

Covalent Lithium

Earl Grey Lithium Project

Life Of Mine (LOM) Environmental Management Plan



Mt Holland Lithium Project				
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1 Introduction

1.1 Overview

Covalent Lithium Pty Ltd (Covalent) as manager of the Mt Holland Joint Venture and for and on behalf of the Mt Holland joint venturers MH Gold Pty Ltd (MH Gold), Montague Resources Australia Pty Ltd (Montague) and SQM Australia Pty Ltd (SQM), has obtained environmental approval to develop the Earl Grey Lithium Project (the Project) at the historical Bounty Gold mine site at Mount Holland.

The Project will comprise the mining and processing of approximately 4 million tonnes per annum (Mtpa) of spodumene ore for the production of approximately 50,000 tonnes per annum (tpa) of battery quality Lithium Hydroxide (LiOH) at the Covalent Lithium Hydroxide plant at Kwinana, to be sold by Covalent shareholder into the international electric vehicle (EV) battery market. This Project is considered unique as it forms part of the only fully integrated Lithium Hydroxide Project in Western Australia, whereby one proponent (Covalent) is responsible for the mining, processing and refinery operations for the EV market.

The Project is located approximately 105 km south-southeast of the Southern Cross town-site in the Yilgarn Mineral Field of Western Australia (M77) at the former Bounty Gold mine. The site is located within and largely surrounded by, unallocated Crown Land. Access to the Project area is via Marvel Loch-Forrestania Road as shown in Figure 1.

1.2 Project Approval Status

The Earl Grey Lithium Project (EGLP) was referred to the Environmental Protection Authority (EPA) under Section 38 of the Environmental Protection Act (EP Act) on 19 May 2017. The EPA determined that a Public Environmental Review (PER) level of assessment was required. The EPA released its report and recommendations in relation to the EGLP proposal on 14 October 2019. The Project was approved with the issue of Ministerial Statement 1118 on 21 November 2019. Two amendments post-approval (via S46 and S45C) were obtained with subsequent issue of second Ministerial Statement 1167 on 14 May 2021. Covalent then received approval for a Revised Proposal in November 2022 via Ministerial Statement 1199. These Ministerial Statements imposed several conditions in relation to Flora and Vegetation, and Terrestrial Fauna management. Covalent is currently seeking an amendment to this approval via Part IV of the Environmental Protection Act to provide for additional area and infrastructure outside of the existing development envelope to support the remaining Life of Mine (LOM) activities.

The EGLP Mining Proposal (REG ID 91617) was initially approved 6 April 2021 by Department of Mines and Industry Regulation (DMIRS) and was superseded three times by an updated EGLP Mining Proposal (REG ID 96491) approved 9 June 2021 that incorporated changes to the Project within S46 and S45C approvals. The approval of EGLP Mining Proposal (REG ID 96491) imposed several non-standard tenement conditions in relation to construction of the water pipeline and additional data required in the Mine Closure Plan. The EGLP Mining Proposal and Mine Closure Plan (REGID 101345) were approved 25 November 2022 and remain current at the time of writing this document.

This Management Plan is prepared to support the Life Of Mine approval application and will be reviewed and implemented following receipt of LOM approval.

1.3 Purpose

Covalent recognises that environmental management is an integral component of activities on site. This is reflected within the Covalent Lithium Environment Policy (COV-000-EN-POL-0002) (Appendix B).

The purpose of this Environmental Management Plan (EMP) is to outline the environmental management framework, standards, plans and procedures that have been developed to ensure that the Covalent Lithium Environment Policy objectives are met during Project operations.

This EMP provides the basis to manage the environmental impacts of the Project in accordance with best practice and regulatory requirements. The EMP has been developed in alignment with the Principles of *AS/NZS ISO14001:2016 Environmental Management Systems* to allow a systematic



approach to the management of the Project's environmental aspects and impacts. The EMP is to be regarded as a manual for the Environmental Management System and a set of procedures during construction works on site.

This document outlines the environmental approval conditions and proponent commitments made during the environmental approvals process as well as sound industry practice. Included in this document are directions outlining the requirements for identifying obligations, planning, auditing, monitoring, reviewing, reporting and managing environmental performance.

This document does not address or attempt to address all legal or other compliance requirements relating to work under the contract (works) and is not a substitute for legal advice. All contractors will undertake the steps necessary to ensure the works comply with all related legislation and regulations. This document will be updated on a periodic basis as new approvals are received, and compliance requirements are determined.

Compliance with the EMP is mandatory for all Covalent Lithium personnel, Contractors, Suppliers and Service organisations.

1.4 Regulatory Compliance Regulations

The requirements stated in this document are required as a minimum standard, and compliance is mandatory. Audits and inspections will be undertaken by Covalent to ensure compliance with these requirements.

All personnel must be aware that Project approvals contain conditions that must be satisfied prior to the commencement and throughout construction of the Project. Non-compliance with these conditions could result in fines or penalties being levied against individuals or companies. All personnel must understand their legal obligations in relation to their scope of work and implement systems to monitor and ensure compliance with these requirements.

Mandatory obligations for the Project are identified in statutory approvals. All personnel must not deviate from the requirements set out in these approvals without written consent from Covalent. Obligations included in these approvals are provided in this EMP. The Contractors for the Project will be audited against this document throughout the Project. Any additional Project compliance requirements will be updated in this document and new revisions will be distributed to the Contractor.

1.5 Document Revision and Development

This document is to be reviewed as follows:

- Following the grant of or modification to relevant approvals;
- Annually; or
- As a result of new information, findings or actions identified through inspections, audits and incident reporting.

Reviews are to examine the appropriateness of this document, taking into consideration corporate, system and compliance requirement changes since the last review was undertaken.

The current revision of this document will be available in the Covalent Lithium Controlled Document Management System (TeamBinder). It is the responsibility of all personnel to ensure they are using the most up to date version of this document when carrying out the works.



Legend
 Proposed LOM Development Envelope

0 7,500 m N
 Scale: 1:450,000
 MGA94 (Zone 50)
 Author: A. Pate
 Date: October 2023

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Earl Grey Lithium Project – Life of Mine (LOM)
Location and Development Envelope

Source: Image: Landgate



2 Definitions, abbreviations, and reference documents

Table 2-1 Definitions

Term	Definition
Australian Standards	Standards published by Standards Australia which set out specifications and procedures designed to ensure products, services and systems are safe, reliable and consistently performed the way they were intended to.
Consultant	Any person engaged by the Contractor to perform consultancy services in connection with Works and includes any Covalent's consultant whose prior Contract is novated to the Contractor.
Controlled Waste	Waste materials listed in Schedule 1 of the <i>Environmental Protection (Controlled Waste) Regulations 2004</i> .
Contract	The agreement between Covalent and the Contractor which comprises the documents set out in clause 2 of the Formal Instrument of Agreement to which the General Conditions are attached.
Contractor	The person(s) bound to carry out and complete Works under Contract.
Covalent	Covalent Lithium Pty Ltd
Environment	The meaning given to that term at common law and in any legislation in force in the State or Territory of Australia in which the site is situated including any land, water, atmosphere, climate, sound, odour, taste, the biological factor of animals and plants and the social factor of aesthetic.
Ground Disturbing Work	Work that will in any way cause any change or disturbance to the ground surface including (but not limited to): clearing of vegetation, placement of survey pegs, excavations, geotechnical investigations, water bore drilling and release of water, bulk earthworks installation of buildings and infrastructure, construction of roads, access tracks and laydown areas.
Hazardous Substance	<p>Under the <i>Occupational Safety and Health Regulations 1996</i>, a substance is a 'hazardous substance' if it meets criteria under:</p> <ul style="list-style-type: none"> The original system in the Occupational Safety and Health Regulations 1996, now called 'the AC classification system'; or An international system called, 'the GHS classification system'. <p>Under the AC classification system, a substance is a 'hazardous substance' if:</p> <ul style="list-style-type: none"> Any of its ingredients is entered in the http://hsis.ascc.gov.au/Default.aspx database at concentrations above the cut-off concentration. HSIS is available at http://hsis.ascc.gov.au/Default.aspx; or The substance meets the criteria in the document, <i>Approved Criteria for Classifying Hazardous Substances [NOHSC: 1008 (2004)]</i> available at http://www.safeworkaustralia.gov.au/Pages/default.aspx <p>Under the GHS classification system (also called the GHS or the Globally Harmonised System of Classification and Labelling of Chemicals 3rd revised edition), a substance is a 'hazardous substance' if it meets any of the criteria in this system.</p>
Heavy Rainfall	Greater than 50 mm in a 24-hour period.
Open Excavation	An open excavation in the context of this specification is any hole, trench, excavation or void in which there exists the potential for entrapment of native fauna.



Term	Definition
Personnel	Covalent Lithium personnel, Contractors, Suppliers and Service organisations
Pollutant	Means a chemical that may reduce the quality of the environment.
Pollution	Means presence of one or more pollutants in the environment.
Principal	Covalent Lithium
Project	The Earl Grey Lithium Project
Site	The lands and other places applicable to WUC to be made available to the Contractor by Covalent for the purposes of the Contract
Scope of Work	The scope of work forming part of Covalent's Project Requirements
Shall, will, must	Mandatory requirement
Should	Discretionary requirement, but ought to be done if practicable;
Subcontractor	A contractor that is employed by another contractor to undertake Project Works, including Consultants.
The Works	The whole of the work to be carried out and completed in accordance with the Contract, including variations provided for by the Contract, which by the Contract is to be handed over to Covalent.
Work	Includes the provision of materials and labour.
Works Under Contract	The work which the Contractor is or may be required to carry out and complete under the Contract and includes variations, remedial work, construction plant and temporary works.

Table 2-2 Abbreviations

Abbreviation	Definition
°	degree
COV	Covalent Lithium Pty Ltd
JV	joint venture
ANZECC	Australian and New Zealand Environment Conservation Council
AS	Australian Standard
BC Reg	Biodiversity Conservation Regulations 2018
DMIRS	Department of Mines, Industry Regulation and Safety
DWER	Department of Water and Environmental Regulation
EMP	Environmental Management Plan
EMS	Environmental Management System
EP(CBCPM) Reg	<i>Environmental Protection (Concrete Batching and Cement Product Manufacturing) Regulations 1998</i>
EP(CW)R	<i>Environmental Protection (Controlled Waste) Regulations 2004</i>
EP(N)R	<i>Environmental Protection (Noise) Regulations 1997</i>
EPA	Environmental Protection Authority
EP Act	<i>Environmental Protection Act 1986</i>
EPBC Act	<i>Environmental Protection and Biodiversity Conservation Act 1999</i>
GDP	Ground Disturbance Permit



Abbreviation	Definition
GHG	Greenhouse Gases
GIS	Geographical Information System
GPS	Global Positioning System
ha	hectares
HAZID	Hazard Identification
HDPE	High Density Polyethylene
H(TS) Reg	<i>Health (Treatment of Sewage and Disposal of Effluent and Liquid Waste) Regulations 1974</i>
HSE	Health Safety & Environment
JHA	Job Hazard Analysis
km	kilometre
LOR	Legal (and other) Obligations Register
mg/L	Milligrams per litre
MGA	Map Grid of Australia
NGER	National Greenhouse and Energy Reporting
NPI	National Pollutant Inventory
POW	Programme of Work
ppm	Parts per million
ROM	Run of Mine Pad
SDS	Safety Data Sheet
SOW	Scope of work
SQM	Sociedad Química y Minera
WWTP	Wastewater Treatment Plant

Table 2-3 Reference documents

Document No.	Document title
COV-001-EN-PRO-0001	Borrow Pit Management Procedure
COV-000-EN-PRO-0021	Clearing and Soil Management Procedure
COV-000-EN-MAN-0004	Conservation Significant Fauna, Flora, Weed Species Manual
COV-000-EN-CHK-0009	Contractor Demobilisation Environmental Inspection Checklist
COV-015-TS-WIN-0008	Drill Pad Rehabilitation Work Instruction
COV-M000-EN-RPT-0003	EGLP Mining Proposal and Mine Closure Plan (REG ID 101345)
COV-M000-EN-FOR-0003	Environmental Alert/Toolbox Talk
COV-000-EN-CHK-0007	Environmental Inspection Checklist (General Area)
COV-M000-EN-FOR-0005	Environmental Data Reporting Form
COV-000-EN-POL-0002	Environment Policy
COV-M000-EN-PRO-0001	Fauna Management and Trench Clearing Procedure
COV-001-EN-PLN-0021	Flora and Vegetation Management Plan (MS1118)



Document No.	Document title
COV-000-EN-FOR-0012	Ground Disturbance Permit Application Form
COV-000-EN-FOR-0028	Ground Disturbance Permit Closeout Form
COV-000-EN-PRO-0012	Ground Disturbance Permit Procedure
COV-000-EN-FOR-0010	Ground Disturbance Permit Release Form
COV-000-EN-REG-0001	Ground Disturbance Permit Register
COV-000-EN-FOR-0026	Ground Disturbance Permit Site Inspection Form
COV-000-HS-FOR-0032	Hazardous Chemical Application Form
COV-000-HS-PRO-0025	Hazardous Materials Management Procedure
COV-000-EN-FOR-0008	Imported Materials Weed Hygiene Inspection
COV-000-HS-FOR-0003	Incident Reporting and Investigation Form
COV-000-HS-PRO-0001	Incident Reporting and Investigation Procedure
COV-000-HS-FOR-0002	Job Hazard Analysis (JHA)
COV-000-EN-CHK-0005	New Contractor to Site Checklist
COV-000-EN-REG-0002	Programme of Work Register
COV-0000-PM-PLN-0002	Project Risk Management Plan
COV-000-EN-PRO-0007	Rehabilitation Environmental Management Procedure
COV-000-EN-PRO-0009	Saline Water Use Management Procedure
COV-000-EN-WIN-0010	Spill Clean-up and Removal Work Instruction
COV-000-EN-WIN-0011	Spill Investigation Work Instruction
COV-000-EN-PRO-0011	Spill Response Environmental Management Procedure
COV-M000-EN-PLN-0001	Terrestrial Fauna Management Plan (MS1118)
COV-M000-EN-FOR-0001	Vehicle and Mobile Equipment Weed Hygiene Inspection Form



3 Project Overview

Covalent proposes to use conventional open pit mining methods, load and haul, drill and blast to extract spodumene from the Earl Grey Lithium deposit. Mining equipment used for the Project will be typical of open cut mining and will include excavators, haul trucks, surface drill rigs, dozers, water trucks, service trucks and graders. Ore will be stockpiled on a ROM pad located adjacent to the concentrator and primary crusher.

Open pit mining is planned on a double shift continuous roster using a single fleet. Early mining operations will produce sufficient suitable material for construction of the ROM pad. Waste will be disposed at two strategic locations including the filling of the historical Bounty Pit and construction of the South Waste Rock Landform (SWRL) that will cover and encapsulate the historical TSF.

The concentrator process is typical for spodumene concentrators. Ore from the ROM stockpile will be blended to the target feed grade and then crushed using a multi-stage crushing flowsheet. The crushed ore will be screened with the coarse fraction processed using dense media separators to produce a coarse spodumene concentrate. The fine fraction will be ground further before being deslimed. Magnetic minerals are removed prior to the feed being conditioned for further upgrading in a flotation circuit. Approximately 4mtpa of spodumene concentrate from the flotation and Dense Media Separation (DMS) circuits will be combined for transport to the Kwinana refinery.

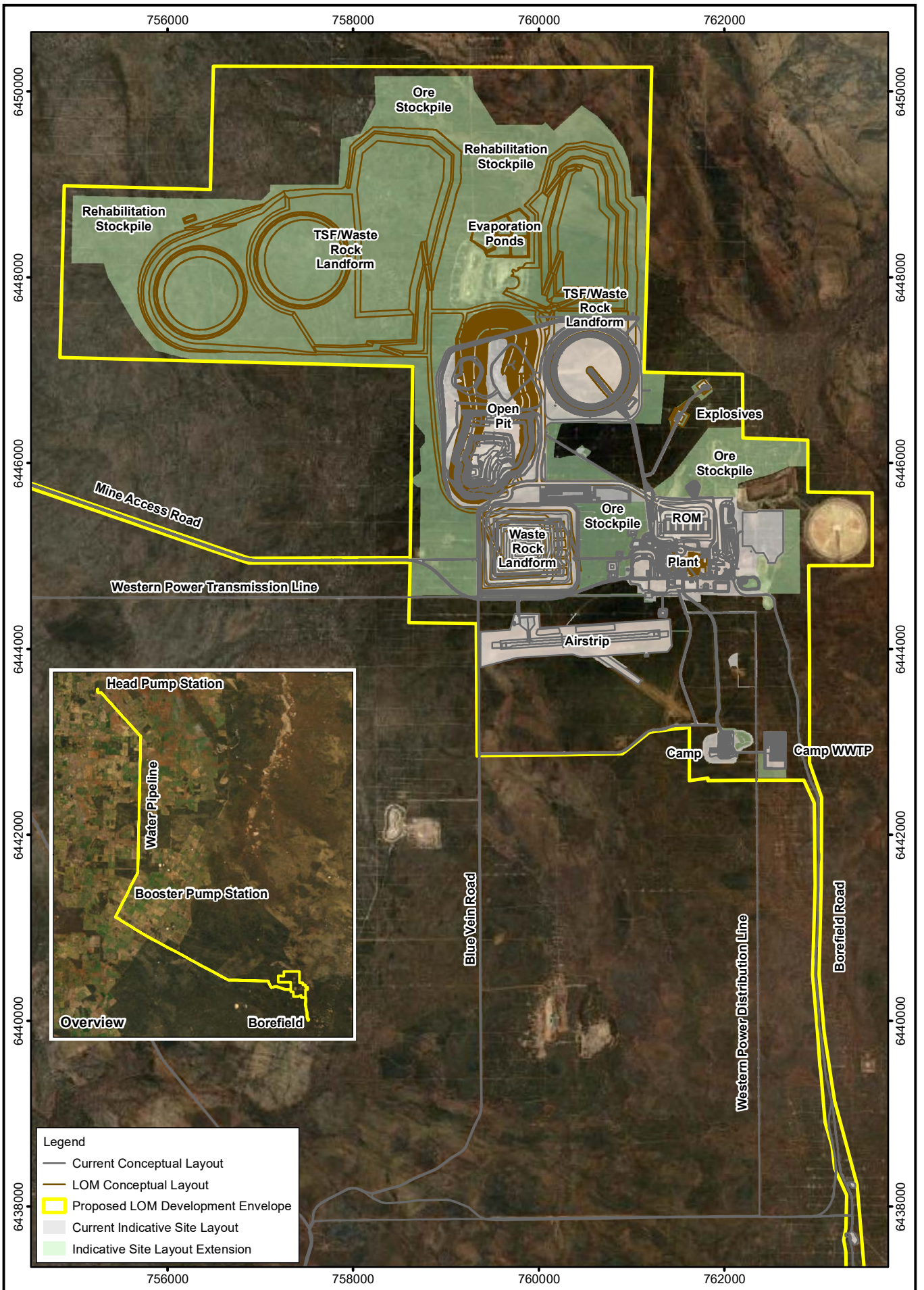
Solid-based waste from the concentrator such as coarse rejects from the Dense Media Separation circuit will be deposited in the various Waste Rock Landforms (WRL) whilst dewatered slurry-based tailings will be deposited within the tailings storage facilities.

Opportunities for progressive rehabilitation will be limited in the early stages of the operation but will be undertaken as the project develops. Whilst current information about the extent of asbestiform materials present on site is limited, sampling of waste for asbestiform materials will be ongoing. This data as it becomes available will enable waste management and rehabilitation practices to become more refined.

The expected workforce during the construction phase will be up to 950 people and during the operations phase the workforce will decrease to approximately 500 people. The Project will or fly in/fly out (FIFO) from Perth.

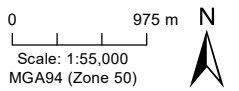
This EMP will be updated as detailed designs become available. Additional information on key mining attributes is available in the EGLP Mining Proposal (REG ID 101345).

An indicative site layout plan is provided in Figure 2.



Legend

- Current Conceptual Layout
- LOM Conceptual Layout
- ▭ Proposed LOM Development Envelope
- ▭ Current Indicative Site Layout
- ▭ Indicative Site Layout Extension



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Earl Grey Lithium Project – Life of Mine (LOM) Indicative Site Plan

Source: Aerial photography: ESRI, Tenements: DMIRS

Author: A. Pate
Date: October 2023

Rev: A | A4

CAD Ref: a2765_CEMP_02_02
Drawn: CAD Resources ~ www.cadresources.com.au
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4 Approvals and Tenure

Environmental approval status is outlined in Section 1.2 with copies of relevant approvals provided in Appendix A.

Works Approval applications are under assessment by Department Water and Environmental Regulation (DWER) for construction of the Concentrator (approved 12 February 2021), Waste Water Treatment Plant (WWTP) (approved 22 April 2021) and Landfill. Other applications may be submitted as determined by Project requirements.

All approvals associated with the Project will be the responsibility of Covalent and should not be sought by the Contractor unless otherwise requested.

Copies of approvals and applications are available in the Site Environment File.

4.1 Ministerial Statement Environmental Exclusion Zones

4.1.1 Disturbance

Ministerial Statement 1199 approved the Project disturbance footprint of 440 ha of previously disturbed land and an allowance for 442 ha of native vegetation clearing. The layout for the project was adjusted to minimise the impact to conservation significant flora and fauna, utilising previously disturbed areas where possible.

Project disturbance will be managed via the Covalent Ground Disturbance Permit procedure (COV-000-EN-PRO-0012).

A summary of the disturbance areas per tenement as per EGLP Mining Proposal (REG ID 10135) is provided in Section 4.2.

4.1.2 Conservation Significant Flora and Exclusion Zones

Conservation Significant Flora and Vegetation Exclusion Zones were imposed by Ministerial Statement 1199. These areas are to be delineated and protected prior to works commencing within 10 metres of the exclusion zone boundary. This will be managed by the Covalent Ground Disturbance Permit Procedure (COV-000-EN-PRO-0012), utilised for all ground disturbance activities on site. Flora and Vegetation Exclusion Zones are shown in Figure 3 (spatial data will be provided to all Contractors as required).

All areas within the Project Development Envelope (DE) have now been surveyed in accordance with conditions of Ministerial Statement 1199 and therefore no further pre-clearance baseline flora surveys are required. The pre-clearance surveys identified 29 conservation significant flora species within the DE, of which 27 species will be impacted (directly or indirectly) as a result of the Project. Direct and indirect impacts to Flora and Vegetation Exclusion Zones are managed under the Project Flora and Vegetation Management Plan (COV-000-EN-PLN-0021), as stipulated by Condition 6 of Ministerial Statement 1118.

Two threatened flora species, Ironcap Banksia (*Banksia sphaerocarpa* var. *dolichostyla*) (T) and Whorled Eremophila (*Eremophila verticillata*) (T) both listed as 'Threatened' under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) and Critically Endangered (CR) under the *Biodiversity Conservation Act 2016* (BC Act) are located within Project Development Envelope. The Ironcap Banksia is predominantly located within Flora and Vegetation Exclusion Zones and found close to the edge of existing site access roads. The Whorled Eremophila is located close to the eastern historic TSF and will not be impacted from Project activities.



4.1.3 Conservation Significant Fauna and Exclusion Zones

Detailed baseline fauna surveys have been undertaken since 2016. Several species of conservation significance were recorded, with two species requiring additional management measures as imposed by Ministerial Statement 1118:

1. Malleefowl (*Leipoa ocellata*)
2. Chuditch (*Dasyurus geoffroii*)

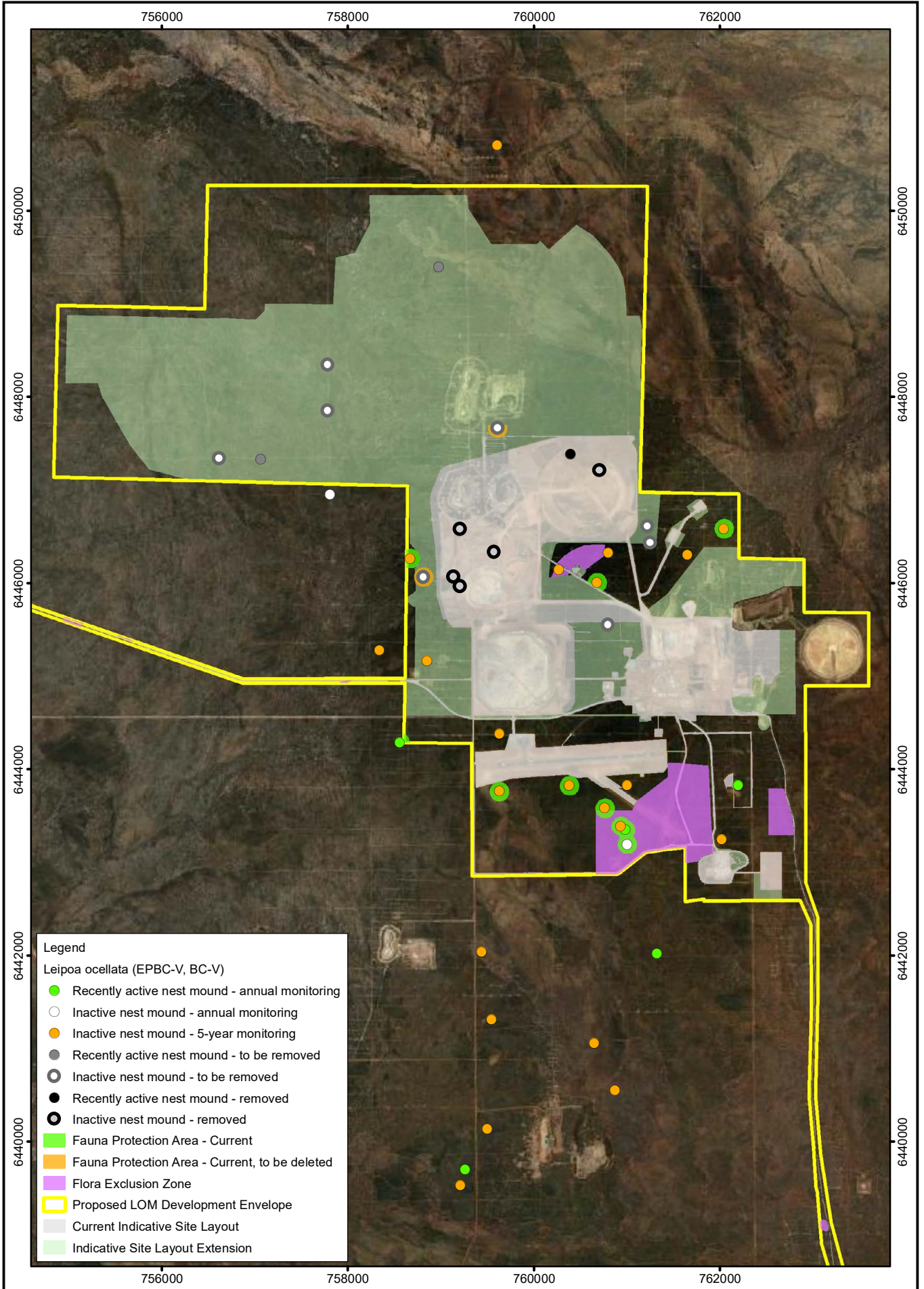
Malleefowl and Chuditch are both listed in both the Western Australia BC Act 2018 and the Commonwealth EPBC Act 1999 as 'Vulnerable'. The vegetation within the DE is identified as suitable breeding and foraging habitat for both species. As a result, pre-clearance surveys are required for both species in accordance with the project Terrestrial Fauna Management Plan (COV-M000-EN-PLN-0001). Pre-clearance surveys and annual population monitoring will be undertaken by adequately trained and licenced personnel.

Malleefowl mounds exist throughout the DE, with majority protected by an Exclusion Zone. Malleefowl Mound Exclusion Zones were imposed by Ministerial Statement 1199 and are based on a 100-metre radius from the centre of a mound. These areas are to be delineated and protected prior to works commencing within 10 metres of the exclusion zone boundary. For mounds without an exclusion zone, or newly identified, the works planned for that area will be relocated to remain outside of the 100-metre buffer zone where possible, managed by the COV Ground Disturbance Permit Procedure (COV-000-EN-PRO-0012). Malleefowl Mound Exclusion Zones are shown in Figure 3 (spatial data will be provided to all Contractors as required).

The breeding season for both Malleefowl and Chuditch (Table 4-1) must be considered when planning ground disturbance activities, as additional management measures may be required. Specific conditions in relation to these requirements will be included in the Ground Disturbance Permit for the activity. Additional management measures for conservation significant (and other fauna) are outlined in Section 7.6 and summarised in Table 4 below.

Table 4-1 Malleefowl and Chuditch Annual Activities

SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG
Vegetation Clearing to be avoided or minimised where possible						Vegetation Clearing					
Fauna displacement walk-through and check of potential refuge sites											
Chuditch Pre-Clearance Survey (Trapping) Implement Radio Collar procedure						Chuditch Pre-Clearance Survey (Trapping)					
Malleefowl Pre-Clearance Survey (Transects or LiDAR)						Chuditch Breeding Season & Annual Population Monitoring					
Malleefowl Breeding Season & Annual Population Monitoring											



- Legend**
- Leipoa ocellata (EPBC-V, BC-V)**
- Recently active nest mound - annual monitoring
 - Inactive nest mound - annual monitoring
 - Inactive nest mound - 5-year monitoring
 - Recently active nest mound - to be removed
 - Inactive nest mound - to be removed
 - Recently active nest mound - removed
 - Inactive nest mound - removed
 - Fauna Protection Area - Current
 - Fauna Protection Area - Current, to be deleted
 - Flora Exclusion Zone
 - ▭ Proposed LOM Development Envelope
 - ▭ Current Indicative Site Layout
 - ▭ Indicative Site Layout Extension

Source: Aerial photography: ESRI, Tenements: DMIRS

0 975 m N
 Scale: 1:55,000
 MGA94 (Zone 50)

Author: A. Pate
 Date: October 2023

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Earl Grey Lithium Project – Life of Mine (LOM)
Exclusion Zones and Malleefowl Mounds

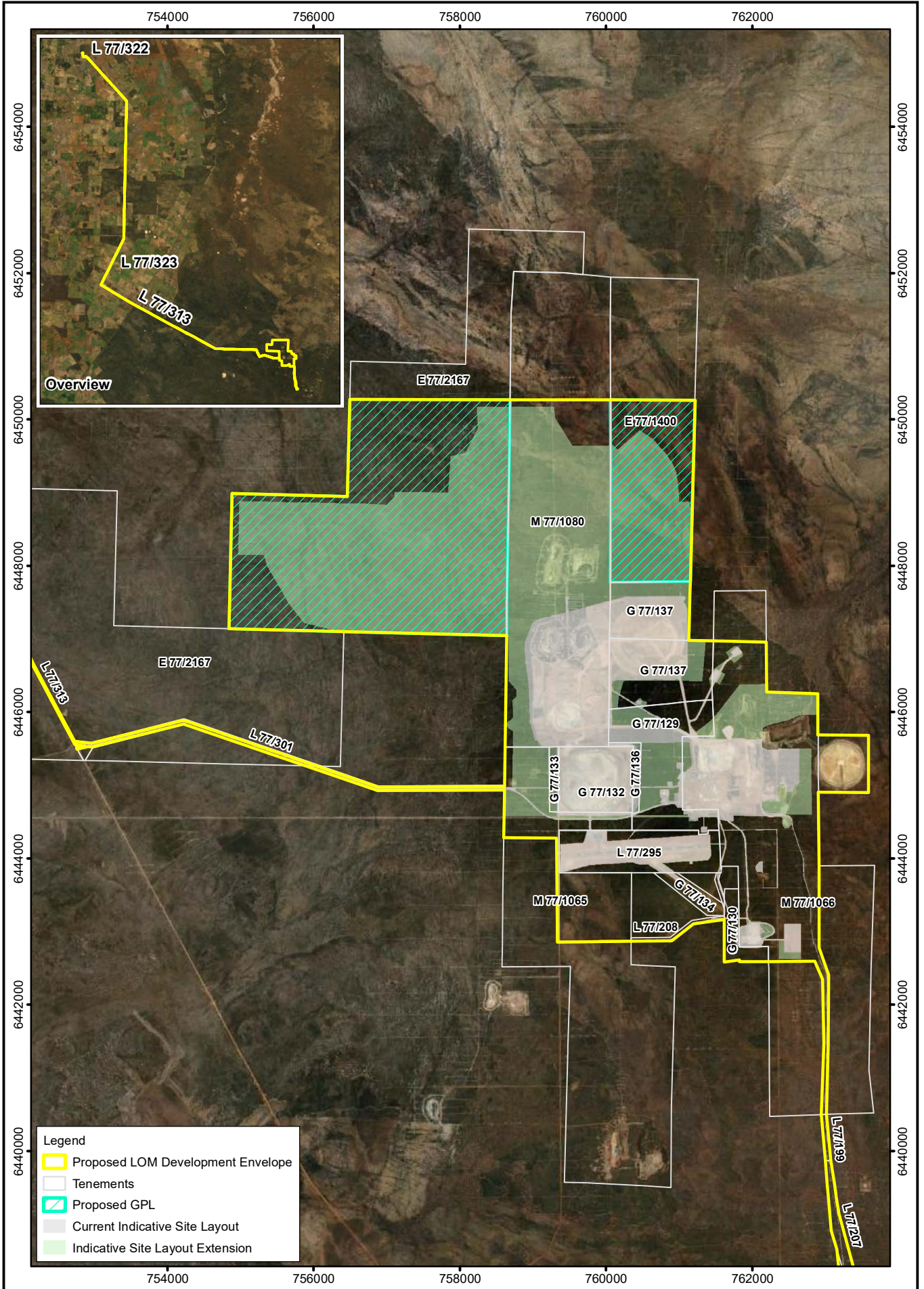


4.2 Tenure

A summary of the tenements associated with Project disturbance approved under the EGLP Mining Proposal (REG ID 101345) are provided in the table below and illustrated in Figure 4.

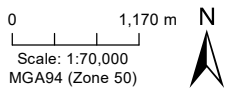
Table 4-2 EGLP Tenure and Disturbance

Tenement	Tenement Holder	Cleared Land	To Be Cleared	Total Area
G 77/129	MH Gold	16.95	29.32	46.27
G 77/130	MH Gold	2.17	0.02	2.19
G77/132	Montague	81.09	9.81	90.90
G77/133	Montague	2.16	0.50	2.66
G 77/134	MH Gold	1.65	0.00	1.65
G 77/136	MH Gold	0.63	7.26	7.89
G 77/137	MH Gold	4.54	119.32	123.86
L 77/199	MH Gold	0.25	0.00	0.25
L 77/207	MH Gold	5.00	0.29	5.29
L 77/295	MH Gold	7.12	0.00	7.12
L 77/301	MH Gold	10.38	66.66	77.04
L 77/313	MH Gold & SQM	9.21	2.55	11.76
L 77/322	MH Gold & SQM	75.86	0.02	75.88
L 77/323	MH Gold & SQM	2.05	0.11	2.16
M 77/1065	Montague	0.21	0.05	0.26
M 77/1066	Montague	7.84	3.84	11.68
M 77/1080	Montague	114.88	69.34	176.40
TOTAL (ha)		405.81	441.92	847.73



Legend

- Proposed LOM Development Envelope
- Tenements
- Proposed GPL
- Current Indicative Site Layout
- Indicative Site Layout Extension



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Earl Grey Lithium Project – Life of Mine (LOM) Tenements

Source: Aerial photography: ESRI, Tenements: DMIRS

Author: A. Pate
 Date: October 2023 Rev: A | A4

CAD Ref: a2765_CEMP_02_04
 Drawn: CAD Resources ~ www.cadresources.com.au
 Tel: (08) 9246 3242 ~ Fax (08) 9246 3202



5 Environmental Management System

The Covalent Environmental Management System (EMS) provides the structure and framework for the strategic management of environmental risks and compliance with legal requirements and standards in accordance with the Covalent Lithium Environment Policy (Appendix B).

The EMS provides personnel and Contractors with guidance on environmental standards, procedures and instructions to be implemented in conducting activities within or on behalf of Covalent.

5.1 EMS Structure

The structure of the Covalent Lithium EMS (Figure 5) is in line with *AS/NZS ISO 14001:2016 Environment Management Systems*. It comprises the following four principal elements (steps):

- Plan: establish objectives, targets, processes, documents and training necessary to deliver results in accordance with the Covalent Lithium environmental policy.
- Do (Implement and Operate): implement approved environmental plans, procedures, guidelines and work instructions during operations.
- Check: undertake audits, inspections, monitoring and measurement of performance against environmental requirements and report the results to internal and external stakeholders.
- Act (Management Review): conduct an annual review of the EMS to achieve continual improvement in environmental performance.

Sections 6 to 9 outline the implementation of the EMS through the Plan (Section 6), Do (Section 7), Check (Section 8) and Act (Section 9) framework.



Figure 5 Covalent Lithium EMS Structure



5.2 EMS Document Hierarchy

To deliver the required objectives of the EMS, Covalent has developed a document hierarchy that aligns with Covalent’s Integrated Management System. The hierarchy as outlined in Figure 6 provides a structured framework for the implementation of the EMS.

This EMP outlines the interaction between the policy, manuals, standards, plans, procedures and work instructions and assists with the implementation of the EMS framework. It also outlines the requirements for the management of environmental risks during construction and operations.



Figure 6 EMS Document Hierarchy



6 Planning

6.1 Environment Policy

The Covalent Lithium Environment Policy (COV-000-EN-POL-0003) (Appendix B) outlines the key principles that underpin environmental management at Covalent. The Policy is to be communicated to all personnel through the Covalent induction process, notice boards and made available on the Covalent intranet portal.

The Environment Policy acknowledges Covalent's responsibility to perform its activities in an environmentally responsible manner.

6.2 Environmental Risk Assessment

A formal risk management process for the identification and management of all Project related risks is required to be undertaken prior to the commencement of construction. The process is defined within the Project Risk Management Plan (COV-000-PM-PLN-0002) and is based on the International Standard, *AS/NZS ISO 31000:2009, Risk Management- Principles and Guidelines*.

Covalent utilises a Risk Assessment Criteria (5x5) matrix to assess and prioritise risks. Covalent has undertaken a risk assessment specific to the construction activities, and relevant management measures have been included in Section 7 of this EMP.

Key environmental risks specific to Contractor scope of work are to be captured in an Environmental Risk Register (ERR) and risk owners assigned accordingly. It is the responsibility of the designated risk owner to ensure that the risk controls and other mitigation measures that have been identified are implemented, and that the register is updated with new or amended risks and controls. The risk registers are to be reviewed and revised annually, where key activities have changed or where legislation or approvals have changed.

A HAZID is required to be undertaken prior to commencement of construction activities, and a construction risk register is to be used to record and address risks specific to the Scope of Work. A task level Job Hazard Analysis (JHA) (COV-000-HS-FOR-0002) or similar process is to be used to identify potential environmental risks and appropriate control measures prior to the commencement of any task.

6.3 Legal Requirements and Other Requirements

Covalent operates in accordance with relevant Commonwealth and State legislation and regulations.

Key State and Commonwealth legislation includes:

- Environmental Protection Act 1986 and subsidiary regulations
- Environmental Protection and Biodiversity Conservation Act 1999 and subsidiary regulations
- *Mining Act 1978* and subsidiary regulations
- Land Administration Act 1997
- Rights in Water and Irrigation Act 1914 and subsidiary regulations
- Aboriginal Heritage Act 1972
- Biodiversity Conservation Act 2016
- Dangerous Goods Safety Act 2004 and subsidiary regulations
- *Building Act 2011* and subsidiary regulations
- *Health Act 1911* and subsidiary regulations
- Contaminated Sites Act 2003
- Town Planning and Development Act 1928
- Heritage of Western Australia Act 1990

The Environment Team receives notifications from the Department of Justice regarding changes to environmental legislation and communicates these to the business as needed. An email information notification service can be found on the Parliamentary Counsel's Office web site,



<http://www.legislation.wa.gov.au>, and should be utilised to receive weekly updates regarding changes to state legislation. Covalent has access to current Australian Standards through SAI Global.

Approval applications and granted approvals contain commitments and conditions (legal requirements) that must be met during Construction activities. Project related licences, approvals and permits are listed in the Legal Obligations Register (LOR) and can be accessed via the Covalent Document Management System or Site Files. Approval conditions and Covalent's commitments to regulators and stakeholders are documented in the LOR. Relevant requirements are embedded in Covalent's procedures that are to be used by Covalent and Contractor personnel. *Copies of all relevant environmental approvals are available in the Site Environment File.*

Legal requirements have been embedded into environmental performance standards, management plans, procedures and work instructions. Legal requirements are also to be met through the implementation of studies, surveys and monitoring programs.

6.4 Objectives and Targets

Consistent with *AS/NZS ISO 14001:2016 Environment Management Systems*, measurable objectives and targets are to be set for significant environmental risks. The environmental objectives and targets are to align with the Covalent Lithium Environment Policy.

The objectives and targets are to be reviewed annually as a part of the management review of the EMS, to identify if any changes are required.



7 Implementation and Operation

7.1 Operational Control

7.1.1 Scope of Environmental Management

The scope for environmental management during construction includes the following:

- Ensure that Covalent and its Contractors executes its services in accordance with this EMP and Covalent's Environment Policy.
- Monitor and assure Environmental Management activities are implemented in accordance with the EMP.
- Collect and collate environmental statistics and data and report in accordance with Legal obligations.
- Monitor and ensure that emergency preparedness procedures are in place and implemented.
- Monitor compliance with licence requirements.
- Monitor incidents reporting, incident investigations and identification and implementation of corrective actions.
- Monitor and ensure identification and implementation of corrective and preventative actions as identified during audits and inspections.
- Maintain environmental records.
- Conduct environmental audits and inspections.
- Implement and maintain the Construction EMP.

7.1.2 Environmental Management Documents

Environmental management documents detail the way environment risks that have been identified in the Environmental Risk Register are managed. Specifically:

- Environmental plans detail **why** specific management measures are required and provide background,
- Environmental procedures outline **what** the management actions are that must be implemented to comply with legal requirements and minimise impacts to the environment, and
- Work instructions provide specific step-by-step detail on **how** actions are to be undertaken.

The use of plans, procedures and work instructions is the primary mechanism for the management of environmental risks. The implementation of the approved plans, procedures and work instructions is mandatory.

The current list of approved plans, procedures and work instructions relating to environment management are be accessed via the Covalent Document Management System.

7.1.3 Contractor Environmental Compliance Requirements

Appendix C of this EMP outlines the environmental requirements for the Contractor EMP. Compliance with the requirements of this EMP is mandatory.

Once Contractors are mobilised to Site, Covalent will use the New Contractor to Site Environmental Checklist (COV-000-EN-CHK-0005) to ensure all pre-mobilisation requirements have been met or if further action is required.



7.2 Ground Disturbance Management

All ground disturbance work is to be managed in accordance with the Ground Disturbance Permit (GDP) procedure (COV-000-EN-PR-0012) and through the implementation of the management actions as detailed in the table below.

Table 7-1 Ground Disturbance Management Actions

Objectives and Targets			
Objective	To prevent unauthorised vegetation clearing outside of approved areas.		
Target	No unauthorised clearing events or breach of GDP conditions.		
Requirements		Responsibility	Timing
1.	Implement the following documents during ground disturbance, flora and topsoil management as relevant to the activities: <ul style="list-style-type: none"> Ground Disturbance Permit Procedure (COV-000-EN-PRO-0012) Ground Disturbance Permit Application Form (COV-000-EN-FOR-0012) Ground Disturbance Permit Release Form (COV-000-EN-FOR-0010) Ground Disturbance Permit Site Inspection Form (COV-000-EN-FOR-0026) Ground Disturbance Permit Closeout Form (COV-000-EN-FOR-0028) Ground Disturbance Permit Register (COV-000-EN-REG-0001) 	<i>All personnel</i>	Construction & Operations
2.	Ensure no work (including ground disturbance and clearing of vegetation) is undertaken without an approved GDP.	<i>All personnel</i>	Construction & Operations
3.	Ensure all work complies with the GDP conditions (including tenement conditions) and the requirements of the GDP Procedure (COV-000-EN-PRO-0012).	<i>All personnel</i>	Construction & Operations
4.	Ensure all Supervisors and other relevant personnel involved in ground disturbance activities have completed GDP training prior to ground disturbance (included in the training matrix).	<i>Covalent</i>	Construction & Operations
5.	Ensure that there is no off-road vehicle movement, unless approved through the GDP process (e.g. earthmoving equipment).	<i>All personnel</i>	Construction & Operations
6.	Ensure that there is no clearing of vegetation (i.e. damage to vegetation including driving over it) unless approved under a GDP.	<i>All personnel</i>	Construction & Operations
7.	Ensure that clearing of vegetation is minimised wherever practicable.	<i>Covalent</i>	Construction & Operations
8.	Survey, peg and flag all GDP areas in accordance with the GDP Procedure (COV-000-EN-PRO-0012).	<i>All personnel</i>	Construction & Operations
9.	Ensure that GDP boundaries are clearly delineated in the field and marked at intervals where the next marker is visible, to a maximum of 30 m intervals between markers.	<i>All personnel</i>	Construction & Operations
10.	Ensure compliance with the weed and plant pathogen management requirements in this EMP.	<i>All personnel</i>	Construction & Operations



11.	Ensure that all Environmental Exclusion zones are demarcated (sighter wire with red and yellow tape), signposted, and avoided during all ground disturbance activities.	<i>Covalent</i>	Construction & Operations
12.	Avoid environmental exclusion zones at all times (including by foot) unless authorised under a GDP.	<i>All personnel</i>	Construction & Operations
13.	The following flagging will be used: <ul style="list-style-type: none"> • GDP boundaries – blue and white as 2 strands (note commissioning is blue and white as 1 strand) • Internal clearing boundaries – Pink as 2 strands • Environmental Exclusion Zones – red and yellow as 2 strands 	<i>All personnel</i>	Construction & Operations
14.	Ensure Contractors are demobilised in accordance with the Contractor Demobilisation Environmental Inspection Checklist (COV-000-EN-CHK-0009) and the Ground Disturbance Permit Closeout Form (COV-000-EN-FOR-0028).	<i>Covalent</i>	Construction & Operations
Monitoring		Responsibility	Timing
15.	Undertake GDP compliance inspections, prior to, during and after works.	<i>All personnel</i>	Construction & Operations
16.	Undertake compliance audits and inspections to determine compliance with these requirements.	<i>Covalent</i>	Monthly
Reporting		Responsibility	Timing
17.	Complete incident reports for breaches of GDP conditions or unauthorised clearing.	<i>Covalent & Contractor</i>	Construction & Operations
18.	Provide all relevant data (including spatial) requested by the Covalent Environment Team via the Environmental Data Reporting Form (COV-M000-EN-FOR-0005).	<i>Contractor</i>	Monthly
Training		Responsibility	Timing
19.	All personnel involved with ground disturbance to undertake Covalent GDP Awareness Training prior to activity.	<i>Covalent</i>	Construction & Operations
20.	Provide training to all staff and contractors on fauna and flora species of conservation significance and issues associated with their preservation and protection. Promote the Conservation Significant Fauna, Flora, Weeds Species Manual (COV-000-EN-MAN-0004).	<i>Covalent</i>	Construction & Operations



7.3 Clearing Topsoil and Vegetation Management

During clearing of native vegetation, topsoil will be removed to a minimum thickness of 300mm (unless otherwise specified in GDP conditions) and stockpiled for use in rehabilitation. Where practical, topsoil removed will ideally be directly placed on areas of disturbance awaiting rehabilitation. Where this is not possible topsoil will be stockpiled to a maximum height of 2 metres. In addition to topsoil, subsoil will be stripped and stockpiled separately for use in rehabilitation. Where possible additional subsoil material will be harvested and stockpiled to build up topsoil inventory for areas of historical disturbance for which no, or little topsoil has been salvaged.

All topsoil and vegetation clearing activities are to be managed in accordance with the Ground Disturbance Permit (GDP) procedure (COV-000-EN-PRO-0012), Clearing and Soil Management Procedure (COV-001-EN-PRO-0021) and through the implementation of the management actions as detailed in the table below.

Table 7-2 Clearing and Material Management Actions

Objectives and Targets			
Objective	To strip and stockpile topsoil and vegetation for use in rehabilitation.		
Target	Stockpiled materials retaining integrity and successfully rehabilitating areas in line with mine closure criteria.		
Requirements		Responsibility	Timing
1.	All ground disturbance activities carried out in line with Ground Disturbance Management Section 7.2.	<i>All personnel</i>	Construction & Operations
2.	Undertake activities in line with Clearing and Soil Management Procedure (COV-001-EN-PRO-0021).	<i>All personnel</i>	Construction & Operations
3.	All clearing of vegetation and/or fauna habitats shall not be carried out unless approval has been obtained from the Covalent Manager Environment & Approvals.	<i>Covalent</i>	Construction & Operations
4.	Areas approved for clearing shall be clearly marked and visible by the operators of machinery.	<i>All personnel</i>	Construction & Operations
5.	Vehicles and machinery will only use designated tracks and roads within the area to be cleared.	<i>All personnel</i>	Construction & Operations
6.	Clearing should not be undertaken where adverse weather conditions would result in significant topsoil losses to wind or rain erosion, and clearing is to be conducted in such a way that topsoil can be salvaged separately. Where practicable, root rakes are to be used for clearing activities.	<i>All personnel</i>	Construction & Operations
7.	Cleared vegetation is to be stockpiled in rows adjacent to topsoil stockpiles in a manner which allows for easy re-distribution during rehabilitation. Areas designated for stockpile rows must be clearly marked out. Each row should be no more than 10 metres wide by 2 metres tall.	<i>All personnel</i>	Construction & Operations
8.	Mulching of cleared vegetation is permitted when using imminently in rehabilitation activities (to reduce risk of combustion). Discuss this with the Covalent Environment Team during activity planning/GDP process.	<i>All personnel</i>	Construction & Operations
9.	Topsoil is to be stripped to a minimum depth of 200mm, unless otherwise approved by Covalent Manager Environment & Approvals. Depth of topsoil and subsoil stripping will be stated in GDP conditions.	<i>All personnel</i>	Construction & Operations



10.	Topsoil shall be reused in rehabilitation immediately where practicable. Where stockpiling is required, the location shall be planned sufficiently such that the stockpile will not be moved again until required for rehabilitation.	<i>All personnel</i>	Construction & Operations
11.	Topsoil from temporary tracks, permanent water pipelines, drill pads and sumps must still be stripped and windrowed adjacent to the infrastructure and stockpiled.	<i>All personnel</i>	Construction & Operations
12.	All other topsoil must be removed and stockpiled no higher than 2 metres, in approved topsoil stockpile locations as stated in approved GDP.	<i>All personnel</i>	Construction & Operations
13.	Topsoil stockpiles will be paddock dumped where possible to increase surface to water volume ratio and allow infiltration of rainfall between stockpiles.	<i>All personnel</i>	Construction & Operations
14.	Bunding or diversion drains are to be utilised in storage areas to minimise topsoil loss through water erosion.	<i>All personnel</i>	Construction & Operations
15.	Weed risk areas will be highlighted on GDP maps so that weed infested topsoil can be stockpiled separately.	<i>All personnel</i>	Construction & Operations
16.	Signs shall be placed on all topsoil stockpiles.	<i>All personnel</i>	Construction & Operations
17.	There are no known Aboriginal Heritage sites within the EGLP footprint. The following shall occur if anything suspected as having Aboriginal Heritage value is identified during clearing activities: <ul style="list-style-type: none"> • Cease all work within 50 metres of the site or object. • Mark the area with pink and black flagging. • Inform the Covalent Environment Team who will contact the Manager Environment & Approvals to arrange assessment of the area. 	<i>All personnel</i>	Construction & Operations
Monitoring		Responsibility	Timing
18.	Topsoil and vegetation stockpiles to be inspected immediately after construction to ensure compliance with above requirements.	<i>Covalent</i>	As required
19.	Visual inspections of inactive stockpiles to be undertaken every 3 months for weed infestation and evidence of erosion.	<i>Covalent</i>	Quarterly
Reporting		Responsibility	Timing
20.	Volumes, locations and source of all topsoil and cleared vegetation to be provided in the Environmental Data Reporting Form (COV-M000-EN-FOR-0005).	<i>Contractor</i>	Monthly
21.	Any clearing outside of approved areas must be reported and investigated as an environmental incident.	<i>Covalent & Contractor</i>	Construction & Operations
Training		Responsibility	Timing
22.	All personnel involved with ground disturbance to undertake GDP Awareness Training prior to activity.	<i>Covalent</i>	Construction & Operations
23.	Provide training to all staff and contractors on flora and fauna species of conservation significance and issues associated with their preservation and protection. Promote the Conservation Significant Fauna, Flora, Weeds Species Manual (COV-000-EN-MAN-0004).	<i>Covalent</i>	Construction & Operations



7.4 Dust Management

Ambient dust levels are monitored around the site as part of the environmental monitoring requirements. To ensure dust does not impact vegetation or create safety and occupational hazards dust impacts will be managed in accordance with the management actions detailed in the table below.

Table 7-3 Dust Management Actions

Objectives and Targets				
Objective	Minimise dust emissions associated with the Project.			
Target	No flora or vegetation health impacts related to dust emissions.			
Requirements			Responsibility	Timing
1.	Implement dust suppression (e.g. water trucks) on unsealed roads and access tracks, cleared areas, at locations of high dust risk, and where dust generation is visible.		<i>All personnel</i>	Construction & Operations
2.	All dust suppressants to be approved by the Covalent Environmental Team prior to use on site.		<i>Contractor</i>	Construction & Operations
3.	Ensure saline and hypersaline water is only used in approved areas which will not impact vegetation. Discuss with the Covalent Environment Team prior to use on site.		<i>All personnel</i>	Construction & Operations
4.	Ensure saline water is not used for dust suppression on topsoil stockpiles or within Environmental Exclusion Zones.		<i>All personnel</i>	Construction & Operations
5.	Comply with site Traffic Management Plan, including vehicle speed limits on haul roads, and at work and camp sites. Speed limits will be reduced where necessary to minimise dust emissions.		<i>All personnel</i>	Construction & Operations
6.	Ensure vehicles remain within designated roads and formed tracks, and park only in allocated areas.		<i>All personnel</i>	Construction & Operations
Monitoring			Responsibility	Timing
7.	Undertake compliance audits and inspections to determine compliance with these requirements.		<i>Covalent</i>	Monthly
Reporting			Responsibility	Timing
8.	Ensure excessive dust emissions (based on visual assessment) are reported to the Covalent Environment Team.		<i>All personnel</i>	Construction & Operations
9.	Undertake incident and hazard reporting where there this is a non-compliance with these requirements.		<i>Covalent & Contractor</i>	Construction & Operations
Training			Responsibility	Timing
10.	All personnel to complete the Covalent HSE Induction that includes dust management.		<i>All personnel</i>	Construction & Operations



7.5 Weeds and Pathogens Management

Weeds and pathogens will be managed in accordance with the management actions detailed in the table below.

Table 7-4 Weeds and Pathogen Management Actions

Objectives and Targets			
Objectives	<ul style="list-style-type: none"> Ensure activities do not result in the introduction of new weed or pathogen species or spread of existing weed or pathogen species within the site. Reduce existing weed populations and spread of existing pathogens within the site where possible. 		
Target	No new weed or plant pathogens are introduced into the site.		
Requirements		Responsibility	Timing
1.	Implement the following documents during Weed management as relevant to the activities: <ul style="list-style-type: none"> Vehicle and Mobile Equipment Weed Hygiene Inspection Form (COV-M000-EN-FOR-0001) Imported Materials Weed Hygiene Inspection (COV-000-EN-FOR-0008) 	<i>All personnel</i>	Construction & Operations
2.	Ensure that all machinery and vehicles arrive onsite have already been thoroughly cleaned down and free of all soil, debris and vegetation material. Vehicles or Equipment not arriving in clean condition may be turned away from site.	<i>All personnel</i>	Construction & Operations
3.	Complete a Vehicle and Mobile Equipment Weed Hygiene Form (COV-M000-EN-FOR-0001) for all machinery or vehicles prior to mobilisation to site and include photographs of vehicles as outlined in the form. Email copies of completed form (or similar) along with the health and safety inspection documents to the Registered Manager.	<i>All personnel</i>	Construction & Operations
4.	Complete an Imported Materials Weed Hygiene Inspection Form (COV-000-EN-FOR-0008) for all imported fill, gravel, mulch or other potential weed, plant pathogen materials, confirming they are free from weed sources prior to arrival on site.	<i>All personnel</i>	Construction & Operations
5.	Undertake periodic weed spraying if required by the Manager Environment & Approvals. Any weed spraying chemicals are required to be approved for use by the Health and Safety Team prior to being brought to site.	<i>Covalent</i>	Construction & Operations
6.	If Dieback (<i>Phytophthora</i> species) is identified during surveys, a Dieback Hygiene Management Plan will be developed and appropriate controls (including clean on exit if applicable) will be implemented to prevent further spread. All Contractors will be obligated to comply with these requirements once implemented.	<i>Covalent</i>	As required
Monitoring		Responsibility	Timing
7.	Conduct area inspections for evidence of weed infestation.	<i>All personnel</i>	Weekly
8.	Undertake compliance audits and inspections to determine compliance with these requirements.	<i>Covalent</i>	Monthly
Reporting		Responsibility	Timing
9.	Report suspected weed outbreaks and coordinates of their location to the Covalent Environment Team.	<i>All personnel</i>	Construction & Operations



10.	Issue approval stickers for all Plant and Equipment once all required documents have been provided, prior to utilisation of Plant and Equipment.	<i>Covalent</i>	Construction & Operations
11.	Undertake incident and hazard reporting where there this is non-compliance with these requirements.	<i>All personnel</i>	Construction & Operations
Training		Responsibility	Timing
11.	All personnel to complete the Covalent HSE Induction that covers weeds and pathogen management.	<i>All personnel</i>	Construction & Operations
12.	Promote the Conservation Significant Fauna, Flora, Weeds Species Manual (COV-000-EN-MAN-0004).	<i>Covalent</i>	Construction & Operations



7.6 Fauna Management

Impacts to conservation significant fauna and other fauna will be mitigated and managed through the implementation of the Terrestrial Fauna Management Plan (COV-M000-EN-PLN-0001), Fauna Management and Trench Clearing Procedure (COV-M000-EN-PRO-0001) and the management actions detailed in the table below.

Table 7-5 Fauna Management Actions

Objectives and Targets			
Objectives	<ul style="list-style-type: none"> Minimise the temporary and permanent reduction or fragmentation of existing fauna habitat. Minimise the direct impacts on fauna including through vehicle collision, entrapment in construction works, or extraordinary exposure to predators. Minimise disturbance to and mortality of all protected or conservation significant fauna within the site. 		
Targets	<ul style="list-style-type: none"> No unauthorised clearing activities. No mortality of conservation significant fauna. 		
Requirements		Responsibility	Timing
1.	Utilise the Environmental Data Reporting Form (COV-M000-EN-FOR-0005) to report fauna sightings and translocations and trench inspections.	<i>All personnel</i>	Construction & Operations
2.	Utilise the Fauna Translocation Reporting Form (COV-000-EN-FOR-0014) for all fauna relocations (handled by trained and licenced personnel only).	<i>Trained personnel</i>	Construction & Operations
3.	Comply with fauna management conditions on Ground Disturbance Permits.	<i>All personnel</i>	Construction & Operations
4.	Ensure all fauna handling is undertaken by a trained and authorised fauna handlers. All fauna handling must meet the requirements outlined in Regulation 47 and 50 of the <i>Biodiversity Conservation Regulations 2018</i> (essentially limited to where there is a potential threat to the fauna or to people). Covalent will maintain a register of trained fauna handlers that are approved by Covalent to handle fauna. All fauna that requires translocation is to be relocated immediately to nearby suitable habitat (undertaken by the Covalent Environment Team) and recorded on the Environmental Data Reporting Form (COV-M000-EN-FOR-0005).	<i>Trained and authorised fauna handlers</i>	Construction & Operations
5.	Prior to vegetation clearing, pre-clearance surveys (via trapping) for Chuditch will be undertaken for the purpose of avoiding potential direct impacts to the species. Trapping for Chuditch will be undertaken for one night immediately prior to vegetation clearing with a total of four traps per hectare relatively evenly distributed.	<i>Covalent</i>	Construction & Operations
6.	<p>Clearing that is undertaken during the months of September, October and November, requires a modified pre-clearance survey to mitigate any potential risk to breeding and denning female Chuditch. In the event a lactating female is captured during these months the following procedure will be implemented:</p> <ul style="list-style-type: none"> Upon capture, lactating females will be radio collared and released the evening of capture and tracked for two days to establish denning site location. If den site is outside of clearing area, clearing will proceed following one night of trapping. 	<i>Covalent</i>	Construction & Operations



	<ul style="list-style-type: none"> If the den is located inside the clearing area, potential dens will have trail cameras deployed to confirm Chuditch presence and if confirmed, an exclusion zone of 100 m radius will be employed. Clearing will not commence in this area, until the trail cameras or the radio collar confirms the den has been abandoned. In the event the radio collared Chuditch and potential den is not located within 48 hours, a further one night of trapping will be implemented at the same sites. If no captures, then clearing will proceed as planned. 		
7.	Malleefowl pre-clearance surveys will only be undertaken during the incubation period when mounds are likely to be active from September to February and occur a minimum of two weeks prior to clearing, to identify any Malleefowl mounds and their status in the area to be cleared. Outside of this incubation period, population monitoring will be adequate to determine the presence of mounds and their status.	<i>Covalent</i>	Construction & Operations
8.	In the event Malleefowl are found in the area to be cleared, but there are no active mounds, trained and authorised fauna handlers (Covalent Environment Team) will be on site to implement a displacement method to allow the Malleefowl to egress on their own but remain within their home range.	<i>Covalent</i>	Construction & Operations
9.	Pre-clearance walk throughs to identify and displace fauna prior to clearing will be undertaken the morning before vegetation clearing commences to displace individuals and will include searching and checking refugia sites.	<i>All personnel</i>	Construction & Operations
10.	Undertake twice daily trench inspections for entrapped fauna within 3 hours of sunrise and between 3pm-6pm. Open lengths of trenches must not exceed the length that can be inspected and cleared in the required timeframes.		Construction & Operations
11.	Backfill open excavations/trenches as soon as practicable. Open trenches will be inspected for fauna no more than half an hour prior to backfilling of trenches.	<i>All personnel</i>	Construction & Operations
12.	Fauna relocation activities will be conducted by personnel with appropriate training and licence for relocation under the <i>Biodiversity Conservation Regulations 2018</i> .		Construction & Operations
13.	Install fauna egress no steeper than 2:1 on open excavations/trenches. If trench is more than 100 m long, egress (ramps or nets) is to be installed every 100 m.	<i>All personnel</i>	Construction & Operations
14.	Install fauna egress devices in all open water storage areas (e.g. turkey nests).		Construction & Operations
15.	Fauna refuges providing suitable shelter from the sun and predators for trapped fauna will be provided at locations no farther than 100 m apart within open trenches.		Construction & Operations
16.	Ensure open excavations, wherever practicable, are covered, fenced or bunded to prevent injury to fauna.	<i>All personnel</i>	Construction & Operations
17.	Water in open trenches will be pumped out in the event of significant rainfall.		Construction & Operations
18.	Contact the Covalent Environment Team in the event that a sick or injured animal is found, and they will attend the scene. Sick or injured wildlife will be taken to a wildlife rehabilitation centre.	<i>All personnel</i>	Construction & Operations
19.	Critically injured wildlife may be euthanized in accordance with the DBCA <i>Minimum Standards for Wildlife Rehabilitation in Western Australia</i>) by appropriately qualified fauna rescue personnel.	<i>Covalent</i>	Construction & Operations



20.	Ensure that no poison baiting of feral animals such as rodents is undertaken without the express permission of the Covalent Manager Environment & Approvals and in accordance with the Manager's specified conditions.	<i>All personnel</i>	Construction & Operations
Monitoring		Responsibility	Timing
21.	Undertake compliance audits and inspections to determine compliance with these requirements.	<i>All personnel</i>	Monthly
22.	Conduct twice daily inspections of open trenches for trapped fauna.	<i>All personnel</i>	Twice Daily
Reporting		Responsibility	Timing
23.	Record observations of feral animals or conservation significant fauna species on the Environmental Data Reporting Form (COV-M000-EN-FOR-0005) within the Environmental Data Report and submit to the Covalent Environment Team on a monthly basis.	<i>All personnel</i>	Monthly
24.	Report all fauna mortalities through the Project as an environmental incident.	<i>All personnel</i>	Construction & Operations
25.	All trench inspections to be recorded in the trench register within the Environmental Data Reporting Form (COV-M000-EN-FOR-0005). Maintain records of fauna egress points used and provide photos.	<i>All personnel</i>	Monthly
26.	Undertake incident and hazard reporting where there this is non-compliance with these requirements.	<i>Covalent</i>	Construction & Operations
Training		Responsibility	Timing
27.	Covalent Lithium will arrange fauna handling training (e.g. snake handling and relocation) as required.	<i>Covalent</i>	As required
28.	Provide training to all staff and contractors on fauna and flora species of conservation significance and issues associated with their preservation and protection. Promote the Conservation Significant Fauna, Flora, Weeds Species Manual (COV-000-EN-MAN-0004).	<i>Covalent</i>	Construction & Operations



7.7 Groundwater and Saline Water Infrastructure Management

A supplementary water supply for the site will be developed to ensure water is available for earthworks associated with pre-construction of the airstrip and concentrator in the event installation of the water pipeline is delayed. This water is required for compaction and conditioning of earthworks to meet the predetermined geotechnical properties. Where practicable this water will also be used for ongoing dust suppression.

A 5C Licence has been granted by DWER for abstraction of saline water from Bounty Pit shaft, GWL205547(1) valid 23 February 2021 to 22 February 2031.

Groundwater use and saline water infrastructure will be managed in accordance Saline Water Use Management Procedure (COV-000-EN-PRO-0009) and the management actions detailed in the table below.

Table 7-6 Groundwater and Saline Water Infrastructure Management Actions

Objectives and Targets				
Objectives	<ul style="list-style-type: none"> Maintain to the extent practicable the quantity and quality of groundwater in order to minimise environmental impacts on the surrounding environment. Manage the transport, storage and use of saline water to ensure no uncontrolled releases to the environment. 			
Targets	<ul style="list-style-type: none"> Compliance with abstraction limits in Department of Water and Environmental Regulation groundwater abstraction licences. Compliance with Ministerial Statement 1118 direct and indirect impacts to Flora and Vegetation Exclusion Zones. 			
Requirements			Responsibility	Timing
1.	Procurement of saline water infrastructure When procuring infrastructure being used for saline water (e.g. pipelines, pumps), the manufacturer shall be advised of the salinity condition to ensure suitable materials are selected.		<i>Covalent</i>	Construction & Operations
2.	Drainage infrastructure <ul style="list-style-type: none"> Drainage infrastructure is to be designed so rainfall runoff is directed towards sumps where it can be adequately contained. Containment sumps shall be of sufficient capacity and design to withstand significant rainfall as determined during the design process. Refilling areas are to be constructed to drain toward to the dam or drainage system. 		<i>Covalent</i>	Construction & Operations
3.	Pumps <ul style="list-style-type: none"> All saline pumps used to extract groundwater are to be fitted with an approved flow meter as per Guidelines for water meter installation 2009. Where possible bores pumping water to storage facilities are to have an automatic high level shut off switch fitted to prevent overflowing past the freeboard height. 		<i>Covalent</i>	Construction & Operations
4.	Pipelines <ul style="list-style-type: none"> All pipes shall incorporate the following design criteria as a minimum: <ul style="list-style-type: none"> Constructed of polyethylene (or alternative corrosive resistant material). 		<i>Covalent</i>	Construction & Operations



	<ul style="list-style-type: none"> ○ Pipeline to be clearly marked and signposted as a saline water pipeline at regular intervals, so line of site is maintained between each marking/signpost. ○ Isolation valves installed at regular intervals. ○ Above ground pipelines to run within a suitably designed v-drain or bunded corridor with appropriately located sumps at low points along the route to contain any accidental discharge. ○ Pipelines should run adjacent to existing tracks or roads. Where this is not possible an all-weather access track alongside its entire route should be utilised to allow for inspection and maintenance. ● Pipelines to run above ground where possible. Where underground, the pipeline shall be clearly signposted indicating nature of the pipeline and approximate depth underground. Line of site to be maintained between each signpost. ● Where practicable, utilise existing cleared areas to run the pipeline. ● Where pipeline cross transport corridors, pipeline is run within a culvert suitably designed to withstand all potential traffic to use the crossing. 		
<p>5.</p>	<p>Turkey nest dams</p> <ul style="list-style-type: none"> ● All turkey nest dams shall incorporate the following design criteria as a minimum: <ul style="list-style-type: none"> ○ Lined with impermeable HDPE liner securely anchored to the dam walls. ○ Dams will be operated to maintain a minimum of 500mm freeboard during normal operations to enable containment of rainfall. ○ Freeboard shall be clearly marked with reflective tape so that it can be seen easily from the adjacent access. ○ Dam and associated pumps to be installed with an automatic high level shut off switch to prevent overflowing past the freeboard height, or other means of indicating high level installed. ○ Fauna egress matting will be installed to allow for fauna to escape. ○ Fencing will be installed around the perimeter of storage dams to minimise access by fauna. ○ All water truck filling points to be graded and bunding installed such that any spillage during filling drains to the dam. ● Drainage infrastructure is to be designed so rainfall runoff is directed towards sumps where it can be adequately contained. ● Containment sumps shall be of sufficient capacity and design to withstand significant rainfall as determined during the design process. ● Refilling areas are to be constructed to drain toward to the dam or drainage system. 	<p><i>Covalent</i></p>	<p>Construction & Operations</p>



6.	<p>Storage dams</p> <ul style="list-style-type: none"> • All storage dams shall incorporate the following design criteria as a minimum: <ul style="list-style-type: none"> ○ Constructed below the surface level of the ground, so any infiltration through the walls will occur below the ground surface. ○ Drainage/bunding is to be installed to divert inflow of water from a rainfall event. ○ Minimum 500mm freeboard is to be maintained. ○ Freeboard shall be clearly marked with reflective tape so that it can be easily seen. ○ Suitable fencing/infrastructure to be installed to deter fauna ingress. ○ Suitable fauna egress to be installed or incorporated into design. 	Covalent	Construction & Operations
7.	<p>Exploration/Drilling sumps</p> <ul style="list-style-type: none"> • Water produced during drilling activities or required for mixing with drill muds must be contained within sump to prevent impact to the environment. • Exploration sumps shall take nearby vegetation and rehabilitation requirements into account. 	All personnel	Programme of Work
8.	<p>Water Truck filling</p> <ul style="list-style-type: none"> • Spray bars to be turned off prior to filling. • Position truck in line with stand pipe when filling to ensure minimal water escape. • Water truck to be positioned at the water filling point so any spillage from filling operations is contained and/or directed back to storage facility. • Water trucks are not to be left unattended whilst filling. • Check filling equipment for leaks and damage while filling. • Conduct a visual inspection of storage dams to ensure water level is below high watermark, fauna fence is intact and fauna egress matting functional. • Ensure taps/valves are shut off completely and the pump has been turned off at the completion of filling. 	Operators	Construction & Operations
9.	<p>Dust suppression</p> <ul style="list-style-type: none"> • To avoid creating slippery conditions and erosion, ensure dust suppression only occurs in areas approved for saline water use, and deemed to require it. • Topsoil, subsoil, vegetation stockpiles and rehabilitated areas are not to be sprayed with saline water as part of dust suppression activities. • Ensure no saline water comes into contact with any Environmental Exclusion Zones, vegetation or topsoil, either directly or indirectly from overspray or runoff. • Ensure correct alignment of spray bars and pressure on water trucks to avoid overspray. • Dribbles bars should be used in windy conditions. Where practical, dust suppression should be avoided during high wind events to prevent spray reaching non-target areas such as vegetation or topsoil stockpiles. • Excessive use of saline water is to be avoided to reduce the incidence of saline water runoff. • Any excess saline water is to be disposed of back into saline storage dams, it must not be dumped. 	Operators	Construction & Operations



Monitoring		Responsibility	Timing
10.	Undertake compliance audits and inspections to determine compliance with these requirements.	<i>Covalent</i>	Weekly
11.	Conduct ground water monitoring in accordance with 5C Licence, Mining Proposal and other approvals.	<i>Covalent</i>	As required by licence
12.	Vegetation monitoring of areas adjacent to dust suppression activities will be carried out by the Covalent Environment Team. Any evidence of salt affected vegetation resulting from dust suppression activities will be reported as an environmental incident.	<i>Covalent</i>	As required
13.	Water levels of storage facilities to be monitored daily to ensure water levels are below the freeboard mark and integrity of infrastructure maintained.	<i>All personnel</i>	Daily
14.	Pipeline and pumps to be monitored daily to check for seepage, spills or leaks. Any seepage, spills or leaks shall be controlled and contained as soon as possible. Contact the Covalent Environment Team immediately.	<i>All personnel</i>	Daily
15.	Drilling sumps shall be monitored throughout the drilling program to ensure adequate space remains for water/slurry.	<i>All personnel</i>	Daily
Reporting		Responsibility	Timing
16.	Undertake incident and hazard reporting where there this is non-compliance with these requirements.	<i>Covalent & Contractor</i>	Construction & Operations
17.	Any seepage, spills or leaks are to be recorded as an incident and investigated accordingly.	<i>All personnel</i>	Construction & Operations
18.	Inform Covalent Environment Team of any non-conformances with saline water infrastructure e.g. fauna fence requires maintenance.	<i>All personnel</i>	Construction & Operations
19.	Report volumes of saline and hypersaline water used for dust suppression or material conditioning activities via the Environmental Data Reporting Form (COV-M000-EN-FOR-0005).	<i>All personnel</i>	Monthly
Training		Responsibility	Timing
20.	All personnel to complete the Covalent HSE Induction that covers saline water use and management.	<i>All personnel</i>	Construction & Operations



7.8 Surface Water Management

Surface water will be managed in accordance with the management actions detailed in table below.

Table 7-7 Surface Water Management Actions

Objectives and Targets			
Objective	Maintain the quantity and quality of surface water in order to minimise impacts to the environment.		
Target	No unauthorised release of any pollutant to surface water.		
Requirements		Responsibility	Timing
1.	Ensure that all contaminated water is captured in sediment basins, other control devices or bunds and is settled out or treated prior to discharge to the environment.	<i>All personnel</i>	Construction & Operations
2.	Ensure that no works or structures cause obstructions to the free flow of drainage lines in rainfall events.	<i>All personnel</i>	Construction & Operations
3.	Design, install and manage surface water diversion structures to enable non-contaminated water to be directed around disturbed and construction areas.	<i>All personnel</i>	Construction & Operations
4.	Capture storm water and use it for construction and mining activities where practicable.	<i>All personnel</i>	Construction & Operations
5.	Ensure that potentially contaminated storm water (e.g. runoff which contains hydrocarbons > 5 ppm TPH) is not discharged into the environment.	<i>All personnel</i>	Construction & Operations
6.	Ensure that storm water collected from construction or operational areas that is not contaminated with hydrocarbons is discharged to the environment via sediment reduction controls.	<i>All personnel</i>	Construction & Operations
7.	Ensure that equipment servicing is undertaken in designated areas that have been confirmed as being acceptable by the Covalent Environment Team.	<i>All personnel</i>	Construction & Operations
8.	Ensure all bunds have sufficient capacity so contaminated water is not released to the environment during a rainfall event.	<i>All personnel</i>	Construction & Operations
Monitoring		Responsibility	Timing
9.	Monitor oily water separator discharge water to ensure it contains <5 ppm total petroleum hydrocarbons (TPH) before it can be used for dust suppression or discharged into the environment.	<i>Covalent</i>	Initial test/ quarterly
10.	Inspect surface water and sedimentation control devices for damage or blockages, and repair where required.	<i>All personnel</i>	Monthly
11.	Undertake compliance audits and inspections to determine compliance with these requirements.	<i>All personnel</i>	Monthly
12.	Inspect bunds after rainfall events and remove excess water to ensure there is sufficient capacity.	<i>All personnel</i>	As required
Reporting		Responsibility	Timing
13.	Undertake incident and hazard reporting where there this is non-compliance with these requirements.	<i>Covalent</i>	Construction & Operations



14.	Report oily water separator test results to the Covalent Environment Team.	<i>All personnel</i>	Construction & Operations
Training		Responsibility	Timing
15.	All personnel to complete the Covalent HSE Induction that covers surface water management.	<i>All personnel</i>	Construction & Operations



7.9 Noise and Vibration Management

Noise and vibration will be managed through the implementation of the management actions detailed in the table below.

Table 7-8 Noise and Vibration Management Actions

Objectives and Targets				
Objective	Protect the amenity of fauna from noise impacts resulting from activities associated with the Project.			
Target	Compliance with <i>Environmental Protection (Noise) Regulations 1997</i> .			
Requirements			Responsibility	Timing
1.	Conduct all Project activities in accordance with the <i>Environmental Protection (Noise) Regulations 1997</i> , <i>Australian Standard 2436-1981: Guide to noise control on construction, maintenance and demolition sites</i> and relevant occupational health and safety standards.		<i>All personnel</i>	Construction & Operations
2.	Ensure that equipment is fitted with appropriate noise reduction devices (where necessary) to comply with Project HSE and regulatory requirements.		<i>All personnel</i>	Construction & Operations
Monitoring			Responsibility	Timing
3.	Undertake compliance audits and inspections to determine compliance with these requirements.		<i>All personnel</i>	Monthly
Reporting			Responsibility	Timing
4.	Undertake incident and hazard reporting where there this is non-compliance with these requirements.		<i>All personnel</i>	Construction & Operations
Training			Responsibility	Timing
5.	All personnel to complete the Covalent HSE Induction that covers noise and vibration management.		<i>All personnel</i>	Construction & Operations



7.10 Light Emissions Management

Light emissions will be managed through the management actions detailed in the table below.

Table 7-9 Light Emissions Management Actions

Objectives and Targets			
Objective	To minimise potential impacts from light overspill on terrestrial fauna.		
Target	No negative impacts from light overspill to conservation significant fauna.		
Requirements		Responsibility	Timing
1.	Position lights to directly focus on the intended target.	<i>All personnel</i>	Construction & Operations
2.	Minimise light spill without impacting on the legal requirement to provide a safe working environment.	<i>All personnel</i>	Construction & Operations
3.	Use lighting with beam characteristics applicable to the specific task at hand.	<i>All personnel</i>	Construction & Operations
4.	Switch off lighting deemed not essential to personnel safety when not in use.	<i>All personnel</i>	Construction & Operations
5.	Ensure that lighting is not directed out into surrounding native vegetation areas, so that impacts to fauna species such as Chuditch are minimised.	<i>All personnel</i>	Construction & Operations
Monitoring		Responsibility	Timing
6.	Undertake compliance audits and inspections to determine compliance with these requirements.	<i>All personnel</i>	Monthly
Reporting		Responsibility	Timing
7.	Undertake incident and hazard reporting where there this is non-compliance with these requirements.	<i>All personnel</i>	Construction & Operations
Training		Responsibility	Timing
8.	All personnel to complete the Covalent HSE Induction that covers noise and vibration management.	<i>All personnel</i>	Construction & Operations



7.11 Fire Management

Mitigation and management of fire will be carried out in accordance with management actions detailed in the table below.

Table 7-10 Fire Management Actions

Objectives and Targets			
Objective	Minimise the risk of fire events related to Project activities.		
Target	No fire incidents in Project work areas.		
Requirements		Responsibility	Timing
1.	Develop and implement an Emergency Management Plan for preventing and managing fire so that it complies with the Covalent Emergency Management Plan.	<i>Contractor</i>	Construction & Operations
2.	Ensure that sufficient designated smoking areas are provided and communicate their location to site personnel.	<i>All personnel</i>	Construction & Operations
3.	Fit all vehicles, buildings, vehicles, machinery and drill rigs with serviced fire extinguishers.	<i>All personnel</i>	Construction & Operations
4.	Ensure fire-control equipment is available and maintained in good working order in fire-risk areas including but not limited to hazardous substance storage areas, hot works job sites and refuelling areas.	<i>All personnel</i>	Construction & Operations
5.	Establish and maintain fire breaks around camps, key infrastructure (e.g. telecommunication towers) and active construction locations.	<i>Covalent</i>	Construction & Operations
6.	Store and isolate flammable material and explosives appropriately at all times in accordance with <i>AS 1940-2004 The Storage and Handling of Flammable and Combustible Liquids</i> .	<i>All personnel</i>	Construction & Operations
Monitoring		Responsibility	Timing
7.	Conduct regular inspections of work areas to ensure potential fuel loads are minimised.	<i>All personnel</i>	Monthly
8.	Conduct regular inspections of fire-fighting equipment to ensure it is maintained in working order.	<i>All personnel</i>	Monthly
9.	Monitor hot works using a spotter to ensure that early warning is given should a fire be ignited.	<i>All personnel</i>	Daily
10.	Conduct regular vehicle and machinery inspections for a build-up of combustible materials.	<i>All personnel</i>	Monthly
11.	Undertake compliance audits and inspections to determine compliance with these requirements.	<i>All personnel</i>	Monthly
Reporting		Responsibility	Timing
12.	Undertake incident and hazard reporting where there this is non-compliance with these requirements.	<i>All personnel</i>	Construction & Operations
Training		Responsibility	Timing
13.	Ensure that an adequate number of personnel are trained in basic fire awareness, fire response and use of fire suppression equipment.	<i>Contractor & Covalent</i>	Construction & Operations



7.12 Chemicals and Hazardous Materials Management

Mobile equipment fuel (diesel) will be delivered in fuel tankers and stored in self-bunded storage tanks. The bowser and fuel delivery inlets will be situated on concrete pads to contain any drips and spills and will have a sump to collect rainwater and any fuel spillage. The liquor will be either collected in a sump for collection and removal or pumped to the wash-down bay oil water separator. Bunds and other spill containment structures will be designed in accordance with *AS 1940:2004 The Storage and Handling of Flammable and Combustible Liquids* requirements and contain up to 110% of the largest hydrocarbon storage tank located within the containment area.

Fuels and other petroleum products will be stored in a designated fuel storage area in accordance with *DMIRS Storage and Handling of Dangerous Goods Code of Practice*. Hydrocarbon and chemical storages will be designed and constructed in accordance with *AS 1940:2004 The Storage and Handling of Flammable and Combustible Liquids*, *AS 1692:2006 Steel Tanks for Flammable and Combustible Liquids*, *AS 3780:2008 The Storage and Handling of Corrosive Substances* and *AS 4452:1997 The Storage and Handling of Toxic Substances*. Waste oils produced will be collected and removed from site for recycling or reuse in accordance with *Environmental Protection (Controlled Waste) Regulations 2004*.

Chemicals, hydrocarbons and hazardous substances will be managed in accordance with the Hazardous Materials Management Procedure (COV-000-HS-PRO-0025) and the management actions detailed in the table below.

Table 7-11 Chemicals and Hazardous Materials Management Actions

Objectives and Targets			
Objectives	<ul style="list-style-type: none"> Manage the transport, storage and use of chemicals associated with the Project to ensure no uncontrolled releases to the environment. Manage exposure to and release of naturally occurring hazardous materials including Fibrous materials. 		
Targets	<ul style="list-style-type: none"> Zero significant chemical spills in any Project area. All spills cleaned up within 24 hours at all work sites. 		
Requirements		Responsibility	Timing
1.	Prior to mobilising hazardous chemicals to site, complete the Hazardous Chemical Application Form (COV-000-HS-FOR-0032) and submit to HS.Admin@covalentlithium.com .	<i>All personnel</i>	Prior to mobilisation
2.	Locate areas that contain hazardous substances such as hydrocarbons within enclosed catchment systems.	<i>All personnel</i>	Construction & Operations
3.	Ensure all temporary chemical and hydrocarbon storage tanks are double skinned and self-bunded or provided with bunding capable of holding 110% of the whole tank's contents.	<i>All personnel</i>	Construction & Operations
4.	Ensure all secondary containment facilities have a minimum capacity of 110% of the largest storage vessel within the containment facility, plus 25% of the capacity of all stored individual containers.	<i>All personnel</i>	Construction & Operations



5.	<p>Ensure all equipment holding >20 L of hydrocarbon or chemical (e.g. generators, welders, stationary engines, lighting stands, pumps, refuelling trailers, service/fuel trucks) are secondarily contained to 110% capacity of the total hydrocarbons or chemicals contained in the equipment except where all of the following are demonstrated:</p> <ul style="list-style-type: none"> • There is an internal bund with 110% capacity of the maximum total hydrocarbon or chemical capacity of the equipment, any spillage in the tray can be readily seen and there is a mechanism for removal of any spillage in the tray; and • The refuelling point is within the perimeter of the internal spill tray and, in the event of overfilling, all spillage will return to the internal spill tray. 	<i>All personnel</i>	Construction & Operations
6.	Store fuel for works in self-bunded (doubled-skinned) portable steel tanks located to meet demand unless single skinned hydrocarbon storage tanks are located in bunded areas with impervious floors of concrete or HDPE lining.	<i>All personnel</i>	Construction & Operations
7.	Use HDPE liners for bunding that have maximum permeability of 1×10^{-9} m/s. Ensure that black 'builder's plastic' is not used for lining bunds.	<i>All personnel</i>	Construction & Operations
8.	Grade semi-permanent and permanent bunded storage areas to drain away from the storage tanks to a sump which can be emptied or pumped, as required.	<i>All personnel</i>	Construction & Operations
9.	Maintain distances between tanks and bunding as described in <i>AS 1940:2004 The Storage and Handling of Flammable and Combustible Liquids</i> .	<i>All personnel</i>	Construction & Operations
10.	Ensure that all hydrocarbon and chemical transfer points are secondarily contained.	<i>All personnel</i>	Construction & Operations
11.	Ensure that all bulk chemical and hydrocarbon storage facilities comply with the requirements of, and be registered and licenced under, the <i>Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007</i> , <i>AS 1940:2004 The Storage and Handling of Flammable and Combustible Liquids</i> and relevant licence requirements. Ensure that placarding complies with these and other legislative requirements.	<i>All personnel</i>	Construction & Operations
12.	Ensure bunding is capable of holding no less than 110% of the volume of the largest storage vessel and at least 25% of the total volume of substances stored, where facilities hold multiple storage containers,	<i>All personnel</i>	Construction & Operations
13.	Locate all storage tanks and associated pipelines above ground where possible. Contain below ground pipelines that are unavoidable within a secondary duct and containment facility. Design the duct and containment facility to facilitate pipeline inspection, leak and rupture detection and to allow for recover for any leakage that may occur.	<i>All personnel</i>	Construction & Operations
14.	Ensure that current safety data sheets (SDS) are readily available at all chemical or hydrocarbon storage areas.	<i>All personnel</i>	Construction & Operations
15.	Ensure that any leaks are controlled and repaired as soon as possible.	<i>All personnel</i>	Construction & Operations
16.	Fit service trucks, re-fuelling trailers and other vehicles used for the transportation of hydrocarbons and chemicals with spill kits and drip trays.	<i>All personnel</i>	Construction & Operations
17.	Ensure that all drains or valves in bunds, drip trays and other containment equipment are normally closed.	<i>All personnel</i>	Construction & Operations



18.	Ensure that appropriate licenses (e.g. Dangerous Goods Site Licence for storage of diesel on site) are in place for the transport, handling, storage and disposal of hazardous substances prior to the activity being undertaken. Provide copies of relevant licences to Covalent.	<i>All personnel</i>	Construction & Operations
19.	Remove storm water within bunding/spill trays immediately after a rain event. Ensure that the contents of bunding/spills trays are disposed offsite to an appropriate facility.	<i>All personnel</i>	Construction & Operations
20.	Ensure that appropriate equipment is available on site to remove water from bunds and other containment areas.	<i>All personnel</i>	Construction & Operations
21.	Ensure that relevant personnel are appropriately trained in spill response and how to safely handle the chemicals and hydrocarbons relevant to their work. Ensure that records of training are kept on site so that they are available for audits and inspections.	<i>All personnel</i>	Construction & Operations
22.	Ensure that in the event of a spill, contaminated soil or surface water is removed immediately, contained in a designated area, removed from site and disposed of to an offsite licensed facility.	<i>All personnel</i>	Construction & Operations
23.	Implement the following 6-Cs process when responding to spills: <ul style="list-style-type: none">• Check for danger to the responder,• Control the source to stop further spillage,• Contain the spill to stop it spreading,• Clean up the spill,• Confirm the removal of the spill, and• Complete incident reporting.	<i>All personnel</i>	Construction & Operations
24.	Implement the spill response actions as per the Spill Response Environmental Management Procedure (COV-000-EN-PRO-0011), Spill Clean-up and Removal Work Instruction (COV-000-EN-WIN-0010) and the Spill Investigation Work Instruction (COV-000-EN-WIN-0011).	<i>All personnel</i>	Construction & Operations
25.	Ensure that spill management equipment and emergency response equipment appropriate to the volume and type of hydrocarbons or chemicals being stored are available, clearly labelled and highly visible at each chemical / hydrocarbon storage location at all times.	<i>All personnel</i>	Construction & Operations
26.	Store, manage and handle all hazardous substances and hydrocarbons in accordance with the <i>Dangerous Goods Safety Act 2004</i> and regulations, relevant licence conditions, legislation and standards.	<i>All personnel</i>	Construction & Operations
27.	Report all spills of hydrocarbons or chemicals as an incident. Ensure that the report includes: <ul style="list-style-type: none">• Time of spill, location and photos.• Estimated volume and type of material spilled.• Confirmation of contaminated material disposal.	<i>All personnel</i>	Construction & Operations
28.	Report locations of hydrocarbon-contaminated sites to Covalent and ensure that they are fully remediated. Contaminated soil is to be cleaned up and transported to the approved bio-remediation stockpile.	<i>All personnel</i>	Construction & Operations
29.	Store flammable products and combustible liquids in flammable goods storage cabinets in accordance with <i>AS1940:1988</i> and placard according to <i>Dangerous Goods Regulations 2007</i> . Isolate flammable products and combustible liquids appropriately.	<i>All personnel</i>	Construction & Operations



30.	Ensure that hydrocarbon and chemical transport, handling, storage and disposal is strictly controlled and managed to ensure that contamination to the environment does not occur.	<i>All personnel</i>	Construction & Operations
31.	Use liners and drip trays under drill rigs to minimise risk of hydrocarbon spillage.	<i>All personnel</i>	Construction & Operations
32.	Ensure that only biodegradable surfactants are used in response to hydrocarbon spillage. Dispose of surplus or discarded surfactant concentrate must be into solid general waste bins, not into the sewage system. This will ensure compliance with the <i>ARMCA & ANZECC (1997)</i> concentration levels for surfactants.	<i>All personnel</i>	Construction & Operations
33.	Ensure that in the event that ruptures or leaks not being able to be quickly repaired, the operations associated with the facility are shut down, the cause identified and recorded, and repairs carried out at the earliest practical time.	<i>All personnel</i>	Construction & Operations
34.	Ensure that all spillage and rainwater collected from fuel transfer points and from within the bunded area is collected and passed through a separator system to recover hydrocarbon materials. Ensure that the remaining oil materials are disposed off-site. Ensure that the treated wastewater achieves a water quality (hydrocarbon content <5 parts per million) suitable for reuse onsite.	<i>All personnel</i>	Construction & Operations
Monitoring		Responsibility	Timing
35.	Conduct site inspections of facilities and dangerous goods licence compliance inspections.	<i>All personnel</i>	Weekly
36.	Undertake compliance audits and inspections to determine compliance with these requirements.	<i>Covalent</i>	Quarterly
Reporting		Responsibility	Timing
37.	Undertake incident and hazard reporting where there this is non-compliance with these requirements.	<i>All personnel</i>	Construction & Operations
38.	Report quantities of all imported chemicals and hazardous materials via the Environmental Data Reporting Form (COV-M000-FOR-0005).	<i>All personnel</i>	Monthly



7.13 Waste Management

A landfill facility will be constructed to enable the disposal of all putrescibles and inert waste. All waste material will be covered regularly with clean fill material to prevent the spread of rubbish and to deter animals. A fence will be erected around the boundary of the landfill facility to ensure an effective barrier is in place to prevent fauna from accessing the waste material and reduce volume of windblown waste. Until the landfill facility is operational, waste will be removed from site for recycling or disposal (as appropriate) at a licenced landfill in Hyden or Southern Cross.

Solid waste will be managed in accordance with the management actions detailed in table below.

Table 7-12 Waste Management Actions

Objectives and Targets			
Objective	Minimise the generation of construction waste and maximise opportunities to reuse or recycle material in preference to disposal.		
Target	All controlled waste removed from site and accounted for.		
Requirements		Responsibility	Timing
1.	Ensure that all rubbish and scrap is progressively disposed of.	<i>All personnel</i>	Construction & Operations
2.	Clean up windblown waste around Project work sites and landfills regularly.	<i>All personnel</i>	Construction & Operations
3.	Implement the waste management hierarchy (i.e. elimination, reduction, reuse, recycling, treatment and disposal).	<i>All personnel</i>	Construction & Operations
4.	Ensure that waste skips and bins have lids and are kept closed to contain litter and prevent animal access.	<i>All personnel</i>	Construction & Operations
5.	Ensure that chemical, hydrocarbon and other hazardous waste material are appropriately segregated, stored and signed before being transported and disposed to an approved offsite location.	<i>All personnel</i>	Construction & Operations
6.	Ensure that all controlled waste is transported off site via a licensed controlled waste carrier. Maintain all receipts and tracking numbers on site for audit and inspection purposes.	<i>All personnel</i>	Construction & Operations
7.	Ensure that chemicals, hydrocarbons or other controlled wastes are stored in bunded areas that comply with the requirements outlined in the Chemicals and Hazardous Materials Management section.	<i>All personnel</i>	Construction & Operations
8.	Provide fireproof receptacles at all crib rooms and offices for disposal of cigarette butts.	<i>All personnel</i>	Construction & Operations
9.	Ensure that all sites are kept free from wind-blown waste generated through storage or transport. Littering is prohibited.	<i>All personnel</i>	Construction & Operations
10.	Undertake recycling of all commercially viable materials from work areas including steel, cables, other metals and pallets.	<i>All personnel</i>	Construction & Operations
11.	Ensure that the tipping area at landfill is no more than 30 metres in length or more than 2 metres above ground level in height.	<i>All personnel</i>	Construction & Operations



12.	Ensure that there is sufficient, dense, inert and incombustible material stored that is readily available to cover the landfill tipping area at least twice.	<i>All personnel</i>	Construction & Operations
13.	Ensure that there is a fence around the boundary of the landfill site which effectively creates a barrier for large fauna e.g. kangaroos and which is at least 1.8 m in height.	<i>All personnel</i>	Construction & Operations
14.	Ensure that storm water at the landfill is adequately managed so that: <ul style="list-style-type: none"> • It is diverted from areas of the site where there is waste disposal occurring; and • Water that has come into contact with waste is to be diverted into a sump on the site, or otherwise retained on the site. 	<i>All personnel</i>	Construction & Operations
15.	Ensure that where viable, domestic waste is pre-sorted to recover recyclables, such as glass, aluminium, plastic and cardboard, for recycling off site.	<i>All personnel</i>	Construction & Operations
16.	Install appropriate signage for the landfill, including signage within the facility, to designate specific areas (e.g. Recycling area, tipping area).	<i>All personnel</i>	Construction & Operations
17.	Ensure that access to the landfill is controlled, with only authorised personnel permitted entry.	<i>All personnel</i>	Construction & Operations
18.	Collect and remove waste solvents and hazardous liquids (including oil) from site for recycling or disposal to an approve liquids disposal facility. Bund temporary storage areas in accordance with <i>AS 1940:2004 The Storage and Handling of Flammable and Combustible Liquids</i> and construct with materials of an impervious nature to prevent contamination in the event of accidental spillage.	<i>All personnel</i>	Construction & Operations
Monitoring		Responsibility	Timing
19.	Conduct visual inspection of worksites and waste storage and disposal facilities for littering and inappropriate waste disposal.	<i>All personnel</i>	Construction & Operations
20.	Conduct inspections to monitor and record volumes of waste disposed to onsite landfill or removed from site (recycled or disposed).	<i>All personnel</i>	Construction weekly
21.	Ensure waste volumes, weights and types of waste being disposed of at the landfill are recorded in a logbook, which will be kept onsite. Where a conversion factor is used to determine weight of waste, this conversion factor must also be noted.	<i>All personnel</i>	Construction & Operations
22.	Undertake compliance audits and inspections to determine compliance with these requirements.	<i>All personnel</i>	Construction & Operations
Reporting		Responsibility	Timing
23.	Report waste quantities (i.e. tonnes, m ³ or litres) for all waste including controlled waste removed from site to Covalent, as well as records including receipts of controlled waste removed from site.	<i>All personnel</i>	Monthly
24.	Undertake incident and hazard reporting where there this is non-compliance with these requirements.	<i>All personnel</i>	Construction & Operations



7.14 Wastewater Management

Wastewater will be managed in accordance with the management actions detailed in the table below.

Table 7-13 Wastewater Management Actions

Objectives and Targets			
Objective	Manage the collection and treatment of sewage to minimise the risk of environmental impacts.		
Targets	<ul style="list-style-type: none"> Wastewater Treatment Plants (WWTP) produce effluent that is within operating licence limits. Compliance with the <i>Environmental Protection (Controlled Waste) Regulations 2004</i>. Compliance with the <i>Health (Treatment of Sewage and Disposal of Effluent and Liquid Waste) Regulations 1974</i>. 		
Requirements		Responsibility	Timing
1.	Construct WWTPs in accordance with works approval, local shire and Department of Health requirements.	<i>Covalent</i>	Construction & Operations
2.	Operate WWTPs and spray irrigation fields in accordance with licence requirements, legal requirements, and the manufacturer's Operation and Maintenance Manual. Servicing and maintenance is to occur in line with the manufacturer's Operation and Maintenance Manual.	<i>Covalent</i>	Construction & Operations
3.	Ensure that washdown bay wastewater is disposed offsite or directed to an oily water separator prior to re-use for dust suppression. Reuse washdown bay wastewater only for dust suppression in approved areas if TPH is <5 ppm.	<i>All personnel</i>	Construction & Operations
4.	Undertake regular maintenance of wash-down bays and include the removal of sediment and waste off site to a licensed facility for treatment or disposal.	<i>All personnel</i>	Construction & Operations
5.	Vehicle washdown water is to be captured in a sump and constructed in such a way to ensure no runoff leaves the temporary wash pad. At decommissioning of the temporary wash pad, potentially contaminated soil is to be excavated and disposed of at the approved bioremediation area. Ensure biodegradable degreasers are used during the washing down of equipment/machinery.	<i>All personnel</i>	Construction & Operations
6.	Remove portable ablutions sewerage and WWTP sludge off-site by a licenced carrier or pump to the WWTP if approved by Covalent NPI Superintendent and Manager Environment & Approvals.	<i>Covalent</i>	Construction & Operations
7.	Monitor the wastewater treatment system and volumes regularly and implement a maintenance program in accordance with the Operations and Maintenance Manual.	<i>Covalent</i>	Construction & Operations
8.	Ensure that fencing and warning signs are installed around the perimeter of the WWTP irrigation spray fields.	<i>Covalent</i>	Construction & Operations
9.	Ensure that odour emitted from any WWTP or its associated infrastructure does not unreasonably interfere with the health, welfare, convenience, comfort or amenity of any person who is not within the WWTP area and investigate unreasonable odours to identify the cause and take remedial action.	<i>Covalent</i>	Construction & Operations
10.	Ensure that all discharges to the irrigation sprayfield consist only of water treated within the WWTP unless otherwise approved by Covalent NPI Superintendent and Manager Environment & Approvals.	<i>Covalent</i>	Construction & Operations



11.	Install and maintain devices for measuring cumulative volumes for all effluent that is discharged via the irrigation sprayfield.	<i>Covalent</i>	Construction & Operations
12.	Ensure that all temporary ablation blocks or port-a-loos are of a model approved by Department of Health and are individually approved in accordance with the <i>Health (Treatment of Sewage and Disposal of Effluent and Liquid Waste) Regulations 1974</i> . Request advice from the Covalent Environment Team.	<i>All personnel</i>	Construction & Operations
13.	Ensure that all temporary ablation blocks are not be used for greater than 12 months unless otherwise approved. If ablation blocks are in place for greater than 12 months, a permanent system and the relevant approvals associated with the system is required.	<i>All personnel</i>	Construction & Operations
14.	Maintain the WWTP system to reinstate the quality of discharged water to within the licensed limit should monitoring of the WWTP indicate a system malfunction, or an exceedance in licenced water quality limits. Any such maintenance or repairs to the system will be carried out as soon as possible once any exceedance is identified.	<i>Covalent</i>	Construction & Operations
Monitoring		Responsibility	Timing
15.	Ensure that daily inspections of the WWTP are undertaken in accordance with Suppliers Operating Manual and Suppliers Daily Checklist. Conduct maintenance to ensure load capacity and system clean outs are undertaken at appropriate intervals.	<i>Covalent</i>	Daily
16.	Conduct daily inspections of portable ablations holding tanks to ensure adequate capacity is available for workforce.	<i>Covalent</i>	Daily
17.	Conduct compliance audits and inspections.	<i>Covalent</i>	Monthly
18.	Undertake compliance audits and inspections to determine compliance with these requirements.	<i>Covalent</i>	Monthly
Reporting		Responsibility	Timing
19.	Undertake incident and hazard reporting where there this is non-compliance with these requirements.	<i>All personnel</i>	Construction & Operations
20.	Report WWTP effluent discharge volumes and any sludge disposal volumes and any controlled waste receipts via Environmental Data Reporting Form (COV-M000-EN-FOR-0005) to Covalent Environment Team.	<i>All personnel</i>	Construction & Operations
Training		Responsibility	Timing
21.	Train appropriate personnel in WWTP operations, maintenance and treated effluent sampling.	<i>Covalent</i>	Construction & Operations



7.15 Drilling and Programme of Work Management

Drilling and Programme of Work (POW) activity management will be managed in accordance with the management actions detailed in the table below.

Table 7-14 Drilling and POW Management Actions

Objectives and Targets			
Objective	Manage drilling and other POW activities to minimise environmental risk and ensure compliance with regulatory requirements.		
Target	Compliance with tenement conditions, commitments, rehabilitation and legal obligations.		
Requirements		Responsibility	Timing
1.	Maintain a drill log to record the location of drill holes and capping of holes.	<i>All personnel</i>	POW
2.	Cap, plug or otherwise make safe drill holes or surface holes immediately after completion.	<i>All personnel</i>	POW
3.	Plug drill holes securely below ground at a minimum depth of 400 mm within 6 months of drilling unless approved by Covalent or being used as water monitoring or production bores.	<i>All personnel</i>	POW
4.	Install sumps of an appropriate size and use to contain water and sediment encountered during drilling. Ensure that the sump is located away from significant vegetation, GDP boundaries and exclusion zones.	<i>All personnel</i>	POW
5.	Backfill excavations (e.g. sumps, costeans etc.) as soon as possible and re-spread with topsoil and cleared vegetation.	<i>All personnel</i>	POW
6.	Rip compacted areas to a depth of 1 m where possible along the contour.	<i>All personnel</i>	POW
7.	Block access to tracks following rehabilitation.	<i>All personnel</i>	POW
8.	Remove sample bags within 6 months of drilling.	<i>All personnel</i>	POW
9.	Backfill and rehabilitate all disturbances to the surface of the land made as a result of drilling activities including costeans, drill pads, grid lines and access tracks, in line with Drill Pad Rehabilitation Work Instruction (COV-015-TS-WIN-0008) and to the satisfaction of Covalent. Ensure that backfilling and rehabilitation occurs no later than 6 months after excavation unless otherwise approved by Covalent.	<i>All personnel</i>	POW
10.	Remove all rubbish from site (including any hydrocarbon spills) following drilling.	<i>All personnel</i>	POW
11.	Ensure that no hydro-test water is sourced from local groundwater that may cause a detrimental effect to surrounding vegetation.	<i>All personnel</i>	POW
12.	Ensure that no hydro-test water or drilling liquids are discharged outside of cleared areas, outside of the GDP or into environmental exclusion zones.	<i>All personnel</i>	POW
13.	Cover all drill muds on the drill pad surface or within the sump with dry soil to prevent any potential hazards to wildlife as soon as drilling of that hole is completed. Inspect the drill pad surface and sump the following day to ensure no sticky substance has seeped through the dry soil to the ground surface.	<i>All personnel</i>	POW
14.	Ensure that refuelling and lubricant changes are only carried out in locations and using procedures approved by Covalent.	<i>All personnel</i>	POW



15.	Ensure that drilling muds and fluid are recycled where possible and disposed of within sumps. Ensure that the sumps are ramped on at least one side to allow fauna egress. Ensure that the sumps are backfilled as soon as possible.	<i>All personnel</i>	POW
16.	Ensure that wells intersecting water are constructed by a driller having a current Class 1 water well drillers certificate issued by Western Australian branch of the Australian Drilling Industry Association or other certification approved by DWER as equivalent.	<i>All personnel</i>	POW
17.	Ensure that where clearing is required for exploration activities, the machinery used complies with the POW and GDP requirements.	<i>All personnel</i>	POW
18.	Ensure details of approvals are provided to Covalent Environment Team for upload into the Programme of Work Register (COV-000-EN-REG-0002).	All personnel	POW
19.	All rehabilitation activities to be planned in collaboration with Covalent Environment Team to ensure alignment with the Rehabilitation Environmental Management Procedure (COV-000-EN-PRO-0009) and EGLP Mine Closure Plan (COV-001-EN-PLN-0001).	All personnel	POW
Monitoring		Responsibility	Timing
20.	Undertake compliance audits and inspections to determine compliance with these requirements.	<i>All personnel</i>	Monthly
Reporting		Responsibility	Timing
21.	Undertake incident and hazard reporting where there this is non-compliance with these requirements.	<i>Covalent & Contractor</i>	POW



7.16 Borrow Pit Management

Several Borrow pits will be developed to source suitable surface laterite sources primarily for road construction and ongoing road maintenance. Borrow pit material will be excavated and transferred to either a screening plant adjacent to work site or by direct placement. Where possible, Borrow pits will be located within the nominated infrastructure areas that are already earmarked for disturbance. Where sufficient material cannot be found then material will be sourced from discreet Borrow Pits within the general Development Envelope area.

Borrow Pit Management will be managed in accordance with the management actions detailed in the table below.

Table 7-15 Borrow Pit Management

Objectives and Targets			
Objective	To ensure borrow pit areas are rehabilitated and left in a condition that is consistent with the natural landscape.		
Target	All borrow pits rehabilitated and free draining post construction.		
Requirements		Responsibility	Timing
1.	Borrow Pits shall be designed, constructed and rehabilitated so that: <ul style="list-style-type: none"> Borrow Pit does not form permanent water bodies and to minimise ponding of water following rainfall events. Borrow Pit allows for fauna egress from the pit. Borrow Pit rehabilitation does not include increase in weed cover. No surface or batter slumping or collapse occurs that impacts on local hydrology. To minimise risk to personnel and fauna. 	<i>All personnel</i>	Construction & Operations
2.	A Borrow Pit Management Plan or procedure shall be developed by the Contractor that incorporates the requirements of this document. This document requires approval by Covalent Manager Environment & Approvals prior to mobilisation.	<i>Contractor</i>	Prior to mobilisation
3.	All Borrow Pits should be progressively rehabilitated where applicable.	<i>All personnel</i>	Construction & Operations
Monitoring		Responsibility	Timing
4.	Borrow Pit development monitored against Contractor Borrow Pit Management Plan.	<i>Covalent</i>	Monthly
Reporting		Responsibility	Timing
5.	Provide all relevant data (including spatial) requested by the Covalent Environment Team via the Environmental Data Reporting Form (COV-M000-EN-FOR-0005).	<i>Contractor</i>	Monthly
6.	Undertake incident and hazard reporting where there this is non-compliance with these requirements.	<i>Covalent & Contractor</i>	Construction & Operations
Training		Responsibility	Timing
7.	All personnel to complete the Covalent HSE Induction that will include Borrow Pit Management (when applicable).	<i>All personnel</i>	Construction & Operations



7.17 Concrete Batching Management

Concrete Batching Management will be managed in accordance with management actions detailed in the table below.

Table 7-16 Concrete Batching Management Actions

Objectives and Targets			
Objective	Manage concrete batching to minimise the risk of environmental impacts.		
Target	Compliance with Environmental Protection (Concrete Batching and Cement Product Manufacturing Regulations 1998 (EP(CBCPM) Reg).		
Requirements		Responsibility	Timing
1.	A Concrete Batching Procedure shall be developed by the Contractor that incorporates the requirements of the Environmental Protection (Concrete Batching and Cement Product Manufacturing) Regulations 1998) and this document. This procedure requires approval by Covalent Manager Environment & Approvals prior to mobilisation.	<i>Contractor</i>	Prior to mobilisation
2.	Material lost during concrete batching or transport shall be immediately cleaned up.	<i>All personnel</i>	Construction & Operations
3.	All aggregate and sand kept on site shall be stored in bays which are designed to minimise dust, or where the use of bays is not practicable, in stockpiles on the ground.	<i>Contractor</i>	Construction & Operations
4.	Where aggregate or sand is stockpiled on the ground, it shall be kept covered or damp, or otherwise treated to minimise dust.	<i>Contractor</i>	Construction & Operations
5.	All wind shields, water sprays, dust extraction systems and other devices used shall be maintained in good working order.	<i>Contractor</i>	Construction & Operations
6.	All water draining from areas likely to contain waste materials shall drain into a slurry pit or settling pond.	<i>Contractor</i>	Construction & Operations
Monitoring		Responsibility	Timing
7.	Undertake compliance audits and inspections to determine compliance with the requirements of Concrete Batching Procedure (Contractor) and requirements of the EMP.	<i>All personnel</i>	Monthly
Reporting		Responsibility	Timing
8.	Provide all relevant data (including spatial) requested by the Covalent Environment Team via the Environmental Data Reporting Form (COV-M000-EN-FOR-0005).	<i>Contractor</i>	Monthly
9.	Undertake incident and hazard reporting where there this is non-compliance with these requirements.	<i>Covalent & Contractor</i>	Construction & Operations
Training		Responsibility	Timing
10.	All personnel to complete the Covalent HSE Induction that will include Concrete Batching Management (when applicable).	<i>All personnel</i>	Construction & Operations



7.18 Resources and Training

The environmental roles of key personnel are described in table below:

Table 7-17 Environmental roles of key personnel

Title	Responsibilities
Covalent Lithium Project Director	<ul style="list-style-type: none"> • Support the development, implementation and maintenance of the Covalent EMP. • Review and update the Covalent Lithium Environment Policy. • Assist in the resolution of issues which could not be resolved at lower levels in the escalation process. • Promote environmental awareness. • Participate in management review of the Covalent EMP. • Allocate sufficient human, physical and financial resources to ensure compliance with legislation, regulations and legal requirements.
Covalent Lithium Leadership Team	<ul style="list-style-type: none"> • Support the development, implementation and maintenance of the Covalent EMP. • Conduct annual reviews of the Covalent Lithium Environment Policy. • Assist in the resolution of issues which could not be resolved at lower levels in the escalation process. • Promote environmental awareness. • Provide input into management reviews of the Covalent EMP. • Provide adequate resources to enable Covalent Lithium to comply with legislation, regulations and other environmental obligations.
Covalent Lithium Manager Environment & Approvals	<ul style="list-style-type: none"> • Review and update the Covalent Lithium Environment Policy. • Review and approve the Covalent EMP, plans, procedures and work instructions. • Identify required human, physical and financial resources to comply with legislation, regulations and legal requirements. • Report the performance of the Covalent EMP and improvement opportunities to the Leadership Team. • Liaise with the general public and key stakeholders (e.g. government departments) as required. • Manage and resolve community complaints. • Delegate responsibilities to the Environmental Team Superintendents; and • Undertake strategic planning to ensure; <ul style="list-style-type: none"> ○ Support and advice is provided to operational teams on environmental management and legal requirements. ○ Delivery of environmental awareness. ○ Maintenance of environmental data and records. ○ Recording and reporting of non-compliances in the Covalent incident management system and to regulatory authorities. ○ Achievement of environmental approvals. ○ Compliance with legal requirements. ○ Development and update of environmental training and awareness. ○ Delivery of environmental monitoring programs. ○ Reporting to government regulatory authorities.
Covalent Lithium Environment Team	<ul style="list-style-type: none"> • Comply with the Covalent Lithium Environment Policy. • Co-ordinate the development and implementation of environmental monitoring programs. • Review, update and implement the Covalent EMP, plans, procedures and work instructions. • Conduct audits and inspections, identify and track implementation of contingency actions and prepare audit and inspection reports. • Provide support and advice to operational teams on environmental management and legal requirements. • Develop and conduct environmental awareness and training.



Title	Responsibilities
	<ul style="list-style-type: none"> • Liaise with government departments officers on permitting, licensing and compliance issues. • Prepare environmental plans, approval applications and compliance reports in consultation with government authorities and Manager Environment & Approvals. • Undertake reporting of environmental performance. • Monitor operational team and contractor reporting of environmental incidents into the incident management system.
Covalent Lithium Registered Manager, and other Managers and Supervisors	<ul style="list-style-type: none"> • Comply with the Covalent Lithium Environment Policy. • Comply with relevant environmental Acts, Regulations, codes of practice and standards. • Comply with conditions of licences, permits, approvals, agreements and other legal requirements as recorded in the Legal Requirements and Other Obligations Management System. • Implement the Covalent EMP and associated procedures, plans and work instructions in the workplace. • Undertake environmental inspections and audits in accordance with the Covalent EMP. • Investigate environmental incidents and report incidents in the incident management system. • Identify and implement corrective, preventative and contingency actions arising from inspections, audits and incidents. • Undertake appropriate action in the event of inadequate environmental performance or unacceptable risk. • Allocate adequate and appropriate resources to ensure environmental obligations and reporting are met. • Oversee supplier and Contractor compliance with environmental requirements. • Promote environmental awareness within both employees and contractor groups on site
Covalent Lithium Personnel	<ul style="list-style-type: none"> • Comply with the Covalent Lithium Environment Policy. • Comply with relevant environmental Acts, Regulations, codes of practice and standards. • Comply with conditions of licences, permits, approvals, agreements and other legal requirements as recorded in the Legal Obligations and Other Requirements Register. • Implement the Covalent EMP and associated procedures, plans and work instructions in the workplace. • Report to management promptly regarding any hazards, non-compliances, incidents and/or breaches. • Participate in awareness environmental training. • Conduct operational activities in an environmentally responsible manner.
Contractors	<ul style="list-style-type: none"> • Comply with the Covalent Lithium Environment Policy. • Comply with relevant environmental Acts, Regulations, codes of practice and standards. • Comply with conditions of licences, permits, approvals, agreements and other legal requirements as recorded in the Legal Obligations and Other Requirements Register. • Implement the Covalent EMP and associated procedures, plans and work instructions in the workplace. • Provide adequate, suitably qualified and experienced personnel on site to coordinate the management of environmental issues during construction. This requires a minimum of one suitably qualified environmental (or HSE) representative to be employed onsite by the Contractor, and an additional suitably qualified environmental representative for every 50 Contractor personnel on site or on a case by case basis in agreement with Covalent. • Provide an organisation chart and job descriptions as part of the Contractor's EMP.



Title	Responsibilities
	<ul style="list-style-type: none"> • Report hazards, non-compliances, incidents and/or breaches in the incident management system. • Implement corrective, preventative and contingency actions to resolve non-compliances. • Take appropriate action in the event of inadequate environmental performance or unacceptable risk. • Conduct operational activities in an environmentally responsible manner. • Allocate adequate and appropriate resources to ensure environmental obligations and reporting are met. • Ensure Suppliers and Subcontractors comply with environmental obligations; and. • Provide training to workforce on environmental requirements relating to the Covalent Lithium Project.

7.19 Environment Team Structure

The Covalent Environment Team provides environmental management and advice services to the Covalent Project teams and Contractors. Environmental personnel are accountable to the Covalent Manager Environment & Approvals for the implementation of this EMP.

7.20 Competence, Training and Awareness

All personnel working on the Project are to be competent to conduct their work in accordance with this EMP. Personnel are required to participate in the Project Induction and any specified site or work area induction or training packages on the Project.

All personnel are to receive training on minimum environmental standards. This training is to be delivered through Covalent inductions, Online e-learning training and Toolbox Talks and information sessions.

All site-based personnel are to undertake an induction program that includes the Covalent Corporate Induction and Site induction specific to the work area (e.g. mine).

7.20.1 Covalent Inductions

General environmental awareness training will be outlined in the Covalent HSE Induction Presentation. The induction program includes training and assessment so that all personnel are aware of their environmental responsibilities and are assessed as being competent to carry out their work in an environmentally conscious manner. The inductions should include information on but not be limited to the following:

- Environmental setting of the Project,
- Project approvals and key legislation,
- Regulatory penalties and impacts of non-compliance,
- Environmental Exclusion Zones,
- Ground Disturbance Permits (GDPs),
- Protection and preservation of fauna, identification of fauna species and reporting requirements,
- Identification of feral fauna species and reporting requirements,
- Protection of vegetation and flora,
- Identification of weeds, management measures and reporting requirements,
- Dust management,
- Water management and water use efficiency,
- Fire risk, impacts, management and response,
- Hazardous substances storage and use,
- Use of spill kits and other procedures for cleaning up spills of potentially contaminating materials and substances,
- Waste management,
- Clearing vegetation and topsoil management,
- Unexpected Heritage Finds,



- GHG emissions and energy efficiency, and
- Incident and hazard reporting.

7.20.2 Toolbox Meetings

Environmental content relevant to the work activities is to be covered in monthly toolbox meetings that are held on site. These toolbox meetings are to discuss environmental risks, environmental incidents and environmental performance, and provide a forum for all personnel involved in work activities to discuss environmental performance and new issues arising from their work activities. Environmental awareness training is also to be delivered at toolbox meetings as required.

7.20.3 Environmental Alerts

Environmental alerts are to be issued on a periodic basis where new information needs to be released to Project personnel, such as learnings from incidents and non-compliances. An Environmental Alert Form (COV-M000-EN-FOR-0003) has been developed for this purpose.

7.20.4 Specific Environmental Training Requirements

Training is to be provided to personnel as detailed below:

Table 7-18 Specific Environmental Training Required for Personnel

Training Type and Content	Frequency	Audience
Ground Disturbance Permit Awareness Training	Prior to mobilisation is preferable or part of the Environment Induction.	For all personnel involved in ground disturbance, including Supervisors.
Environmental Data Reporting Training	Prior to mobilisation and through ongoing consultation and clarification of specific reporting requirements.	For Contractor's Environmental Representative.
Health, Safety and Environment Induction	Prior to commencing work on Site.	For all personnel.
Reptile Handler or Fauna Handler Training	As required.	For specific personnel identified by the Covalent Manager Environment & Approvals.

7.20.5 Other Environmental Awareness Training

Personnel performing tasks that may potentially cause environmental impacts that require reporting to Regulators are to:

- Receive additional induction and/or training in an e-learning module or face-to-face format to further inform them of particular requirements, risks and controls, or
- Be certified as having completed relevant induction and training processes, and/or as having gained appropriate experience, before undertaking such tasks.

Specific awareness training packages may include:

- Kick-off environmental briefing covering major risks and management measures,
- Specific environmental approvals,
- Key legal obligations and penalties and impacts of non-compliance,
- Environmental data management system,
- Incident investigation training,
- Hazardous materials storage and use, and
- Spill response training.

7.20.6 Training Records

Training records are to be maintained in the Covalent Document Management System and include the following as a minimum:

- Records of training attendance (e.g. awareness training, toolbox meetings),



- Copies of the training materials,
- Competency assessments (where relevant to the training provided), and
- Training matrix.

7.21 Communications and Document Control

7.21.1 Internal Communications

All personnel are expected to participate in regular discussions including toolbox meetings, as well as to attend pre-start meetings prior to the commencement of works for the day. These meetings will include a review of any previous incidents, potential hazards and any procedural changes.

Environmental (or integrated HSE) notice boards are to be established at various locations on site to inform personnel of relevant environmental information including environmental performance, environmental incident alerts and environmental notices. The notice boards are to be updated on a regular basis.

Environmental risks and key site environmental issues are to be communicated through site and toolbox meetings and return to work programs. A record of the communication topic, names of personnel in attendance and the presenter's name is to be maintained on site as an auditable record.

Significant environmental issues are to be escalated to the Covalent Manager Environment & Approvals and/or appointed delegate. All significant internal communication relating to the environment are to be maintained and recorded in the Covalent DMS.

The Covalent SharePoint pages will be the central location for Covalent personnel to access EMS information including the Environment Policy, environmental plans, procedures, work instructions, forms/checklists, alerts, toolbox topics and manuals. The Environment SharePoint page also contains key environmental approvals and legislation, standards and reports, as well as providing specialist information on biological science programs and rehabilitation.

Covalent environmental personnel are to report on a weekly basis on environment and approvals related matters detailing key issues and achievements. The Covalent Manager Environment & Approvals will compile a monthly Environmental Report which summarises the weekly environmental reports.

A Contractor update on the implementation progress of the EMP is to be provided to the Covalent Environment Team on a weekly basis during to discuss items such as the following:

- Incident management update,
- Risks,
- Audits and inspections,
- Approvals,
- Monitoring,
- Ground Disturbance Permits, and
- Compliance reporting.

7.21.2 External Communication

Covalent is responsible for all external communication relating to matters concerning the environment.

Members of the Environment Team are responsible for external communication with government regulators (including Department of Water and Environmental Regulation, Office of the Environmental Protection Authority, Department of Mines, Industry Regulation and Safety, Department of Health) particularly in relation to approvals and the reporting of environmental incidents. Contractors are not to communicate directly with government agencies on key environmental matters unless they relate to approvals that they are responsible for.

The Covalent Manager Environment & Approvals or nominated delegate is responsible for the management of environmental-related communications with the media, and high-level discussions with government and other agencies as required.



Covalent Lithium personnel and Contractors are required to refer all media communications to the Project Director.

All community or regulatory queries or complaints received by site personnel will be directed to the Covalent Manager Environment & Approvals, who will manage the action close-out as required. Under no circumstances will personnel communicate with the media on matters concerning the Project.

Records of all external communication are to be maintained in the Covalent DMS. All personnel are to ensure that communication received from external stakeholders is documented and responded to in accordance with this EMP.

7.22 Documentation and Document Control

7.22.1 Document Management System

All documents are to be stored in and accessed via the Document Management System (DMS). A controlled document is one that has significant value to the organisation, whose unrestrained amendment can result in inconsistent documentation across the business, and potentially endanger the health or safety of personnel and impact the environment.

All Controlled Documents therefore must be:

- Managed and controlled by the Covalent Document Control team.
- Approved for adequacy and appropriateness before being used.
- Reviewed using a formal process with reviewer details and formal signoffs being obtained.
- Updated (as necessary) using a formal process where the document will be reviewed and approved.
- Version controlled so that at any point the status and version history is available.
- Available for use once finalised with historical versions retained.
- Communicated to Covalent Lithium personnel and Contractors via SharePoint, email and contractual letters when changes are made.
- Easily read and understood.
- Identified using a unique document name and numbering scheme.

The role of Document Control is to ensure that current procedures, registers, forms and supporting environmental documentation are being used. Project documents can be accessed through the Project's document control system, thereby ensuring that only the most current and up to date documents are used. All printed copies of controlled documents are to be regarded as potentially superseded.

When creating new documents, the Covalent Document Templates will be used. The Document Control team will create a new document number. Documents are to be peer reviewed before being submitted to document control for final review and approval.

All key operational environmental documents are required to be lodged with the Covalent Document Control Team, and the relevant processes followed to finalise the documents.

7.22.2 Hard Copy Documents

Documents with wet signatures or that have been completed (such as checklists, inspection forms) are to be scanned and stored in the relevant location within the DMS.

As all hardcopy documents are uncontrolled, it is the user's responsibility to ensure that they have the most up to date version by checking in DMS.

7.22.3 Updated, Superseded, Obsolete or Withdrawn Documents

Any updated, superseded obsolete or withdrawn controlled documents are to be maintained in DMS for audit purposes.

Updated documentation is to be communicated to all relevant personnel via email correspondence, the intranet e-Care portal and toolbox meetings.



Contractors are to be informed of updated documents through formal correspondence issued by the Covalent Commercial Team.

7.22.4 Controlled Documents

All key environment documents are held in the Covalent DMS. All key environment documents that form part of the EMS are planned to be made available on the Covalent Environment SharePoint page.

7.23 Emergency Preparedness and Response

The Covalent Emergency Management Plan provides an overview of the emergency management arrangements and principles of implementation. Emergency response procedures are required to be in place and implemented.

Covalent teams are to ensure that training and periodic testing of emergency management plans is conducted at regularly planned intervals (a minimum annually).

The emergency management plan is to be revised following periodic testing and where incident investigations identify a need.



8 Monitoring and Measurement

Environmental monitoring of operations is required in order to understand the impacts on key environmental values. Monitoring is a requirement of permits, approvals and licences.

The monitoring requirements during construction are documented in this EMP. Where monitoring is required under a license or permit, Covalent will advise the Contractor if there is any monitoring that the Contractor is required to do.

Covalent procedures, forms and work instructions also detail the monitoring and measurements that are required and how they are to be conducted.

Monitoring and measuring equipment is to be regularly maintained, serviced and calibrated according to the manufacturer's instructions/specifications and/or recognised national/international standards. Personnel conducting the equipment calibration are to be trained and competent, and records of maintenance, service and calibration must be retained.

All monitoring and measurement records are to be retained and stored within the Covalent Lithium DMS.

Some of the specific information that requires monitoring and reporting is listed in the Environmental Data Reporting Form (COV-M000-EN-FOR-0005). Relevant personnel are required to collect and collate monitoring information for submission to Covalent on a monthly basis using this form or as requested by the Covalent Environmental Team.

Plans and guidelines will be developed where further information on sampling and monitoring is required.

8.1 Environmental Data

Environmental data is required to be collected across all Project sites for reporting to government regulatory agencies on a periodic basis.

The Environmental Data Reporting Form (COV-M000-EN-FOR-0005) is to be used to collect the required key environmental data on a monthly basis from Contractors and Covalent Environmental Reporting Groups. The completed form is to be emailed on a monthly basis to the Covalent Environment team, at the following email address: environmental.reporting@covalentlithium.com.

The data is to be captured in an environmental data management system and reviewed on a regular basis to compare against licence limits and other environmental criteria.

Environment personnel can assist by providing training on the use of the monthly environmental report to Covalent teams and Contractors as needed.

8.2 Evaluation of Compliance

8.2.1 Internal Audits and Inspections

Environmental audits and inspections are to be conducted to ensure that construction activities are implemented in accordance with the Environment Policy, legal and approval requirements, environmental standards, the EMP, environmental plans, procedures and work instructions. Audits are to be undertaken in accordance with the Australian/New Zealand Standard *AS/NZS ISO 19011:2014: Guidelines for Auditing Management Systems*.

Inspections and audits are to be scheduled by Covalent teams and Contractors. The status of planned versus completed inspections and audits is to be recorded and reported to the Leadership Team on a monthly basis.

Covalent teams are to conduct regular inspections of their work areas and activities using specific work area inspection forms or the Environmental Inspection Checklist (COV-000-EN-CHK-0007). Inspection findings are to be recorded in the approved inspection forms or checklists and actions raised as required. Actions arising from inspections are to be entered by Covalent teams into the Covalent action management system for tracking and close out.



The Covalent Environment Team is to conduct regular inspections of operational areas and activities where there are potential environmental risks, using approved environmental inspection checklists. All actions raised during the inspection are to be loaded into the Covalent action management system for tracking and close out.

The Covalent Environment Team is to conduct audits of activities undertaken by Covalent teams and Contractors to determine compliance key EMS documents, legal requirements and approval/licence/permit conditions. The results are to be communicated to the Leadership Team. Actions raised during the audit are to be communicated to the auditees and entered into the Covalent action management system for tracking and close out.

8.2.2 External Audits and Inspections

External audits and inspections are conducted periodically by government regulators to ensure compliance with permits, licences and commitments made by Covalent. Relevant Covalent representatives are to accompany the regulator during their inspection or audit.

Findings and recommendations of these audits are to be recorded as corrective actions by the Covalent Environment Team in the Covalent action management system. Actions are to be undertaken by Covalent teams and Contractors as required to close them out within agreed time frames. Evidence of close out of actions is to be provided to regulators where required.

8.2.3 Internal Environmental Reporting

Covalent teams and Contractors (including Subcontractors) are to complete a monthly Environmental Data Reporting Form (COV-M000-EN-FOR-0005) to ensure that data relating to their activities is provided. The Covalent Environment Team is to conduct a review of the submitted data for completeness and accuracy. Reports provided to the Covalent Environment Team may be used as evidence of legal compliance or non-compliance and therefore must be correct and auditable.

The Covalent Environment Team is required to submit a monthly environmental report to the Covalent Leadership Team.

8.2.4 External Environmental Reporting

Covalent prepares and submits a range of reports to financiers and government regulatory agencies including:

- Environmental compliance reports to government regulatory agencies in accordance with approval requirements.
- Monthly and biannual reports to financiers and stakeholders.

8.3 Incident and Action Management

Incidents are to be managed in accordance with the Incident Reporting and Investigation Procedure (COV-000-HS-PRO-0001), utilising the Incident Reporting and Investigation Form (COV-000-HS-FOR-0003) or via the INX InControl Incident Management system.

8.3.1 Incident Reporting and Investigation

All environmental hazards, high potential near misses and incidents shall be reported and recorded using the Covalent incident and hazard reporting system.

The Incident Owner is responsible to:

- Participate in incident investigations relating to their work area or scope of work.
- Ensure that the necessary incident investigation is undertaken within the prescribed timeframes.
- Establish suitable corrective actions to prevent recurrence.
- Ensure incident reports and investigations are completed.
- Monitor the close out of action items and provision of supporting evidence.
- Evaluate the effectiveness of actions that have been undertaken.
- Provide feedback on the outcomes of the incident.



All environmental incidents are to be reported, categorised and investigated within the timeframe specified in the Incident Reporting and Investigation Procedure (COV-000-HS-PRO-0001).

Covalent and Contractor personnel will investigate all incidents and near misses to determine the cause, and to identify appropriate corrective actions to prevent its recurrence. Every incident or near miss will be investigated in accordance with the Incident Reporting and Investigation Procedure.

Actions arising from the incident are to be entered into the Covalent action management system for tracking and close out.

External reporting of significant environmental incidents is to be undertaken by the Covalent Manager Environment & Approvals or delegate.

If there is unauthorised clearing of native vegetation, or other reportable environmental incident, then the relevant regulatory authorities (DBCA, DCCEEW and DWER) are required to be notified as soon as practicable by the Covalent Environment Team.

Examples of other events that would be reportable by the Covalent Environment Team to regulators (in addition to any reporting requirements under other legislation, permits or agreements) can include:

- Unauthorised disturbance to environmental exclusion zones.
- Clearing beyond the extent approved under clearing permits.
- Disturbance outside of tenements.
- Large spills of hydrocarbons or hazardous chemicals to the ground or surface water.
- Injury or mortality of conservation significant fauna.
- Fire started by construction works that is not immediately contained.

8.3.2 Corrective and Preventative Actions

Corrective and/or preventative actions are to be identified to address the root cause of the incident and prevent further incident occurrence. These actions are to be recorded in the Covalent action management system for tracking and close out, and should align with the following:

- Action required (should be "SMART"):
 - Specific – what needs to be accomplished and where.
 - Measurable – quantifiable so one is able to know when the action is completed.
 - Attainable – results that can realistically be achieved, given available resources.
 - Relevant – actions are worthwhile, and it is the right time to be doing them.
 - Time-bound – when the result(s) can be achieved to establish a sense of urgency.
- Target close out date (should be achievable).
- Person assigned responsibility for the completion of the action item (should be a person with the authority to resolve the root cause of the incident).

The person responsible for the action item shall close out the required action in the action management system by the due date. Action closure must only be undertaken when evidence has been attached in the system demonstrating that the action has been adequately resolved.

The type of evidence that may be applicable to be loaded into the Covalent incident and hazard reporting system includes:

- Correspondence
- Emails
- Procedures
- Job Hazard Analysis
- Photographs
- Waste receipts
- Training materials
- Training attendance record
- Meeting minutes (including toolbox and prestart)



The status of reported incidents is to be reviewed by the Covalent Environmental Team to determine whether:

- Incident investigations have been adequately undertaken.
- Corrective actions identified will adequately address the root cause of the incident and prevent future incident recurrence.
- Action closeouts are overdue.
- The actions have been adequately addressed to prevent current or future non-compliance.
- Evidence has been provided to support the close out of the actions.

Overdue environmental actions heighten the risk of environmental non-compliance and the occurrence of additional incidents. Overdue actions are to be escalated to the responsible person's line manager for their review and action. Where the action item requires further investigation or processes to be implemented, time frames can be extended with the approval from the action assignee.

8.4 Control of Records

The following records shall be maintained in relation to the EMP including (but not limited to):

- Training records,
- Incident reports,
- Environmental alerts,
- Trench inspections,
- Environmental inspection checklists,
- Environmental audit reports and supporting evidence,
- Incident and inspection corrective actions,
- Fuel and oil use receipts,
- Monitoring results,
- Controlled waste receipts and tracking numbers, and
- Weight and/or volume of waste to landfill, waste recycled, and waste disposed of offsite.

Records are to be appropriately named and stored in the DMS or the environmental data management system as appropriate. Copies of records are to be provided by Contractors to the environmental team with submission of the monthly environmental report.

Records will be managed and kept for the life of the Project. Records are to be named and saved on the Covalent Document Management System.



9 Management Review

The review of environmental standards, plans, procedures and work instructions is to be undertaken at least annually. Management review of the EMS is also to be undertaken annually. A report outlining the results of the review is to be prepared by the Covalent Environment Team and presented to the Covalent Leadership Team.

The review will include, as a minimum:

- Results of internal and external audits,
- Environmental performance (lead and lag indicators),
- Objectives, targets and key performance indicators,
- Details of community complaints and reportable incidents,
- Status of corrective and preventative actions,
- Status of actions from previous management reviews,
- Changes in regulatory circumstances including legislative changes, and
- Recommendations for EMS improvement.



Appendices



Appendix A DWER EPA and DMIRS Environmental Approvals

Ministerial Statement 1199 (2022)

DMIRS Mining Proposal Approval REG ID 101345 (2022)



Government of **Western Australia**
Office of the **Appeals Convenor**
Environmental Protection Act 1986

Our ref: Report 1730
Enquiries: Emma Gaunt
Telephone: 6364 7990
Date: 24 November 2022

Ms Anthea Pate
Manager, Environment, Approvals and Safety
Covalent Lithium Pty Ltd
Anthea.pate@covalentlithium.com

Dear Ms Pate

EPA REPORT 1730 – EARL GREY LITHIUM PROJECT (REVISED PROPOSAL)

Thank you for your correspondence to the Minister for Environment advising that you accept the conditions contained in Ministerial Statement 1199 (attached) and that you waive your right of appeal.

At the request of the Minister for Environment, the decision-making authorities have been advised pursuant to section 45(12) of the *Environmental Protection Act 1986* that they may now exercise their powers with respect to the proposal.

Please address future correspondence relating to the implementation of this proposal to:

Senior Manager
Environmental Compliance
Department of Water and Environmental Regulation (DWER)
Locked Bag 10
JOONDALUP DC WA 6919

For any immediate inquiries regarding the compliance requirements of the Statement, please email the Compliance Branch at compliance@dwer.wa.gov.au for assistance.

Should you require clarification on this matter please contact this Office on 6364 7990.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Emma Gaunt'.

Emma Gaunt
APPEALS CONVENOR

cc: Senior Manager, Environmental Compliance

Att.



Our ref Registration ID : 101345
Enquiries Demelza Dravnieks
 (08) 9222 3241
 demelza.dravnieks@dmirs.wa.gov.au

Ms. Anthea Pate
COVALENT LITHIUM Pty Ltd

Sent by email: Anthea.Pate@covalentlithium.com

Dear Ms Pate

**APPROVAL FOR MINING PROPOSAL - EARL GREY LITHIUM PROJECT MINING PROPOSAL - STAGE 2 (COV-M000-EN-RPT-0003)
REGISTRATION ID: 101345**

**ENVIRONMENTAL GROUP SITE NAME: Earl Grey Lithium Environmental Group
ENVIRONMENTAL GROUP SITE: S0237539**

I refer to your Mining Proposal received on 14 December 2021, and revised on 3 November 2022. The Mining Proposal has been assessed by the Department of Mines, Industry Regulation and Safety (DMIRS) and determined to be acceptable for approval under the *Mining Act 1978* (the Mining Act).

I hereby approve the Mining Proposal (Doc IDs: 9691592, 9691591 & 9691588) under the provisions of the Mining Act.

By signing this document I declare that I have no conflict of interest that prevents me from making a decision on this proposal, as outlined in the DMIRS Conflict of Interest Policy.

Please note the comments in Schedule 1 which must be addressed in the next review of the Mine Closure Plan. The approved Mine Closure Plan (Doc IDs: 9691594, 9691596, & 9742963) must be revised and re-submitted to DMIRS by the end of October 2025, in accordance with the revised tenement conditions (see Schedule 2).

I advise that I intend to recommend the Minister for Mines and Petroleum's delegate impose further conditions on G77/129, G77/130, G77/132, G77/133, G77/134, G77/136, G77/137, L77/199, L77/207, L77/208, L77/295, L77/301, L77/313, L77/322, L77/323, M77/1065, M77/1066 and M77/1080, as outlined in Schedule 2. Conditions will also be modified on L77/205 and L77/271. Further correspondence will be sent from DMIRS once the conditions are imposed and modified.

Important – please note that you must submit a revised Mining Proposal for assessment and approval in the following circumstances:

- When any disturbance is proposed outside the approved disturbance envelope;
- The characteristics of any 'Key Mine Activities' detailed in the Mining Proposal need to be altered;

- A new activity, or change to an activity type, beyond that listed in the 'Activity Details' section of the Mining Proposal is proposed; or
- An increase in area is required for any key mine activity or total activity area on any tenement.

This approval does not supersede any other applicable provisions of the Mining Act, or remove the need for any necessary approvals from other authorities.

You are reminded that you are required to report disturbance data on an annual basis and pay any corresponding levy in accordance with the *Mining Rehabilitation Fund Act 2012* and associated Regulations.

Before work is to commence please be reminded of your obligation to carry out the mining operation in accordance with the provisions of the *Work Health and Safety Act 2020* and Work Health and Safety (Mines) Regulations 2022. Duties under this legislation require the mine operator to provide notice of commencement to the regulator for a mining operation, and to establish and implement a mines safety management system prior to the commencement of mining operations including construction. Further information can be found at www.commerce.wa.gov.au.

Further to this, if your proposal is clearing native vegetation a clearing permit under Part V Division 2 of the *Environmental Protection Act 1986* for clearing of native vegetation will be required unless a relevant exemption applies.

Please be reminded that the *Aboriginal Heritage Act 1972* protects all Aboriginal heritage sites in Western Australia, whether or not they have previously been identified or registered under that Act. Consent is required from the Minister for Aboriginal Affairs for any activity which will impact Aboriginal heritage sites. This approval in no way grants authority to impact any Aboriginal heritage site protected under the *Aboriginal Heritage Act 1972*.

Should you have any queries regarding this letter, please contact Demelza Dravnieks on (08) 9222 3241

Yours sincerely



Tyler Sujdovic
Acting Executive Director Resource and Environmental Compliance
Resource and Environmental Compliance Division
25 November 2022

*Attach: Schedule 1: Areas of the Mine Closure Plan that require further development in the next revision
Schedule 2: Recommended further conditions*



Appendix B Covalent Lithium Environmental Policy



Environment Policy

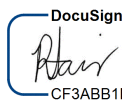
1 Purpose

Covalent Lithium is committed to the principle of sustainable development and recognises the benefits of integrating economic, social and environmental considerations in its business planning and practices. This Policy applies to all Covalent and Project team members.

2 Objectives

We will:

- Comply with all relevant environmental laws and obligations and report on our environmental performance to internal and external stakeholders;
- Minimise any adverse environmental impacts associated with our operations through the efficient use of natural resources such as energy and water, reduction of waste, minimisation of air pollution and operational GHG emissions, and through the responsible management of land and biodiversity;
- Aim for continuous improvement in environmental performance through the development and achievement of key performance indicators and the monitoring and review of our systems;
- Continually assess the environmental risks and potential impacts of our activities and ensure that risk-based objectives, targets and standards are established, reviewed and integrated into our environmental and operational management practices;
- Communicate and consult with employees, contractors, the community, regulators and other parties in relation to environmental matters;
- Commit adequate and appropriate resources to achieve environmental goals and objectives; and
- Review, evaluate and improve this policy regularly to ensure it remains relevant and appropriate to Covalent's activities.

DocuSigned by:

CF3ABB1F32BF44E...

Ryan Hair
Chief Executive Officer
Covalent Lithium Pty Ltd

Document No.	Rev	Implementation Date	Revision Date
COV-000-EN-POL-0002	2	13 April 2023	13 April 2024



Appendix C Contractor Environmental Compliance Requirements

1. Contractor Environmental Risk Assessment

Prior to mobilising to Site, the Contractor must coordinate a Hazard Identification (HAZID) workshop detailing how specific health, safety and environmental risks associated with their scope of work will be managed. Relevant Covalent personnel must be involved in this HAZID.

At the completion of the HAZID, the Contractor must incorporate any additional identified environmental controls and management requirements into their EMP. HAZID actions must be closed prior to mobilisation to site. The Contractor must provide Covalent with a copy of the HAZID register prior to mobilisation to site.

The Contractor must ensure their Subcontractors comply with the Contractor EMP and that Subcontractor risks are addressed in the HAZID.

2. Contractor Environmental Management Plans

If deemed appropriate (in relation to Contractor scope of works environmental risk) by Covalent, the Contractor shall develop a Project specific EMP.

The EMP needs to be developed to specifically address the management of risks within their work scope. The Contractor's EMP must:

- Align with all of the requirements of the Covalent EMP as applicable to their Scope of Work (SOW) (where there is any inconsistency in requirements between the Contractor's EMP and the Covalent EMP, the requirements in the Covalent EMP shall prevail) so that no relevant environmental management measure is omitted.
- Include an assessment of risks relevant to the SOW and specifically address the management of the identified risk exposures.
- Outline an Environmental Management system that is aligned with the requirements of the Australian Standard entitled *AS/NZS ISO 19011:2014: Guidelines for Auditing Management Systems*.

The Contractor can choose to fully adopt the Covalent EMP and related environmental documents (i.e. procedures, work instructions etc.) rather than developing their own full EMP to mirror these requirements. However, in doing so, the Contractor must ensure that they include all environment management measures required to mitigate environmental risks that have been identified to be relevant to their works.

The Contractor's EMP should:

- Outline activities in their scope of work that have a potential environmental impact.
- Outline their environmental management system to show that it is aligned with the requirements of *AS/NZS ISO 19011:2014: Guidelines for Auditing Management Systems*.
- Identify the relevant legal obligations and commitments.
- Refer to the relevant Covalent environmental documents.
- Identify environmental risks relevant to their scope of work.
- Detail the specific management measures to be implemented to minimise risk of impact to the environment.

The Contractor is to ensure their personnel are familiar with the contents of their EMP, and that their personnel and subcontractors comply with the Contractor EMP.

The Contractor EMP is to be subject to periodic review (minimum annually) by the Contractor to:

- Reflect changes in contractual or operational requirements.
- Correct non-compliances identified during auditing.
- Incorporate improvements identified during incident investigations and audits.
- Be consistent with the conditions of Project permits, approvals and licences as they are issued.



2.1. Environmental Objectives and Targets

The Contractor will specify environmental objectives and targets, relevant to the SOW, in the EMP.

The Contractor objectives and targets will, as a minimum, align with the objectives and targets outlined in this document. The Contractor will monitor and report on progress towards achieving these objectives and targets through a monthly progress report.

2.2. Legal and Other Requirements

The Contractor will comply with all relevant legal requirements. Copies of licences, approvals and permits relevant to the SOW will be held on site with files available for audit and inspection purposes.

A Legal and Other Obligations Register (LOR) has been developed by Covalent and is populated with legal requirements and approval conditions, as well as Covalent commitments (to regulators and stakeholders) made during the environmental approvals process. The LOR also documents the compliance actions taken. The LOR is a live document that will be updated regularly throughout Project construction. A subset of the LOR will be extracted and provided to the Contractor where required to assist with the identification and management of legal obligations.

The Contractor EMP and procedures will incorporate legal obligations and will be updated as necessary to align with future approvals and related conditions imposed on the Project.

2.3. Training and Awareness

All Contractor personnel will be aware of and competent to implement the environmental requirements of this document and the Contractor's EMP when performing their individual tasks.

The Contractor will organise for all of its personnel to undertake an environmental (or HSE) induction prior to commencing work on site. The induction will include but not be limited to the following:

- Project approvals and key legal obligations.
- Environmental Exclusion Zones
- Regulatory penalties and impacts of non-compliance.
- Ground Disturbance Permits
- Land access restrictions
- Aboriginal heritage sites, incidents and cultural awareness.
- Dust management
- Identification of weeds, management measures and reporting requirements.
- Issues associated with protection and preservation of fauna, identification of protected fauna species and reporting requirements (sightings & injuries).
- Identification of feral fauna species and reporting requirements.
- Water management and water use efficiency.
- Fire risk, impacts, management and response.
- Significant erosion events.
- Hazardous materials storage and use.
- Use of spill kits and other procedures for cleaning up spills of potentially contaminating materials and substances.
- Waste management.
- Fibrous minerals and materials management.
- GHG emissions and energy efficiency.
- Incident and hazard reporting.
- Any special requirements relevant to the specific work location.

The Contractor will ensure that all its personnel have also undertaken all Covalent organised inductions as required.

The Contractor will develop and implement a training matrix to ensure that training requirements are identified and that relevant personnel receive the necessary training to implement environmental



requirements in their work areas. Training records will be maintained on site and include a regularly updated Training Matrix.

2.4. Resourcing and Responsibilities

The Contractor will provide adequate, suitably qualified and experienced personnel on site to coordinate the management of environmental issues for the works. This requires a minimum of one suitably qualified environmental (or HSE) representative to be employed onsite by the Contractor, and an additional suitably qualified environmental (or HSE) representative for every 50 Contractor personnel on site or on a case by case basis in agreement with Covalent.

The Contractor will demonstrate that responsibility for achieving environmental outcomes rests with senior Project and construction management personnel with support from a suitably qualified environmental (or HSE) advisor. An organisation chart and job descriptions will be provided as part of the Contractor's EMP.

2.5. Communication

The Contractor will discuss environmental issues as a regular component of their toolbox and site meeting agenda. Environmental (or integrated HSE) notice boards will be established to inform personnel of relevant environmental information such as minutes of meetings, results of monitoring, performance standards, environmental incident alerts and Covalent environmental notices. The notice boards will be refreshed periodically with up-to-date information.

The Contractor will present environmental communications to its workforce on a weekly basis. These will present information on the management of environmental risks or key site environmental issues. A record of the communication topic, names of employees in attendance and the presenter's name will be maintained on site as an auditable record.

Covalent is responsible for external communication in relation to matters concerning the environment, including external incident notification to regulatory agencies. This includes but is not limited to communications with the media and government agencies and particularly in relation to reporting of incidents that may have occurred. All community or regulatory queries or complaints received by Project personnel will be directed to the Covalent Manager Environment & Approvals for follow up.

2.6. Monitoring

Environmental monitoring may be required under various permits, approvals and licences. Covalent will inform the Contractor's as to their responsibility for monitoring requirements that are relevant to their works. The Contractor is to ensure that they complete the monitoring that is requested by Covalent.

The Contractor is responsible for ensuring that data and information submitted to Covalent is complete and accurate.

2.7. Reporting

A range of environmental data will be reported to Covalent by the Contractor. Reports provided by the Contractor may be used as evidence of legal compliance or non-compliance and must be correct and auditable.

The Contractor will be responsible for verifying and quality controlling all data reported in relation to their site activities. Data must be provided at the intervals specified by Covalent. Non-reporting will be treated as a non-compliance incident.

Covalent will provide the Contractor with a reporting template within which environmental data will be reported – other information and data may be required as well. The Environmental Data Reporting



Form (COV-M000-EN-FOR-0005) is to be used to collect the required key environmental data on a monthly basis from contractors and Covalent Environmental Reporting Groups. The completed form is to be emailed on a monthly basis to the Environment team, at environmental.reporting@covalentlithium.com. It should be noted that the identification of reporting requirements is ongoing and that Covalent may request additional information to be reported by the Contractor at any point in time.

The Environmental Data Reporting Form will be populated with environmental data on a weekly basis by the Contractor. The data from Contractor reports will be reviewed and quality controlled by the Contractor prior to reporting to the Covalent Environment Team.

All incidents and non-conformances will be reported in accordance with the Project wide HSE incident and hazard reporting system.

2.8. Management Plans and Procedures

Specific management plans may need to be developed by the Contractor to address the management of specific environmental risks which are not addressed by the Covalent EMP. Covalent will advise the Contractor where they are required to develop additional management plans and procedures, or whether the requirements can be incorporated into their EMP.

2.9. Control of Records

Records will be developed and maintained by the Contractor including:

- Training materials, records and matrix.
- Audit and inspection forms.
- Corrective Action Register (CAR)
- Monitoring results such as water abstraction volumes, water quality testing results.
- Controlled waste receipts and tracking numbers.
- Receipts for fuel use.
- Incident reporting and investigation records.
- Trench logs, fauna sightings and trench inspection records.
- Tonnage/cubic metres of waste types to landfill, waste recycled, and waste types disposed of offsite.

The Contractor will ensure that auditable records for all environmental reporting are retained. These records must be maintained on site throughout the Contractor's works. These records will be used by Covalent as evidence of legal compliance and may be required to be produced during site audits by Covalent or external auditors.

Upon completion of the Project all Contractor records will be handed over to Covalent.

2.10. Emergency Response

The Contractor will develop an emergency management plan that includes the response to environmental emergencies, emergency drills and training related to the Contractors scope of work.

The Contractor is to ensure that training and periodic testing of emergency management plans is conducted at regularly planned intervals (a minimum annually).

2.11. Contractor Audits and Inspections

The Contractor will conduct environmental (or combined HSE) inspections at least weekly and inspect the work areas and activities of their personnel as well as their Subcontractors. The Contractor will develop a suitably detailed inspection checklist that addresses the potential environmental issues that could occur within their scope of work. The Contractor will submit the inspection checklist to Covalent for acceptance prior to its use on Site.



The Contractor will conduct quarterly internal environmental audits or at a frequency agreed with the Covalent Manager Environment & Approvals.

Records of these inspections and audits are to be retained by the contractor and copies made available to the Covalent Operations and Environment Team upon request. Actions arising from inspections are to be entered into the Contractor's action management system for tracking and close out.

2.12. Covalent Audits and Inspections

Site audits will be conducted by Covalent according to a Project audit schedule. The audit schedule will detail proposed dates for audits and inspections at all work sites across the Project. The audit schedule will be a dynamic document and will be modified from time to time to suit the changing activities and risks. The audit schedule will be risk based and higher risk activities will be the subject of increased audit and inspection.

Covalent may conduct an EMS audit on the Contractor approximately 6 weeks post mobilisation to site. The Contractor is to achieve 85% in this audit. If the score attained is less than 85% then a re-audit will be organised two weeks later to assess the outstanding action items.

Regular audits will be conducted over the term of the Contract, to ensure that requirements of the Covalent EMP are met. Covalent will provide the Contractor with a copy of the audit report and a table showing noncompliance actions as an outcome of the audit. The Contractor must return a signed copy of the audit report within 3 days of receiving the audit report, confirming agreement with or rejecting the audit findings.

Audit findings and the associated required actions will be recorded in the Project Incident and Action Management System for action and close out. Entries into the system should detail the source of the action (e.g. audit, inspection or other), the action required, target close out date, actual close out date and the person responsible for the action item.

Covalent will conduct inspections on the Contractor (and their Subcontractors as required) on a frequency depending on the environmental risk posed by the Contractor's activities. Any actions arising from the inspections will be entered into the Project Incident and Action Management System for action by the Contractor.

2.13. External Audits

Covalent will give the Contractor a minimum two weeks' notice (where possible) of external audits and required attendees. External audits and inspections of the Project may be conducted by regulators (such as Department of Water and Environment Regulation) to ensure compliance with permits and licences as well as commitments made by the Covalent. For such audits and inspections, a Covalent Environment Team member, Covalent Manager Environment & Approvals and other representatives of Covalent teams will accompany the regulator at all times.

The findings and recommendations arising from external audits will be recorded as corrective actions in the Project Incident and Action Management System and managed to close out in agreed time frames.

2.14. Incident and Hazard Reporting

All environmental hazards and incidents will be reported and managed using the Project wide Health, Safety and Environment (HSE) incident and hazard reporting system. The Contractor accountable for the incident will be responsible for investigating, mitigating and remediating the incident in consultation with Covalent.

All environmental incidents will be reported to Covalent within the timeframes specified, categorised and investigated as outlined in the Covalent Incident Reporting and Investigation Procedure (COV-000-HS-PRO-0001).



Covalent will be involved in investigating incidents with an actual or potential consequence of high and above, including those that breach regulations, licence or contractual conditions. External reporting of any incidents will be conducted by Covalent only.

2.15. Corrective Actions

Corrective actions may be identified from a number of sources, including but not limited to incident investigations, audits, inspections and management reviews. Corrective actions will be systematically implemented and reviewed to ensure they adequately resolve the issue and minimise the risk of reoccurrence of the incident.

A Corrective Actions Register must be maintained by the Contractor and will, record all corrective actions identified and implemented including review of corrective actions and close out details. This register must be maintained on site by the Contractor. The close out details will include the date closed and the name of the person verifying completion of the required action. The corrective actions register will be kept up to date and reported to Covalent upon request.

Corrective actions will also be entered into Covalent's Incident and Action Management System to enable close out of the incident. Corrective actions arising from audits and inspections conducted by Covalent will be registered in Covalent's Incident and Action Management System. The Contractor is required to implement the action and close them out within the required time period.

2.16. Review and Improvement

The Contractor EMP will be subject to periodic review by Contractor management and if required, will be amended to reflect changes in contractual or Project requirements, to correct disparities identified during Project auditing and to ensure it is consistent with the conditions of various permits, approvals and licences as they are issued.