



# REPORT

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## 2025 ANNUAL COMPLIANCE ASSESSMENT REPORT





### ALBEMARLE KEMERTON PLANT

### MINISTERIAL STATEMENTS 1085 & 1187

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**REVISION HISTORY**

Rev.	Date	Status	Prepared By	Reviewed By	Operations Approval	Ext Affairs Approval
A	19-Feb-26	Draft	N. Croston	B. Bell	D. Coulson	T. Baddeley
0	24-Mar-26	Final	N. Croston	B. Bell	D. Coulson	T. Baddeley
Signature:						

**AMENDMENT HISTORY FOR LATEST REVISION**

Clause(s)	Details of Change:

## EXECUTIVE SUMMARY

This Compliance Assessment Report (**CAR**) has been prepared by KASA Consulting on behalf of Albemarle Lithium Pty Ltd (ACN 618 095 471). The purpose of this CAR is to satisfy the requirements of Condition 4-6 of Ministerial Statement (**MS**) 1085 for the Albemarle Kemerton Plant (the **proposal**).

The approved proposal 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 Proposal commenced in January 2019.

It is noted that, following assessment of a section 46 application to amend implementation conditions under the *WA Environmental Protection Act 1986 (EP Act)*, MS-1187 was approved on 14 March 2022. Under this approval, Conditions 9 and 10 of MS-1085 were replaced by Conditions 9 and 10 of MS-1187.

Subsequent to the end of the reporting period, Albemarle was advised that an amendment had been made to Condition 8 of MS 1085 under section 45C. As this amendment occurred after the end of the relevant period, changes associated with this will be reflected in subsequent annual reports.

At the time of writing, a DWER EPA Services desktop audit of MS-1187 was underway, however, the final audit report has not been received.

There were no notifiable incidents during the reporting period.

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

Monitoring of the Banksia Woodland threatened ecological community (TEC), undertaken in 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 (2018-2022). 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.

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

Regarding Greenhouse Gas (**GHG**) emissions, Albemarle received a letter from DWER/EPA Services on 26 November 2024 advising that the Minister for Environment has requested the Environmental Protection Authority (**EPA**) to inquire into, and report on the matter of changing the implementation conditions relating to the Albemarle Kemerton Plant, pursuant to section 46(1) of the EP Act. The EPA's inquiry into GHG conditions was still in process at the time of this report's preparation and submission.

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## GLOSSARY

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

## 1 INTRODUCTION

### 1.1 Proposal Details

The Albemarle Kemerton Plant (the **proposal**) refers to the construction and operation of a lithium manufacturing plant and associated infrastructure, within the Kemerton Strategic Industrial Area (**KSIA**), located approximately 17 km north-east of Bunbury, Western Australia (Figure 1-1: Proposal Site Regional Location).

The Albemarle Kemerton Plant is designed 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, which are proposed to be brought online progressively as production demand increases. These process trains operate using a combination of pyrometallurgical and hydrometallurgical operations to produce up to a total of 100,000 tonnes of lithium hydroxide monohydrate product and up to 200,000 tonnes of sodium sulphate anhydrous co-product per year (five train capacity). Up to 1.1 million tonnes of tailings (known as delithiated beta spodumene (DBS)) will also be produced. At the end of the 2025 reporting year, two processing trains had been built - Train 1 was operational, however, a decision had been made to place Train 2 into care and maintenance in August 2024. Construction had commenced to build Trains 3 and 4, however, a decision to cease construction works was also made in August 2024 (at the same time as the decision to place Train 2 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 co-product is transported by road to either Fremantle or Bunbury for export. During the reporting period, some DBS was sold as an alternative to freshly quarried (virgin) sand for use in cement-related applications and as fill (manufactured sand) or sent to soil / fill recyclers, with the majority of DBS disposed to Tellus Sandy Ridge (as it was at the time), surplus to market demand for the material.

### 1.2 Purpose of Report

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

Condition 4.6 of MS-1085 specifically states:

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

*The Compliance Assessment Report shall:*

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

This CAR provides the status of compliance against all audit elements prescribed under MS-1085 and, where applicable, the compliance status of amended Conditions 9 and 10, as approved in MS-1187. The CAR also provides a summary of how implementation of the Environmental Management Plans (EMPs) has met defined environmental objectives during the reporting period. The reporting period for this CAR covers the period 1 January 2025 through 31 December 2025.

### **1.3 Report Structure**

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

**Figure 1-1: Proposal Site Regional Location**



## 2 SUMMARY OF PROPOSAL’S IMPLEMENTATION STATUS

### 2.1 Proposal Milestones

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

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

Subsequent to the end of the reporting period (3 February 2026), the WA Government initiated an amendment under section 45C to “correct a misdescription” for Condition 8. This amendment will be covered in future CARs.

A summary of environmental approvals issued for the Proposal is provided in Table 2-1 below.

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

Instrument	Description	Approval Date
MS-1085	Gained environmental approval, Part IV, EP Act.	26 October 2018
Works Approval W6154/2018/1	Granted to the Works Approval Holder, subject to the prescribed conditions.	16 November 2018
Works Approval Amendment W6154/2018/1	Amendment to works approval W6154/2018/1 in respect of product capacity, premises boundary and clarifications to design specifications.	10 March 2021
MS-1187	Conditions 9 and 10 of MS-1085 (Greenhouse Gas Management and Offsets) deleted and replaced with implementation conditions set out in MS-1187.	14 March 2022
MS-1085, amendment via section 45C	Amendment to the proposal to reduce the clearing area and associated biodiversity offset requirement and allow for the construction of an on-site power station.	14 March 2022
Works Approval Amendment W6154/2018/1	Amendment to works approval W6154/2018/1 to update infrastructure and legal address, construct and operate waste transfer station.	23 June 2022
Works Approval Amendment W6154/2018/1	Amendment to update street address and change authorised duration and sample frequency for environmental commissioning for Train 1.	09 June 2023

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

### 2.1.1 Notice of Substantial Commencement

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

## 2.2 Proposal Components

Non-Process Infrastructure (NPI) buildings comprise a laboratory, site operations building, mess building, emergency building, wellness centre and gate houses. The processing plant will comprise up to five lithium hydroxide conversion trains (during the reporting period, one in operation and one in care and maintenance) that incorporate the following main areas:

- Spodumene delivery and stockpiling.
- Calcinating, acidifying and storage of acidified ore area.
- Leaching, purification, filtration and tailings collection area.
- Reactants delivery and storage area.
- Causticising, and Sodium Sulphate Decahydrate crystallisation.
- Crude Lithium Hydroxide (LiOH) evaporation and crystallisation.
- Pure LiOH evaporation and crystallisation.
- Lithium hydroxide monohydrate drying, packaging and storage.
- Anhydrous sodium sulphate crystallisation – Li removal.
- Sodium sulphate drying, packaging and storage.
- Potassium collection building.
- Service plant and buildings including, boilers, cooling towers, raw and RO water, and air compressor building.
- Engineering Workshop/Warehouse and diesel tanks.
- Waste transfer station.
- DBS and DBS-based products storage areas.

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 Proposal Issues during the reporting period

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

As of 31 December 2025, Albemarle was operating Train 1 and was clearing inventory from Train 2 to place it into care and maintenance.

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

Albemarle is also actively pursuing potential co-product development opportunities in accordance with Condition 8-1 of MS-1085. DBS has been sold and used as a construction material or cement-related components where possible, or sent to soil / fill recyclers, with excess volume transported by road to the Sandy Ridge Waste Disposal facility during the reporting period. Previously, excess material was sent to Koolyanobbing to in-pit backfill to support closure objectives.

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

## 3 STATEMENT OF COMPLIANCE

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

The findings are supported with evidence in electronic format (Appendix B).

In relation to assessing conformance to approved management plan commitments, the following approach has been taken. Where a particular aspect of a management plan has not been demonstrated to be fully implemented, the management plan conditions and commitments are considered to have been complied with if sufficient evidence exists to demonstrate:

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

### 3.1 Summary of Compliance Status

During the reporting period DWER conducted a desktop compliance audit against Conditions 9 and 10 of MS-1187, for the period covering 15 March 2022 to 23 May 2025. Albemarle provided further information to DWER for the audit in December 2025 and at the time of writing, the final audit report has not been received. The audit report will be addressed in subsequent CARs if applicable.

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

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

### **3.2 Environmental Management Plans**

This CAR presents a summary of how each management plan objective has been addressed and is supported by documentary evidence and data in the appended electronic evidence. The status of objectives for the Albemarle EMPs are listed in Table 3-2.

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

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1085: M1-1	Proposal implementation	When implementing the proposal, the proponent shall not exceed the authorised extent of the proposal as defined in Table 2 of Schedule 1, unless amendments to the proposal and the authorised extent of the proposal have been approved under the EP Act.	Implement the proposal as per Attachment 1 to Statement 1085, Schedule 1.	CAR.	Overall	When implementing the proposal.	Compliant	The authorised extent of the proposal as defined in Table 2 of Schedule 1 of MS-1085 has not been exceeded (see below).
MS-1085: M1-1	Proposal implementation	<b>Table 2 Physical elements:</b> Clearing of no more than 54.31ha of native vegetation and 33.39ha of pine plantation within the Development Envelope of 89.25ha		Post Clearing Survey 11 June 2019.	Construction	Completed.	Completed	Extent of clearing was 48.8 ha of native vegetation and 33.39 ha of pine plantation. Post clearing survey map provided by BGC Contracting. Cleared area coordinates confirmed by Wood personnel as complying with designated clearing boundaries. Development site fully fenced and cleared; no further clearing required.
MS-1085: M1-1	Proposal implementation	<b>Table 2 Operational elements:</b> Process Plant Capacity: No more than 100,000 tonnes of lithium hydroxide product and no more than 200,000 tonnes of sodium sulphate by-product produced per year.			Operations	When implementing the proposal.	Compliant	As at the end of the reporting period, the plant is only operating Train 1; output is therefore well below proposed process plant capacity.
MS-1085: M1-1	Proposal implementation	<b>Table 2 Operational elements:</b> Tailings Capacity: No more than 1.1 million tonnes per year.			Operations	When implementing the proposal.	Compliant	As above.
MS-1085: M2-1	Contact Details	The proponent shall notify the CEO of any change of its name, physical address or postal address for the serving of notices or other correspondence within twenty-eight (28) days of such change. Where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State.	Provide written correspondence indicating any change of name, physical or postal address.	Copy of written notification to CEO of change of address.	Overall	If any change to name, physical address or postal address occurs.	Compliant	EPA Services have been notified of the WA address for all correspondence via email and Environment Online enquiry in September 2024.
MS-1085: M3-1	Time limit for substantial commencement	The proposal must be substantially commenced within 5 years from the date of this Statement.	Commence activity.	Provide evidence to the CEO in writing to demonstrate the proposal has substantially commenced.	Construction	Substantial commencement by 26 October 2023.	Completed	Date of commencement 2 January 2019.
MS-1085: M3-2	Time limit for substantial commencement	The proponent must provide to the CEO documentary evidence demonstrating Albemarle Kemerton Plant that they have complied with condition 3-1 no later than 30 days after expiration of 5 years from the date of this Statement.	Provide written evidence to the CEO to demonstrate the proposal has substantially commenced.	Copy of written notification to CEO of substantial Commencement.	Construction	Substantial commencement demonstrated by 25 November 2023.	Completed	Section 2.2.1 of 2020 CAR notified DWER of substantial commencement occurring in January 2019.
MS-1085: M4-1	Compliance reporting	The proponent shall prepare and maintain a Compliance Assessment Plan which is submitted to the CEO at least six (6) months prior to the first CAR required by condition 4- 6, or prior to implementation of the proposal, whichever is sooner.	Prepare and submit a CAP in accordance with Post assessment guidelines and to the requirements of the CEO.	Acknowledgement of receipt from CEO.	Pre-construction	July 2019 or prior to implementation, whichever is sooner.	Compliant	Compliance Assessment Plan, Revision 0, 12 November 2018 (Wood, 2018c) approved by DWER on 21 November 2018 (ref. 2018-1542934967508). The CAP was updated in November 2023 (ALB-KEM-PLA-04) and submitted to DWER. DWER Executive Director Compliance and Enforcement (for the CEO) approved the updated CAP on 09 January 2024 (Ref. DWERA-001586).
MS-1085: M4-2	Compliance reporting	The CAP shall indicate: (1) the frequency of compliance reporting; (2) the approach and timing of compliance assessments; (3) the retention of compliance assessments; (4) the method of reporting of potential non-compliances and corrective actions taken; (5) the table of contents of CARs; and (6) public availability of CARs.	Prepare and submit a CAP in accordance with Post assessment guidelines and to the requirements of the CEO.	Approval letter.	Pre-construction	Compliance Assessment Plan to be submitted by 26 July 2019.	Compliant	The updated CAP was approved by DWER Executive Director Compliance and Enforcement (for the CEO) on 9 January 2024 (Ref. DWERA-001586). The Annual CAR is now due for submission by 31 March.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1085: M4-3	Compliance reporting	After receiving notice in writing from the CEO that the CAP satisfies the requirements of condition 4-2 the proponent shall assess compliance with conditions in accordance with the CAP required by condition 4-1.	Conduct compliance assessment in accordance with the CAP.	CAR	Overall	Jan 2020 for first CAR and annually thereafter until 2024. From 2024 onward CAR will be submitted by 31 March annually.	Compliant	Biannual audits undertaken to assess compliance with Ministerial Conditions by KASA Consulting (Nick Croston Exemplar registered Lead Environmental Auditor #13656). Audits were undertaken in June and November 2025.
MS-1085: M4-4	Compliance reporting	The proponent shall retain reports of all compliance assessments described in the CAP required by condition 4-1 and shall make those reports available when requested by the CEO.	Retain CARs and make available when requested.	CARs.	Overall	As requested by the CEO.	Compliant	Albemarle Kemerton Project 2024 Annual CAR (74211-0000-DV00-RPT-0218) prepared and submitted to CEO on 25 March 2025 (ALB-NA-LET-0313). Previous Albemarle Kemerton Project Annual CARs were available on the Albemarle website.
MS-1085: M4-5	Compliance reporting	The proponent shall advise the CEO of any potential non-compliance within seven (7) days of that non-compliance (NC) being known.	Notify the CEO of potential non-compliances in writing and verbally.	<ul style="list-style-type: none"> <li>Copy of written notification.</li> <li>CAR.</li> </ul>	Overall	Within 7 days of NC being known.	Not required at this stage	Not applicable during the reporting period. The Proponent has not identified any potential non-compliances during 2025.
MS-1085: M4-6	Compliance reporting	<p>The proponent shall submit to the CEO the first CAR fifteen (15) months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first CAR, or as otherwise agreed in writing by the CEO.</p> <p>The CAR shall:</p> <ol style="list-style-type: none"> <li>be endorsed by the proponent's CEO or a person delegated to sign on the Chief Executive Officer's behalf;</li> <li>include a statement as to whether the proponent has complied with the conditions;</li> <li>identify all potential non-compliances and describe corrective and preventative actions taken;</li> <li>be made publicly available in accordance with the approved CAP; and</li> <li>indicate any proposed changes to the CAP required by condition 4-1.</li> </ol>	Prepare and submit a CAR within the required reporting timeframe.	<ul style="list-style-type: none"> <li>CAR.</li> <li>Acknowledgement of receipt from CEO.</li> <li>Evidence of documents available on Project website.</li> </ul>	Overall	Jan 2020 for first CAR and annually thereafter until 2024. From 2024 onward CAR will be submitted by 31 March annually.	Compliant	Albemarle submitted its first CAR (P-74211-0000-BA00-RPT-0246) on 24 January 2020. Albemarle requested a change to compliance reporting dates in May 2023 and this was approved on 16 November 2023 via email. The reporting period is now 1 January to 31 December each year. Previous Albemarle Kemerton Project Annual CARs available on the Albemarle website.
MS-1085: M5-1	Public availability of data	Subject to condition 5-2, within a reasonable time period approved by the CEO of the issue of this Statement and for the remainder of the life of the proposal the proponent shall make publicly available, in a manner approved by the CEO, all validated environmental data (including sampling design, sampling methodologies, empirical data and derived information products (e.g., maps)) relevant to the assessment of this proposal and implementation of this Statement.	All environmental plans and reports required by MS-1085 and MS-1187 are made publicly available.	CAR.	Overall	Within a reasonable time period approved by the CEO.	Compliant	Approval documents, including management plans with associated appended datasets relevant to the proposal assessment are publicly available via the Albemarle website. Compliance data associated with the 2024 CAR is made available to the public upon request.
MS-1085: M5-2	Public availability of data	<p>If any data referred to in condition 5-1 contains particulars of:</p> <ol style="list-style-type: none"> <li>a secret formula or process; or</li> <li>confidential commercially sensitive information; the proponent may submit a request for approval from the CEO to not make these data publicly available. In making such a request the proponent shall provide the CEO with an explanation and reasons why the data should not be made publicly available.</li> </ol>	Submit a request for approval from the CEO to not make sensitive information publicly available, if applicable.	<ul style="list-style-type: none"> <li>Copy of written request to CEO.</li> <li>CEO approval.</li> </ul>	Overall	As required.	Not required at this stage	No environmental data considered confidential or commercially sensitive.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1085: M6-1	Flora and vegetation	The proponent shall ensure that the construction and ongoing operation of the proposal is undertaken in a manner that avoids direct or indirect impacts to Threatened Flora and communities, including Glossy-leafed Hammer Orchid ( <i>Drakaea elastica</i> ), Dwarf Bee-orchid ( <i>Diuris micrantha</i> ), Dwarf Hammer-orchid ( <i>Drakaea micrantha</i> ), Banksia Woodlands of the Swan Coastal Plain and Low lying <i>Banksia attenuata</i> woodlands or shrublands outside of the Albemarle Development Envelope, as shown in Schedule 1.	Prepare and implement the FVMMP.	Annual Flora and vegetation monitoring report submitted with the CAR.	Overall	For the life of the proposal as approved by the CEO.	Compliant	<p>Albemarle ensures avoidance of direct and indirect impacts to Threatened Flora and communities through implementation of the Albemarle Kemerton Plant Flora and Vegetation Management Plan (FVMMP).</p> <p>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).</p> <p>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.</p> <p>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.</p>
MS-1085: M6-2	Flora and vegetation	<p>Prior to ground-disturbing activities or as otherwise agreed by the CEO, the proponent shall prepare and submit a Flora and Vegetation Monitoring and Management Plan (the Plan) to the CEO. The Plan shall:</p> <ol style="list-style-type: none"> <li>(1) when implemented, substantiate and ensure that condition 6-1 is being met;</li> <li>(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;</li> <li>(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;</li> <li>(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</li> <li>(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.</li> </ol>	Prepare and submit the FVMMP.	<ul style="list-style-type: none"> <li>• Receipt acknowledgement from CEO.</li> <li>• CEO approval.</li> </ul>	Pre-construction	Prior to ground disturbing activities or otherwise agreed by the CEO.	Compliant	<p>Flora and Vegetation Monitoring and Management Plan Rev.1; 30 November 2018 (Wood, 2018a) sighted.</p> <p>Letter acknowledging receipt and satisfaction with the plan received from Anthony Sutton, Executive Director of DWER on 3 December 2018 (ref. DWERA-001672). Also refer to findings in Table 3-2.</p> <p>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.</p> <p>Current version of the Management Plan (2025) is available on the Albemarle website.</p>

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1085: M6-3	Flora and vegetation	In the event that the monitoring specified in the Plan indicates that the criteria specified in the Plan have been triggered, the proponent shall: (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 Flora and Vegetation Management and Monitoring Plan (FVMMP) and continue implementation of those actions until the trigger criteria are met, or until the CEO has confirmed by notice in writing that it has been demonstrated that the objective in condition 6-1 will continue to be met and implementation of the management and/or contingency actions is no longer required.	Implement and comply with reporting requirements in FVMMP if criteria are triggered	<ul style="list-style-type: none"> <li>CAR.</li> <li>Written notification/ reports to CEO.</li> </ul>	Overall	Within 21 days of the criteria being triggered.	Not required at this stage	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.
MS-1085: M6-4	Flora and vegetation	The proponent may review and revise the FVMMP.	Review and revise FVMMP.	<ul style="list-style-type: none"> <li>Revised FVMMP (as required).</li> <li>CEO approval.</li> </ul>	Pre-construction Construction	As required.	Compliant	An update of the FVMMP (Rev. 3) 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 MS1085 had been met.
MS-1085: M6-5	Flora and vegetation	The proponent shall review and revise the FVMMP as and when directed by the CEO.	Revise and submit FVMMP as and when required by the CEO.	<ul style="list-style-type: none"> <li>Revised FVMMP submitted (as required).</li> <li>CEO approval.</li> </ul>	Pre-construction Construction	As notified by Albemarle or as and when required by the CEO.	Compliant	Update of the FVMMP has been undertaken in consultation with DWER.
MS-1085: M6-6	Flora and vegetation	The proponent shall implement the latest version of the FVMMP, which the CEO has confirmed by notice in writing, satisfies the requirements of condition 6-2.	Latest version of the FVMMP implemented.	<ul style="list-style-type: none"> <li>CEO approval.</li> <li>CAR.</li> </ul>	Overall	Following receipt in writing from the CEO that the latest Plan satisfies the requirements set out in condition 6-2.	Compliant	The updated FVMMP (Rev. 3) has been implemented (see relevant FVMMP sections of this report for specific findings). Also refer to findings in Table 3-2.
MS-1085: M7-1	Water Management Plan	The proponent shall ensure that construction and ongoing operation of the proposal is undertaken in a manner that: <ul style="list-style-type: none"> <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>	Prepare and implement the Water Management Plan.	Water monitoring report submitted with the CAR.	Overall	For the life of the proposal as approved by the CEO.	Compliant	Ongoing monitoring programs for water quality and vegetation has confirmed that the quality and quantity of off-site surface and groundwater has been maintained and there has been no adverse impact on the receiving environment. 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. All of these were assessed in accordance with Tier 1 and 2 of the trigger response procedure and with consideration to spatial, temporal, and seasonal trends. The proposal 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.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1085: M7-2	Water Management Plan	<p>Prior to ground-disturbing activities or as otherwise agreed by the CEO, the proponent shall prepare and submit a Water Management Plan to the CEO, on the advice of the Department of Water and Environmental Regulation. The Plan shall:</p> <ol style="list-style-type: none"> <li>(1) when implemented, substantiate and ensure that condition 7-1 is being met;</li> <li>(2) 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>(3) detail the proposed frequency, timing and indicative locations of groundwater and surface water monitoring for potential contamination;</li> <li>(4) 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;</li> <li>(5) 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>	Prepare and submit the Water Management Plan.	<ul style="list-style-type: none"> <li>• Receipt acknowledgement from CEO.</li> <li>• CEO approval.</li> </ul>	Pre-construction	Prior to ground-disturbing activities or as otherwise agreed by the CEO.	Compliant	<p>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.</p> <p>New 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.</p> <p>The Water Management Plan included details of management actions, surface and groundwater monitoring programs and specified trigger values and contingency actions (framework in Appendix 3).</p>
MS-1085: M7-3	Water Management Plan	<p>In the event that the monitoring specified in the Plan indicates that the criteria specified in the Plan have been triggered, the proponent shall:</p> <ol style="list-style-type: none"> <li>(1) report such findings to the CEO within 21 days of the criteria being triggered;</li> <li>(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</li> <li>(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 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>	Implement and comply with reporting requirements in Water Management Plan if criteria are triggered.	<ul style="list-style-type: none"> <li>• CAR.</li> <li>• Written notification/ reports to CEO.</li> </ul>	Overall	Within 21 days of the criteria being triggered.	Not required at this stage	<p>Quarterly groundwater and monthly surface water monitoring reports to date have concluded that no criteria have been triggered because the concentrations of process related analytes recorded are consistent with historical levels and observed variations in some parameter concentrations are attributed to background levels and are not considered to be related to construction or operational activities.</p>
MS-1085: M7-4	Water Management Plan	The proponent may review and revise the Water Management Plan.	Review and revise the Water Management Plan.	<ul style="list-style-type: none"> <li>• Revised Water Management Plan (as required).</li> <li>• CEO approval.</li> </ul>	Pre-construction Construction	As required.	In progress	<p>New revision of Water Management Plan (Final01) prepared by Ramboll was submitted via Environment Online on 29 October 2025.</p> <p>No correspondence regarding the acceptability of the plan has been received since submission, only the automated acknowledgement that it had been received.</p>
MS-1085: M7-5	Water Management Plan	The proponent shall review and revise the Water Management Plan as and when directed by the CEO.	Revise and submit the Water Management Plan as and when required by the CEO.	<ul style="list-style-type: none"> <li>• Revised Water Management Plan (as required).</li> <li>• CEO approval.</li> </ul>	Pre-construction Construction	As notified by Albemarle or as and when required by the CEO.	Not required at this stage	<p>The CEO did not formally request the Water Management Plan be reviewed during the reporting period.</p>

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1085: M7-6	Water Management Plan	The proponent shall implement the latest version of the Water Management Plan, which the CEO has confirmed by notice in writing, satisfies the requirements of condition 7-2.	Latest version of the Water Management Plan implemented.	<ul style="list-style-type: none"> <li>CEO approval.</li> <li>CAR.</li> </ul>	Overall	As and when confirmed by the CEO	Compliant	<p>The current, approved version of the Water Management Plan is being implemented.</p> <p>New revision of the 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. This will be implemented once approved.</p>
MS-1085: M8-1	Terrestrial Environment Quality (Waste management)	During operation of Albemarle Lithium Plant, the proponent shall ensure that all reasonable and practicable measures have been undertaken to minimise the generation of waste and its discharge into the environment.	<ul style="list-style-type: none"> <li>Comply with Waste Management Plan.</li> <li>Develop and implement waste minimisation program.</li> </ul>	<ul style="list-style-type: none"> <li>CAR.</li> <li>Waste register.</li> </ul>	Overall	For the life of the proposal as approved by the CEO.	Compliant	<p>A Waste Management Plan (Albemarle, 2022) had been prepared detailing measures have been undertaken to improve co-product market opportunities.</p> <p>Albemarle continued to look for markets for co-products. In September 2025, Albemarle submitted a request to DWER to have the Waste Management Plan renamed as a Co-products Management Plan.</p> <p>A revised Co-Product Management Plan was submitted in December 2025.</p> <p>In February 2026 (after the end of the reporting period), Albemarle was advised the WA Government had completed an amendment to MS 1085 under section 45C to "correct a misdescription" of Condition 8. This changed the Management Plan title to be a "Waste and Outputs" Management Plan.</p> <p>As at time of writing, Albemarle was awaiting written confirmation from DWER as to the scope of "Waste and Outputs". This will be addressed in subsequent CARs.</p>
MS-1085: M8-2	Terrestrial Environment Quality (Waste management)	<p>Within 3 years of the publication of this Statement or as otherwise agreed by the CEO, the proponent shall prepare and submit a Waste Management Plan to the CEO. The Waste Management Plan shall:</p> <ol style="list-style-type: none"> <li>when implemented, substantiate and ensure that condition 8-1 is being met;</li> <li>specify targets to be met, and detail actions undertaken to meet those targets by applying principles of Waste Management Hierarchy including Avoidance, Recovery and Disposal;</li> <li>quantify the outcome/s of applying the principle of the "Recovery (re-use, reprocessing, recycling); and</li> <li>provide evidence that all reasonable and practicable measures have been undertaken to Avoid and Recover waste.</li> </ol>	Prepare and submit the Waste Management Plan.	<ul style="list-style-type: none"> <li>Receipt acknowledgement from CEO.</li> <li>CEO approval.</li> </ul>	Operation	Within 3 years of the publication of the MS or as otherwise agreed by the CEO.	Compliant	<p>Revision 1 of the Waste Management Plan (P-74211-0000-HS00-PLN-0001) was submitted to DWER on 28 September 2022.</p> <p>Albemarle has submitted a request to have this document renamed as a Co-products Management Plan and to limit its scope to the management of co-products, e.g. DBS, consistent with the EPA Assessment 1618.</p> <p>Refer above for further details.</p>

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1085: M8-3	Terrestrial Environment Quality (Waste management)	After receiving notice in writing from the CEO that the Waste Management Plan satisfies the requirements of condition 8-2, the proponent shall: (1) implement the actions in accordance with the requirements of the approved Waste Management Plan; and (2) continue to implement the approved Waste Management Plan until the CEO has confirmed by notice in writing that it has been demonstrated that the targets specified in condition 8-2 have been met and therefore the implementation of the actions is no longer required.	Implement the Waste Management Plan.	<ul style="list-style-type: none"> <li>CEO approval.</li> <li>CAR.</li> </ul>	Operation	After receiving notice in writing from the CEO that the Waste Management Plan satisfies the requirements of condition 8-2 and until the CEO has confirmed by notice in writing that it has been demonstrated that the targets specified in condition 8-2 have been met and therefore the implementation of the actions is no longer required.	Compliant	<p>An internal waste management audit was undertaken in September 2024 (QA-AUD-KEM-20242-002) that identified no non-compliances. Three observations were identified and addressed through the Kemerton corrective action system.</p> <p>No incidents were raised during the reporting period relevant to MS Condition 8</p> <p>During the reporting period, the proponent made significant progress on co-product commercialisation with all SSA co-product sold to the market and some DBS sold as fill / cement-based (bound) materials, some DBS was sent to soil / fill recyclers and some DBS was used in the Kemerton Roads Project. Additionally, the MRIWA Research Project M10607, associated with the Kemerton Roads Project commenced in 2025, representing a significant investment by Albemarle in the commercialisation of the DBS co-product.</p>
MS-1085: M8-4	Terrestrial Environment Quality (Waste management)	The proponent may review and revise the Waste Management Plan.	Review and revise the Waste Management Plan.	<ul style="list-style-type: none"> <li>Revised Waste Management Plan (as required).</li> <li>CEO approval.</li> </ul>	Operation	As required.	In progress	<p>Albemarle has submitted a request in September 2025 to have this document renamed as a Co-products Management Plan and to limit its scope to the management of co-products, e.g. DBS.</p> <p>Due to DWER wanting to ensure alignment of requirements across similar facilities, Albemarle had been informed the approval for this change may take 12--18 months.</p> <p>A revised Co-Product Management Plan was submitted in December 2025.</p> <p>In February 2026 (after the end of the reporting period), Albemarle was advised the WA Government had completed an amendment to MS 1085 under section 45C to "correct a misdescription" of Condition 8. This changed the Management Plan title to be a "Waste and Outputs" Management Plan.</p> <p>As at time of writing, Albemarle was awaiting written confirmation from DWER as to the scope of "Waste and Outputs". This will be addressed in subsequent CARs.</p>
MS-1085: M8-5	Terrestrial Environment Quality (Waste management)	The proponent shall review and revise the Waste Management Plan as and when directed by the CEO.	Revise and submit as and when required by the CEO.	<ul style="list-style-type: none"> <li>Revised Waste Management Plan submitted (as required).</li> <li>CEO approval.</li> </ul>	Operation	As notified by Albemarle or as and when required by the CEO.	In progress	<p>As at time of writing, Albemarle was awaiting written confirmation from DWER as to the scope of "Waste and Outputs".</p> <p>Once this advice is received, Albemarle will be able to review and revise the Management Plan accordingly.</p>
MS-1085: M8-6	Terrestrial Environment Quality (Waste management)	The proponent shall implement the latest version of the Waste Management Plan, which the CEO has confirmed by notice in writing, satisfies the requirements of condition 8-2.	<ul style="list-style-type: none"> <li>Latest version submitted and is available to project personnel.</li> <li>Waste Management Plan is referenced in the CEMP.</li> </ul>	<ul style="list-style-type: none"> <li>CEO approval.</li> <li>CAR.</li> </ul>	Operation	Following receipt in writing from the CEO that the latest Plan satisfies the requirements set out in condition 8-2.	Not required at this stage	Although not yet approved in writing, Albemarle is implementing the Management Plan consistent with the objectives and outcomes in Conditions 8-1 and 8-2.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1187: M9-1	Greenhouse gas (GHG) management	Subject to condition 9-3, the proponent shall take measures to ensure the <b>PS Net GHG Emissions</b> do not exceed: (1) 956,000 tCO <sub>2</sub> -e for the period 1 January 2021 to 31 Dec 2024; (2) 1,195,000 tCO <sub>2</sub> -e for the period 1 January 2025 to 31 Dec 2029; (3) 1,186,000 tCO <sub>2</sub> -e for the period 1 January 2030 to 31 Dec 2034; (4) 1,110,000 tCO <sub>2</sub> -e for the period 1 January 2035 to 31 Dec 2039; (5) 960,000 tCO <sub>2</sub> -e for the period 1 January 2040 to 31 Dec 2044; (6) 700,000 tCO <sub>2</sub> -e for the period 1 January 2045 to 31 Dec 2049; (7) zero tonnes of CO <sub>2</sub> -e for every five year period from 1 January 2050 onwards.	Implement the GHGMP.	<ul style="list-style-type: none"> <li>CAR.</li> <li>GHG monitoring records.</li> </ul>	Overall	For the life of the proposal as approved by the CEO.	Not required at this stage	A power station has not been built at the proposal so no PS emissions were relevant during the reporting period.
MS-1187: M9-2	GHG management	Subject to condition 9-3, the proponent shall take measures to ensure the <b>Plant Net GHG Emissions</b> do not exceed: (1) 1,240,000 tCO <sub>2</sub> -e for the period 1 January 2021 to 31 Dec 2024; (2) 1,550,000 tCO <sub>2</sub> -e for the period 1 January 2025 to 31 Dec 2029; (3) 1,000,000 tCO <sub>2</sub> -e for the period 1 January 2030 to 31 Dec 2034; (4) 1,000,000 tCO <sub>2</sub> -e for the period 1 January 2035 to 31 Dec 2039; (5) 1,000,000 tCO <sub>2</sub> -e for the period 1 January 2040 to 31 Dec 2044; (6) 740,000 tCO <sub>2</sub> -e for the period 1 January 2045 to 31 Dec 2049; (7) zero tonnes of CO <sub>2</sub> -e for every five (5) year period from 1 January 2050 onwards.	Implement the GHGMP.	<ul style="list-style-type: none"> <li>CAR.</li> <li>GHG monitoring records.</li> </ul>	Overall	For the life of the proposal as approved by the CEO.	Compliant	Routine construction and operational activities during the reporting period resulted in emissions well below the specified limits. Relevant to condition 9-3(2), the 2025 Greenhouse Gas Emissions Annual Report was submitted in February 2026 included the emissions for the 2025 reporting period: <ul style="list-style-type: none"> <li>Scope 1 emissions were 12,761 tCO<sub>2</sub>-e for 1 January 2025 – 31 December 2025.</li> </ul> Cumulative emissions for the period 1 January 2025 to 31 December 2029 will be reported in each relevant annual GHG Emissions report including compliance against the required Plant Net GHG Emissions limit. Cumulative emissions remain well below the required limit.
MS-1187: M9-3	GHG management	Where the times between the <b>Commencement of Operations</b> and the end of a period specified in conditions 9-1 and 9-2 is less than five years, the <b>PS Net GHG Emissions</b> or <b>Plant Net GHG Emissions</b> limit for that period is to be determined in accordance with the following formula: Reduced <b>Net GHG Emissions</b> limit = $A/B * C$ Where: A is the relevant <b>Net GHG Emissions</b> limit for the periods as specified in condition 9-1 or 9-2. B is the time (in days) in the relevant period. C is the days remaining between the <b>Commencement Date</b> and the end of the relevant period.	Implement the GHGMP.	<ul style="list-style-type: none"> <li>CAR.</li> <li>GHG monitoring records.</li> </ul>	Overall	For the life of the proposal as approved by the CEO.	Completed	This condition is no longer relevant as the reporting period (1 January 2025 to 31 December 2025) is now part of the period defined in Condition 9-2 (2) and therefore, there is a new five (5) year period.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1187: M9-4	GHG management	<p>The proponent shall implement the Albemarle Kemerton Plant Greenhouse Gas Management Plan (Final Version, 8 October 2021) which includes the following:</p> <ol style="list-style-type: none"> <li>(1) is consistent with the achievement of the PS Net GHG Emissions and Plant Net GHG Emissions limits in conditions 9-1 and 9-2 subject to the adjustment provided for in condition 9-3 (or achievement of emission reductions beyond those required by those emission limits);</li> <li>(2) estimated Proposal GHG Emissions and Emissions Intensity for the life of the proposal;</li> <li>(3) compare estimated Proposal GHG Emissions and Emissions Intensity for the life of the proposal against other comparable facilities;</li> <li>(4) identify and describe any measures that the proponent will implement to avoid, reduce and/or offset Proposal GHG Emissions and/or reduce the Emissions Intensity of the proposal; and</li> <li>(5) provide a program for the future review of the plan to: <ol style="list-style-type: none"> <li>a) assess the effectiveness of measures referred to in condition 9-4(4); and</li> <li>b) identify and describe options for future measures that the proponent may or could implement to avoid, reduce, and/or offset Proposal GHG Emission and/or reduce the Emissions Intensity of the proposal.</li> </ol> </li> </ol>	Implement the GHGMP.	<ul style="list-style-type: none"> <li>• CAR.</li> <li>• GHG monitoring records.</li> </ul>	Overall	For the life of the proposal as approved by the CEO.	Compliant	<p>The proponent has been implementing the current Greenhouse Gas Management Plan.</p> <p>This has included:</p> <ul style="list-style-type: none"> <li>• Determination of emissions and emissions intensity, including relevant reports for WA and Cwth Governments. Please refer to the annual GHG report on the Albemarle website for further details.</li> <li>• During the reporting period, several emissions and energy improvement projects were investigated including: <ul style="list-style-type: none"> <li>• MVR heater upgrades</li> <li>• Optimisation and debottlenecking projects for Pyromet to reduce energy consumption</li> <li>• Trialling lime as a replacement to reduce process emissions</li> </ul> </li> <li>• Future measures identified that could reduce emissions include: <ul style="list-style-type: none"> <li>• Running heat recovery preheaters in parallel</li> <li>• Add heat recovery tank between MVR feed and CXs</li> <li>• Automate cooling tower fan running</li> </ul> </li> </ul>
MS-1187: M9-5	GHG management	<p>The proponent:</p> <ol style="list-style-type: none"> <li>(1) may revise and submit to the CEO the Confirmed Greenhouse Gas Management Plan at any time;</li> <li>(2) must revise and submit to the CEO the Confirmed Greenhouse Gas Management Plan if there is a material risk that conditions 9-1 and 9-2 will not be complied with, including but not limited to as a result of a change to the proposal;</li> <li>(3) must revise and submit to the CEO the Confirmed Greenhouse Gas Management Plan by the date that the first five (5) yearly consolidated report is required to be submitted under condition 9-10(1) and every five (5) years after that date; and</li> <li>(4) must revise and submit to the CEO the Confirmed Greenhouse Gas Management Plan as and when directed to by the CEO.</li> </ol>	Revise and submit the Confirmed GHGMP.	<ul style="list-style-type: none"> <li>• CAR.</li> <li>• GHG monitoring records.</li> </ul>	Overall	For the life of the proposal as approved by the CEO.	Compliant	<p>Version 3 of the GHG Management Plan (08-10-2021) was approved through the approval of MS-1187.</p> <p>An EPA inquiry initiated by the Minister into changing the GHG implementation conditions relating to the Albemarle Kemerton Plant is currently underway. This inquiry commenced in 2024 and is expected to conclude in 2026.</p>
MS-1187: M9-6	GHG management	<p>Within one (1) month of receiving confirmation in writing from the CEO that:</p> <ol style="list-style-type: none"> <li>(1) the Greenhouse Gas Management Plan referred to in condition 9-4 satisfies condition 9-4; or</li> <li>(2) any subsequent version of the Confirmed Greenhouse Gas Management plan submitted under condition 9-5 satisfies condition 9-4,</li> </ol> <p>the proponent must submit a separate summary of the relevant plan to the CEO for public disclosure, which must:</p> <ol style="list-style-type: none"> <li>(3) include a summary of the matters specified in conditions 9-4(1) to 9-4(4); and</li> <li>(4) be published as required by condition 9-11(2).</li> </ol>	Submit a summary of the relevant Confirmed GHGMP to the CEO.	<ul style="list-style-type: none"> <li>• Receipt acknowledgement from CEO.</li> <li>• CEO approval.</li> </ul>	Overall	Within one month of receiving written confirmation from the CEO that the GHGMP meets the requirements set out in condition 9-6.	Compliant	Greenhouse Gas Management Plan, Rev. 3 – 08 October 2021 was approved 15 March 2022 and was available on the Albemarle website.
MS-1187: M9-7	GHG management	The proponent shall implement the most recent version of the <b>Confirmed</b> Greenhouse Gas Management Plan until the CEO has confirmed by notice in writing that it has been demonstrated that the <b>Net GHG Emission</b> limits in conditions 9-1 and 9-2 have been met.	Latest GHGMP version submitted and is available to project personnel.	<ul style="list-style-type: none"> <li>• CEO approval.</li> <li>• CAR.</li> </ul>	Operation	Following receipt in writing from the CEO that the latest Plan satisfies the requirements set out in condition 9-7.	Compliant	The GHG Management Plan was being implemented (see finding for Condition 9-4).

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1187: M9-8	GHG management	<p>The proponent shall submit an annual report to the CEO each year by 31 March, commencing on the first 31 March after the <b>Commencement of Operations</b>, or such other date within that financial year as is agreed by the CEO to align with other reporting requirements for <b>GHG</b>, specifying for the previous calendar year:</p> <p>(1) the quantity of Proposal GHG Emissions and lithium hydroxide produced; and</p> <p>(2) the Emissions Intensity for the proposal.</p>	Submit annual report to the CEO.	CAR	Operation	By 31 March annually.	Compliant	The Kemerton Plant 2025 Greenhouse Gas Emissions annual report (February 2025) included the proposal emissions (Section 3), the quantity of lithium hydroxide produced (Section 4) and the emissions intensity (Section 5) as required.
MS-1187: M9-9	GHG management	<p>The proponent shall submit to the CEO by 31 March 2030 or such other date within that financial year as is agreed by the CEO to align with other reporting requirements for GHG, and every fifth year thereafter:</p> <p>(1) a consolidated report specifying:</p> <p>a) for each of the preceding five (5) calendar years, the matters referred to in conditions 9-8(1) and (2);</p> <p>b) for the period specified in condition 9-1 and 9-2 that ended on 30 June of the year before the report is due:</p> <p>i.) the quantity of Proposal GHG Emissions;</p> <p>ii.) the Net GHG Emissions, PS Net GHG Emissions and Plant Net GHG Emissions;</p> <p>iii.) the type, quantity, identification or serial number, and date of retirement or cancellation of any <b>Authorised Offsets</b> which have been retired or cancelled and which have been used to calculate the <b>Net GHG Emissions, PS Net GHG Emissions</b> and <b>Plant Net GHG Emissions</b>; referred to in condition 9-9(1)(b) ii, including written evidence of such retirement or cancellation; and</p> <p>iv.) any measures that have been implemented to avoid or reduce <b>Proposal GHG Emissions</b>;</p> <p>(2) an audit and peer review report of the consolidated report required by condition 9-9(1), carried out by an independent person or independent persons with suitable technical experience dealing with the suitability of the methodology used to determine the matters set out in the consolidated report, whether the consolidated report is accurate and whether the consolidated report is supported by credible evidence.</p>	Submit consolidated report and audit and peer review report to the CEO.	<ul style="list-style-type: none"> <li>CAR.</li> <li>Consolidated Report.</li> <li>Audit and Peer Review Report.</li> </ul>	Operation	31 March 2030 and every 5 <sup>th</sup> year thereafter.	Not required at this stage	This requirement has not been triggered.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1187: M9-10	GHG management	A consolidated report referred to in condition 9-9(1) must be accompanied by: (1) a revision of the Confirmed Greenhouse Gas Management Plan under condition 9-5(3); and (2) a separate summary report, for the period specified in conditions 9-1 and 9-2 that ended on 30 June of the year before the report is due and any previous periods specified in condition 9-1 and 9-2, and which includes: a) a graphical comparison of <b>PS Net GHG Emissions</b> with the <b>PS Net GHG Emissions</b> limits detailed in conditions 9-1 (subject to the adjustment provided for in condition 9-3); b) a graphical comparison of <b>Plant Net GHG Emissions</b> with the <b>Plant Net GHG Emissions</b> limits detailed in condition 9-2 (subject to the adjustment provided for in condition 9-3); c) proposal <b>Emissions Intensity</b> compared to comparable facilities; d) a summary of measures undertaken by the proponent to avoid or reduce <b>Proposal GHG Emissions</b> for compliance periods detailed in conditions 9-1 and 9-2; and e) a clear statement as to whether limits for <b>PS Net GHG Emissions</b> and <b>Plant Net GHG Emissions</b> set out in conditions 9-1 and 9-2 have been met, and whether future <b>PS Net GHG Emissions</b> and <b>Plant Net GHG Emissions</b> limits are likely to be met, including a description of any reasons why those limits have not been, and/or are unlikely to be met.	Submit consolidated report including revised Confirmed GHGMP and summary report and audit and peer review report to the CEO.	<ul style="list-style-type: none"> <li>CAR.</li> <li>Consolidated Report.</li> <li>Revised GHGMP.</li> </ul>	Overall	31 March 2030 and every 5 <sup>th</sup> year thereafter.	Not required at this stage	This requirement has not been triggered.
MS-1187: M9-11	GHG management	The proponent shall make the <b>Confirmed</b> Greenhouse Gas Management Plan, the summary of that plan, and all reports required by condition 9 publicly available on the proponent's website within the timeframes specified below for the life of the proposal, or in any other manner or time specified by the CEO: (1) any Confirmed Greenhouse Gas Management Plan, within two (2) weeks of receiving written confirmation from the CEO as referred to in condition 9-6; (2) the summary of any Confirmed Greenhouse Gas Management Plan referred to in condition 9-6 and the reports referred to in conditions 9-8, 9-9 and 9-10 within two (2) weeks of submitting the document to the CEO.	Confirmed GHGMP and all reports required by condition 9 publicly available on project website.	GHGMP and all reports required by condition 9 available on project website.	Operation	Within the timeframes set out in condition 9-11.	Compliant	GHG Management Plan Rev 3 was available on the Albemarle website.
MS-1187: M10-1	Offsets	The proponent shall undertake an offset with the objective of counterbalancing the significant residual impact to 40.4 ha of foraging habitat, including 9.12 ha of potential breeding habitat for Carnaby's Black Cockatoo ( <i>Calyptorhynchus latirostris</i> ), Forest Red-tailed Black Cockatoo ( <i>Calyptorhynchus banksii naso</i> ) and Baudin's Black Cockatoo ( <i>Calyptorhynchus baudinii</i> ) as a result of implementation of the proposal.	Prepare and implement the Offset Strategy.	<ul style="list-style-type: none"> <li>Offset strategy.</li> <li>CAR.</li> </ul>	Overall	As defined in the offset strategy.	In progress	The offset area is yet to be formally secured under a protection mechanism. Consultations to secure the offset area under a protection mechanism are ongoing. It has been agreed that the preservation of Lot 42 for biodiversity offsets purposes would occur through funding from the proponent to acquire the land for vesting to the State of Western Australia, managed by 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 (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). 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 in progress.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1187: 10-2	Offsets	Within twelve (12) months of the publication of this Statement, the proponent shall prepare and submit an Offset Strategy to the CEO. The Offset Strategy shall: (see below)	Prepare and submit the Offset Strategy to the CEO.	Receipt acknowledgement from CEO.	Overall	15 March 2023.	Compliant	An Albemarle Kemerton Plant Offset Strategy (ref. ALB-KEM-PLA-01) (Preston, 2019) with appendices 1-3 was originally submitted to DWER in 2019 via email to registrar@dwer.wa.gov.au (24 October 2019). An updated strategy (Rev 1, 25 June 2020) and appendices was submitted via email to DBCA on 15 July 2020, with a further update (Rev 2, 23 May 2023) addressing the amended Condition associated with approval of MS-1187 (document submitted to DWER on 31 May 2023). 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.
MS-1187: 10-2	Offsets	(1) identify an initially unprotected area or areas to be protected and managed for conservation that contains the Priority Ecological Community and foraging habitat values identified in condition 10-1;	Prepare and submit the Offset Strategy to the CEO.		Overall		Compliant	Unprotected area identified, and Offset report Lot 42 Wellesley Road North, Kemerton Offset Site Study Report (June 2018) confirms area contains Priority Ecological Community (Floristic Community Type 21c 'Low lying Banksia attenuate woodlands and shrublands') and 45.73 ha of foraging habitat. 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 (request to re-survey received from DBCA). This area has been accepted by all parties. A summary of the proposed offset area is provided in Section 5 of the Offset Management Plan (Rev. 3).
MS-1187: 10-2	Offsets	(2) demonstrate how the proposed offset counterbalances the significant residual impact through consideration of the six principles and completion of the WA Offsets Template, as described in the WA Environmental Offsets Template Guidelines 2014, and the <i>Environmental Protection and Biodiversity Conservation Act 1999</i> Environmental Offsets Policy (October 2012) in conjunction with the associated Offsets assessment guide;	Prepare and submit the Offset Strategy to the CEO.		Overall		Compliant	Offset report Lot 42 Wellesley Road North, Kemerton Offset Site Study Report (Ecoedge, 2018) prepared including assessment against the "six principles". A summary of this assessment is included in Section 6 of Rev. 3 of the Offset Management Plan.
MS-1187: 10-2	Offsets	(3) identify the environmental values of the offset area(s)	Prepare and submit the Offset Strategy to the CEO.		Overall		Compliant	Environmental values identified in Offset report Lot 42 Wellesley Road North, Kemerton Offset Site Study Report (Ecoedge, 2018). A summary of the environmental values is included in Section 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).

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1187: 10-2	Offsets	(4) commit to a protection mechanism for any areas of land acquisition, being either the area is ceded to the Crown for the purpose of conservation, or the area is managed under other suitable mechanisms as agreed by the CEO;	Prepare and submit the Offset Strategy to the CEO.		Overall		Compliant	<p>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).</p> <p>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 the proponent 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 to secure the offset area under a protection mechanism are ongoing.</p>
MS-1187: 10-2	Offsets	(5) if any land is to be ceded to the Crown for the purpose of conservation, the proponent will identify: <ul style="list-style-type: none"> <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> </ul>	Prepare and submit the Offset Strategy to the CEO.		Overall		Compliant	<p>Section 9.8 of Rev 3 of the Offset Management Plan addresses the funding arrangement and items that Albemarle is expecting to fund. It was anticipated that the tripartite deed and sales agreement would be signed by the end of December 2025; however, this did not occur. 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.</p>
MS-1187: 10-2	Offsets	(6) identify any threats to offset values and provide management and/or rehabilitation actions to be undertaken to address the threats including: <ul 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> </ul>	Prepare and submit the Offset Strategy to the CEO.		Overall		Compliant	<p>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.</p>
MS-1187: 10-2	Offsets	(7) define the role of the proponent and/or any third parties.	Prepare and submit the Offset Strategy to the CEO.		Overall		Compliant	<p>Roles and responsibilities are defined in Section 9.2 of the Offsets Management Plan (Rev. 3, 29 Oct 2025).</p>

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS-1187: M10-3	Offsets	<p>After receiving notice in writing from the CEO, on advice of the Department of Biodiversity, Conservation and Attractions, that the Offset Strategy satisfies the requirements of condition 10-2, the proponent shall:</p> <p>(1) implement the actions in accordance with the requirements of the approved Offsets Strategy; and</p> <p>(2) continue to implement the approved Offset Strategy until the CEO has confirmed by notice in writing that it has been demonstrated that the completion criteria in the Offset Strategy have been met and therefore the implementation of the actions is no longer required.</p>	Prepare and submit the Offset Strategy to the CEO.	<ul style="list-style-type: none"> <li>CEO approval.</li> <li>CAR.</li> </ul>	Overall	After receiving notice in writing from the CEO, that the Offset Strategy satisfies the requirements of condition 10-2 and until the CEO has confirmed by notice in writing that it has been demonstrated that the completion criteria in the Offset Strategy have been met and therefore the implementation of the actions is no longer required.	In progress	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.
MS-1187: M10-4	Offsets	The proponent shall review and revise the Offset Strategy as and when directed by the CEO.	Revise and submit the offset strategy as and when required by the CEO.	Revised Offset strategy submitted.	Overall	As required.	In progress	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.
MS-1187: M10-5	Offsets	The proponent shall implement the latest version of the Offset Strategy, which the CEO has confirmed by notice in writing, satisfies the requirements of condition 10-2.	Implement the latest approved offset strategy.	CAR	Overall	As defined in the offset strategy.	Not required at this stage	The Offset Strategy has not yet been confirmed by the CEO in writing to satisfy the requirements of condition 10-2.

**Table 3-2: Environmental Management Plans Objective's Status**

EMP	Subject	Key Objectives	Target	Status	Comments
FVMMP	Orchids	Avoid indirect impact to known threatened orchid species.	No reportable decline of nearby Endangered/ Declared Rare Flora (DRF) <i>Drakaea elastica</i> individuals or habitat, attributable to the proposal.	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 (Banksia 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 proposal. 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 proposal. No significant increase in weed cover within immediately adjacent vegetation, attributable to the proposal.	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 Weed of National Significance (WoNS) or declared pests were attributable to the proposal. 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 proposal in 2025.
FVMMP	Dieback	Avoid introduction and/or spread of Dieback into adjacent areas.	No evidence of Dieback infestation identified within immediately adjacent areas/vegetation resulting from the proposal.	Compliant	The 2025 Spring survey (Ecoedge, 2026) identified no infestations of <i>Phytophthora cinnamomi</i> or confirmed dieback attributable to the proposal. The report did note Indistinct signs of <i>Phytophthora</i> 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 (Ecoedge, 2026) specified 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 during the reporting period concluded that concentrations of process related analytes are consistent with historical levels, are not considered to be related to construction or operational activities and are attributed to background levels.
GHG MP	GHG emissions	Avoid, where possible, and minimise greenhouse gas emissions as far as practicable.	The minimisation of scope 1 and scope 2 emissions arising from the construction phase and operation of the facility.	In Progress	Albemarle has made a commitment to protect the environment through the continuous improvement of energy performance. Albemarle implements an organisation-wide energy management approach. It is noted that Albemarle received a letter from DWER/EPA Services on 26 November 2024 specifying that the Minister for Environment has requested the EPA to inquire into, and report on the matter of changing the implementation conditions relating to the Albemarle Kemerton Plant, pursuant to section 46(1) of the EP Act. On completing its inquiry and in accordance with section 46(6) of the EP Act, the EPA will prepare and give to the Minister a report that includes a recommendation on whether or not the conditions to which the inquiry relates, or any of them, should be changed, and any other recommendations that it thinks appropriate. The EPA's inquiry into GHG conditions is ongoing as at time of writing.

## 4 REFERENCES

- Albemarle. (2022). *Waste Management Plan (Doc. No. P-74211-0000-HS00-PLN-0001)*. Albemarle.
- DWER. (2025). *Notice of Compliance Audit Findings - MS 1187 - Albemarle Kemerton Plant. 6 Nov 2025*. Government of Western Australia.
- Ecoedge. (2018). *Lot 42 Wellesley Road North, Kemerton Offset Site Study Report*. Bunbury, Western Australia: Prepared for GHD on behalf of Albemarle, unpublished.
- Ecoedge. (2026). *Banksia Woodland Threatened Ecological Community - Spring 2025 Monitoring*. Perth: Unpublished report for Albemarle Lithium.
- Government of Western Australia. (2014). *WA Environmental Offsets Guidelines*. Government of Western Australia.
- OEPA. (2012a). *Post Assessment Guideline No. 1 - Preparing an Audit Table*. Office of the Environmental Protection Authority.
- OEPA. (2012b). *Post Assessment Guideline No.2 - Preparing a Compliance Assessment Report*. East Perth, WA: Office of the Environmental Protection Authority.
- Preston. (2019). *Albemarle Kemerton Plant Offset Strategy – Ministerial Statement 1085*. Prepared for Albemarle (ALB-KEM-PLA-01) 24 October 2019.
- Preston Consulting. (2021). *Albemarle Kemerton Plant Greenhouse Gas Management Plan (doc. No. ALB-KEM-EMP-01)*. Unpublished report prepared for Albemarle Lithium.
- Ramboll. (March 2025). *Water Management Plan - Annual Compliance Report - 7421-0000-DV00-RPT-0220*.
- Wood. (2018a). *Albemarle Kemerton Plant. Flora and Vegetation Monitoring and Management Plan, Rev 1 (November 2018)*.
- Wood. (2018c). *Albemarle Kemerton Plant. Compliance Assessment Plan, Rev 1 (November 2018)*.
- Wood. (2018d). *Albemarle Kemerton Plant. Water Management Plan, Rev 1 (December 2018)*. Perth.

## APPENDICES

**Appendix A: Post Assessment Form for Statement of Compliance**

## Statement of Compliance

### 1. Proposal and Proponent Details

Proposal Title	Albemarle Kemerton Plant
Statement Number	1085 and 1187
Proponent Name	Albemarle Lithium Pty Ltd
Proponent's Australian Company Number (where relevant)	618 095 471

### 2. Statement of Compliance Details

Reporting Period	1/01/25 to 31/12/25
------------------	---------------------

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

Audit Table for Statement addressed in this Statement of Compliance is provided at Attachment:	2
Refer to 2025 Annual Compliance Assessment Report.	

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

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

INITIALS:



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

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

**Non-compliance/potential non-compliance 3-1**


Which implementation condition or procedure was non-compliant or potentially non-compliant? N/A
Was the implementation condition or procedure non-compliant or potentially non-compliant? N/A
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)? N/A

Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
<input type="checkbox"/> Yes <input type="checkbox"/> Reported to DWER verbally    Date _____ <input type="checkbox"/> Reported to DWER in writing    Date _____	<input type="checkbox"/> No

What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance? N/A
What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates) N/A
What was the cause(s) of the non-compliance or potential non-compliance? N/A
What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance? N/A
What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence? NA
Please provide information/documentation collected and recorded in relation to this implementation condition or procedure: <ul style="list-style-type: none"> <li>• in the reporting period addressed in this Statement of Compliance; and</li> <li>• as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance.</li> </ul> (the above information may be provided as an attachment to this Statement of Compliance)


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

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

INITIALS: 

#### 4. Proponent Declaration

I, **Tom Baddeley, Head of External Affairs Australia**, (*full name and position title*)  
 declare that I am authorised on behalf of **Albemarle Lithium Pty Ltd**  
 (*being the person responsible for the proposal*) to submit this form and that the information  
 contained in this form is true and not misleading.

Signature:.......... Date:.....26-3-26.....

Please note that:

- it is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give or cause to be given information that to his knowledge is false or misleading in a material particular; and
- the Chief Executive Officer of the DWER has powers under section 47(2) of the *Environmental Protection Act 1986* to require reports and information about implementation of the proposal to which the statement relates and compliance with the implementation conditions.

#### 5. Submission of Statement of Compliance

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

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

#### 6. Contact Information

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

**Manager, Compliance (Ministerial Statements)**

**Department of Water and Environmental Regulation**

Postal Address: Locked Bag 10  
 Joondalup DC  
 WA 6919

Phone: (08) 6364 7000

Email: [compliance@dwer.wa.gov.au](mailto:compliance@dwer.wa.gov.au)

#### 7. Post Assessment Guidelines and Forms

Post assessment documents can be found at [www.epa.wa.gov.au](http://www.epa.wa.gov.au)

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

INITIALS: 

## ATTACHMENT 1

Table 1 Compliance Status Terms

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

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

INITIALS: 

**Appendix B: Compliance Status Definitions**

Compliance Status	Definition	Notes
Compliant	Implementation of the proposal has been carried out in accordance with the requirements of the audit element.	This term applies to audit elements with: <ul style="list-style-type: none"> <li>• Ongoing requirements that have been met during the reporting period; and</li> <li>• Requirements with a finite period of application that have been met during the reporting period, but whose status has not yet been classified as 'completed'.</li> </ul>
Completed	A requirement with a finite period of application has been satisfactorily completed.	This term may only be used where: <ul style="list-style-type: none"> <li>• Audit elements have a finite period of application (e.g., construction activities, development of a document);</li> <li>• The requirement has been satisfactorily completed; and</li> <li>• The Office of the Environmental Protection Authority (EPA Services) has provided written acceptance of 'completed' status for the audit element.</li> </ul>
Not required at this stage	The requirements of the audit element were not triggered during the reporting period.	This should be consistent with the 'phase' column of the audit table.
Potentially Non-compliant	Possible or likely failure to meet the requirements of the audit element.	This term may only be used where during the reporting period the proponent has identified a potential non-compliance and has not yet finalised its investigations to determine whether non-compliance has occurred. Where this term is used, the proponent should advise when investigations will be finalised and provide follow up advice of the outcome.
Non-compliant	Implementation of the proposal has not been carried out in accordance with the requirements of the audit element.	This term applies where the requirements of the audit element have not been met during the reporting period and its status is not 'completed'.
In Progress	Where an audit element requires a management or monitoring plan be submitted to the EPA Services or another government agency for approval, that submission has been made and no further information or changes have been requested by the EPA Services or the other government agency and assessment by the EPA Services or other government agency for approval is still pending.	The term 'In Process' must only be used for the purpose stated in the definition column. The term 'In Process' may not be used to describe the compliance status of an implementation condition and/or procedure that requires ongoing implementation throughout the life of the proposal (e.g., implementation of a management plan).