







## 2025 Annual Compliance Report – EPBC 2017/8099

1 January to 31 December 2025

Albemarle Lithium Hydroxide Manufacturing Plant, Kemerton WA

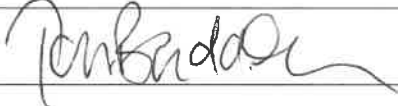
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0	04-Mar-26	Draft	N. Croston	D. Coulson	B. Bell	T. Baddeley
0	20-Mar-26	Final	N. Croston	D. Coulson	B. Bell	T. Baddeley
Signature						

## 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</b> (please print):	Tom Baddeley
<b>Position</b> (please print):	Head of External Affairs Australia
<b>Organisation</b> (please print including ABN/ACN if applicable):	Albemarle Lithium Pty Ltd. ACN 618 095 471
<b>Date:</b>	20 March 2026

## 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 (the **Project**). This ACR covers the period from 1 January to 31 December 2025.

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.

For the duration of the reporting period, of the two processing trains that had been built, Train 1 was operational and Train 2 was in care and maintenance (following the decision in August 2024).

It is noted that an amendment to the conditions of EPBC 2017/8099 was approved on 24 December 2025 to reflect the changes associated with the approval of MS-1187 (15 March 2022).

A review of Project compliance against the conditions of EPBC 2017/8099 identified that no notifiable incidents occurred during the reporting period.

Environmental Management Plans (EMPs) were being implemented as required and EMP objectives had been met.

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.

Monitoring of the Banksia Woodland threatened ecological community (TEC), undertaken in Spring 2025, identified that the Banksia Woodland remains generally very healthy, with approximately 70% of plots rated in Excellent vegetation condition and the remainder rated in Very Good condition. Species richness showed a consistent increasing trend across long-term transects when compared with earlier monitoring years (2018-2024). Between 2024 and 2025, total species counts increased significantly, with statistical modelling indicating an approximate 26% increase, driven primarily by recruitment in the lower native stratum. Increases in richness are considered most likely attributable to above-average rainfall.

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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, the Environment and Water (Cth)
D(E)MIRS	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 Monitoring and Management 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: Project Site).

The Project's approvals allow for the plant to process up to 1 million tonnes of spodumene ore concentrate sourced from the Talison Greenbushes Operation. The approval allows for ore concentrate to be processed within up to five lithium hydroxide product process trains, noting that only Train 1 is currently operational (Train 2 is built and was operating, but a decision was made to place it into care and maintenance in August 2024).

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 as well as up to 1.1 million tonnes of the co-product known as delithiated beta spodumene (**DBS**) (such numbers based on a 5 Train basis).

As of 1 January 2025, Albemarle was operating Train 1 and was undertaking activities to make safe and clear inventory from Train 2 to place it into care and maintenance, with these activities underway throughout the reporting period.

The lithium hydroxide monohydrate product is transported 155 km by road to the Port of Fremantle for export. Sodium sulphate anhydrous co-product is also 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).

Subsequent to the reporting period, on 12 February 2026, Albemarle announced it would be idling Train 1, placing the entire facility into care and maintenance.

### 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 1 January of every year.*

10a) *The approval holder must ensure each compliance report includes:*

*i. accurate and complete details of compliance and any non-compliance with the conditions and the **plans**, and any **incidents**.*

*ii. one or more **shapefile** showing all **clearing of protected matters**, and/or their habitat, undertaken within the 12-month period at the end of which that **compliance report** is prepared.*

*iii. a schedule of all **plans** in existence in relation to these conditions and accurate and complete details of how each **plan** is being implemented.*

*10b) The approval holder must ensure each **compliance report** is completed to the satisfaction of the **Minister** and is consistent with the Annual Compliance Report Guidelines, Commonwealth of Australia 2023.*

*10c) The approval holder must publish each **compliance report** on the **website** within 60 **business days** following the end of the 12-month period for which that **compliance report** is required.*

*10d) The approval holder must notify the **department** electronically, within 5 **business days** of the date of publication that a **compliance report** has been published on the **website**.*

*10e) The approval holder must provide the weblink for the **compliance report** in the notification to the **department**.*

*10f) The approval holder must keep all published **compliance reports** required by these conditions on the **website** until the expiry date of this approval.*

*10g) The approval holder must:*

*i. Exclude or redact **sensitive biodiversity data** from each **compliance report** and **shapefile** published on the **website** or otherwise provided to a member of the public.*

*ii. If **sensitive biodiversity data** is excluded or redacted from a version of a **compliance report** published or otherwise provided to a member of the public, submit the full **compliance report** to the **department** within 5 **business days** of its publication on the **website** and notify the **department** in writing what exclusions and redactions have been made in the version published on the **website** or otherwise provided to a member of the public.*

*iii. If **sensitive biodiversity data** is excluded or redacted from a version of a **shapefile** published or otherwise provided to a member of the public, submit the full **shapefile** to the **department** within 5 **business days** of its publication on the **website** and notify the **department** in writing what exclusions and redactions have been made in the version published on the **website** or otherwise provided to a member of the public.*

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 1 January through 31 December 2025.

### 1.3 Report Structure

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

Figure 1: Project Site inside the Kemerton Strategic Industrial Area (KSIA)



## 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 DCCEEW) 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).

During the reporting period (24 December 2025), the EPBC Act approval was updated for relevant amendments to ensure alignment with the amendments made to the EP Act approvals (MS 1085 and MS 1187).

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.	9 June 2023

Jurisdiction	Instrument	Description	Date
State	Works Approval Amendment W6154/2018/1	Works approval holder-initiated amendment to update legal address, change duration and sampling timeframes 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
State	Works Approval Amendment W6154/2018/1	Storage and blending of up to 80,000 tonnes of DBS and DBS-based product for an 18-month period.	26 February 2025
Federal	EPBC 2017/8099	Notification of variation to conditions attached to approval, Albemarle Lithium Hydroxide Manufacturing Plant, Kemerton, WA (EPBC 2017/8099).	24 December 2025

### 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.

Additionally, initial construction works of both Trains 3 and 4 commenced in 2023 (such as concrete footings), however the construction ceased in August 2024 as part of the decision to place Train 2 into care and maintenance. These initial construction works components remain on-site under care and maintenance.

### 2.3 Project Issues

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 2025, Albemarle was operating Train 1 and was clearing inventory from Train 2 to place it into care and maintenance.

Subsequent to the reporting period, on 12 February 2026, Albemarle announced it would be idling Train 1, placing the entire facility into care and maintenance.

Albemarle has explored various power supply options and is currently connected to the South West Interconnected System (SWIS). The Project has a current 29MW 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 Project could reach up to 58MW.

Albemarle is also actively pursuing potential co-product development opportunities - DBS has been sold for use as a construction material or cement-related component where possible, or sent to soil / fill recyclers, with excess volumes transported by road to 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.

In November 2025, the Department of Water and Environmental Regulation (**DWER**) advised of a potential retrospective non-compliance against Condition 10.2 of MS 1187 for the year 2023 because the revised Offset Strategy (Rev 2) was received by DWER on 31 May 2023, rather than within 12 months of MS 1187 being published (14 March 2023). As the revised Offset Strategy was received shortly after the required due date, DWER has indicated that no further action will be required and the matter will be closed. As at time of writing this annual compliance report, written confirmation of this determination from DWER is pending and because of this, it has not been included in Table 3-1, however any outcomes of this will be addressed in the next report.

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 implement conditions 6-1 to 6-6 and 7-1 to 7-6 of Ministerial Statement 1085 which requires Albermarle to implement the following EMPs:

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

As of 31 December 2025, the following versions of these management plans were approved.

- FVMMP Plan Rev. 3; 13 December 2024 (Preston Consulting, 2024).
- WMP Rev. 1, 4 December 2018 (Wood, 2018d).

*[It is noted that following extensive consultation with DWER an updated version of the WMP (Rev. Final01) was submitted on 29 October 2025; however, this is yet to be formally approved by DWER as at the end of the reporting period or at time of writing.]*

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 each of the above Albemarle EMPs is listed in Table 3-3 below.

### 3.3 New Environmental Risks

The project 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 and subsequently placed into care and maintenance as of the announcement made 12 February 2026.

### 3.4 Corrective Actions

No corrective actions are required 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	To avoid and mitigate <b>harm to protected matters</b> , the approval holder must not clear: <ol style="list-style-type: none"> <li>a. outside of the <b>project area</b></li> <li>b. more than 48.8 hectares of <b>native vegetation</b></li> <li>c. more than 33.39 ha of <b>pine plantation</b> within the <b>project area</b>.</li> </ol>	No clearing occurred during the reporting period. All clearing was completed historically as part of the initial construction phase. 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 <b>protected matters</b> , the approval holder must comply with and implement conditions 6-1 to 6-6 and 7-1 to 7-6 of <b>Ministerial Statement 1085</b> .	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 <b>protected matters</b> , the approval holder must:		
		a. implement conditions 10-1 to 10-5 of <b>Ministerial Statement 1187</b> .	Status of implementation of Conditions 10-1 to 10-5 of MS 1085 is detailed in Table 3-2 below. No non-compliances with implementation of conditions occurred during the reporting year.	Compliant
		b. within 20 <b>business days</b> of finalising the Offset Strategy required by conditions 10-1 to 10-5 of <b>Ministerial Statement 1187</b> , provide the <b>department</b> with the <b>offset attributes</b> and a <b>shapefile</b> for the offset area required by condition 3a.	In 2025, responses to DWER’s Requests for Information (RFIs) were provided and an updated Offset Strategy - the Offset Management Plan (Rev. 3, 29 October 2025) - was resubmitted via Environment Online on 30 October 2025. Upon receiving approval from the department, the Offset Strategy will be considered finalised and offset attributes and a shapefile for the offset area will be provided to the department within 20 business days. As of 31 December 2025, no correspondence has been received since submission except for the automated acknowledgement that it had been received.	Not Applicable
		c. within 20 <b>business days</b> of securing the offset area under a protection mechanism, as required by condition 10-2(4) of <b>Ministerial Statement 1187</b> , provide the <b>department</b> with the final <b>offset attributes</b> and a final <b>shapefile</b> for the secured offset area.	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 offset purposes would occur through funding from the proponent to acquire the land for vesting to the State of Western Australia, managed by the Department of Biodiversity, Conservation and Attractions (DBCA). A Tripartite Agreement has been drafted between the Western Australia Land Authority (trading as DevelopmentWA – the current freehold landholder), the DBCA for the State of Western Australia and Albemarle Lithium to enable the valuation and transfer of the land from DevelopmentWA to the DBCA. 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 well progressed and a draft Access Licence received for review.	Not Applicable
4	Reporting	The approval holder must:		
		a. notify the Department in writing of any proposed changes to the conditions of the <b>Ministerial Statement 1085</b> and <b>Ministerial Statement 1187</b> no later than 2 <b>business days</b> after the approval holder: <ol style="list-style-type: none"> <li>i.) proposes such a change in writing; or</li> <li>ii.) becomes aware of a proposal for such a change.</li> </ol>	There were no changes to MS 1085 or MS 1187 during the reporting period.	Not Applicable

Cond. No.	Area	Condition	Evidence / Comments	Status
		b. publish each management plan/offset strategy provided for under conditions 2 and 3 on the approval holder's <b>website</b> within 20 <b>business days</b> of the date the management plan / offset strategy is approved by the Western Australian Government.	The approved Flora and Vegetation Monitoring and Management Plan ( <b>FVMMP</b> ) (2025) and Water Management Plan (Wood 2018b) are available on the Albemarle website. An update of the original FVMMP was submitted to DWER in December 2024 and approval of the updated plan was granted on 15 January 2025. The updated plan was published on Albemarle's website on 23 January 2025. A revision of Water Management Plan (Final01) prepared by Ramboll was submitted via Environment Online on 29 October 2025. No correspondence regarding the acceptability of the plan has been received since submission, only the automated acknowledgement that it had been received. In 2025, responses to DWER's Requests for Information (RFIs) were provided and an updated Offset Strategy was renamed the Offset Management Plan (Rev. 3, 29 October 2025) and resubmitted via Environment Online on 30 October 2025. As of 31 December 2025, no correspondence has been received since submission except for the automated acknowledgement that it had been received. The updated Water Management Plan and Offset Management Plan will be uploaded to the Albemarle website within 20 business days of their approval.	Compliant
		c. keep management plans and offset strategy published on the approval holder's <b>website</b> until at least the end date of this approval.	Current approved plans were available on the Albemarle 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
		d. exclude or redact <b>sensitive ecological data</b> from management plans/offset strategy published on the <b>website</b> 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 <b>department</b> in writing of the date of <b>commencement of the action</b> within 10 <b>business days</b> after the <b>date of commencement of the action</b> .	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 <b>commencement of the action</b> does not occur within 5 years from the date of this approval, then the approval holder must not <b>commence the action</b> without the prior written agreement of the <b>Minister</b> .	Action commenced within the 5 years therefore condition not applicable.	Not Applicable
7	Records	The approval holder must maintain accurate and complete <b>compliance records</b> .	At the time of the audit, sampled records were readily available, well maintained and accurate.	Compliant
8	Records	If the <b>department</b> makes a request in writing, the approval holder must provide electronic copies of <b>compliance</b> records to the <b>department</b> within the timeframe specified in the request.	No written request for records has been made during the reporting year.	Not applicable
9	Records	The approval holder must ensure that any <b>monitoring data</b> (including <b>sensitive ecological data</b> ), surveys, maps, and other spatial and metadata required under conditions of this approval, is prepared in accordance with the <b>department's</b> Guidelines for biological survey and mapped data (2018) and submitted electronically to the <b>department</b> within three months of the submission of the <b>compliance report</b> .	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.  It was Albemarle Lithium's understanding that the 2024 monitoring data submission to DCCEEW was completed within three months of the submission of the compliance report. However, it was noted during an internal review of compliance records that no confirmation of receipt from DCCEEW was able to be located. This inability to find such records was in part related to significant business interruption at the time due to the decision around care & maintenance including the exit of personnel from the business. Accordingly, as a contingency, the data was submitted again via email. An automated reply to this submission was received from the department on 20 Feb 2026. As at time of writing this annual compliance report, confirmation from DCCEEW is pending on whether it received the initial data submission and any non-compliance will be addressed in the next report (noting that in any event it would be administrative in nature with no environmental impact).  Although an internal review was conducted to assess whether there had been an omission, and what may have contributed to an omission (or to the lack of record keeping of receipt of submission), review outcomes were inconclusive, in part affected by significant business interruption at the time due to the decision around care & maintenance.  Internal processes have been updated to ensure record of confirmation of receipt are appropriately retained to prevent recurrence of this issue.	Potential Non-compliance

Cond. No.	Area	Condition	Evidence / Comments	Status
10	Reporting	The approval holder must prepare a <b>compliance report</b> for each 12-month period following 1 January of every year.	The 2023-24 Annual Compliance Report (ACR) (7421-0000-DV00-RPT-0217) prepared for the Project. Email sighted regarding submission of letter (ALB-NA-LET-0349) to EPBC Monitoring on 18 March 2025, informing DCCEEW that the ACR was published on the Albemarle website. All previous ACR reports were also available on the Albemarle website. No ecological data considered sensitive.	Compliant
10a	ACR	The approval holder must ensure each <b>compliance report</b> includes: <ul style="list-style-type: none"> <li>i. accurate and complete details of compliance and any non-compliance with the conditions and the <b>plans</b>, and any <b>incidents</b>.</li> <li>ii. one or more <b>shapefile</b> showing all <b>clearing of protected matters</b>, and/or their habitat, undertaken within the 12-month period at the end of which that compliance report is prepared.</li> <li>iii. a schedule of all <b>plans</b> in existence in relation to these conditions and accurate and complete details of how each <b>plan</b> is being implemented.</li> </ul>	Section 3 of this report identifies the compliance status against EPBC 2017/8099, as amended on 24 December 2025. No clearing was undertaken during the reporting period. Table 3-3 defines the level of compliance with relevant environmental management plans.	Compliant
10b	ACR	The approval holder must ensure each <b>compliance report</b> is completed to the satisfaction of the <b>Minister</b> and is consistent with the <i>Annual Compliance Report Guidelines, Commonwealth of Australia 2023</i> .	Email sighted regarding submission of letter (ALB-NA-LET-0349) to EPBC Monitoring on 18 March 2025, informing DCCEEW that the ACR was published on the Albemarle website. No response from the DCCEEW was received indicating the report was unsatisfactory to the Ministers or failed to meet the Guidelines.	Compliant
10c	ACR	The approval holder must publish each <b>compliance report</b> on the website within 60 <b>business days</b> following the end of the 12-month period for which that <b>compliance report</b> is required.	All previous ACR reports are available on the Albemarle website and evidence available (see above) of publication within the required 60 days.	Compliant
10d	ACR	The approval holder must notify the <b>department</b> electronically, within 5 <b>business days</b> of the date of publication that a <b>compliance report</b> has been published on the <b>website</b> .	Email sighted regarding submission of letter (ALB-NA-LET-0349) to EPBC Monitoring on 18 March 2025, informing DCCEEW that the ACR was published on the Albemarle website.	Compliant
10e	ACR	The approval holder must provide the weblink for the <b>compliance report</b> in the notification to the <b>department</b> .	The following is the link to where previous ACRs are located on Albermarle’s website. <a href="https://www.albemarle.com/au/en/australia-regulatory-index">https://www.albemarle.com/au/en/australia-regulatory-index</a>	Compliant
10f	ACR	The approval holder must keep all published <b>compliance reports</b> required by these conditions on the <b>website</b> until the expiry date of this approval. Note: <b>Compliance reports</b> may be published on the <b>department’s</b> website.	The following is the link to where previous ACRs are located on Albermarle’s website. <a href="https://www.albemarle.com/au/en/australia-regulatory-index">https://www.albemarle.com/au/en/australia-regulatory-index</a>	Compliant
10g	ACR	The approval holder must: <ul style="list-style-type: none"> <li>i. Exclude or redact <b>sensitive biodiversity data</b> from each <b>compliance report</b> and <b>shapefile</b> published on the <b>website</b> or otherwise provided to a member of the public.</li> <li>ii. If <b>sensitive biodiversity data</b> is excluded or redacted from a version of a <b>compliance report</b> published or otherwise provided to a member of the public, submit the full <b>compliance report</b> to the department within 5 <b>business days</b> of its publication on the <b>website</b> and notify the <b>department</b> in writing what exclusions and redactions have been made in the version published on the <b>website</b> or otherwise provided to a member of the public.</li> <li>iii. If <b>sensitive biodiversity data</b> is excluded or redacted from a version of a <b>shapefile</b> published or otherwise provided to a member of the public, submit the full <b>shapefile</b> to the <b>department</b> within 5 <b>business days</b> of its publication on the <b>website</b> and notify the <b>department</b> in writing what exclusions and redactions have been made in the version published on the <b>website</b> or otherwise provided to a member of the public.</li> </ul>	No biodiversity data was considered to be sensitive.	Not applicable
11	Reporting	The approval holder must notify the <b>department</b> in writing of any: <b>incident</b> ; non-compliance with the conditions; or non-compliance with the commitments made in <b>plans</b> . The notification must be given as soon as practicable, and no later than two <b>business days</b> after becoming aware of the <b>incident</b> or non-compliance. The notification must specify: <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 <b>incident</b> and/or non-compliance.</li> </ul>	No notifiable incidents occurred during the reporting period. As at time of writing, a formal response from DWER is pending regarding outcomes of a desktop audit conducted during 2025. DCCEEW will be notified should this identify anything or relevance to this approval.	Not applicable

Cond. No.	Area	Condition	Evidence / Comments	Status
12	Reporting	The approval holder must provide to the <b>department</b> the details of any <b>incident</b> or <b>noncompliance</b> with the conditions or commitments made in <b>plans</b> as soon as practicable and no later than <b>10 business days</b> after becoming aware of the incident or non-compliance, specifying: <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 <b>incident</b> 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 incident; non-compliance with the conditions; or non-compliance with the commitments made in plans had occurred during the reporting period. As at time of writing, a formal response from DWER is pending regarding outcomes of a desktop audit conducted during 2025. DCCEEW will be notified should this identify anything or relevance to this approval.	Not applicable
13	Auditing	The approval holder must ensure that <b>independent audits</b> of compliance with the conditions are conducted as requested in writing by the <b>Minister</b> .	No audits requested by the Minister; however, quarterly internal compliance audits are conducted by KASA Consulting.	Not applicable
14	Auditing	For each <b>independent audit</b> , the approval holder must: <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 requested by the Minister.	Not applicable
15	Auditing	The approval holder must publish the audit report on the <b>website</b> within <b>10 business days</b> of receiving the <b>department's</b> approval of the audit report and keep the audit report published on the <b>website</b> until the end date of this approval.	No audits requested by the Minister.	Not applicable
16	Reporting	Within 30 days after the <b>completion of the action</b> , the approval holder must notify the <b>department</b> in writing and provide <b>completion data</b> .	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 Flora and Vegetation Monitoring and Management Plan (FVMMP). Monitoring of the Banksia Woodland threatened ecological community (TEC) is undertaken annually to compare the vegetation condition, species richness and species density at permanently established transects and Photographic Monitoring Points (PMPs). Monitoring of the Banksia Woodland TEC undertaken in Spring 2025 (Ecoedge, 2026) confirmed that the Banksia woodland remains generally very healthy, with approximately 70% of plots rated in Excellent condition and the remainder rated Very Good vegetation condition. No evidence of clearing, fire, or significant physical disturbance was recorded between monitoring periods. Species richness showed a consistent increasing trend across long-term transects when compared with earlier monitoring years (2018-2022). Between 2024 and 2025, total species counts increased significantly, with statistical modelling indicating an approximate 26% increase, driven primarily by recruitment in the lower native stratum. Increases in richness are considered most likely attributable to above-average rainfall.	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: 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.	Flora and Vegetation Monitoring and Management Plan Rev.1; 30 November 2018 (Wood, 2018a) sighted (available on Albemarle website). An update of the FVMMP (Rev. 3, 13 Dec 2024 – ALB-KEM-EMP-02) was submitted to DWER in December 2024 and 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 MS 1085 had been met.	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: 1. report such findings to the CEO within 21 days of the criteria being triggered; 2. 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 3. 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.	No criteria had been triggered. The Spring 2025 survey conducted in August 2025 (Ecoedge, 2026) specified that vegetation was found to be in Excellent to Very Good condition, with species richness showing a consistent increasing trend across long-term transects when compared with earlier monitoring years (2018-2024). The report concluded that management objectives stated in the FVMMP had been met.	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 and 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.	Compliant

Condition No.	Area	Condition	Evidence / Comments	Status
MS1085: M6-5	Flora and vegetation	The proponent shall review and revise the FVMMP as and when directed by the CEO.	An update of the FVMMP (Rev 2) has been undertaken in consultation with DWER.	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 updated FVMMP (Rev. 3) has been implemented (see relevant FVMMP sections of this report for specific findings). Also refer to findings in Table 3-3.	Compliant
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.  The most recent Annual Report for the Water Management Plan (Ramboll, March 2025) for sampling conducted in 2024 identified that there were a number of trigger exceedances over the monitoring period. The exceedances were assessed in accordance with Tier 1 and 2 of the trigger response procedure, with consideration to spatial, temporal, and seasonal trends. This showed that the Project's construction and operations activity is not considered to have impacted groundwater or surface water at the Site, with all of the trigger exceedances considered to be due to natural background variations and upgradient / upstream sources.	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>	Water Management Plan prepared and submitted (Rev.1, 4 December 2018) prior to ground disturbing activities (available on Albemarle website). Correspondence from DWER (ref DWERA-001671) indicated the submitted Water Management Plan is considered to have met the requirements of condition 7 of MS-1085. The revision of Water Management Plan (Final01) prepared by Ramboll was submitted via Environment Online on 29 October 2025. No correspondence regarding the acceptability of the plan has been received since submission, only the automated acknowledgement that it had been received.  The Water Management Plan included details of management actions, surface and groundwater monitoring programs and specified trigger values and contingency actions.	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 attributed to background levels and are not considered to be related to construction or operational activities.	Not applicable
MS1085: M7-4	Water Management Plan	The proponent may review and revise the WMP.	The revision of Water Management Plan (Final01) prepared by Ramboll was submitted via Environment Online on 29 October 2025.  No correspondence regarding the acceptability of the plan has been received since submission, only the automated acknowledgement that it had been received.	Compliant

Condition No.	Area	Condition	Evidence / Comments	Status
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 formally requested the Water Management Plan be reviewed.	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 proponent is implementing the latest version of the WMP confirmed by the CEO in writing as satisfying the conditions of 7-2.	Compliant
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.	The offset area is yet to be formally secured under a protection mechanism. Negotiations 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 the Department of Biodiversity, Conservation and Attractions (DBCA).  A Tripartite Agreement has been drafted between the Western Australia Land Authority (trading as DevelopmentWA – the current freehold landholder), DBCA (representing 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 has also been drafted.  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 well progressed. A draft access licence from DBCA to Albemarle Lithium has now been prepared by DBCA for Albemarle's review to enable Albemarle to conduct necessary offset improvement works on the land (once transferred).	Compliant
MS1187: M10-2	Offsets	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:	An Albemarle Kemerton Plant Offset Strategy (ref. ALB-KEM-PLA-01) (Preston, 2019) was originally submitted to DWER in 2019. An updated strategy (Rev 1, 25 June 2020) and appendices was submitted 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).  In 2025, responses to DWERs Requests for Information (RFIs) were provided and the Offset Strategy was renamed the Offset Management Plan (Rev. 3, 29 October 2025) and resubmitted via Environment Online on 30 October 2025.  No correspondence has been received since submission except for the automated acknowledgement that it had been received.	Compliant
MS1187: M10-2	Offsets	(1) 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;	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 <i>Banksia attenuata</i> woodlands and shrublands') and 45.73 ha of foraging habitat. This area has been accepted by all parties. The area was re-surveyed in 2024 (GHD 2025) to confirm values following a bushfire partially affecting the site as well as due to the passage of time since the 2018 survey (request to re-survey received from DBCA).  A summary of the proposed offset area is provided in Section 5 of the Offset Management Plan (Rev. 3).	Compliant
MS1187: M10-2	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 Environmental Protection and Biodiversity Conservation Act 1999 Environmental Offsets Policy (October 2012) in conjunction with the associated Offsets assessment guide;	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 of Rev. 3 of the Offset Management Plan.	Compliant
MS1187: M10-2	Offsets	(3) identify the environmental values of the offset area(s)	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 6 of Rev 3 of the Offset Management Plan. This includes the WA Offsets Template table as per the requirements of the WA Environmental Offsets Guideline (EPA, 2014).	Compliant

Condition No.	Area	Condition	Evidence / Comments	Status
MS1187: M10-2	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;	<p>The Offset Site is proposed to be a conservation estate vested in the Conservation and Parks Commission of WA (The Commission) and managed by DBCA. The Commission works to protect WA's biodiversity and conservation estate acting as an independent and trusted community steward and government advisor (DBCA, 2025). Formalising this requires:</p> <ul style="list-style-type: none"> <li>• A Tripartite Agreement between the Western Australia Land Authority (trading as DevelopmentWA – the current freehold landholder), 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).</li> <li>• A Land Purchase Agreement (funded by Albemarle Lithium) enabling the legal land transfer.</li> <li>• A 20-year Management Agreement specifying activities to be completed by Albemarle and activities to be completed by DBCA (including the ongoing funding arrangement for the proponent).</li> <li>• An access licence granted by DBCA to Albemarle Lithium to allow certain biodiversity offset improvement works to be conducted onsite.</li> </ul> <p>Consultations and negotiations to secure the offset area under a protection mechanism are ongoing.</p>	Compliant
MS1187: M10-2	Offsets	(5) if any land is to be ceded to the Crown for the purpose of conservation, the proponent will identify: <ol style="list-style-type: none"> <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 twenty (20) years after completion of purchase, and</li> <li>c) an appropriate management body for the ceded land.</li> </ol>	Section 9.8 of Rev 3 of the Offset Management Plan addresses the funding arrangement and items that Albemarle is expecting to fund. Treasury approval is required and DevelopmentWA has commenced the valuation process required by Treasury. The contents and allocation of activities between the proponent and DBCA will also be set out in the 20-year Management Agreement.	Compliant
MS1187: M10-2	Offsets	(6) identify any threats to offset values and provide management and/or rehabilitation actions to be undertaken to address the threats including: <ol style="list-style-type: none"> <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>	Section 9.3 (Table 14) of the Offset Management Plan identifies objectives, targets and completion criteria management actions are defined in Table 15 (Section 9.4.2). Threats and response mechanisms are defined in Section 10 and monitoring requirements are defined in Section 9.5.	Compliant
MS1187: M10-2	Offsets	(7) define the role of the proponent and/or any third parties.	Roles and responsibilities are defined in Section 9.2 of the Offsets Management Plan (Rev. 3, 29 Oct 2025).	Compliant
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: <ol style="list-style-type: none"> <li>(1) implement the actions in accordance with the requirements of the approved Offsets Strategy; and</li> <li>(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.</li> </ol>	Notice in writing from the CEO has not yet been received.	Not applicable
MS1187: M10-4	Offsets	The proponent shall review and revise the Offset Strategy as and when directed by the CEO.	Response to DWERs RFIs were provided and the Offset Strategy was resubmitted via Environment Online on 30 October 2025. No correspondence has been received since submission except for the automated acknowledgement that it had been received.	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.	Notice in writing from the CEO has not yet been received.	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	A Spring 2025 vegetation survey was undertaken in August 2025. The survey report (Ecoedge, 2026) 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 ( <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 Banksia Woodlands of the Swan Coastal Plain TEC/ Low lying <i>Banksia attenuata</i> woodlands or shrublands PEC, attributable to the Project.  No incidents of fire originating within, and spreading outside of, the Development Envelope.	Compliant	The Spring 2025 monitoring report for the Banksia Woodland TEC monitoring undertaken in August 2025 (Ecoedge, 2026) specified that the evidence indicates that the Banksia woodland is not in decline.  Banksia woodland remains generally very healthy, with approximately 70% of plots rated in Excellent condition and the remainder rated Very Good vegetation condition.  No evidence of clearing, fire, or significant physical disturbance was recorded between monitoring periods.
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 2025, 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.  The 2025 Spring survey (Ecoedge, 2026) specified that weeds were confined to the lower stratum and occurred at low abundance and cover. While some historical fluctuations in weed richness were noted, there was no evidence of ongoing weed spread or intensification attributable to the Project in 2025.

EMP	Subject	Key Objectives	Target	Status	Comments
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	The 2025 Spring survey (Ecoedge, 2026) identified no infestations of <i>Phytophthora cinnamomi</i> or confirmed dieback attributable to the Project. The report did note Indistinct signs of Phytophthora disease at Transect 7 that would need to be followed up by appropriate sampling of recently dead plants to confirm.
FVMMP	Litter	Avoid the release of litter to the surrounding environment.	Removal of litter when identified within immediately adjacent areas / vegetation resulting from the Proposal.	Compliant	Internal audits and inspections of site identified that litter was generally well managed and no litter was sighted within areas immediately adjacent to the plant site.
FVMMP	Fire	Prevent the occurrence of fire and, in the event of fire, implement contingencies to prevent the spread of fire to the surrounding environment.	No incidents of fire originating within and spreading outside of the Development Envelope. Prior to each bush fire season, fire breaks maintained once per year or checked and confirmed as not requiring additional maintenance.	Compliant	The Spring 2025 monitoring report for the Banksia Woodland TEC monitoring undertaken in August 2025 confirmed that no evidence of fire was recorded between monitoring periods.
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

- Albemarle. (2024). Annual Compliance Report 2023-2024 (7421-0000-DV00-RPT-0217).
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- Ecoedge. (2018). *Lot 42 Wellesley Road North, Kemerton Offset Site Study Report*. Bunbury, Western Australia: Prepared for GHD on behalf of Albemarle, unpublished.
- Ecoedge. (2023). *Banksia Woodland Threatened Ecological Community and Drakaea elastica Spring 2023 Monitoring (January 2024)*. Perth: Unpublished report for Albemarle Lithium Pty Ltd.
- GHD. (2018a). *Flora and Vegetation Management Plan Rev.1; 30 November 2018*.
- GHD. (2018b). *Banksia Woodland Threatened Ecological Community and Drakaea elastica Baseline Monitoring*. Unpublished report prepared for Albemarle Lithium Pty Ltd, Perth.
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- GHD. (2020). *Banksia Woodland Threatened Ecological Community and Drakaea elastica Second Year Monitoring (November 2020)*. Unpublished report prepared for Albemarle Lithium Pty Ltd, Perth.
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