Western Australian
Mining and Refining

ABN 70 623 090 139

Covalent Lithium Response To DWER *Response Table - Required amendments to the Referral Information Documentation*, 21 October 2025

The following Attachments are provided in support of the Covalent response in the table below.

Attachment 1	Western Botanical 2025 Survey for Booster Station 3 to support s43A Assessment
Attachment 2	Updated FVEMP (previously Appendix 2 of ERD)
Attachment 3	Revised Impact Assessment for Conservation Significant Flora, JBS&G 2025
Attachment 4	Addendum to LoM Referral – Additional Information
Attachment 5	EMM Earl Grey TSF2 Groundwater model V2' (EMM 2025)
Attachment 6	Laboratory certificates
Attachment 7	Heritage surveys
Attachment 8	MG Engagement Summary (redacted)
Attachment 9	Amended GHG Report (previously Appendix 12 of ERD)

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Response Table - Required amendments to the Referral Information Documentation

Requirement	EPA Services advice	Proponent response 21/10/25
Flora and Vegetation		
1.Provide the results of recent flora and vegetation surveys that were conducted after the proposal was referred, an updated assessment of impacts and an offset strategy.		
1.a 1.1	**Comments** • It is understood that additional flora and vegetation surveys have been undertaken since the proposal was referred. • The survey results presented in the Flora and Vegetation Environmental Management Plan (Appendix 2 of the environmental review document (ERD) for the Earl Grey Lithium Project, Life of Mine Proposal) were incomplete in that the report did not include images for *Cryptandra exserta* (BC- P1), *Rinzia fimriolata* (BC-P1), *Rinzia torquata* (BC-P3) and *Rinzia triplex* (BC-P3). It also did not include a description for *R. torquata.* **Action/s** **1.1** Conduct additional flora and vegetation surveys in accordance with Technical Guidance - Flora and Vegetation Surveys for Environmental Impact Assessment | EPA Western Australia. Submit the data to IBSA. Update Appendix 6 of the ERD. justify any variance from the technical guidance document. **1.2** The LoM proposal will remove 21.83% of Thryptomene salina (P1) recorded individuals. No individuals of this species were to be removed by the approved proposal and the 2023/2024 targeted surveys did not identify any new individuals. **1.3** The 2023/2024 targeted survey report does not conclude whether the Ironcap Hills P3 PEC is present in the area outside of the LoM. **1.4** Based on the most recent survey, the number of individuals identified in the region increased significantly for several P1 species. However, the number of P1 individuals identified in the disturbance area remained as stated in the previous survey.	**Comment** • All baseline surveys within the original DE area were completed prior to the ERD submission and therefore no further surveys of the DE were required/planned. Further regional surveys outside of the Development Envelope (DE) have provided additional plant records for individual priority species An additional survey was required to support a change to the DE via a s43A (approved 8th October 2025). This change was required for an additional Booster station 3. This data has been incorporated within the proposal data set and the report and its submitted to IBSA (confirmation Ref no ISA-0001015). A copy of the report is provided in **Attachment 1.** • The FVMP was amended to include updated information to reflect changes to some species • Note that *Cyptandra exserta* (BC-P1) is no longer referenced in the ERD or Appendix A of the FVMP. Further work by Western Botanical found that the original sample was misidentified as the Reference Herbarium material was ambiguous. The collected material has since been determined as being within the *Cyptandra wilsonii* group, which has several entities within it, and are not priority species. *Cryptandra exserta* does not occur within any of the areas surveyed by Western Botanical for Covalent Lithium to date. • Appendix A of the FVMP (Table 9 of ERD) has been updated to include data (images/descriptions) for *Rinzia fimriolata, Rinzia torquata and Rinzia triplex* consistent with information originally provided in the ERD. The updated FVEMP is provided as **Attachment 2** to this submission. **1.1** All flora and vegetation surveys, including additional targeted surveys, have been conducted in accordance with current EPA (2016) Technical Guidance Flora and Vegetation Surveys for Environmental Impact Assessment. A consolidated review of all flora impact data has been provided in **Attachment 3** (Revised Impact Assessment for Conservation Significant Flora, JBS&G 2025). **1.2** Further regional surveys outside of the Development Envelope (DE) have provided additional plant records for individual priority species including *Thryptomene salina.* An updated percentage impact table is provided in **Attachment 3**. **1.3** The purpose of the targeted survey was to identify conservation significant flora taxa. It was not to identify PEC boundaries. As the PEC is not being impacted, this was not part of the scope of work for targeted surveys. **1.4** The ongoing additional flora surveys were to identify and locate new regional populations

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		of priority species **outside** of the DE. All baseline surveys of within the DE area were completed prior to the submission. The recent s43A included an increase in DE, the additional area being associated with Booster station 3 adjacent to the pipeline. The vegetation information was provided in the S43a which was approved (8th October, 2025) as noted above.
1.b 1.2	**1.b Comment** It is noted that the surveys completed for the proposal identified additional occurrences of BC-P1 species known to occur in as few as 2 locations (prior to the ERD surveys) within ranges that are as small as 3 km in radius. **Action/s** **1.1** Confirm whether additional vegetation exclusion zones (VEZs), associated control sites, dust monitoring locations and plant monitoring quadrats will be proposed and update the maps accordingly Please advise and also what controls are in place to protect these zones. **1.2** The approved proposal includes commitments to protect flora in 5 flora protection areas (FPA) and establish associated control sites, dust monitoring locations and plant monitoring quadrats. One protection zone is proposed for the EGLP LoM; however, *the area was never proposed to be cleared.* It is unknown how many P1 individuals have been identified in the new FPA compared to the number of individuals that are proposed to be cleared.	**Comment** The additional occurrences of DBCA-P1 species known to occur in small locations and within small ranges for this proposal include the following: • *Brachyloma stenolobum* • *Chamelaucium sp.* Parker Range (B.H. Smith 1255) • *Eutaxia* sp. North Ironcap (P. Armstrong PA 06/898) • *Labichea rossii* • *Microcorys elatoides* • *Microcorys* sp. Mt Holland broad-leaf (G. Barrett s.n. PERTH 04104927) • *Thryptomene* sp. Hyden (B.J. Lepschi & L.A. Craven 4477) All taxa with the exception of *Eutaxia* sp. North Ironcap, are currently protected within the existing Flora Exclusion Zones (as per MS1199). **1.1** One additional FVEZ has been included as part of the LoM proposal. It is located within the development envelope on the northeastern side but outside of the footprint. The location of this FVEZ is shown in the image below.  A figure showing the new FVEZ and indicative locations for dust monitoring, control sites have been provided and will be verified by botanists and added to the FVMP once a suitable vegetation community is confirmed. Refer to Figure 4-8 of **Attachment 3** This exclusion zone will be protected from disturbance through the use of the existing Covalent site Ground Disturbance Permit (GDP) system. When clearing is proposed, the GDP process

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		overlays any proposed disturbance shape files with other sensitive environmental shape files including rare and threatened plant flora and fauna communities, heritage areas and also references all approval conditions and boundaries etc. as part of ongoing protection systems. Any sensitive area adjacent to the disturbance area is also identified and where appropriate, buffer zones applied. **1.2** … *"the area was never proposed to be cleared".* This statement is incorrect. The north-eastern FPZ was originally part of the proposed Disturbance Footprint (DF) for the West Waste Rock Landform (WRL) which was subsequently modified to avoid the FPZ. The DF has been constrained as much as possible to avoid known areas of diverse populations of conservation significant flora. Figures 17 to 23 of the ERD illustrate where different conservation significant flora have been identified, with the overlay of the DE and DF. The areas excluded from the DF (and therefore not cleared/disturbed) are also illustrated, and from this it is evident where populations are avoided. A figure has been prepared highlighting areas of high-density populations of conservation significant flora have been avoided and is provided in **Attachment 4.** The purpose of the FVEZs is to protect known conservation significant flora taxa locations and habitat. The LoM FVEZ was identified as being of particular ecological value and therefore removed from the DF. It is an avoidance measure, not an offset. Nonetheless, the number of P1 individuals in the FPZ is known and can be provided if required.
1c 1.3-1.5	**Comments** The proponent has suggested that the development envelope does not include Ironcap Hills (IH) PEC (BC-P3). The proponent has based this conclusion on the results of statistical analysis and the observed lack of landforms and species of the Middle IH, South IH, Digger Rock and Hatter Hill vegetation complexes. The IH PEC also includes the Mount Holland and North IH vegetation complexes. **Action** **1.1** Further validate the presence/absence of the Mount Holland and North IH vegetation complexes within the DE. **1.2** Two of the six complexes are not addressed. Can you please provide an assessment and compare for the 2 outstanding complexes, using DBCA endorsed reference for a veg survey, with statistical analysis to confirm presence/absence **1.3** Assess and advise whether the DE contains any ecological communities that would be considered rare.	**Comment** Based on section 6.9 of the Mattiske report (Appendix 2), Covalent believes this statement incorrect. The majority of the Survey Area is situated within the buffer of the Ironcap Hills Vegetation assemblages (Mt Holland, Middle, North and South Ironcap Hills, Digger Rock and Hatter Hill) (banded ironstone), a Priority 3 ecological community (Figure 8). An analysis of the similarity between vegetation communities defined within the Survey Area and those defined by Gibson (2004a) from survey quadrats established on Middle and South Ironcap, Hatter Hill and Digger Rock, and which are the basis for the vegetation types which are associated with the Ironcap Hills Vegetation assemblages (Mt Holland, Middle, North and South Ironcap Hills, Digger Rock and Hatter Hill) (banded ironstone) Priority 3 ecological community, did not demonstrate a statistically significant level of similarity.' Whilst the DE is situated within the Ironcap Hills PEC, the vegetation within the DE is not statistically representative of the vegetation communities which define the PEC. The latter appears to relate to the broader regional approach adopted by government agencies in defining PECs without the necessary detailed and comprehensive ground-truthing and extensive data analysis in interpretation, as undertaken by Mattiske Consulting. **1.1** The Ironcap Hills vegetation assemblages, as defined by the DBCA in their listing of PECs is as per the image below:

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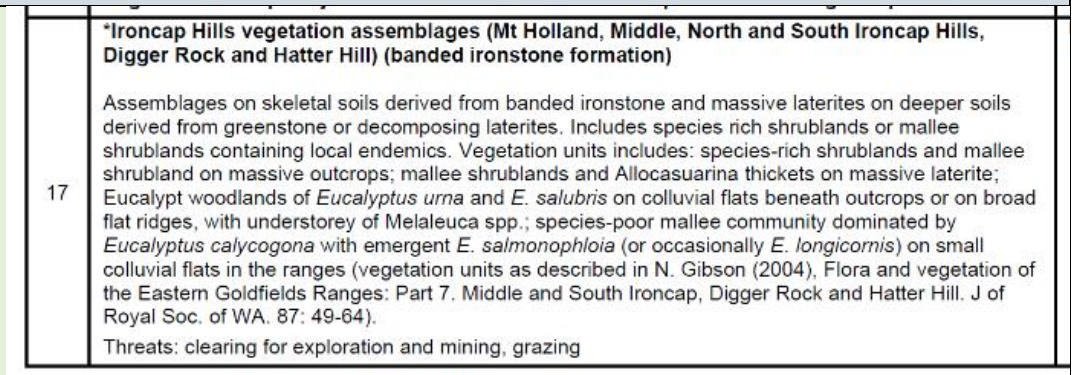
	1.4 The proponent considers that the only rare vegetation community in the development envelope is S3 and proposes to exclude the one occurrence of S3 from any clearing activities. No exclusion zone has been proposed for the S3 vegetation community. Describe the protection mechanism and associated monitoring for the identified S3 vegetation community **1.5** Avoidance for S3 vegetation **1.6** Review and update (if identified in 1.3 and 1.4) the mitigation hierarchy to manage impacts to any potentially rare ecological communities and flora.	 17 | ***Ironcap Hills vegetation assemblages (Mt Holland, Middle, North and South Ironcap Hills, Digger Rock and Hatter Hill) (banded ironstone formation)** Assemblages on skeletal soils derived from banded ironstone and massive laterites on deeper soils derived from greenstone or decomposing laterites. Includes species rich shrublands or mallee shrublands containing local endemics. Vegetation units includes: species-rich shrublands and mallee shrubland on massive outcrops; mallee shrublands and Allocasuarina thickets on massive laterite; Eucalypt woodlands of *Eucalyptus urna* and *E. salubris* on colluvial flats beneath outcrops or on broad flat ridges, with understorey of Melaleuca spp.; species-poor mallee community dominated by *Eucalyptus calycogona* with emergent *E. salmonophloia* (or occasionally *E. longicornis*) on small colluvial flats in the ranges (vegetation units as described in N. Gibson (2004), Flora and vegetation of the Eastern Goldfields Ranges: Part 7. Middle and South Ironcap, Digger Rock and Hatter Hill. J of Royal Soc. of WA. 87: 49-64). Threats: clearing for exploration and mining, grazing This clearly states that the Ironcap Hills vegetation assemblages, are comprised of Mt Holland, Middle, North, and South Ironcap Hills, Digger Rock and Hatter Hill. Furthermore, it states that the vegetation assemblages are based on the survey, as described by N. Gibson (2004). Mattiske Consulting (2023) undertook a statistical comparison between the vegetation within the DE and the vegetation communities defined by Gibson (2004), using the data available from the DBCA which comprised Gibson's survey data set for the surveys undertaken across a range of greenstone hills in the Eastern Goldfields. Gibson did not specifically establish survey quadrats within either North Ironcap or Mount Holland. Mattiske Consulting (2023), on behalf of the proponent, has completed the appropriate statistical analysis using the relevant data set commensurate with the document referenced as that on which the PEC definition is based (i.e. Gibson, 2004) This information updates the information provided in Section 6.6.2 of the ERD, with a summary provided **in Attachment 4** (section 2.1). **1.2** No information is missing, refer to Section 6.6.2 – there are 6 vegetation complexes that together form the PEC Ironcap Hills vegetation complexes noted in the first paragraph under 'Priority Ecological Community' heading: *"The Proposal coincides with part of the mapped area of a DBCA-classified 'Priority' ecological community named 'Ironcap Hills vegetation complexes (Mt Holland, Middle, North and South Ironcap Hills, Digger Rock and Hatter Hill) (banded ironstone formation)' (herein referred to as the 'Ironcap Hills PEC'), with a mapped extent of > 11,800 ha, as shown in Table 11."* These are discussed and assessed in this section as a collective, given they are integral to the definition of this particular Priority Ecological Community. **1.3** As stated in the vegetation survey report prepared by Mattiske Consulting (2023), several of the mapped vegetation communities are likely to be impacted to varying degrees. Specific impact percentages were not provided in the vegetation survey report as an infrastructure footprint was not available at the time. Since preparation of the vegetation survey report, impacts to the

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		vegetation communities present in the DE have been provided within the revised draft ERD. The calculations of impacts to the vegetation communities within the updated ERD tables (**Attachment 4, section 2.1)** demonstrate high impacts to several vegetation communities. As stated in the vegetation survey report, with one exception, the vegetation communities impacted are, from both a vegetation community and species composition consideration, common and widespread in the region. The exception to this is the S3 vegetation community, which is the vegetation supporting the threatened *Banksia dolichostyla*. This community was recorded at the northern most extent of the DE and is being excluded from any proposed clearing activities – as has been the case in the approved Earl Grey Revised Proposal DE. Hence, the only vegetation community which could be considered as rare, is not proposed to be cleared. **1.4** The patch of S3 vegetation community referred to within the ERD as being of conservation significance, is located in the northern part of the Survey Area, a new location within the LoM DE which had not been previously surveyed. This and the existing known locations of S3 are shown in Figure 25 of the submitted ERD. These areas have been avoided by footprint design. As previously mentioned, sensitive areas such as the S3 community will be protected from disturbance through the use of the GDP system. When clearing is proposed the GDP process overlays any proposed disturbance shape files with other sensitive environmental shape files including rare and threatened plant flora and fauna communities, heritage areas and also references all approval conditions and boundaries etc. as part of ongoing protection systems. Any sensitive area adjacent to the disturbance area is also identified and where appropriate, buffer zones applied. **1.5** Figure 25 of the submitted ERD shows locations of S3 vegetation in relation to DF. It illustrates the areas of ecological value that are now outside the DF – these have been deliberately avoided/excluded from the DF and represent the maximum practical avoidance. **1.6** No changes to the mitigation hierarchy are proposed, as avoidance has already been demonstrated as far as practicable. The current mitigation hierarchy within section 6.5 provides for: • Avoidance of S3 (being subcommunity S3b) – this refers to the new community location to the north of the LoM DF. The alignment of the footprint was carefully designed through careful selection and mitigation processes to ensure the S3 vegetation would not be impacted. This vegetation community will be protected from disturbance through the use of the GDP system as described above. • Minimise - Reduction on the clearing of flora taxa, with specific emphasis on minimising the impact to Banksia dolichostyla. Note that the S3 community exists within the current Revised Proposal DE. However, changes required for the LoM, may see some impacts within the revised LoM footprint (that were not previously impacted). This accounts for the assessed impact to Banksia individuals in the vicinity of the expanded site infrastructure.

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		• Offset – translocation (as defined by DBCA) of Banksia dolichostyla (using seed/seedlings germinated from site collected seed material; as per offset strategy, yet to be approved) to an area set aside in the southeastern portion of the site being an abandoned airfield located within an S3 community.
1.d 1.6	**Comments** Green Energy Approvals is aware that the Shire of Yilgarn has been granted a clearing permit (CPS 10197/1) to clear 9.9 ha of native vegetation in a footprint of 69.07 ha. This clearing permit relates to road construction and material sourcing to be conducted by the Shire of Yilgarn to accommodate an anticipated increase in heavy vehicle traffic associated with the proposed expansion of the Earl Grey Lithium Project, LOM. Recently, DEMIRS has also approved clearing of native vegetation for mineral exploration within the adjacent Jilbadji Nature Reserve. **Action/s** 1.6. Please provide a comprehensive assessment of cumulative impacts for flora and vegetation associated with all approved clearing in the vicinity of the EGLP, LOM proposal	**1.5** The cumulative impact assessment (CIA) has been updated within the following Attachments: • **Attachment 3** – for revised cumulative impacts to flora • **Attachment 4**, **Section 2.1** – for revised cumulative impacts to vegetation (updates section 6.6.2 of ERD) • **Attachment 4**, **Section 4.1** and for revised consideration of cumulative impacts (updates Section 11.2 of ERD), which defines the scope of relevant third-party activities being those located within an approximate 10 km (local) and 20 km (regional) radius of the proposal within the Southern Cross IBRA Subregion, being the region within which the impacts to flora and vegetation and fauna habitat occur. The information supporting this assessment is based on publicly available information, which in this case is limited to area cleared. There were 4 clearing permits related to the road construction and material sourcing to be conducted by the Shire of Yilgarn to accommodate an anticipated increase in heavy vehicle traffic associated with the proposed expansion of the LOM project, not all of which are in scope for the CIA: • CPS 10197/1 - Northern Section – from Moorine Rock to Fence Road (chainage 0.2 to 50.0 km); this lies outside of the scope of the CIA, being >20km from the LOM DE and is outside of the Southern Cross IBRA subregion. • CPS 10265/1 - Fence Rd to the Marvel Loch – Forrestania Road (chainage 50.0 to 63.0 km); being >20km from the LOM DE and is mostly outside of the Southern Cross IBRA subregion. • CPS 10049/1 - Southern Section – the Marvel Loch – Forrestania Rd from chainage 63.0 to 113.0 km at the turnoff to the Mt Holland mine site, CPS10049/1 – only a portion of this permit area lies within the scope of the CIA, with the remainder being both >20km away and not within the Southern Cross IBRA subregion.
1.f	**Comment** An updated offset strategy was not included with the referral. **Action** **1.10**. Provide an updated offset strategy to counterbalance the residual impacts of the proposal that is consistent with the Environmental Offsets Policy and Guidelines and where residual impacts relate to threatened species or communities, the	**1.10** At the time of submission of the LOM referral, Covalent' s offset strategy for MS1118 and MS1199 was under review by DWER. The indication from DWER was that the offset strategies from the existing approvals and the LOM would need to be combined. As no comments had been received at the time of submission an offset strategy was not able to be prepared. An updated Flora Offset Strategy has since been provided combining flora offset requirements for both the Approved Project and LoM proposal. This is provided as an **appendix to Attachment 3.**

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	Environmental Protection and Biodiversity Act 1999 Environmental Offsets Policy Assessment Guide. **1.11** The proposed restoration site that will comprise the offset is significantly smaller than the area to be cleared for the LoM expansion. As the proposed restoration site contains the former airstrip, the area is disturbed and its biodiversity and fauna habitat value are unlikely to be comparable to the area to be cleared for the LoM expansion. **1.12** The contamination status of the former airstrip is unknown. **1.13** A fire in January this year surrounding the Mt Holland mine site affected ~44,000 to 50,000 ha, with extensive damage to flora (potentially 40,000 banksia trees burnt), Malleefowl mounds, exclusion zones and monitoring bores. Covalent is to provide shapefiles for the fire affected area and include Malleefowl mounds/nests. The Offset Strategies were prepared prior to the fire, so they may need to revisit the plan. Covalent has queried whether the recent fire affected areas can be considered as opportunity for monitoring/ rehabilitation as part of offsets.	**1.11** The proposed restoration site is not intended to be comparable in spatial area but is intended to be the location of rehabilitation trials to replace individual Iron Cap Banksia impacted. It is not the proposed offset for fauna habitat. The restoration site was selected as it is a historical legacy disturbance area and is bordered on either side by suitable remnant vegetation containing *Banksia dolichostyla and Microcorys elatoides.* The new *Banksia dolichostyla* will enhance the existing naturally occurring individuals in the area and reduce the current fragmentation, potentially reestablishing a linkage between existing populations. Therefore, the offset work will significantly improve biodiversity and fauna. Rehabilitation of the airstrip is already underway. Refer to Flora Offset Strategy (Appended to **Attachment 3**) for further detail. **1.12** (As referenced in the Flora Offset Strategy RFI). As part of its baseline site contamination assessments, Covalent completed a Preliminary Site Investigation (PSI) in 2019 to assess historic mining activities (GHD, 2019). The site was reported to DWER in July 2020 and subsequently classified as 'Potentially contaminated – investigated required' under the Contaminated Sites Act 2003. The notice of classification recommended further investigations at the site to delineate and characterise contamination and assess the suitability of the site for the proposed lithium mine. Following the PSI, Covalent progressed decommissioning and demolition works, enabling a Detailed Site Investigation (DSI) in May 2020 by 360 Environmental (2020). This targeted investigation focused on previously inaccessible subsurface soils in historically impacted areas. As more areas became accessible, a second DSI was completed in April 2021 (360 Environmental, 2021). Together, these investigations established a contamination baseline and informed future remediation and development strategies for the EGLP. In early 2025, Covalent engaged specialist contamination consultants SLR to update the Conceptual Site Model (CSM) documenting the current contamination status of the Areas of Potential Concern. The updated CSM completed in accordance with DWER risk-based approach to contaminated sites management was submitted to the Contaminated Sites branch of DWER in March 2025 with a recommendation to reclassify the site. This is still under assessment and Covalent has been advised that due to the considered low risk of contamination that assessment may not be completed in the short term. The Bounty Airstrip, identified as AOPC22, was included in the 2020 DSI (360 Environmental, 2020), which included 10 surface soil samples. The field observations state "No evidence of ground staining or odours was reported in any of the samples collected. PID readings were all reported at 0 parts per million (ppm)". Analysis of the 10 surface soil samples show none exceeded the risk assessment criteria. SLR concluded that soils in AOPC 22 did not appear impacted by metals, RH, BTEX, PAHs and PFAS from historical aircraft refuelling or AFFF use. The sampling analysis and quality plan, prepared by SLR for the field work was prepared consistent with the Data Quality Objectives approach in the relevant 1999 National Environment

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		Protection (Assessment of Site Contamination) Amendment Measure No.1 revised May 2013 (NEPC 2013) [2013 NEPC, ASC] schedules. The proposed methodology is consistent with the information provided in the Department of Water and Environment Regulation (DWER, formerly Department of Environmental Regulation (DER) Assessment and Management of Contaminated Sites. Contaminated Sites Guideline dated December 2014 (DER, 20140 [AMCS Guideline] The revised CSM (SLR, 2025) concluded the exposure pathway at AOPC22 was incomplete ie at least one necessary link in the chain connecting a contaminant's source to a person is missing, so exposure does not occur via that specific route meaning that the potential for exposure is removed and the risk ranking as low. No further investigations have been recommended. Covalent believe based on the work completed by SLR under the contaminated sites surveys there were sufficient soils samples taken throughout the contaminated sites surveys to conclude that the restoration site was not a 'hotspot' of contaminants as a result of historical land use activities. The contaminated sites status is addressed in the LoM Offset Strategy RFI. **1.13** Post fire, no change to strategy is proposed at this time, as noted by DWER, fire is a natural event. The EIA is expected to consider vegetation condition pre-fire.
1a 1g	**Comments** Covalent has advised that additional targeted and regional flora surveys have been undertaken since the proposal was referred. **Actions** **(1g.1)** Please outline what additional surveys have been undertaken to support the assessment and provide the survey or summary reports. Where required, justify any variance from EPA technical guidance. **(1g.2)** Confirm that all survey reports and data have been submitted via IBSA submissions with the IBSA numbers provided for verification. **(1g.3)** Provide an updated map of the survey efforts applied in relation to the study area and development envelope, identifying any direct and indirect impact areas. **(1g.4)** Provide updated maps showing the recorded locations of all significant flora in relation to the proposal and species distributions.	**1g.1** Western Botanical has been conducting ongoing additional targeted regional flora surveys since the initial submission of the ERD. This collated data set has been submitted to IBSA (submission ref no ISA 0001018) with a summary report (Western Botanical 2025, WB1082 EGLP Regional Surveys Summary October 2025) provided with the LoM Offset Strategy RFI. An additional survey specific to Booster Station 3 which has required a small increase in the size of the DE has also been completed and the report is provided with the LoM Offset Strategy RFI (Western Botanical BS3 Flora and Vegetation Report). There was no variance to EPA technical guidance in any of the additional surveys. **1g.2** All data associated with the above surveys have been collated and submitted to IBSA (Refer to Attachment A). A summary of IBSA submissions is provided in the table below

<table>
<tr><th>Requirement</th><th>EPA Services advice</th><th>Proponent response 21/10/25</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><th colspan="3">SUMMARY OF IBSA SUBMISSION ASSOCIATED WITH THE EGLP</th></tr>
<tr><th>IBSA/ISA Number</th><th>Study Area</th><th>Contractor</th></tr>
<tr><td>IBSA 2023-0451</td><td>LoM Development Survey</td><td>Mattiske</td></tr>
<tr><td>IBSA-2023-0393</td><td>Logistics Road Central</td><td>Western Botanical</td></tr>
<tr><td>IBSA-2023-0315</td><td>Logistics Road Northern</td><td>Western Botanical</td></tr>
<tr><td>IBSA-2023-0297</td><td>Logistics Road Southern</td><td>Western Botanical</td></tr>
<tr><td>IBSA-2023-0451</td><td>Life of Mine Expansion Area and Regional Survey</td><td>Western Botanical</td></tr>
<tr><td>ISA-0001015</td><td>Booster Station 3 Development Envelope</td><td>Western Botanical</td></tr>
<tr><td>ISA-0001017</td><td>Microcorys elatoides Regional Surveys</td><td>Western Botanical</td></tr>
<tr><td>ISA-0001018</td><td>Regional Surveys for Threatened, Priority Flora and Species of Interest</td><td>Western Botanical</td></tr>
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1g.3 An updated survey map of the Development Envelope with the addition of Booster station 3 was provided as part of the s43A amendment request and updated Proposal Content Document (Figure 4), now published on the EPA Website.

1g.4 Updated maps showing the locations of all significant flora in relation to the proposal have been provided as part of Attachment 3.
</td></tr>
<tr><td>1b
1g</td><td>• No updated assessment of the residual impacts of the proposal or proposed environmental outcomes have been provided.

Actions

• (1b.1) Provide an updated quantitative and qualitative impact assessment based on the additional survey information. Clarify the extent of potential direct, indirect and cumulative impacts of the approved proposal and revised proposal on all recorded significant flora species. This should include:

○ number of individuals and populations in a local and regional context
○ numbers and proportions of individuals and populations directly or potentially indirectly impacted
○ numbers/proportions/populations currently protected within the conservation estate (where known).</td><td>1b.1 to 1b.3 - Refer to Revised Impact Assessment – Conservation Significant Flora in Attachment 3.</td></tr>
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	• **(1b.2)** Provide an updated assessment of residual impacts, after application of the avoidance and minimisation elements of the mitigation hierarchy, including whether there are **significant residual impacts**. Assess the significance of the proposal's impacts in a local and regional context. For guidance on what the EPA may have regard to in its consideration of 'significance' refer to the Statement of environmental principles, factors, objectives and aims of EIA. **(1b.3)** Review, and where required update, the proposed environmental outcomes and whether these are consistent the with EP Act principles and environmental factor objectives (see Interim Guidance - Outcomes and Outcomes-based conditions.pdf for guidance). This should also include details on whether and how the proposed environmental outcome can be assured by conditions or other statutory decision-making processes.	
1c 1h	**Comments** Covalent has provided the *Earl Grey Lithium Life of Mine Proposal Flora Offset Strategy* (February 2025). Comments on the approved proposal offset strategy required by conditions 4-7 to 4-10 of MS 1199 were provided to Covalent on 13 August 2025. Given the offset strategy for the Life of Mine proposal is based on the strategy provided for the approved proposal, the same comments are considered relevant at this stage of the assessment If Covalent provides further supporting information and evidence that changes the environmental outcomes of the impact assessment, particularly the significant residual impacts, then the proposed offset strategy may also require amending. **Actions** **(1h.1)** Covalent must provide sufficient evidence about and assess whether (and how) an offset is likely to counterbalance Covalent has advised that additional targeted and regional flora surveys have been undertaken since the proposal was referred. • **(1h.5)** Where required, provide an updated offset strategy to counterbalance the significant residual impacts of the proposal consistent with the WA Environmental Offsets Policy and Guidelines and, where	**1h.1** Refer to **Attachment 3**, which provides a revised impact assessment for conservation significant flora. **1h.2 –** Refer to **Appendix B (revised Flora Offset Strategy) of Attachment 3**

Requirement	EPA Services advice	Proponent response 21/10/25
	significant residual impacts relate to listed threatened species or ecological communities, the *Environment Protection and Biodiversity Act 1999* Environmental Offsets Policy.	
Terrestrial Fauna		
2. Provide a comprehensive assessment of cumulative impacts for terrestrial fauna and terrestrial fauna habitat.		
2.a	**Comment** As stated above, clearing of native vegetation in the vicinity of the EGLP, LOM proposal has been approved for other projects. **Action** **2a.1** Please provide a comprehensive assessment of cumulative impacts for terrestrial fauna and terrestrial fauna habitat associated with all approved clearing in the vicinity of the EGLP, LOM proposal.	**2.a1** Refer to section 1c/1.6 above regarding cumulative impacts of third party clearing**.** The cumulative impact assessment has been updated to provide more detailed assessment of impacts to terrestrial fauna and habitat, associated with all approved clearing within the vicinity of the proposal. Updated information (to that which was provided in Section 11.2 of ERD) is provided in **Attachment 4 (Section 4.1).** **2a.2** The initial map showing the distribution of the malleefowl mound within the LoM area omitted some previously identified mallee fowl mounds listed on the database. An updated Malleefowl mound figure is provided in **Attachment 4 (Figure h3.1).**
2b	**(2b.1)** The program is proposed to take place within the Jilbadji Nature Reserve approximately 2 km from the proposal. The program would expand the broad framework of the current landscape-scale feral predator management Western Shield program, currently managed by DBCA. **(2b.2)** DBCA's website states that the Western Shield program has reduced fox numbers in the southwest by over 80%, which has led to the recovery of several species, including the chuditch. There are no statements regarding the success of the program in relation to malleefowl, however the species is noted to occur in several of the areas where the Western Shield program currently occurs. **(2b.3)** Covalent has proposed some adaptive management measures, with trigger criteria to be developed further once baseline monitoring is complete. Covalent proposes to review and revise (if needed) the triggers and threshold criteria after	**2b.1** The proposed LOM Threatened Fauna Offset Strategy (TFOS) provides further details on why the Jilbadji Nature Reserve site has been selected, noting that DBCA do not currently undertake predator control in this Reserve. **2b.2** The Baiting and Monitoring Offsets Strategy is independant of the DBCA funded Western Shield program but will adopt its methodology as it provides a robust, science-backed approach. Section 5.3 of the LOM TFOS addresses Covalent's confidence in the benefits of the proposed offset program and includes consideration of other baiting programs that have beneficial impacts to Chuditch and ground-nesting birds such as Malleefowl. As previously indicated, the landscape scale baiting programs are deemed the most effective method of managing foxes across the state, and Western Shield has reduced foxes by 80 % in the southwest. Whilst there are no statements within the DBCA website pertaining specifically to the success of the program in relation to malleefowl, the Malleefowl Recovery Plan, and National Threat Abatement Plans for foxes identifies predation as the key threat to malleefowl. Based on the above, Covalent is confident not only will both the chuditch and the malleefowl species benefit from the baiting and monitoring programme but this program will be beneficial

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	5 years. Currently only one trigger criteria has been proposed and relates to a 25% increase in introduced predators. Other preliminary trigger criteria should be considered at this stage, which can be adjusted following completion of baseline monitoring. Covalent should consider reviews and revisions more frequently, not just 5 years following program commencement. **(2b.4)** Covalent is proposing to establish a management framework and manage a not-for-profit fund and board to ensure the ongoing management and funding of these activities. Covalent proposes to manage the offset for 30 years and suggests that other proponents could contribute funding and that the program could be ongoing as an expansion to the Western Shield. Offsets must ensure a long-lasting environmental benefit and be capable of being maintained into the future (including after the project has been completed). This does not necessarily mean that a proponent is responsible for an offset forever, but that the offset must sustain the increase in environmental value. How will the program be designed to be enduring, enforceable and deliver long term strategic outcomes the term for the duration of mining operations. **Actions** **(2b.5)** Address the comments above in relation to the proposed offset strategy.	to a suite of other fauna species. **2b.3** An additional early response trigger has been included (section 7.4 of the TFOS), and these will be reviewed/revised after 3 years. **2b.4** Covalent now proposes to fund the program directly and not through a not-for–profit fund/board. (section 7.6 of the TFOS). The adaptive management and long term monitoring results, including analysis of program efficacy, will provide a sound basis for decisions on the future of on-ground management within Jilbadji Nature Reserve. As the program nears its 30-year life, Covalent will consult with the relevant agencies regarding the future of the program in this location and potential for transferring responsibility for ongoing active management of the conservation reserve. The program is easily scalable, and would allow for it to be expanded in duration after Covalent's mining operations have ceased or expanded in extent throughout the Jilbadji Nature Reserve and surrounding region. It is envisaged that other developments and proponents in the region with similar significant residual impacts could contribute to predator control and monitoring efforts and deliver long term strategic outcomes for chuditch and malleefowl beyond Covalent's 30-year program. The LoM TFOS has been updated to include comments above.
Inland Waters		
3 Revise the hydrological model to include input parameters for all relevant proposal elements and provide an updated assessment of impacts to inland waters.		
3.0	**Comment** The hydrogeological modelling presented in the referral does not include: • the TSF2 area • discharge of 200, 000 L/d of brine from the reverse osmosis plant to an abandoned on-site gold mine pit • Abstraction of groundwater from the borefield • Failure scenarios for the proposed water supply and tailings pipelines **Action/s** **3.1** Please revise the hydrological model to include the	**3.1** Consulting hydrologists EMM modelled groundwater inputs associated with TSF2 seepage and local hydrology to better understand influences to the mine plan and any potential associated impacts. They concluded in their review of the impacts to inland waters, based on the hydrogeological modelling that groundwater flow and potential for seepage is likely dominated by preferential flow paths and vertical gradients. The supernatant water within the TSFs will be of lower salinity than the background groundwater. They also concluded that a numerical model was not considered necessary to understand potential impacts at the site based on the significant depth to groundwater and given the low level of risk to inland waters of poor quality with no environmental receptors or other beneficial uses. The hydrological model was updated in 2025 with new data inputs. A copy of the current revised groundwater model 'EMM Earl Grey TSF2 Groundwater model V2' (EMM 2025) is provided as

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	information listed above. **3.2** Confirm whether the significant amendment will result in an increase in brine production and on-site disposal. **3.3** Discuss any potential impacts to inland waters that would result from brine disposal. **3.4** The site layout depicted in the hydrogeological memo (Figure 3.5) differs from that presented in the ERD (Figure 8). Confirm the location of TSF2/WRL and other structures in the LoM expansion area.	**Attachment 5** The revised model incorporated additional data inputs which included: • the TSF2 area data following a geotechnical drilling programme and the installation of new monitoring bores as there was previously insignificant data specific to the TSF2 area; and • The addition of brine discharge The model did not include: • abstraction from the borefield for production purposes due to both the poor quality of water rendering it unsuitable for use in the processing plant (TDS 80-120,000 mg/L) and the requirement for significant refurbishment to render these bores operable. • Failure scenarios, as in the event of a pipeline failure, the plant will immediately be shut down as there are no alternate water sources available of suitable quality. **3.2** Brine production volume will increase because of the proposed expansion case from an estimated 200 kL/day up to a peak estimate of 560 kL/day. The disposal option for brine will not change from the approved project. **3.3** There is negligible impacts to inland waters anticipated as a result of the disposal of brine water due to the following factors: • The brine produced will be of comparable or lesser salinity to the receiving background hypersaline groundwater; • The brine volume will be incorporated into the water demand circuit for dust suppression use; • Any day-to-day surplus brine disposal will be directed into the backfilled, gold mine void and is of an order of magnitude less than the proposed abstraction from this mine void via a vent shaft (SVR) connected to the mine void; and • There are no groundwater dependent receptors in the location of the proposed activities as the water table is deep (50-70m across DE) and hypersaline. Refer to EMM Earl Grey TSF2 Groundwater model V2' (EMM 2025) provided at **Attachment 5**. **3.4** The TSF2 and WRL locations are unchanged, as per the ERD. **3.5** Inland waters have been addressed and approved under the s43aA application approved 8th October 2025. No further action is required.
Terrestrial environmental quality		

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Provide laboratory certificates of analysis and QA/QC analyses for all assessments referred to in the Waste Characterisation report (Appendix 11 of the ERD) to support the conclusions presented, therein.		
4.	**Comment** The Waste rock characterisation report (Appendix 11 of the ERD) does not provide support for the following analyses that were conducted: • Leach testing • Mineralogy testing • Sulfur assays • Acid neutralisation capacity • Groundwater characterisation • Plant available elements • Radionuclide testing **Action/s** **4.1.** Please provide laboratory certificates of analysis and QA/QC analysis for the above analyses.	**4.1** The required certificates are provided as **Attachment 6.** The Principal Geochemist at MBS Environmental has advised that requests for laboratory certificates for mine waste rock is not usual (unlike contaminated sites) and that related assay/geochemical work is not always required to be NATA accredited (unlike standards for contaminated sites work, which is different). The revised appendix includes a spreadsheet of the main set of results, which includes total element content by method '4A', environmental elements by aqua regia method 'AR005', the acid neutralising capacity/acid base accounting analysis; leach testing in DI ASLP and pH 2.9 ASLP. Plant available elements" is method 'M3' on the Chemistry Centre report. Mineralogy testing - more was not done as part of this report as it was included in previous reports. Sulfur Assays - MBS only have the export from Covalent database. Radionuclide testing was not needed or done. Concentrations of radionuclides were calculated from the total elemental concentration by method 4A assuming natural NORM equilibrium. This is the normal procedure (IAEA/ARPANSA) for natural solids/minerals. Report describes the assumed activity co-efficients which relate to NORM equilibrium. Groundwater characterisation - was taken from site supplied data and QA/QC certificates are provided in **Attachment 6**.
Social surroundings		
Update the aboriginal cultural heritage assessment by providing outstanding information as outlined in Attachment 1.		
5.	**Comments** • Significant portions of the proposed expansion area were not accessible during the Aboriginal cultural heritage (ACH) survey. These areas require surveying and Traditional Owner (TO) engagement with clearance prior to the commencement of ground disturbing works. • The Marlinyu Ghoorli (TOs) have expressed that they do not wish for "doombarie trees" in the DE to be cleared. • Green Energy Approvals understands that a Native Title	**5.1** Heritage Surveys have now been completed over the entire LoM Development area. (See **Attachment 7**) The final field survey was completed post the January 2025 fires enabling good access to areas previously assessed as difficult to access due to dense vegetation. Two areas of cultural concern have been identified (ochre site, drain). The disturbance footprint has been modified to ensure these areas are not impacted. A summary report combining all site surveys associated with LoM has been submitted to DWER.

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	Agreement and a Heritage Agreement have been established between the proponent and the Marlinyu Ghoorlie. We also understand that these two parties are working towards agreement on a Cultural Heritage Management Plan. • Report 4 of the archaeological and ethnographic site avoidance survey of the proposed Tailings Storage Facility and the Borrow Pit indicates that areas within E77/2166 have been excised from the development envelope. **Action/s** **5.1** Please provide information and a map on areas within the proposed disturbance areas resulting from both direct and indirect impacts that have not been surveyed for Aboriginal heritage and cultural values. **5.2** Please confirm the nomenclature for the doombarie tree, its abundance and locations of occurrence in the DE. **5.3** Provide evidence of meaningful consultation with the Traditional Owners. **5.4** Describe management measures to demonstrate the application of the mitigation hierarchy to avoid and minimise impacts to Aboriginal cultural heritage values including doombarie trees. **5.5** Provide information to clarify that the proposed Aboriginal cultural heritage impact mitigation measures are technically and practically feasible. **5.6** Confirm whether the development envelope is as per the ERD and shapefiles provided to Green Energy Approvals and whether it shows the excised areas noted in the ACH report. **5.7** Confirm whether other surface or shallow deposits of ochre are known to be present in the DE and whether this information was conveyed to the Traditional Owners for consideration as an area of cultural concern. **5.8** Confirm whether areas of the DE (E77/2166) have been excised (as indicated in Report 4 of the archaeological and ethnographic site avoidance survey of the proposed Tailings Storage Facility and the Borrow Pit). **5.9** Clarify whether the excised areas were considered in the assessments of native assessments of native vegetation clearing	**5.2** Doombarie trees refers to Quandong trees or *Santalum* spp. They are prominent in the regional landscape and are not considered conservation significant. They are abundant and therefore locations were not recorded or mapped in the report as they were not classified as threatened or priority species. There are two species of Quandong in the Mt Holland area, as described by G. Cockerton of Western Botanical: • *Santalum acuminatum*, (Sweet Quandong), widespread and common. Occurs across southern Australia. These are commonly encountered in vegetation near Mt Holland, mostly on heavier soils or laterite gravels, but not present in sandier (sandplain) soils. These are semi-parasitic on eucalypts and other shrubs mostly. Whilst they have been observed the locations have not been recorded during botanical surveys. Refer to the figure below for regional distribution:  *Santalaum acuminatum* Regional distribution (florabase.dbca.wa.gov.au; last accessed 19/04/24) • *Santalum murrayanum,* (Bitter Quandong), uncommon in this area with yellow fruits in autumn-winter, inedible outer fruit though seed kernel may still be edible. Occurs in both WA and southern eastern states. Only two of these species have been observed

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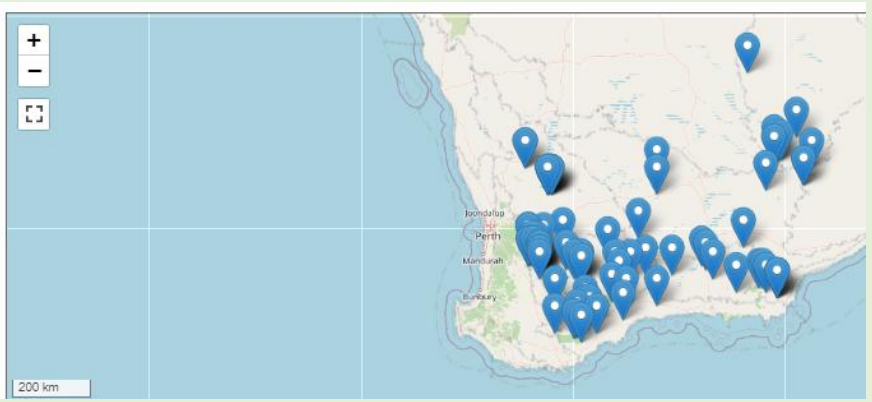
	as well as impacts to PECs and conservation significant flora and fauna **5.10** Provide updated shapefiles for the DE and submit a s43a application, as required. **5.11** The Department of Planning, Lands and Heritage (DPLH) has reviewed the ERD and the Terra Rosa Consulting (Terra Rosa) 2025 archaeological and ethnographic work area clearance and site avoidance heritage survey report. DPLH notes that the proposal's development envelope intersects with the actual boundaries of three Lodged Aboriginal heritage places as administered by DPLH including MGCL21-01 (ID 40149), MG2245-002 (ID 40263) and MG2245-001 (ID 40264). **5.12** Based on the information held by DPLH, approvals under the Aboriginal Heritage Act 1972 (AHA) are required if damage to an Aboriginal site is proposed to occur. The proponent is referred to the DPLH website at Aboriginal Heritage Approvals for information on 'Land use under the Aboriginal Heritage Act 1972' for the types of approvals available under the AHA that can applied for. **5.13** The proposal is located within the Marlinyu Ghoorlie Native Title Claim group area. DPLH notes that the proponent has had ongoing engagement with Marlinyu Ghoorlie, and it is understood that they have an established Native Title Agreement and a Heritage Agreement and are working towards agreement on a Cultural Heritage Management Plan. As such, any impacts to Aboriginal heritage from the proposal should be addressed through the mechanism in the provisions of the AHA. **5.14** Section 8, Table 16 (Social Surroundings) of the ERD states that ethnographic and archaeological Aboriginal heritage surveys have been undertaken for the proposal during 2005, 2017, 2022, 2024 and 2025. Whilst no locations or objects of Aboriginal cultural heritage (i.e. places, objects, ancestral remains or cultural landscapes) were recorded, the surveys identified several areas/matters of cultural significance including Malleefowl (Leipoa ocellata) nest mounds, Dumbarri (Quandong) trees (Santalum acuminatum), a water source, an ochre source and ten isolated artefacts. Based on the outcomes of the surveys, the Marlinyu Ghoorlie Traditional Owners have requested that these areas be avoided and access to these areas be restricted – these locations include two of the Lodged	near Mt Holland in the past 4 years. [Geoff Cockerton Western Botanical pers comms]. Refer to the figure below for regional distribution:  *Santalum murrayanum* (T Mitch) CA Gardner Regional distribution (florabase.dbca.wa.gov.au; last accessed 19/04/24) The protection of Doombarie trees was discussed with Native Title applicants, Marlinyu Ghoorlie group and Terra Rosa. On this basis it was agreed that it was not a management requirement to preserve the Doombarie trees within the LOM disturbance footprint and all reference to the preservation of Doombarie trees from the Heritage report (in consultation with MG). This is evidenced by omissions of any Doombarie tree reference in previous reports and from the lack of 'in field' recording of GPS locations of Doombarie tree during the survey, which is a standard requirement and undertaken for all other identified heritage items. Agreement on all such matter will be documented in the Cultural Heritage Management Plan under development. **5.3** A table summarizing engagement with the MG is provided in Attachment 8, with the names and information that may be commercial in confidence redacted. However, this provides evidence of the level of engagement to date. **5.4** Covalent takes into consideration many aspects to minimise and mitigate impacts to environmental and cultural values. This is evidence by the changes to disturbance footprint.

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	Aboriginal heritage places identified above. If the proponent wishes to view the information held by DPLH for the Lodged Aboriginal heritage places identified above, they can submit a request through the Home – ACH knowledge Portal (dplh.wa.gov.au)	No known areas of Aboriginal heritage were located within the DF, as is already identified in Section 8 of the ERD. Three sites of aboriginal concern were identified and the mining plan footprint was modified and a buffer applied to individual sites as additional protection. Covalent have a ground clearance procedure and will engage TO representatives as on-ground monitors during clearing of native vegetation. In the event that matters of cultural heritage significance are identified, work will stop, and the area avoided until the matter can be investigated and appropriate actions determined in consultation with the Traditional Owners. The following mitigation has been added: *Covalent Lithium, as part of its standard ground clearance procedure, will engage Traditional Owner representative as on-ground monitors during clearing of native vegetation. In the event that matters of cultural heritage significance are identified, work will stop, and the area avoided until the matter can be investigated and appropriate actions determined in consultation with the Traditional Owners.* **5.5** The three aboriginal sites of concern have been identified on the mine plan footprint and normal ongoing operational process and systems such as the ground disturbance permit ensures practical protocols are implemented to mitigate the risk of impact to these sites. These pre-clearance arrangements will be agreed as part of the development of the CHMP. **5.6 & 5.8** There is no tenement E77/2166 included in the LOM proposal - Covalent believes the tenement being referenced is actually E77/2167. As part of ongoing mitigation considerations, the current DE has been designed to avoid areas of known cultural heritage. The reference in the cultural heritage reports to "excision" refers to a request to retain two identified sites and ensure the disturbance footprint does not intercept these areas. This relates to a terminology difference and these areas have not been "excised" from the DE or the lease. There is no change to the current DE from that previously submitted within the referral for the Life of Mine project and no s43A is required. Covalent has committed to the protection of the sites of aboriginal concern. No areas of cultural significance will be excised from the DE. They have not been excised out of the DE footprint. Whilst these areas intersect the DE shapefiles they have been designated as exclusion zones, similar to the Flora Protection exclusion zones. No changes to spatial data required. **5.7** Covalent is not aware of other ochre deposits within the DE nor were any identified during the LoM heritage surveys. The sites identified as an ochre deposit will be protected from disturbance through the use of the GDP as detailed above **5.9** Assessments of native vegetation clearing as well as impacts to PECs and conservation significant flora and fauna have considered the full DE and data previously submitted reflects the correct assessment and impacts within the disturbance footprint. Refer to comments in 5.6

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		and 5.8. **5.10** Given there is no excision of areas within the footprint a s43 application and revised shape files are not required. **5.11 & 5.12** Three 'sites of concern' were identified within the DE envelope. Whilst they are not a heritage site protected by legislation Covalent has agreed to protect these areas. As a result, the mine layout has been altered to avoid these sites and a 50m buffer zone has been applied around the individual sites for ongoing protection. Whilst the GIS data includes them within the Development Envelope footprint, they are not included in the disturbance footprint. So for the purposes of a GDP they are essentially an 'exclusion' zone and have not been removed from the data set. **5.13** Covalent is working with the Marlinyu Ghoorlie group to develop an agreed CHMP. This document, when complete, will establish mechanisms and protocols to deal with any matters of concern. **5.14** Several site surveys over a two year period were undertaken as part of the heritage survey requirements for the LoM approvals. Individual reports were provided for each discrete survey and sequentially forwarded to DWER as part of the ongoing environmental assessment. At the completion of the final survey these individual reports were then amalgamated into one LoM report. At this time Covalent met with the MG and Terra Rosa to discuss the contents of the documents, particularly the reference to Doombarri trees and mallee fowl mounds which had not been raised in surveys in previous years. Following discussions MG agreed that there would be no requirement to preserve Doombarri trees and mallee fowl mounds, the ochre source and drainage line would be protected, and the artefacts would be collected prior to the commencement of clearing.
Greenhouse gas (GHG) emissions		
Provide a complete list of all input parameters for the GHG emissions model and present GHG emissions estimates for the various operating scenarios. Note, the EPA considers GHG emissions from off-site hauling of concentrate and refinery residue between Mount Holland and the proponent's refinery in Kwinana to be Scope 1 emissions.		
6.	**Comments** The proposal's breakdown of GHGs by scope is unclear. The Green Energy Approvals considers that hauling of lithium concentrate from the mine site in Mount Holland to the proponent's refinery in Kwinana and the hauling of refinery waste from the refinery in Kwinana to the TSF/WRL in Mount Holland will result in Scope 1 emissions for the proposal. **Action/s** **6.1** Provide a complete list of input parameters for the GHG emissions model and include off-site transport-related emissions between Mount Holland and the proponent's refinery in Kwinana as Scope 1.	**6.1** Following discussions with DWER Covalent has provided revised numbers to DWER. These amended numbers include change of transport offsite to the refinery and to the port and return from Scope 3 to Scope 1. These amended numbers do not trigger the threshold requirement of 100k t c/a. The amended GHG numbers have now been approved under S43A (8th October 2025.) **6.2** There are no other scenarios for the delivery of scheme water to the site. In the event the water pipeline failed the concentrator would immediately be shut down as it is not feasible to cart water. Therefore, no provision has been made for carting scheme water to site in the greenhouse gas calculations. The emissions associated with pumping of pipeline water have already been included in calculations. Other options associated with groundwater are not considered due to the poor water quality, rendering them unsuitable for use in the concentrator.

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	6.2 Provide estimates for GHG emissions associated with various scenarios for the delivery of scheme water to the site (e.g. carting prior to/in lieu of pipeline, energy associated with pumping to/on site, etc.). **6.3** Update the GHG emissions calculated for the life of the proposal, and if they exceed 100,000 tonnes/annum, provide a GHG environmental management plan. **6.4** The GHG assessment does not address the possibility of importing waste from sources other than Covalent Lithium's existing or proposed refinery to construct the WRL/TSF or to rehabilitate the site. **6.5** The GHG assessment does not address the possibility that the WRL/TSF design may change if residue from the refinery can be diverted from disposal at the mine site. (e.g. smaller footprint, less clearing, lower Scope 1 emissions from hauling). **6.6** Will hauling to the Port of Bunbury use the proposed Shire of Yilgarn road upgrades or will additional road upgrades (and associated clearing) be required? **6.7** Comments in relation to greenhouse gas emissions are being addressed via the section 43A application submitted by Covalent on 25 July 2025 and currently under assessment by the EPA. Letter on s43 additional information sent 29 August 2025.	**6.3** Covalent has amended the Greenhouse Gas calculations for the LoM Project and included transport to the refinery and to the Port and return as Scope 1. This report reflects discussions with DWER regarding transport related emissions and some revised assumptions based on new mine plans. These numbers do not exceed the 100,000-t threshold in any year and do not therefore trigger the requirement for a GHG Management Plan. The recently amended GHG report is provided at **Attachment 9**. **6.4** The Proposal is limited to the disposal of Covalent Lithium refinery waste ONLY. Any change to waste disposal would require review and amendment of all approvals, including Ministerial Statement, DWER Licence and MP. **6.5** The GHG assessment is conservative and provides for worst case scenario Covalent can only seek approval and base designs around the assumption that all refinery waste will be returned to Mt Holland and as a result have not been considered in the GHG assessment. **6.6** No additional road upgrades are proposed. **6.7** Response to s43A RFI complete and S43A now approved. No further action is required.
Consideration of proposal alternatives		
Provide an options analysis showing the alternative locations considered for the placement of tailings storage facilities, waste rock landforms and stockpiles as well as alternative processing of lithium minerals in the pegmatite ore as they relate to impact mitigation, waste avoidance and resource recovery.		
7.	**Comments** • Consistent with the Statement of environmental principles, factors, objectives and aims of the EIA, the proponent is required to present a genuine evaluation of proposal options or alternatives. The Environmental Review Document and supporting information documents lack information about alternatives to the proposed significant amendment. In particular, there is no discussion of alternative locations for the placement of tailings storage facilities (TSFs), waste rock landforms (WRLs) and material stockpiles. The proposal includes placement of these elements in floristically diverse green field locations which are drained by surface water	**Comment** A copy of the Mining Proposal was provided for information only to support DWER's understanding of the proposed mining operations. This will be assessed separately by DMPE. Section 2.17 of the ERD provides an explanation of the current project design and siting options. The current disturbance footprint for the Life of Mine proposal is constrained by tenure and avoidance of locations of conservation significant flora or other matters. Wherever possible, proposed disturbance has been incorporated into areas of existing clearing/disturbance. The current design balances these matters with the need to provide sufficient safe and stable waste material and tailings storage facilities, that are outside of zones of impact to the pit or other mine workings.

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	channels and are underlain by paleochannels. • Waste rock and tailings will occupy a significant proportion of greenfield areas in the proposed expanded development envelope. • The proponent contends that some of the pegmatite ore contains non-economic lithium minerals (cookeite (9%) and petalite). Presumably, these minerals will be stored in TSFs/WRLs. Alternative processing of these minerals could increase the yield of lithium from the proposal, decrease mine waste and impacts associated with re-claiming tailings for re-processing at a later date. **Action/s** **7.1** Please provide a discussion of alternative locations for the placement of TSFs, WRLs and stockpiles. **7.2** Please discuss alternative processing of lithium minerals in the pegmatite ore as they relate to impact mitigation, waste avoidance and resource recovery. **7.3** The revised MP for the LoM has not been submitted and the ERD does not confirm whether the proposed WRL/TSF will also have a downstream construction (which requires the most material, occupies the most space and necessitates the most clearing). **7.4** The proponent proposes to dispose of some mine waste in historical pits located in the DE only. There are many historical pits that are outside of the DE but are located within historical Mount Holland tenements and the surrounding area. Clearing could be reduced by reducing waste and disposing of waste in existing pits. **7.5** The approved and LoM proposals do not minimise waste rock. Waste rock from the mine may require retrieval and processing to extract lithium from cookeite (9% of waste rock). Alternatives to clearing to dispose of waste rock could be sale of waste rock to a mineral processor to obtain lithium and or other valuable elements.	**7.1** Covalent has taken into consideration a number of aspects when determining placement of infrastructure and stockpiles within existing tenure limitations to mitigate impacts. These include: • Utilisation of historical disturbances; • Location of conservation significant flora; • Location of aboriginal sensitive areas; • Proximity to pit and associated economics; and • Topography. Covalent has utilised where practicable historical disturbances as is evidenced in previous approvals and there is now only limited opportunity for utilisation of historical disturbance. The geometry of the WRL and TSF has been influenced by the proximity of conservation significant species to minimise the impacts to dense pockets of priority flora and aboriginal significant areas as can be seen in Figure 18 and 20 of the ERD. The location of this infrastructure has taken into consideration proximity to pit to ensure economic haul distances when removing waste and construction of the TSF and WRL's. There is some flexibility regarding locations of stockpiles, and these have been largely located in areas away from priority species and in general in flatter areas to reduce any issues associated with run-off on steep areas. Topsoil stockpiles are also limited to a height of 2m in line with industry standard to maximise mycorrhizal fungi and seed banks within the stockpile to optimise rehabilitation results. Waste cannot be backfilled into the pit until late in the LOM due to the size and geometry of the pit. There is therefore limited flexibility for alternate placement of infrastructure within the DE when taking into account the above considerations as can be seen. **7.2** Covalent has identified petalite deposits within the existing pit which will be disposed in an isolated location within WRL to enable it to be recovered in the future if it becomes viable. Petalite could potentially be processed through the Covalent concentrator plant but would require modifications to the plant. It would also necessitate the need to be processed separately to the pegmatite ie both could not be co-processed at the same time. There is currently limited market globally and there is not currently an economic resource at this point in time for this project. **7.3** The MP will be provided for information only to support DWER's understanding of the proposed mining operations. This will be assessed separately by DEMIRS. The TSF will be constructed using downstream integrated landforms. This represents the lowest risk of embankment failure, reflects the safety requirements for embankment stability and is also the lowest risk of subsequent environmental impacts (in the event of failure). This is a

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		requirement of DEMIRS and is the same construction methodology of the existing approved TSF1. Approval for TSF design and operation is the responsibility of DEMIRS via the Mining Proposal and DWER through Works Approval and Licence under Part V of the EP Act. It is anticipated that the only consideration within the Part IV assessment will be management of seepage – which will be addressed within the pending Groundwater Report/Model. **7.4** This statement is incorrect. Covalent has maximised the usage of historical legacy pits and mine voids for both waste disposal and water storage where possible. Consideration has also been given to ensure voids that are linked with future economic resources that belong to the State are not sterilised as per DMPE requirements. **7.5** Waste rock is generated by the ratio of overburden to ore. Some of the existing pits are currently used for water storage. backfilling of disused pits (e.g. with waste rock or tailings), while preferred, can only be approved where the underlying resource is not sterilised (under the Mining Act). The existing pits referred to are subject to underlying gold resource tenure. It would appear there is some confusion regarding storage of tailings waste vs overburden. The WRL's are for storage of overburden, and even where there is potential for alternative processing, this overburden, ie 'waste rock', is required to be stored pending any alternate use and does not substantially reduce the footprint required. It should be noted that the WRL footprint has been minimised as far as possible operationally, to accommodate the exclusion of areas of ecological value (as per item 1.3-1.5 above). Tailings are stored within TSF's as wet material and does not contain any materials of commercial value that would provide prospect of future reuse.
General Comments		
	(6.1) There are several errors in the *Earl Grey Lithium Project Life of Mine Updates to supporting information* (July 2025) such as in text reference errors, incorrect table headings and figure duplications. Additionally, some of the figures are difficult to read. **(6.2)** Covalent is required to provide a complete package in response to the initial request for further information dated 2 February 2024. This should include all RFI tables with comments/responses provided since then, any updated sections of or addendums to the ERD, updated figures, tables and appendices that contain information to support the assessment. This complete package of additional information provided by Covalent will be published on the EPA website.	**6.1** The addendum has been amended and is attached. (See Attachment 4.) **6.2** Covalent has now submitted a consolidated response and package of information to each outstanding RFI , which includes: • APP0000831 response to RFI re Approved Project flora offset strategy, with updated impact assessment for conservation significant flora, with revised FOS Rev 4 based on consolidated flora data and additional survey reports; • APP0008837 response to RFI re Approved Project Fauna Offset Strategy, with updated TFOS Rev 4, copies of all the fauna offset site reports and the LOM fauna offset strategy; and • This response and attachments. **6.3a,b** Please refer to the Proposal Content Document as published, and the ERD as publicly advertised for the Proposal which includes

Requirement	EPA Services advice	Proponent response 21/10/25
	(6.3) In accordance with section 40AA of the EP Act and as per the *Environmental Impact Assessment (Part IV Divisions 1 and 2) Procedures Manual* (EPA 2024), in addition to the information required as part of the referral, the significant amendment of the approved proposal is also required to have information about: • the approved proposal (Earl Grey Lithium Project), so the environmental impacts may be considered in context with the significant amendment (Earl Grey Lithium Project Life of Mine Proposal) • the combined effects that implementation of the approved proposal and the significant amendment might have on the environment • the existing implementation conditions relating to the approved proposal (MS 1199) and whether Covalent considers they should be inquired into. This should include consideration of whether the existing implementation conditions are adequate to ensure the proposal's ongoing elements are consistent with EPA's environmental factor objectives **(6.4)** Covalent should review whether the approved MS 1199 implementation conditions are adequate to meet contemporary standards or are achieving the expected environmental outcomes, and whether they need revising as part of the significant amendment application. **(6.5)** Covalent should consider whether outcome conditions and associated monitoring can replace existing environmental management plan conditions. Where existing management plan conditions are proposed to continue, review and where required update any relevant plans for the proposal, highlighting proposed changes, to address combined impacts and to ensure the revised proposal meets current EPA objectives. **(6.6)** Provide updated information on the history (five years) and current status of compliance with MS 1199 (this may be provided as a table). This can include reference to the most recent Compliance Assessment Report if it is less than one year old, provided any potential non-compliance since that time is also discussed	• the maximum extent of the proposal (within PCD and ERD) addresses the cumulative extent of the Approved Project with the Proposal; and • the impact assessment within the ERD that considers the Approved Project (operating under MS1199) as part of the cumulative impact assessment for each of the key environmental factors. Additional information regarding cumulative impact assessment is provided in **Attachment 3** and **Attachment 4**. With respect to conservation significant flora, please refer to the revised and consolidated impact assessment in **Attachment 3** of this response. **6.3c, 6.4** As a result of the most recent meeting with EPA services, it is Covalent's understanding that any approval of the Proposal will result in a Ministerial Statement and conditions that supersede and replace those within MS11999 (consistent with the management of conditions for previously approval update, MS1118 to MS1167 to MS1199), with conditions that will ensure the following environmental outcomes for key environmental factors can be met: • **Flora and Vegetation:** ▪ No more than 1885 ha of native vegetation will be cleared within a 4009 ha development envelope ▪ No direct or indirect disturbance to flora and vegetation in the exclusion zones [updated figure is in the revised flora impact assessment document] ▪ No more than 12 individuals of *Banksia dolichostyla* to be subject to direct disturbance inside the development envelope; ▪ The loss of no more than the identified percentages of the following Priority 1 species: ▪ 12.5% of *Microcorys elatoides* ▪ 9.14% of *Thrymptomene jilbadji* ▪ 7.00% of *Chamelaucium sp. Mount Holland (G. Cockerton & G. Grigg WB40918*) ○ The loss of no more than 5% of the known population of all other Priority 1 species. • **Terrestrial Fauna** • no direct or indirect impacts to malleefowl mounds within the exclusion areas (update figure included in **Attachment 4**, Figure 3.1); • no direct or indirect adverse impacts to malleefowl and chuditch within the development envelope; • no removal of active malleefowl mounds within the development envelope; and • minimise proposal-related direct or adverse indirect impacts to malleefowl from feral animals within the development envelope. **Discussion of conditions:**

Requirement	EPA Services advice	Proponent response 21/10/25
		The following comments relate to Covalent's understanding of likely requirements for implementation of the combined Approved Project and LOM Proposal with respect to the current conditions for MS1199: ▪ The limitations and extent of the proposal (Condition 1) will reflect the recent approved s43A change to proposal ▪ Condition 2 (Flora and vegetation): ○ 2.1 will reflect the outcomes described above for flora and vegetation ○ 2-2 no change ○ 2-3 to 2-6 no longer relevant, already in place (2-6 is duplicated by 2-10) ○ 2-7 to 2-10 remain the same ▪ Condition 3 (Terrestrial Fauna) ○ 3-1 to reflect outcomes described above for fauna ○ 3-2, 3-4 no longer required (already met) (3-4 is duplicated by 3-7) ○ 3-5 to 3-7 unchanged ○ ▪ Condition 4 Offsets - The proponent must implement offsets to counterbalance the significant residual impacts of the proposal on the following environmental values: ○ 1443 ha of foraging and breeding habitat for malleefowl (*Leipoa ocellata*); ○ 1430 ha of foraging and potential breeding habitat for chuditch (*Dasyurus geoffroii*); ○ 12 individuals of *Banksia dolichostyla*. ▪ Offsets to be implemented in accordance with offset strategy documents approved by CEO (as provided with this submission for approval): ○ Flora Offset Strategy (2025) ▪ Approved Project Fauna Offset Strategy (2025) ▪ Life of Mine Threatened Fauna Offset Strategy and Management Plan (2025) ▪ Conditions 4-8 to 4-12 no longer relevant. Residual impacts to *M. elatoides* are no longer considered significant residual impacts; it is likely to be downgraded to Priority 2 species. Refer to Revised Impact Assessment for Conservation Significant Flora (JBS&G 2025) in **Attachment 3**. ▪ Rehabilitation outcome should ensure ○ rehabilitated areas are capable of sustaining long term viability of *Banksia dolichostyla* and associated priority species; ○ being safe, stable and non-polluting landforms; ○ rehabilitated vegetation is self-sustaining and ○ rehabilitated areas are consistent with the species diversity and abundance of native vegetation within comparative analogue or reference sites. ▪ No rehabilitation trials are proposed. ▪ No change to requirements of conditions 6 to 9.

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<tr><th>Requirement</th><th>EPA Services advice</th><th>Proponent response 21/10/25</th></tr>
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6.5 The current approved management plans, EGLP Flora and Vegetation Management Plan and EGLP Terrestrial Fauna Environmental Management Plans (and any subsequent versions approved by the CEO) are considered appropriate to continue to adaptively manage the impacts of both the Approved Project (MS1119) and the Proposal without further amendment required specific to the Proposal.

As has been indicated in recent consultation with EPA Services and DWER, these plans are currently under revision to take into consideration the impacts of the January 2025 Skeleton Rock fire, and adjust management actions accordingly.

Covalent will continue to implement these plans as amended from time to time, for the Approved Project into and including the Life of Mine proposal, as these form part of the Covalent Lithium site environmental management framework and consistent with the requirement of EPBC Act approval 2017/7950 (Condition 3).

6.6 A summary of the past four years compliance status against MS1118, MS1167 and MS1199 is provided below. The 2025 compliance report is not due until next year 2026.

<table>
<tr><th colspan="3">Summary of Compliance Report Status</th></tr>
<tr><th>Ministerial Statement</th><th>Reporting Year</th><th>Non Compliances</th></tr>
<tr><td>Project commenced in 2021</td><td></td><td></td></tr>
<tr><td>MS 1118</td><td>CAR 2021</td><td>0 Non compliances</td></tr>
<tr><td>MS 1118, 1167, 1199</td><td>CAR 2022</td><td>0 Non compliances</td></tr>
<tr><td>MS 1199</td><td>CAR 2023</td><td>0 Non compliances</td></tr>
<tr><td>MS1199</td><td>CAR 2024</td><td>0 Non compliances</td></tr>
<tr><td>MS1199</td><td>CAR 2025</td><td>Due in 2026</td></tr>
</table>

Please refer to the Covalent website at Environment - Covalent Lithium where you will find copies of the four Compliance Assessment Reports completed to date. (They are large files and are difficult to upload)

There are no new potential non-compliances to note since this report.

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