

# **Covalent Lithium Earl Grey Lithium - Life of Mine Proposal Proposed Alternate Threatened Fauna Offset Strategy Expanded Predator Control in Jilbadji Nature Reserve – Option C**

## **1 Purpose**

Covalent has been requested to consider a further variation to the Threatened Fauna Offset Strategy which would include the expansion of the Predator Control and Monitoring programme originally proposed, to encompass the baiting of the whole of the Jilbadji Nature Reserve.

This Briefing Paper has been prepared to summarise the key features associated with the alternate Fauna Offset Strategy for the EGLP Life of Mine (LoM)

## **2 Background**

Covalent Lithium is progressing a proposal to expand and extend lithium mining operations at Mt Holland. An ERD/PD was submitted to the DWER under the Environmental Protection Act (1986) in November 2023 and to DCCEEW under the Environmental Protection and Biodiversity Conservation Act (1999) in December 2024. The LOM Proposal includes clearing of an additional 1,443 ha of native vegetation providing suitable habitat for malleefowl and chuditch - both listed as Vulnerable. The clearing of malleefowl and chuditch habitat has triggered the requirement for Fauna Offsets.

Two predator control and monitoring programmes have previously been presented by Covalent for consideration and discussion by DWER. Covalent initially proposed Predator Control and Monitoring in Jilbadji Fauna Offset Strategy for the LoM (Option A). This option comprised both baiting and monitoring of a portion (36,000 ha) of the Jilbadji Nature Reserve.

In January 2026, DBCA advised that the predator control programme proposed in Jilbadji did not align with their priorities for conservation reserves in the region and that conservation reserves were only utilised by government departments requiring offsets. This was confirmed in a meeting on 27 February 2026.

Concurrently, DCCEEW issued draft EPBC conditions (20 February 2026), indicating provisional support for the TFOS methodology in Jilbadji Nature Reserve.

Following meetings held in February 2026 with DWER and DBCA, Covalent was advised to reassess alternative offset options including identifying an alternative offset location on Unallocated Crown Land (UCL) – Option B.

Covalent prepared an alternate Fauna Offset Strategy for baiting in the UCL west of the Mt Holland site. This strategy replicated the initial Option A strategy but was located in the UCL and not Jilbadji Nature Reserve. It also included supplementation by way of sponsorship/contribution to WABSI research/WA Feral Cat Working Group.

In March 2026, Covalent was requested to consider a third option which included an expanded baiting programme encompassing the entire Jilbadji Nature Reserve. Baiting the broader area addresses concern around recolonisation from unbaited areas that may result with smaller baiting areas. A third predator control and monitoring option (Option C) was developed which involved the baiting of a larger area and modifications to the previously proposed monitoring programme. This is detailed in the following sections.

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### **3 Key Features - Expanded Predator Control over Jilbadji Nature Reserve – Option C**

The expanded Predator Control programme proposed is described in the following, noting fundamentals of the programme remain unchanged.

#### **3.1 Expanded Baiting Programme Area and Location**

This revised alternate offset strategy involving the expanded baiting area over Jilbadji Nature Reserve comprises the expansion of the proposed baiting programme to encompass the whole of the Jilbadji Nature Reserve (circa 207,000 ha in total). This compares to the original proposed baiting area of 36,000 ha based on calculations previously determined by DWER and DCCEEW offset calculators in earlier offset strategies. This revised option represents a 5.6-fold increase in the area to be baited.

The programme will be based on Western Shield methodology and standards as currently prescribed. Programme establishment will include a LiDAR survey over the area for the identification of mallee fowl mounds that will inform the monitoring and baiting programme development.

#### **3.2 Interim Sponsorship Research/Conservation Programmes**

Increased baiting costs incurred from the expanded baiting area will replace interim financial support for WABSI and the WA Feral Cat Programme, which were originally planned to supplement the Option B strategy and in case of delays accessing UCL under Option B.

#### **3.3 Control Area**

The expanded baiting programme would prohibit the implementation of a control area within Jilbadji Nature Reserve as it would be significantly influenced by the baiting programme due to its proximity. The original area identified as the Control Area in Option B will remain as the monitored area (monitored and baited) and that this will be representative of the broader Jilbadji NR. Covalent considers that this lack of control area can be adequately addressed by the collection of additional 3 years of baseline data from the 36,000 ha monitoring area within the expanded baiting area as shown in Figure 1 prior to the commencement of the baiting programme.

This period of additional baseline data collection aligns with the current acknowledged period of production limitations of Eradicat. Additional baseline data collection will be performed ahead of commencement of baiting, prior to the bait production ramp up.

This more extensive baseline will enable an improved comparison of ongoing population numbers of predators, chuditch and malleefowl from the same location pre and post the commencement of baiting. The collection of additional baseline data would align with the current shortage of baits and any delay incurred to the commencement of the baiting programme.

Results of monitoring will inform future programme design and ongoing adaptive management to ensure environmental outcomes are optimised. This may involve:

- Evaluation of baiting protocols.
- Evaluation against targets, including early response triggers, and environmental criteria including triggers and thresholds.
- Implementing mitigation measures, and changes to management measures in response to monitoring results if population numbers of chuditch and malleefowl are not responding as expected (or in line with programme objectives).
- Review of management actions as new management measures and technologies become available that may be more effective for terrestrial fauna management.



- Review of trigger criteria and early response triggers considering more comprehensive monitoring information to ensure they are the most effective.
- It is expected that, once sufficient monitoring data is collected throughout the baiting programme (i.e. 5 years), the trigger and threshold criteria for malleefowl and chuditch will be reviewed by an appropriate fauna specialist and revised as necessary.

Monitoring has been occurring at this location on an annual basis since 2018 as part of Covalent's fauna management programme providing a long, continuous data set, and confirming the presence of chuditch, malleefowl and introduced predators. This historical monitoring will also serve to establish the baseline.

The measurable outcomes based on monitoring data are:

1. Chuditch and Malleefowl population size is maintained or improved at offset site compared to baseline.
2. Occupancy of foxes is reduced by 40 % at offset site compared to baseline.
3. Occupancy of feral cats is reduced by 20 % at offset site compared to baseline.

### **3.4 Programme Term**

The Fauna Offset Strategy will be for a duration of 15 to 20 years aligned with current LOM production forecasts. The strategy will be reviewed every 5 years.

### **3.5 Tenure**

Option C will be located in the Jilbadji Nature Reserve immediately north of the Development Envelope and provides suitable habitat and proximity to the impact area. Jilbadji Nature Reserve is the second largest nature reserve in the GWW contains suitable habitat contiguous with the habitat within the Development Envelope and is known to have Malleefowl and Chuditch populations.

The location of the Offset Strategy within Jilbadji Nature Reserve provides security of tenure allowing more expedient implementation of the project through timely land access approvals and will not require a conservation covenant to provide protection in perpetuity.

### **3.6 Financial Contribution to Fire Management / Mitigation**

Consistent with previous offset strategies, fire mitigation measures to improve confidence in offset outcomes is proposed via financial contribution including, but not limited to, the cost of the satellite imagery (at the commencement and then once every 10 years) and / or Helitak (or equivalent) hire for fire ignition required for prescribed burns (one day per annum). An MoU will be developed with DBCA to this effect.

The inclusion of fire mitigation measures aligns with DCCEEW requests.

### **3.7 Post Fire Monitoring and Predator Control**

The location of the Expanded Predator control programme in Jilbadji Nature Reserve will provide additional value as it will enable additional predator, chuditch and malleefowl data to be collected from within the area burnt by the regional Skelton Rock bush fires which occurred in January 2025. Extensive areas of the Mt Holland mine site and surrounds were burnt and a rise in predator numbers are anticipated as a result of the fire. The baiting programme is expected to reduce the number of predators normally observed post fire.



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## 4 Conclusion

The fundamentals of the Expanded Predator Control in Jilbadji Nature Reserve remains unchanged from those initially proposed in Options A and B. These fundamentals include:

- Targeting both feral cats and the introduced European fox to reduce predator occurrence.
- Annual broadscale aerial baiting with 1080 and Eradicat.
- Ongoing annual monitoring of introduced predator occurrence and Malleefowl and Chuditch populations.
- Monitoring methodology specific to each species and following the methodology of Western Shield and National Malleefowl Recovery Team.

The Expanded Predator Control Programme in Jilbadji Nature Reserve - Option C, comprises five key elements that are different to the previous submitted Offset Strategy (Predator control in the UCL – Option B). These elements include:

- Expanded baiting programme from 36,000 ha to approximately 207,000 ha to cover entire Jilbadji Nature Reserve.
- Exclusion of financial support of research / conservation programmes, given the significant expansion of the baiting programme area.
- Removal of control area within Jilbadji Nature Reserve due to influence by the baiting programme. The monitoring programme will capture data pre and post baiting.
- Predator Control programme will be for a duration of 15 to 20 years aligned with current LOM production forecasts.
- Greater certainty of tenure – no conservation covenant required.

Covalent will also continue to liaise with DBCA regarding the requirements of the offset strategy including obtaining the relevant permits and approvals and the development of the MOU requirements for fire management.

The Proposed Threatened Fauna Offset Strategy has been revised to include Option C and is being submitted to DWER and DCCEEW (Rev 5, April 26) to meet the proposed conditions of approval under the EPBC and EP Act respectively.

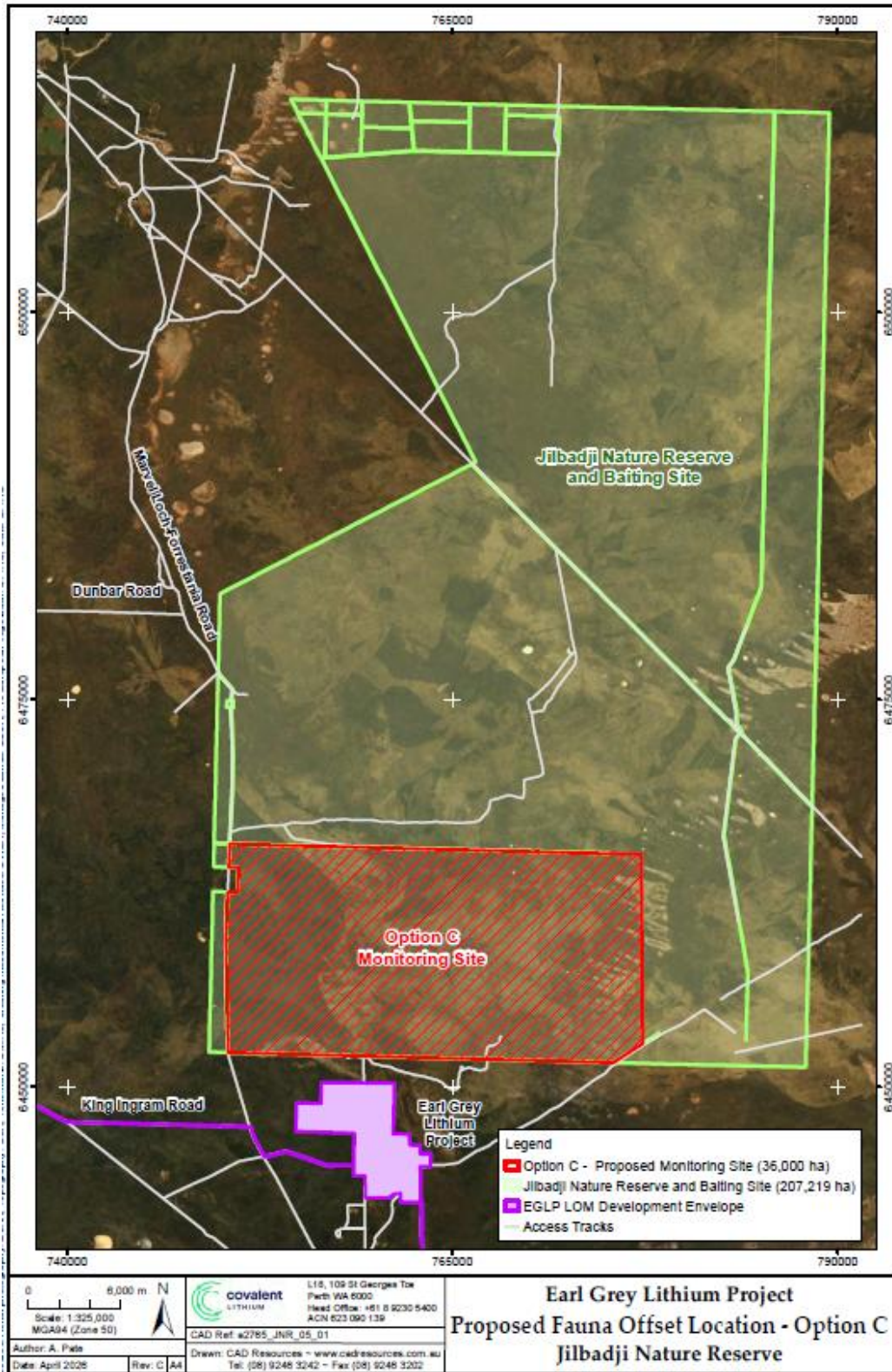


Figure 1 – Expanded Predator Control Programme in Jilbadji Nature Reserve