



# 2023 – 2024 Annual Compliance Report – EPBC 2017/8099

26 October 2023 to 31 December 2024

Albemarle Lithium Hydroxide Manufacturing Plant, Kemerton WA

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Document No.:

**7421-0000-DV00-RPT-0217**

Rev.	Date	Status	Prepared By	Reviewed By	Operations Approval	Ext Affairs Approval
0	05-Mar-25	Final	N. Croston	B. Bell	D. Coulson	T. Baddeley
Signature						

## DECLARATION OF ACCURACY

In making this declaration, I am aware that sections 490 and 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

<b>Signed:</b>	
<b>Full name (please print):</b>	Tommas Michael Bernard Budgeley
<b>Position (please print):</b>	Head of External Affairs
<b>Organisation (please print including ABN/ACN if applicable):</b>	Albemarle Lithium Pty Ltd. ACN 618 095 471
<b>Date:</b>	13.03.25

## EXECUTIVE SUMMARY

This Annual Compliance Report (**ACR**) has been prepared by KASA Consulting on behalf of Albemarle Lithium Pty Ltd (ACN 618 095 471) (**Albemarle**). The purpose of this ACR is to satisfy the requirements of Condition 10 of *Environmental Protection and Biodiversity Conservation Act 1999* (**EPBC Act**) approval (**EPBC 2017/8099**) for the Albemarle Lithium Hydroxide Manufacturing Plant Project (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.

During the reporting period, Albemarle continued commissioning Trains 1 and 2 and construction of Trains 3 and 4 of the Kemerton Lithium Plant; however, in August 2024, Albemarle made a market-driven decision to cease construction activities on Trains 3 and 4 and to place Train 2 into care and maintenance, leaving only Train 1 operational. As of 31 December 2024, Albemarle had commenced operation of Train 1 and was undertaking planning to make safe and clear inventory from Train 2 to place it into care and maintenance.

Following an approved change to the reporting period for the Compliance Assessment Reports (**CARs**) for Ministerial Statements MS-1085 and MS-1187, the Department of Climate Change, Energy, Environment and Water (**DCCEEW**) approved a change (in December 2024) to align State and Commonwealth reporting periods with the calendar year. As this ACR is the first to be aligned with the CAR reporting period, it covers an extended period from 26 October 2023 to 31 December 2024. It is also noted that a request to amend approval EPBC 2017/8099 to reflect the changes associated with MS-1187 (approved on 15 March 2022) was still ongoing (under this approval, Conditions 9 and 10 of MS-1085 were replaced by Conditions 9 and 10 of MS-1187).

A review of Project compliance against the conditions of EPBC 2017/8099 identified that no conditions were non-compliant, and no notifiable incidents occurred 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.

Annual monitoring of the Banksia Woodland threatened ecological community (**TEC**) was undertaken in November 2023 to compare the vegetation condition, species richness, and density at permanently established transects. The survey identified vegetation to be in very good condition, with no material change evident compared to previous surveys (2018 – 2022). Species richness and species density in the 2023 survey was equal to or greater than in previous years. A 2024 spring survey had also been conducted; however, at the time of writing the consultant's report had not been received. The findings of this report will be included in the 2025 ACR.

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

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## GLOSSARY

Term	Definition
ACN	Australian Company Number
ACR	Annual Compliance Report
CAR	Compliance Assessment Report
DBCA	Department of Biodiversity, Conservation and Attractions (WA)
DCCEEW	Department of Climate Change, Energy, Environment and Water (Cth)
DMIRS	Department of Energy, Mines, Industry Regulation and Safety (WA)
DoEE	Department of the Environment and Energy (now DCCEEW)
DRF	Declared Rare Flora
DWER	Department of Water and Environmental Regulation (WA)
EMP	Environmental Management Plan
EP Act	<i>Environmental Protection Act 1986</i> (WA)
EPA	Environmental Protection Authority (WA)
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth)
FVMMP	Flora and Vegetation Management and Monitoring Plan
ha	Hectare
KSIA	Kemerton Strategic Industrial Area
LiOH	Lithium Hydroxide
MS-1085	Ministerial Statement 1085
MS-1187	Ministerial Statement 1187
NPI	Non-Process Infrastructure
OEMP	Operational Environmental Management Plan
PMP	Photographic Monitoring Point
SWIS	South West Interconnected System
TEC	Threatened Ecological Community
The Project	Albemarle Lithium Hydroxide Manufacturing Plant Project
WMP	Water Management Plan
WoNS	Weed of National Significance

## 1 DESCRIPTION OF ACTIVITIES

### 1.1 Project Description

The Project refers to the construction and operation of a lithium manufacturing plant and associated infrastructure, within the KSIA (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, noting that only Train 1 is currently operational. The process trains operate using a combination of pyrometallurgical and hydrometallurgical operations, to produce up to a total of 100,000 tonnes of lithium hydroxide monohydrate product and up to 200,000 tonnes of sodium sulphate anhydrous by-product per year. Other by-products are produced in smaller quantities. Up to 1.1 million tonnes of tailings is also generated per year, assuming all five process trains are operational.

As of 31 December 2024, Albemarle had commenced operation of Train 1 and was undertaking planning to make safe and clear inventory from Train 2 to place it into care and maintenance.

The lithium hydroxide monohydrate product is transported 155 km by road to the Port of Fremantle for export. Sodium sulphate anhydrous by-product is also transported by road to either Fremantle or Bunbury for export. Tailings is currently sold and reused as a construction material where possible, with excess volume transported by road to an approved facility for disposal, which is outside the scope of this report.

### 1.2 Purpose of Report

This ACR has been prepared to meet the requirements imposed on the Project by the Federal Minister for Environment and Water, through EPBC 2017/8099.

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:*

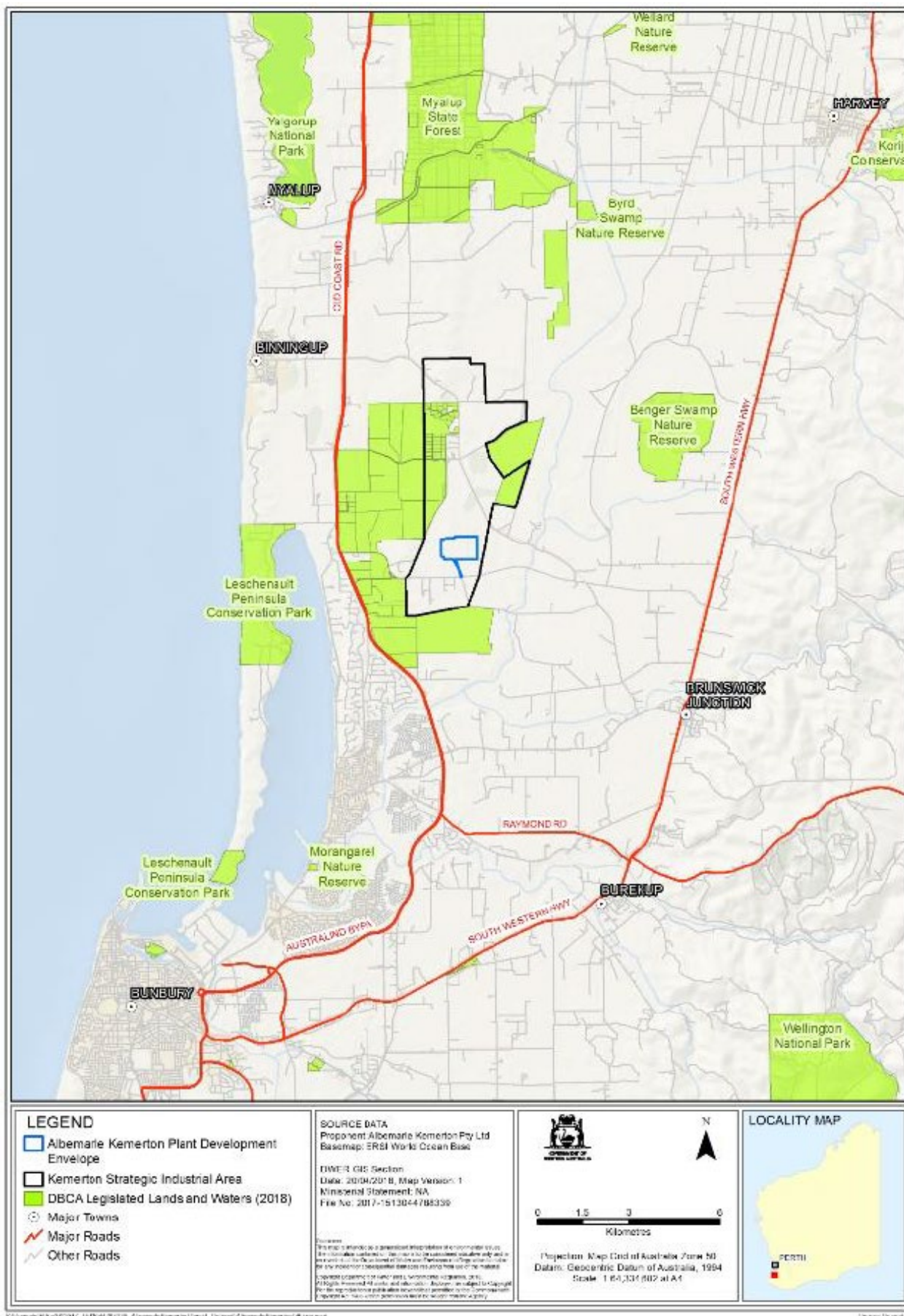
- a.) publish each compliance report on the website within 60 business days following the relevant 12 month period;*
- b.) notify the Department by email that a compliance report has been published on the website within five business days of the date of publication;*
- c.) keep all compliance reports 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 ACR provides the status of the Project’s compliance against all audit elements prescribed under EPBC 2017/8099, as well as an assessment of how implementation of EMPs has met defined environmental objectives during the reporting period 26 October 2023 through 31 December 2024.

### **1.3 Report Structure**

This ACR has been prepared in accordance with the DCCEEW Annual Compliance Report Guidelines, 2023 (DCCEEW, 2023).

Figure 1-1: Project Site Regional Location





## 2 SUMMARY OF PROPOSAL’S IMPLEMENTATION STATUS

### 2.1 Project Milestones

The Project was environmentally assessed and approved by the Department of the Environment and Energy (DoEE; now DCCEE) under sections 130(1) and 133(1) of the EPBC Act, and under Part IV of the Western Australian *Environmental Protection Act 1986 (EP Act)* by the Environmental Protection Authority (EPA). A summary of Environmental approvals issued is provided in Table 2-1 below.

**Table 2-1: Summary of Key Environmental Approvals History**

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

Albemarle is consulting with DCCEEW regarding an update to EPBC 2017/8099. A comparison table of current EPBC 2018/8099 has been prepared and comments provided by Albemarle in email dated 22 November 2023 (to –DCCEEW EIA Officer). As of 31 December 2024, the amendment was still in process to correctly capture the MS1187 changes, with the change to reporting period having been addressed in writing from DCCEEW during 2024.

### 2.1.1 Notice of Substantial Commencement

Construction commenced on 2 January 2019 and DoEE (now DCCEEW) were provided with notice of substantial commencement by email on 10 January 2019 and acknowledged receipt via letter (DoEE ref. 2017/8099).

## 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 comprises two lithium hydroxide conversion trains (one in care and maintenance) that incorporate the following main process areas:

- Spodumene delivery and stockpiling.
- Calcinating, acidifying and storage of acidified ore area.
- Leaching, purification, filtration and tailings collection area.
- Reagents delivery and storage area.
- Causticizing, 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.

## 2.3 Project Issues

In October 2023, the amended joint venture agreement between Albemarle and Mineral Resources was approved and now Albemarle has 100% ownership of the Kemerton Lithium Plant.

During the reporting period, Albemarle continued commissioning Trains 1 and 2 and construction of Trains 3 and 4 of the Kemerton Lithium Plant; however, in August 2024 Albemarle made a market-driven decision to cease construction activities on Trains 3 and 4 and to place Train 2 into care and maintenance. As of 31 December 2024, Albemarle had commenced operation of Train 1 and was undertaking planning to make safe and clear inventory from Train 2 to place it into care and maintenance.

During the reporting period, Albemarle shifted sending tailings from the Kemerton Lithium Plant to the Koolyanobbing iron ore mine for in-pit backfill, to instead disposing of the material at Sandy Ridge. Albemarle is actively pursuing potential use opportunities in accordance with Condition 8-1 of MS-1085 and has provided

material to several construction projects, including the Bunbury by-pass and Armadale train line. Excess volumes of tailings are currently disposed of at the Sandy Ridge waste disposal facility.

### 3 STATEMENT OF COMPLIANCE

Table 3-1 presents the compliance status of applicable Approval Conditions prescribed in EPBC 2017/8099. Refer to Table 3-2 for the Statement of Compliance for MS-1085 and MS-1187 Conditions referred to in the EPBC approval.

No non-compliances with EPBC 2017/8099 were identified during the current reporting period.

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 may still be considered to have been complied with, if sufficient evidence exists to demonstrate:

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

#### 3.1 Designations to Record Compliance

For the purposes of this ACR, compliance classifications were in accordance with DCCEEW's Annual Compliance Report Guidelines (2023). The following designations have been used to record findings:

- **Compliant:** 'Compliance' is achieved when all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions.
- **Non-compliant:** A designation of 'non-compliant' must be given where the requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met.
- **Not applicable:** A designation of 'not applicable' must be given where the requirements of a condition or elements of a condition fall outside of the scope of the current reporting period. For example, a condition that applies to an activity that has not yet commenced.

#### 3.2 Environmental Management Plans

Condition 2 of EPBC 2017/8099 requires that Albemarle complies with the following EMPs:

- Flora and Vegetation Management and Monitoring Plan (**FVMMP**).
- Water Management Plan (**WMP**).

As of 31 December 2024, the following versions of these management plans were approved.

- FVMMP Plan Rev. 1; 30 November 2018 (GHD, 2018a).
- WMP Rev. 1, 4 December 2018 (Wood, 2018d).

This ACR 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 Albemarle EMPs are listed in Table 3-3 below.

### 3.3 New Environmental Risks

Kemerton Lithium Plant conducts regular reviews of environmental risks and updates the facility environmental risk register as required. No new material environmental risks were identified during the reporting period. The anticipated environmental emissions from the facility will be substantially less in the medium term due to operations being limited to a single train.

### 3.4 Corrective Actions

No corrective actions have been identified under this ACR.

### 3.5 Approval Conditions and Compliance Table

Table 3-1: Audit Findings – EPBC Approval 2017/8099 – Conditions

Cond. No.	Area	Condition	Evidence / Comments	Status
1	Vegetation	For the protection of the protected matters, the approval holder must not clear more than 54.31 hectares of native vegetation and 33.39 ha of pine plantation within the project area.	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 (email: Post Clearing Survey 11/06/2019).	Compliant
2	Vegetation	To mitigate the impacts of the action to the protected matters, the approval holder must comply with and implement conditions 6-1 to 6-6 and 7-1 to 7-6 of Ministerial Statement 1085.	See findings for conditions 6-1 to 6-6 and 7-1 to 7-6 of MS-1085 in Table 3-2 below.	Compliant
3	Offsets	To offset the impacts of the action to the protected matters, the approval holder must:		
3a	Offsets	Implement conditions 10-1 to 10-5 of Ministerial Statement 1085	Conditions 10-1 to 10-5 of MS-1085 have been superseded by Conditions 10-1 to 10-5 of MS-1187. Albemarle is consulting with DCCEEW regarding an update to EPBC 2017/8099 to reflect these changes. A comparison table of current EPBC 2018/8099 has been prepared and comments provided by Albemarle in email dated 22 Nov 2023 (to DCCEEW - EIA Officer). As of 31 December 2024 the amendment was still in process. Status of implementation of Ministerial Conditions 10-1 to 10-5 is detailed in Table 3-2 below.	Compliant
3b	Offsets	Within 20 business days of finalising the Offset Strategy required by conditions 10-1 to 10-5 of Ministerial Statement 1085, provide the Department with the offset attributes and a shapefile for the offset area required by condition 3a.	An Albemarle Kemerton Plant Offset Strategy (ref. ALB-KEM-PLA-01) and appendices 1-3 was originally submitted to the Department of Water and Environmental Regulation ( <b>DWER</b> ) 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 the Department of Biodiversity, Conservation and Attractions ( <b>DBCA</b> ) on 15 July 2020, with a further update (Rev 2. 23 May 2023) addressing regulator comments submitted on 31 May 2023. The Offset Strategy is yet to be finalised as consultation between Albemarle and relevant regulatory authorities is still ongoing.	Not Applicable
3c	Offsets	Within 20 business days of securing the offset area under a protection mechanism, as required by condition 10-2(4) of Ministerial Statement 1085, provide the Department with the final offset attributes and a final shapefile for the secured offset area.	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: <ul style="list-style-type: none"> <li>• A <b>Tripartite Agreement</b> between the Western Australia Land Authority (trading as DevelopmentWA – the current freehold landholder), DBCA and Albemarle to enable valuation and the purchase of the land from DevelopmentWA and its vesting to the State of Western Australia (managed via DBCA).</li> <li>• A <b>Land Purchase Agreement</b> (funded by Albemarle) enabling the legal land transfer; and</li> <li>• A <b>20-year Management Agreement</b> specifying activities to be completed by the proponent and activities to be completed by DBCA (including the ongoing funding arrangement for the proponent).</li> </ul> During the reporting period, the Tripartite Agreement was drafted between the three 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 were also agreed with drafting of the 20-year Management Agreement now commenced.	Not Applicable

Cond. No.	Area	Condition	Evidence / Comments	Status
4	Reporting	The approval holder must:		
4a	Reporting	Notify the Department in writing of any proposed changes to the conditions of the Ministerial Statement 1085 no later than 2 business days after the approval holder: i.) proposes such a change in writing; or ii.) becomes aware of a proposal for such a change.	A s46 application was submitted to EPA Services, dated 26 October 2019, to revise Condition 10-1 and Condition 10-2 (1) of MS-1085 and reflect the changes presented in the Section 45c application. Letter sent to DoEE dated 28 October 2019 notifying them of the proposed change.  Following assessment of s46 application, MS-1187 issued on 15 March 2022, amending conditions 9 and 10 of MS-1085.  A letter was sent to Minister Plibersek c/- DCCEEW on 9 October 2023 requesting a change to reporting period from 26 Oct - 25 Oct annually to 1 Jan - 31 Dec annually. DCCEEW approved a change to the reporting period on 9 December 2024 to align the EPBC reporting period with State approvals and the calendar year (letter from Branch Head Post Approvals Branch, DCCEEW ref. 2017-8099-20170302 - Letter of Approval).  The above change was approved without having to vary EPBC 2017/8099 conditions. The requested amendment to capture changes associated with the update of MS1187 was still in progress as of 31 December 2024.	Compliant
4b	Reporting	Publish each management plan/offset strategy provided for under conditions 2 and 3 on the approval holder's website within 20 business days of the date the management plan / offset strategy is approved by the Western Australian Government.	The approved Flora and Vegetation Management and Monitoring Plan ( <b>FVMMP</b> ) (Wood 2018a) and Water Management Plan (Wood 2018b) are available on the Albemarle website.  An update of the original FVMMP had been submitted to DWER in December 2024 and Albemarle were waiting feedback on the acceptability of the plan as at the end of the reporting period. Approval of the updated plan has been granted on 15 January 2025 and the plan published on the website on 23 January 2025.  An update of the Water Management Plan was in progress as of 31 December 2024.  Letter from DBCA dated 19 August 2020 acknowledges receipt of Offset Strategy; however, as of 31 December 2024, Albemarle were still awaiting a decision on the acceptability of the updated Strategy.	Compliant
4c	Reporting	Keep management plans and offset strategy published on the approval holder's website until at least the end date of this approval.	Current approved plans were available on the Albemarle Kemerton website (available here: <a href="https://www.albemarle.com/au/en/australia-regulatory-index">https://www.albemarle.com/au/en/australia-regulatory-index</a> ).	Compliant
4d	Reporting	Exclude or redact sensitive ecological data from management plans/offset strategy published on the website or provided to a member of the public.	Ecological data in management plans not considered sensitive.	Not Applicable
5	Reporting	The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.	Letter from DOEE (now DCCEEW) dated January 2019 (reference 2017/8099) acknowledging email notification (10 January 2019) from Albemarle of commencement of action on 2 January 2019.	Compliant
6	Stakeholder	If the commencement of the action does not occur within 5 years from the date of this approval, then the approval holder must not commence the action without the prior written agreement of the Minister.	Action commenced within the 5 years therefore condition not applicable.	Not Applicable
7	Records	The approval holder must maintain accurate and complete compliance records.	At the time of the audit, sampled records were readily available, well maintained and accurate.	Compliant
8	Records	If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request.	No formal written request for records sighted; however, compliance records provided with submission of each CAR to state regulators (DWER).	Not applicable
9	Records	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under conditions of this approval, is prepared in accordance with the Department's Guidelines for biological survey and mapped data (2018) and submitted electronically to the Department within three months of the submission of the compliance report.	Monitoring data associated with Annual Compliance Reports was prepared in accordance with the guidelines (Department of Environment and Energy, 2018) and is provided via an electronic link in the report appendices. Reports are published on the Kemerton page of the Albemarle website.  Monitoring data associated with the 2022-23 Annual Compliance Report submitted to DCCEEW via email (Albemarle Environment Manager to EPBC Monitoring) on 19 April 2024.	Compliant
10	Reporting	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;	Following commencement of the Project in January 2019, Albemarle prepared a single CAR for state and federal approvals; however, following submission of the second report in January 2021, DAWE (now DCCEEW) requested a standalone ACR aligned with the updated (2023) Commonwealth reporting guidelines for the EPBC approval. This was prepared and a non-compliance was initially raised against Condition 10 in the 2021 report; however, DAWE specified that no action would be taken regarding the non-compliance following submission of the ACR in May 2021; therefore this condition has subsequently been listed as compliant.	Compliant

Cond. No.	Area	Condition	Evidence / Comments	Status
		<ul style="list-style-type: none"> <li>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;</li> <li>c) keep all compliance reports publicly available on the website until this approval expires;</li> <li>d) exclude or redact sensitive ecological data from compliance reports published on the website; and</li> <li>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.</li> </ul>	<p>The original combined 2020 report, along with the subsequent three ACRs are available on the Albemarle website. Email sighted from Albemarle Environmental Manager to EPBC Monitoring dated 22 Jan 2024, informing DCCEEW that the 2022-23 Annual Compliance Report (ACR) (P-74211-0000-BA00-RPT-0281) was published on the Albemarle website on 19 January 2024.</p> <p>No ecological data considered sensitive.</p>	
11	Reporting	<p>The approval holder must notify the Department in writing of any: incident; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than two business days after becoming aware of the incident or non-compliance. The notification must specify:</p> <ul style="list-style-type: none"> <li>a) the condition which is or may be in breach; and</li> <li>b) a short description of the incident and/or non-compliance.</li> </ul>	No notifiable incidents occurred during the reporting period.	Not applicable
12	Reporting	<p>The approval holder must provide to the Department the details of any incident or noncompliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying:</p> <ul style="list-style-type: none"> <li>a) any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future;</li> <li>b) the potential impacts of the incident or non-compliance; and</li> <li>c) the method and timing of any remedial action that will be undertaken by the approval holder.</li> </ul>	No notifiable incidents or non-compliances with conditions or commitments recorded to date.	Not applicable
13	Auditing	The approval holder must ensure that independent audits of compliance with the conditions are conducted as requested in writing by the Minister.	No audits yet requested by the Minister; however, quarterly internal compliance audits are conducted by KASA Consulting.	Not applicable
14	Auditing	<p>For each independent audit, the approval holder must:</p> <ul style="list-style-type: none"> <li>a) provide the name and qualifications of the independent auditor and the draft audit criteria to the Department;</li> <li>b) only commence the independent audit once the audit criteria have been approved in writing by the Department; and</li> <li>c) submit an audit report to the Department within the timeframe specified in the approved audit criteria.</li> </ul>	No audits yet requested by the Minister.	Not applicable
15	Auditing	The approval holder must publish the audit report on the website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on the website until the end date of this approval.	No audits yet requested by the Minister.	Not applicable
16	Reporting	<p>Within 30 days after the completion of the action, the approval holder must notify the Department in writing and provide completion data.</p> <p>NOTE: Completion data means an environmental report and spatial data information clearly detailing how the conditions of this approval have been met. The Department's preferred spatial data format is shapefile.</p>	The action is not yet complete.	Not applicable



Table 3-2: Audit Findings – EPBC Approval 2017/8099 – MS-1085 Conditions

Condition No.	Area	Condition	Evidence / Comments	Status
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.	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 TEC has been undertaken annually since the start of the project to compare the vegetation condition, species richness and species density at permanently established transects and Photographic Monitoring Points (PMPs).	Compliant
MS1085: 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: <ol style="list-style-type: none"> <li>when implemented, substantiate and ensure that condition 6-1 is being met;</li> <li>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;</li> <li>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;</li> <li>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</li> <li>specify management or contingency actions to be implemented in the event that the criteria identified required by condition 6-2(4) have been triggered.</li> </ol>	FVMMP Plan Rev. 1; 30 November 2018 (GHD, 2018a) sighted (available on Albemarle website). Letter acknowledging receipt and satisfaction with the plan received from Executive Director of DWER on 3 Dec 2018 (ref. DWERA-001672).	Compliant
MS1085: 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"> <li>report such findings to the CEO within 21 days of the criteria being triggered;</li> <li>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</li> <li>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.</li> </ol>	No criteria had been triggered. Banksia woodland TEC monitoring was undertaken in August 2024; however, the report had not been provided by the consultant at the time of writing this ACR. 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: <ol style="list-style-type: none"> <li>No reportable decline of nearby Endangered/Declared Rare Flora (DRF) <i>Drakaea elastica</i> individuals or habitat, attributable to the Project.</li> <li>No reportable decline to adjacent areas representative of the Banksia Woodlands of the Swan Coastal Plain TEC/ PEC, attributable to the Project.</li> <li>No incidents of fire originating within, and spreading outside of, the Development Envelope.</li> <li>No incidents of vegetation clearing outside of the approved Development Envelope.</li> </ol>	Not applicable
MS1085: M6-4	Flora and vegetation	The proponent may review and revise the FVMMP.	The FVMMP (Rev 3) had been updated to address regulator comments and was submitted to DWER on 24 December 2024.	Compliant
MS1085: M6-5	Flora and vegetation	The proponent shall review and revise the FVMMP as and when directed by the CEO.	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.	Not applicable
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.	The CEO confirmed the FVMMP (Rev 1) satisfied the requirements of condition 6-2 in a letter dated 3 December 2018 (ref. DWERA-001672). The FVMMP has been implemented (see Table 3.3 of this report for specific findings). The latest submitted version of the FVMMP (Rev 3) was not yet approved, as of the end of this current reporting period, 31 December 2024.	Compliant

Condition No.	Area	Condition	Evidence / Comments	Status
MS1085: 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"> <li>maintains the quality and quantity of off-site surface and groundwater, to the receiving environment including but not limited to the Threatened Orchid habitat.</li> </ul>	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).	Compliant
MS1085: M7-2	Water Management Plan	Prior to ground-disturbing activities or as otherwise agreed by the CEO, the proponent shall prepare and submit a WMP to the CEO, on the advice of the Department of Water and Environmental Regulation. The Plan shall: <ol style="list-style-type: none"> <li>when implemented, substantiate and ensure that condition 7-1 is being met;</li> <li>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;</li> <li>detail the proposed frequency, timing and indicative locations of groundwater and surface water monitoring for potential contamination;</li> <li>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; and</li> <li>specify management or contingency actions to be implemented in the event that the criteria identified required by condition 7-2(4) have been triggered.</li> </ol>	WMP Rev. 1, 4 December 2018. (Doc. No. 606541-4500-DV00-PLN-0004) (Wood, 2018d). Correspondence from DWER (ref DWERA-001671) specified the submitted WMP was considered to have met the requirements of condition 7 of MS-1085.	Compliant
MS1085: M7-3	Water Management Plan	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"> <li>report such findings to the CEO within 21 days of the criteria being triggered;</li> <li>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</li> <li>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.</li> </ol>	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 not considered to be related to construction or operational activities and are attributed to background levels.	Not applicable
MS1085: M7-4	Water Management Plan	The proponent may review and revise the WMP.	A revised WMP with proposed trigger levels was submitted to DWER on 17 January 2022. Response from DWER received 15 June 2022 with requirement for amendments. As of 31 December 2024 a further update of the WMP to address DWER comments was in progress.	Compliant
MS1085: M7-5	Water Management Plan	The proponent shall review and revise the WMP as and when directed by the CEO.	The CEO has not 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.	Not applicable
MS1085: M7-6	Water Management Plan	The proponent shall implement the latest version of the WMP, which the CEO has confirmed by notice in writing, satisfies the requirements of condition 7-2.	The current approved WMP is Rev.1, 4 December 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.	Compliant

Condition No.	Area	Condition	Evidence / Comments	Status
MS1187: 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.	Albemarle are progressing an offset. An offset area has been agreed and consultations to secure the offset area under a protection mechanism are ongoing (see comments for 10-2 below).	Compliant
MS1187: 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"> <li>4. identify an initially unprotected area or areas to be protected and managed for conservation that contains the PEC and foraging habitat values identified in condition 10-1;</li> <li>5. 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;</li> <li>6. identify the environmental values of the offset area(s);</li> <li>7. 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;</li> <li>8. 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"> <li>a) the quantum of, and provide funds for, the upfront works associated with establishing the conservation area;</li> <li>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</li> <li>c) an appropriate management body for the ceded land.</li> </ol> </li> <li>9. 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"> <li>a) the objectives and targets to be achieved, including completion criteria;</li> <li>b) management and/or rehabilitation actions and a timeframe for the actions to be undertaken;</li> <li>c) funding arrangements and timing of funding for conservation activities; and</li> <li>d) monitoring requirements for activities.</li> </ol> </li> <li>10. define the role of the proponent and/or any third parties.</li> </ol>	<p>An Albemarle Kemerton Plant Offset Strategy (ref. ALB-KEM-PLA-01) (Preston Consulting, 2019) with appendices 1-3 was originally submitted to the 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 the 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 10.3 below). The approved, and subsequent revisions of the Offset Strategy address the requirements of Condition 10.2 as follows:</p> <ol style="list-style-type: none"> <li>1. Unprotected area identified, and Offset report <i>Lot 42 Wellesley Road North, Kemerton Offset Site Study Report</i> (June 2018) confirms area contains Priority Ecological Community (Floristic Community Type 21c 'Low lying <i>Banksia attenuata</i> woodlands and shrublands') and 45.73 ha of foraging habitat. This area has been accepted by all parties.</li> <li>2. Offset report <i>Lot 42 Wellesley Road North, Kemerton Offset Site Study Report</i> (June 2018) (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.</li> <li>3. Environmental values identified in Offset report <i>Lot 42 Wellesley Road North, Kemerton Offset Site Study Report</i> (June 2018). A summary of the environmental values is included in Section 5.2 of Rev 2 of the Offset Strategy.</li> <li>4. 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: <ul style="list-style-type: none"> <li>• A <b>Tripartite Agreement</b> between the Western Australia Land Authority (trading as DevelopmentWA – the current freehold landholder), DBCA and Albemarle Lithium to enable valuation and the purchase of the land from DevelopmentWA and its vesting to the State of Western Australia (managed via DBCA).</li> <li>• A <b>Land Purchase Agreement</b> (funded by Albemarle Lithium) enabling the legal land transfer; and</li> <li>• A 20-year <b>Management Agreement</b> specifying activities to be completed by the proponent and activities to be completed by DBCA (including the ongoing funding arrangement for the proponent).</li> </ul> </li> <li>5. During the reporting period, the Tripartite Agreement was drafted between the 3 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 were also agreed with drafting of the 20-year Management Agreement now commenced.</li> <li>6. 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.</li> <li>7. Roles and responsibilities are defined in Section 13 of the Offsets Strategy.</li> </ol>	Compliant

Condition No.	Area	Condition	Evidence / Comments	Status
MS1187: 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.	The Offset Strategy is yet to be approved (see above).	Not applicable
MS1187: M10-4	Offsets	The proponent shall review and revise the Offset Strategy as and when directed by the CEO.	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.	Not applicable
MS1187: 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.	The Offset Strategy has not yet been finalised / confirmed in writing as satisfying the requirements of condition 10-2.  Offset Strategy yet to be implemented.	Not applicable

**Table 3-3: 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	Year 5 annual vegetation survey undertaken in November 2023. The survey report (Ecoedge, 2023) 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	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.	No reportable decline to adjacent areas representative of the <i>Banksia</i> 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 <i>Banksia</i> Woodland TEC undertaken in November 2023 and 2024 compared the vegetation condition, species richness and species density at permanently established transects and PMPs. The survey report for the 2024 survey was not available at the time of report writing; however, the 2023 report (Ecoedge, 2023) identified no statistical differences ( $p > 0.5$ ) between species richness or species densities between the base survey in 2018 (GHD, 2018b) and subsequent annual surveys at any of the monitoring transects or control transects (GHD, 2019a), (GHD, 2020), (Onshore Environmental, 2021), (Onshore Environmental, 2022). 2024 results will be included in the 2025 ACR.
FVMMP	Clearing	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.	No incidents of vegetation clearing outside of the approved Development Envelope.	Compliant	No vegetation clearing activities occurred during the reporting period.

EMP	Subject	Key Objectives	Target	Status	Comments
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.  No significant increase in weed cover within immediately adjacent vegetation, attributable to the Project.	Compliant	Quarterly weed surveys are undertaken and have identified no discernible changes in weedy grass or herb densities and new weed species.  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.
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	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> .  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.
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	Quarterly groundwater and monthly surface water monitoring reports to date have concluded that the concentrations of process related analytes recorded are consistent with historical levels. Any changes in analytes are not considered to be related to construction or operational activities and are attributed to background levels.

## 4 REFERENCES

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