (or achievement of emission reductions beyond those required by those emission limits); estimated Proposal GHG Emissions and Emissions Intensity for the life of the proposal; compare estimated Proposal GHG Emissions and Emissions Intensity for the life of the proposal against other comparable facilities; identify and describe any measures that the proponent will implement to avoid, reduce and/or offset Proposal GHG Emissions and/or reduce the Emissions Intensity of the proposal; and provide a program for the future review of the plan to: <ol style="list-style-type: none"> assess the effectiveness of measures referred to in condition 9-4(4); and identify and describe options for future measures that the proponent may or could implement to avoid, reduce, and/or offset Proposal GHG Emission and/or reduce the Emissions Intensity of the proposal. 	Implement the GHGMP.	<ul style="list-style-type: none"> CAR. GHG monitoring records. 	Overall	For the life of the proposal as approved by the CEO.	Compliant	<p>Version 3 of the GHG Management Plan (08-10-2021) (Preston Consulting, 2021) was approved as part of the approval of MS-1187, which requires implementation of the plan. The requirements detailed in Condition 9-4 (1) - (5) were included in Sections 5.1, 5.2 and 6 of the GHG MP.</p> <p>The GHG MP was being implemented. Albemarle has made a commitment to protect the environment through the continuous improvement of energy performance. Albemarle implements an organisation-wide energy management approach.</p> <p>It is noted that Albemarle received a letter from DWER/EPA Services on 26 November 2024 specifying that the Minister for Environment has requested the EPA to inquire into, and report on the matter of changing the implementation conditions relating to the Albemarle Kemerton Plant, pursuant to section 46(1) of the Environmental Protection Act 1986 (EP Act).</p>
MS-1187: M9-5	GHG management	<p>The proponent:</p> <ol style="list-style-type: none"> may revise and submit to the CEO the Confirmed Greenhouse Gas Management Plan at any time; must revise and submit to the CEO the Confirmed Greenhouse Gas Management Plan if there is a material risk that conditions 9-1 and 9-2 will not be complied with, including but not limited to as a result of a change to the proposal; must revise and submit to the CEO the Confirmed Greenhouse Gas Management Plan by the date that the first five (5) yearly consolidated report is required to be submitted under condition 9-10(1) and every five (5) years after that date; and must revise and submit to the CEO the Confirmed Greenhouse Gas Management Plan as and when directed to by the CEO. 	Revise and submit the Confirmed GHGMP.	<ul style="list-style-type: none"> CAR. GHG monitoring records. 	Overall	For the life of the proposal as approved by the CEO.	In Progress	<p>Version 3 of the GHG Management Plan (08-10-2021) was approved through the approval of MS-1187.</p> <p>During 2024 the GHG MP was being updated but this was on hold awaiting the findings of the EPA inquiry into changing the GHG implementation conditions relating to the Albemarle Kemerton Plant.</p>
MS-1187: M9-6	GHG management	<p>Within one (1) month of receiving confirmation in writing from the CEO that:</p> <ol style="list-style-type: none"> the Greenhouse Gas Management Plan referred to in condition 9-4 satisfies condition 9-4; or any subsequent version of the Confirmed Greenhouse Gas Management plan submitted under condition 9-5 satisfies condition 9-4, <p>the proponent must submit a separate summary of the relevant plan to the CEO for public disclosure, which must:</p> <ol style="list-style-type: none"> include a summary of the matters specified in conditions 9-4(1) to 9-4(4); and be published as required by condition 9-11(2). 	Submit a summary of the relevant Confirmed GHGMP to the CEO.	<ul style="list-style-type: none"> Receipt acknowledgement from CEO. CEO approval. 	Overall	Within one month of receiving written confirmation from the CEO that the GHGMP meets the requirements set out in condition 9-6.	Compliant	<p>Greenhouse Gas Management Plan Rev. 3 – 08 October 2021 was approved 15 March 2022 and was available on the Albemarle website.</p> <p>Non-compliance previously raised due to separate summary of the plan not being prepared within defined timeframe. The summary plan has now been prepared using DWER EPA Services template and uploaded to Albemarle website on 22 December 2023; therefore, the non-compliance is considered to have been closed out.</p>

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1187: M9-7	GHG management	The proponent shall implement the most recent version of the Confirmed Greenhouse Gas Management Plan until the CEO has confirmed by notice in writing that it has been demonstrated that the Net GHG Emission limits in conditions 9-1 and 9-2 have been met.	Latest GHGMP version submitted and is available to project personnel.	<ul style="list-style-type: none"> CEO approval. CAR. 	Operation	Following receipt in writing from the CEO that the latest Plan satisfies the requirements set out in condition 9-7.	Compliant	The GHG Management Plan was being implemented (see finding for Condition 9-4).
MS-1187: M9-8	GHG management	The proponent shall submit an annual report to the CEO each year by 31 March, commencing on the first 31 March after the Commencement of Operations , or such other date within that financial year as is agreed by the CEO to align with other reporting requirements for GHG , specifying for the previous calendar year: <ol style="list-style-type: none"> the quantity of Proposal GHG Emissions and lithium hydroxide produced; and the Emissions Intensity for the proposal. 	Submit annual report to the CEO.	CAR	Operation	By 31 March annually.	Compliant	Kemerton Lithium Plant Greenhouse Gas Summary report 2023 (P-74211-0000-DV00-RPT-0213) (Greenbase, 2024) (27 March 2024) was submitted to DWER on 28 March 2024 (ALB-NA-LET-0313). Report includes estimated Scope 1 and Scope 2 GHG emissions and emissions intensity.
MS-1187: M9-9	GHG management	The proponent shall submit to the CEO by 31 March 2030 or such other date within that financial year as is agreed by the CEO to align with other reporting requirements for GHG, and every fifth year thereafter: <ol style="list-style-type: none"> a consolidated report specifying: <ol style="list-style-type: none"> for each of the preceding five (5) calendar years, the matters referred to in conditions 9-8(1) and (2); for the period specified in condition 9-1 and 9-2 that ended on 30 June of the year before the report is due: <ol style="list-style-type: none"> the quantity of Proposal GHG Emissions; the Net GHG Emissions, PS Net GHG Emissions and Plant Net GHG Emissions; the type, quantity, identification or serial number, and date of retirement or cancellation of any Authorised Offsets which have been retired or cancelled and which have been used to calculate the Net GHG Emissions, PS Net GHG Emissions and Plant Net GHG Emissions; referred to in condition 9-9(1)(b) ii, including written evidence of such retirement or cancellation; and any measures that have been implemented to avoid or reduce Proposal GHG Emissions; an audit and peer review report of the consolidated report required by condition 9-9(1), carried out by an independent person or independent persons with suitable technical experience dealing with the suitability of the methodology used to determine the matters set out in the consolidated report, whether the consolidated report is accurate and whether the consolidated report is supported by credible evidence. 	Submit consolidated report and audit and peer review report to the CEO.	<ul style="list-style-type: none"> CAR. Consolidated Report. Audit and Peer Review Report. 	Operation	31 March 2030 and every 5 th year thereafter.	Not required at this stage	This requirement has not been triggered.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1187: M9-10	GHG management	<p>A consolidated report referred to in condition 9-9(1) must be accompanied by:</p> <ol style="list-style-type: none"> 1. a revision of the Confirmed Greenhouse Gas Management Plan under condition 9-5(3); and 2. a separate summary report, for the period specified in conditions 9-1 and 9-2 that ended on 30 June of the year before the report is due and any previous periods specified in condition 9-1 and 9-2, and which includes: <ol style="list-style-type: none"> a) a graphical comparison of PS Net GHG Emissions with the PS Net GHG Emissions limits detailed in conditions 9-1 (subject to the adjustment provided for in condition 9-3); b) a graphical comparison of Plant Net GHG Emissions with the Plant Net GHG Emissions limits detailed in condition 9-2 (subject to the adjustment provided for in condition 9-3); c) proposal Emissions Intensity compared to comparable facilities; d) a summary of measures undertaken by the proponent to avoid or reduce Proposal GHG Emissions for compliance periods detailed in conditions 9-1 and 9-2; and e) a clear statement as to whether limits for PS Net GHG Emissions and Plant Net GHG Emissions set out in conditions 9-1 and 9-2 have been met, and whether future PS Net GHG Emissions and Plant Net GHG Emissions limits are likely to be met, including a description of any reasons why those limits have not been, and/or are unlikely to be met. 	Submit consolidated report including revised Confirmed GHGMP and summary report and audit and peer review report to the CEO.	<ul style="list-style-type: none"> • CAR. • Consolidated Report. • Revised GHGMP. 	Overall	31 March 2030 and every 5 th year thereafter.	Not required at this stage	This requirement has not been triggered.
MS-1187: M9-11	GHG management	<p>The proponent shall make the Confirmed Greenhouse Gas Management Plan, the summary of that plan, and all reports required by condition 9 publicly available on the proponent's website within the timeframes specified below for the life of the proposal, or in any other manner or time specified by the CEO:</p> <ol style="list-style-type: none"> 1. any Confirmed Greenhouse Gas Management Plan, within two (2) weeks of receiving written confirmation from the CEO as referred to in condition 9-6; 2. the summary of any Confirmed Greenhouse Gas Management Plan referred to in condition 9-6 and the reports referred to in conditions 9-8, 9-9 and 9-10 within two (2) weeks of submitting the document to the CEO. 	Confirmed GHGMP and all reports required by condition 9 publicly available on project website.	GHGMP and all reports required by condition 9 available on project website.	Operation	Within the timeframes set out in condition 9-11.	Compliant	GHG Management Plan Rev 3 was available on the Albemarle website. This condition was previously recorded as non-compliant because the summary of the GHG Management Plan was not made publicly available within the defined timeframe. The summary has now been uploaded to Albemarle website (on 22 December 2023); therefore, the non-compliance is now considered to have been closed out.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1187: M10-1	Offsets	The proponent shall undertake an offset with the objective of counterbalancing the significant residual impact to 40.4 ha of foraging habitat, including 9.12 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.	Prepare and implement the Offset Strategy.	<ul style="list-style-type: none"> Offset strategy. CAR. 	Overall	As defined in the offset strategy.	In Progress	<p>The offset area is yet to be formally secured under a protection mechanism. Consultations to secure the offset area under a protection mechanism are ongoing. It has been agreed that the preservation of Lot 42 for biodiversity offsets purposes would occur through funding from the proponent to acquire the land for vesting to the State of Western Australia, managed by DBCA.</p> <p>A Quadripartite Agreement has been drafted between the Western Australia Land Authority (trading as DevelopmentWA – the current freehold landholder), DBCA, the State of Western Australia and Albemarle Lithium to enable the valuation and transfer of the land from DevelopmentWA to the State of Western Australia (managed via DBCA) with finalisation expected in H1, 2025. This will then enable the Land Purchase Agreement (and land transfer) to occur in late H1, 2025. Additionally, the contents and allocation of activities between the proponent and DBCA will also be set out in the 20-year Management Agreement, with drafting of this document now commenced.</p>
MS-1187: 10-2	Offsets	Within twelve (12) months of the publication of this Statement, the proponent shall prepare and submit an Offset Strategy to the CEO. The Offset Strategy shall: (see below)	Prepare and submit the Offset Strategy to the CEO.	Receipt acknowledgement from CEO.	Overall	15 March 2023.	Compliant	<p>An Albemarle Kemerton Plant Offset Strategy (ref. ALB-KEM-PLA-01) (Preston, 2019) with appendices 1-3 was originally submitted to DWER in 2019 via email to registrar@dwer.wa.gov.au (24 October 2019) from Preston Consulting. An updated strategy (Rev 1, 25 June 2020) and appendices was submitted via email to DBCA on 15 July 2020, with a further update (Rev 2. 23 May 2023) addressing the amended Condition associated with approval of MS 1187 (document submitted to DWER on 31 May 2023). The Offset Strategy is yet to be finalised as consultation between Albemarle and relevant regulatory authorities is still ongoing (see comments against Condition 10.1 above). The original revision of the Offset Strategy addressed the requirements of Condition 10.2 as follows (the updated versions also include this information). The revised Offset Strategy is due for submission in H1, 2025.</p>
MS-1187: 10-2	Offsets	(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;	Prepare and submit the Offset Strategy to the CEO.		Overall		Compliant	<p>Unprotected area identified, and Offset report Lot 42 Wellesley Road North, Kemerton Offset Site Study Report (June 2018) confirms area contains Priority Ecological Community (Floristic Community Type 21c 'Low lying Banksia attenuate woodlands and shrublands') and 45.73 ha of foraging habitat. This area has been accepted by all parties.</p>

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1187: 10-2	Offsets	(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 Template Guidelines 2014, and the <i>Environmental Protection and Biodiversity Conservation Act 1999</i> Environmental Offsets Policy (October 2012) in conjunction with the associated Offsets assessment guide;	Prepare and submit the Offset Strategy to the CEO.		Overall		Compliant	Offset report Lot 42 Wellesley Road North, Kemerton Offset Site Study Report (Ecoedge, 2018) prepared including assessment against the "six principles". A summary of this assessment is included in Section 6.1 of Rev 2 of the Offset Strategy.
MS-1187: 10-2	Offsets	(3) identify the environmental values of the offset area(s)	Prepare and submit the Offset Strategy to the CEO.		Overall		Compliant	Environmental values identified in Offset report Lot 42 Wellesley Road North, Kemerton Offset Site Study Report (Ecoedge, 2018). A summary of the environmental values is included in Section 5.2 of Rev 2 of the Offset Strategy.
MS-1187: 10-2	Offsets	(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;	Prepare and submit the Offset Strategy to the CEO.		Overall		Compliant	<p>Consultations to secure the offset area under a protection mechanism are ongoing. During the reporting period, it was agreed that the preservation of Lot 42 for biodiversity offsets purposes would occur through funding from the proponent to acquire the land for vesting to the State of Western Australia, managed by DBCA. Formalising this requires:</p> <ul style="list-style-type: none"> A Quadripartite Agreement between the Western Australia Land Authority (trading as DevelopmentWA – the current freehold landholder), DBCA, the State of Western Australia and Albemarle Lithium to enable the valuation and transfer of the land from DevelopmentWA to the State of Western Australia (managed via DBCA). A Land Purchase Agreement (funded by Albemarle Lithium) enabling the legal land transfer; and A 20-year Management Agreement specifying activities to be completed by the proponent and activities to be completed by DBCA (including the ongoing funding arrangement for the proponent).
MS-1187: 10-2	Offsets	(5) if any land is to be ceded to the Crown for the purpose of 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 the first twenty (20) years after completion of purchase, and (c) an appropriate management body for the ceded land. 	Prepare and submit the Offset Strategy to the CEO.		Overall		Compliant	During the reporting period, the Quadripartite Agreement was drafted between the 4 parties with finalisation expected in H1, 2025. This will then enable the Land Purchase Agreement (and land transfer) to occur in late H1, 2025. Additionally, the contents and allocation of activities between the proponent and DBCA will also be set out in the 20-year Management Agreement, with drafting of this document now commenced.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1187: 10-2	Offsets	(6) identify any threats to offset values and provide management and/or rehabilitation actions to be undertaken to address the threats including: (a) the objectives and targets to be achieved, including completion criteria; (b) management and/or rehabilitation actions and a timeframe for the actions to be undertaken; (c) funding arrangements and timing of funding for conservation activities; and (d) monitoring requirements for activities.	Prepare and submit the Offset Strategy to the CEO.		Overall		Compliant	Section 8.3 of the Offset Strategy identifies management actions. Threats and response mechanisms are defined in Section 9, objectives, targets and completion criteria are defined in Section 10 of the Offset Strategy and monitoring requirements are defined in Section 11.
MS-1187: 10-2	Offsets	(7) define the role of the proponent and/or any third parties.	Prepare and submit the Offset Strategy to the CEO.		Overall		Compliant	Roles and responsibilities are defined in Section 13 of the Offsets Strategy.
MS-1187: M10-3	Offsets	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: 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.	Prepare and submit the Offset Strategy to the CEO.	<ul style="list-style-type: none"> CEO approval. CAR. 	Overall	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.	Not required at this stage	The Offset Strategy is yet to be approved (see above).
MS-1187: M10-4	Offsets	The proponent shall review and revise the Offset Strategy as and when directed by the CEO.	Revise and submit the offset strategy as and when required by the CEO.	Revised Offset strategy submitted.	Overall	As required.	Not required at this stage	No formal request received from CEO to update Offset Strategy; however, the Offset Strategy has been updated following approval of MS 1187 and Revision 2 has been resubmitted for approval.
MS-1187: 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.	Implement the latest approved offset strategy.	CAR	Overall	As defined in the offset strategy.	Not required at this stage	Revised version of the Offset Strategy due for submission in H1, 2025. Offset Strategy yet to be implemented. As per condition 10-3.

Table 3-2: Environmental Management Plans Objective’s Status

EMP	Subject	Key Objectives	Target	Status	Comments
FVMMP	Orchids	Avoid indirect impact to known threatened orchid species.	No reportable decline of nearby Endangered/ Declared Rare Flora (DRF) <i>Drakaea elastica</i> individuals or habitat, attributable to the Project.	Compliant	A Spring 2025 vegetation survey was undertaken on 15 August 2024. The survey report (Ecoedge, 2025) reported that no <i>Drakaea elastica</i> (or any other threatened flora) were seen to be emerging or flowering. No <i>Drakaea elastica</i> have been found since 2018, and the report concluded that the ‘potential habitat [was] intact and therefore no known indirect impact to the known threatened orchid species in this area.
FVMMP	TEC/PEC	Avoid indirect impact to vegetation and flora (Banksia Woodland TEC / Low lying Banksia attenuata woodlands or shrublands PEC) outside of the Development Envelope.	No reportable decline to adjacent areas representative of the Banksia Woodlands of the Swan Coastal Plain TEC/ Low lying Banksia attenuata woodlands or shrublands PEC, attributable to the Project. No incidents of fire originating within, and spreading outside of, the Development Envelope.	Compliant	The Spring 2024 monitoring report for the Banksia Woodland TEC monitoring undertaken in August 2024 (Ecoedge, 2025) specified that the evidence indicates that the Banksia woodland is not in decline. There were no incidents of fire originating within and spreading outside the Development Envelope.
FVMMP	Clearing	Avoid clearing or removal of vegetation and flora (Banksia Woodland TEC / Low lying Banksia attenuata woodlands or shrublands PEC) outside of the Development Envelope.	No incidents of vegetation clearing outside of the approved Development Envelope.	Compliant	No clearing undertaken during the reporting period. No further clearing anticipated.

FVMMP	Weeds	Prevent introduction and/or spread of weeds into adjacent areas.	No new Declared Weeds or Weeds of National Significance within surrounding vegetation, attributable to the Project.	Compliant	<p>Quarterly weed surveys are undertaken and have identified no discernible changes in weedy grass or herb densities and new weed species.</p> <p>During 2024, the quarterly weed surveys identified some isolated declared weed species; including, one patch of <i>Gomphocarpus fruticosus</i> (narrow leaf cotton bush) and one bridal creeper in the winter and spring surveys; however, the survey reports stated that no WoNS or declared pests were attributable to the Project.</p> <p>The 2024 Spring survey (Ecoedge, 2025) identified a statistically significant increase in weed species and weed cover at Transect 3 (adjacent to the Project Area) but concluded that the significant increase can be ascribed to a substantial increase in rainfall between 2018 and 2024 rather than an impact of the Project.</p>
FVMMP	Dieback	Prevent introduction and/or spread of Dieback into adjacent areas.	No evidence of new Dieback infestation identified within immediately adjacent areas/vegetation resulting from the Project.	Compliant	<p>A phytophthora dieback survey was undertaken in November 2024 within a 25m corridor surrounding the perimeter fence. The survey report (Glevan Consulting, 2024) identified no infestations of <i>Phytophthora cinnamomi</i>.</p> <p>All ground engaging equipment coming to site must be cleaned prior to arrival and is required to undergo a weed and seed assessment. Sighted records indicated this process was well implemented.</p>
Water MP	Water	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.	To not exceed trigger values for process related analytes.	Compliant	<p>Quarterly groundwater and monthly surface water monitoring reports during the reporting period concluded that concentrations of process related analytes are consistent with historical levels, are not considered to be related to construction or operational activities and are attributed to background levels.</p>

GHG MP	GHG emissions	Avoid, where possible, and minimise greenhouse gas emissions as far as practicable.	The minimisation of scope 1 and scope 2 emissions arising from the construction phase and operation of the facility.	In Progress	<p>Albemarle has made a commitment to protect the environment through the continuous improvement of energy performance. Albemarle implements an organisation-wide energy management approach.</p> <p>It is noted that Albemarle received a letter from DWER/EPA Services on 26 November 2024 specifying that the Minister for Environment has requested the EPA to inquire into, and report on the matter of changing the implementation conditions relating to the Albemarle Kemerton Plant, pursuant to section 46(1) of the Environmental Protection Act 1986 (EP Act).</p> <p>On completing its inquiry and in accordance with section 46(6) of the EP Act, the EPA will prepare and give to the Minister a report that includes a recommendation on whether or not the conditions to which the inquiry relates, or any of them, should be changed, and any other recommendations that it thinks appropriate. The EPA's inquiry into GHG conditions is expected to take 3-6 months.</p>
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4 REFERENCES

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- Greenbase. (2024). *Kemerton Lithium Plant Greenhouse Gas Summary Report*. Perth: Unpublished report for Albemarle.
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- Preston Consulting. (2021). *Albemarle Kemerton Plant Greenhouse Gas Management Plan (doc. No. ALB-KEM-EMP-01)*. Unpublished report prepared for Albemarle Lithium.
- Wood. (2018a). *Albemarle Kemerton Plant. Flora and Vegetation Monitoring and 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)*. Perth.

APPENDICES

Appendix A: Post Assessment Form for Statement of Compliance

Appendix B: Documentary Evidence (Electronic)

Click on the link below to access evidence and supporting documentation for the Albemarle Kemerton Lithium Plant 2024 CAR.

[2024 CAR Documentary Evidence](#)

https://albemarle01.sharepoint.com/:f:/r/sites/Kemerton.Teams2/Environmental/04%20EMS%20Performance%20Evaluation/04.2%20Reporting/EPA_CAR/02%20Supporting%20Documents/2024%20CAR%20Documentary%20Evidence?csf=1&web=1&e=ydhYgJ

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: 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: 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 non-compliance and has not yet finalised its investigations to determine whether non-compliance 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.	The term 'In process' must only be used for the purpose stated in the definition column. '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).

