# Appendix D Concept Mine Closure and Rehabilitation Plan (Projectick 2026)



# LEI LITHIUM MINE

# Concept Mine Closure Plan

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Revision 1

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# DOCUMENT CONTROLS

## *DOCUMENT INFORMATION*

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# 1. SCOPE AND PURPOSE

## 1.1. Introduction

Lithium Plus Minerals Ltd (LPM) is proposing to develop the Lei Lithium Mine, an underground lithium mining operation located on the Cox Peninsula in the Northern Territory. As part of the environmental assessment process, the Northern Territory Environment Protection Authority (NT EPA) directed LPM to prepare a Concept Mine Closure Plan (MCP) to support the Supplementary Environmental Report (SER).

This Concept MCP outlines LPM's current closure strategy and demonstrates how closure considerations have been incorporated into project planning at an early stage of development. The document establishes the proposed closure vision, post-mining land-use objectives, rehabilitation outcomes, and management framework that will guide future closure planning throughout the life of the Project.

## 1.2. Purpose

This Concept MCP has been prepared having regard to the purpose of the environmental impact assessment process under section 42 of the *Environmental Protection Act 2019 (NT)*.

The purpose of this Concept MCP is to:

- describe the proposed closure philosophy for the Project;
- identify the intended post-mining land uses and closure outcomes;
- outline the proposed rehabilitation and closure strategy;
- identify key closure risks and opportunities;
- establish a framework for the development of completion criteria;
- describe approaches to progressive rehabilitation, monitoring and adaptive management;
- outline strategies for care and maintenance and unplanned closure;
- describe stakeholder engagement processes relevant to closure planning; and
- provide a foundation for future updates of the Mine Closure Plan as the Project progresses.

The Concept MCP has been prepared to address the closure-related requirements identified by the NT EPA as part of the SER process and to demonstrate that closure planning has been integrated into project design and environmental assessment activities from the earliest stages of development.

## 1.3. Scope

This Concept MCP addresses the proposed closure of the Lei Lithium Mine and associated infrastructure. The document considers the anticipated disturbance footprint, proposed mining and processing activities, environmental values, stakeholder interests and rehabilitation objectives relevant to the Project.

The scope of this document includes:

- closure objectives and rehabilitation outcomes;
- post-mining land use considerations;
- stakeholder engagement relevant to closure planning;
- development of completion criteria;
- closure risks and opportunities;
- closure implementation strategies;
- rehabilitation monitoring and maintenance requirements;
- care and maintenance, and unplanned closure arrangements;
- financial provisioning considerations; and
- information and data management requirements.

As a concept-level document, this MCP does not provide detailed engineering designs, final closure cost estimates or site-specific closure methodologies. These aspects will be progressively developed and refined through subsequent revisions of the MCP as additional information becomes available during project development and operations.

### 1.4. Closure Planning Approach

Closure planning for the Lei Lithium Mine has been developed in accordance with the principle that closure is a whole-of-life activity to be integrated into project planning, operations, rehabilitation, and stakeholder engagement. Consistent with leading practice mine closure guidance, rehabilitation opportunities, closure risks, stakeholder expectations and post-mining land use objectives will be reviewed and refined throughout the life of the Project. The Project's closure philosophy is described in Section 2.4 and provides the basis for the closure strategy presented in this Concept Mine Closure Plan.

### 1.5. Status of this Plan

This Concept MCP represents the current closure strategy for the Project at the concept stage and reflects the level of information currently available on project design, environmental assessment, stakeholder engagement, and closure planning.

Future revisions of the MCP will be developed to progressively greater levels of detail as the Project advances through approvals, construction, operations, pre-closure planning, closure implementation and post-closure monitoring. These revisions will refine closure objectives, completion criteria, implementation measures, monitoring requirements and relinquishment pathways as additional information becomes available.

Future revisions of the MCP will incorporate, where relevant:

- changes to project design;
- operational experience;
- rehabilitation performance;
- monitoring outcomes;
- stakeholder feedback;
- regulatory requirements; and
- improvements in closure knowledge and industry practice.

This approach ensures that the MCP remains current, fit for purpose and aligned with the level of detail required at each stage of the Project lifecycle. This plan will be reviewed annually or sooner if there is a statutory requirement to do so, such as an application to amend an approval.

## 2. PROJECT OVERVIEW

### 2.1. Project Description

The Lei Lithium Mine is proposed by Lithium Plus Minerals Ltd (LPM) as a small-scale underground lithium mining operation on the Cox Peninsula, approximately 30 km south of Darwin in the Northern Territory. The Project is located on vacant Crown land and forms part of LPM's broader Bynoe Lithium Project. The project location is shown in **Figure 1 – Project Location.**

The Project will target spodumene-bearing pegmatites and is proposed to produce direct shipping ore (DSO). Ore will be crushed and screened on site before being transported by road to Darwin Port for export. On-site chemical processing is not proposed.

At the concept stage, the Project is expected to mine approximately 3.1 Mt of ore over an operational life of approximately seven years from construction to closure, followed by rehabilitation and post-closure monitoring.

## 2.2. Underground Mine

The Project is proposed as an underground mine extending to an approximate depth of 700 m below the surface. Underground mining will target spodumene-bearing pegmatites and will be accessed via a cut-and-cover tunnel and associated underground mine infrastructure.

Underground mining is expected to reduce the surface disturbance footprint compared with open-cut mining. Waste rock will be returned underground, although residual underground voids are expected to remain because approximately 3.1 Mt of DSO will be exported from the site.

Closure planning for the underground mine will focus on the safe and stable closure of underground access points, ventilation raises and other openings; assessment of the long-term stability of underground workings and residual voids; groundwater recovery; and any implications for post-mining land use and relinquishment.

## 2.3. Surface Infrastructure

Surface infrastructure will support underground mining, ore handling, water management and site access. The Project is expected to clear up to approximately 100 ha of native vegetation and will include temporary waste rock storage areas, haul roads, workshops, administration facilities, power generation, crushing and screening facilities, ore handling areas and other ancillary infrastructure. The current conceptual site layout is shown in **Figure 2 – Conceptual Mine Layout**.

Water management infrastructure will include clean water, sediment and mine-affected water storages, together with drains, pumps, pipelines and associated controls required to manage runoff and operational water. Infrastructure requirements will be refined as project design progresses.

Closure planning for surface infrastructure will focus on decommissioning and removal of infrastructure no longer required, remediation of any contaminated areas, reshaping of disturbed landforms, replacement of suitable growth media, revegetation using appropriate native species, and monitoring to demonstrate achievement of closure objectives.

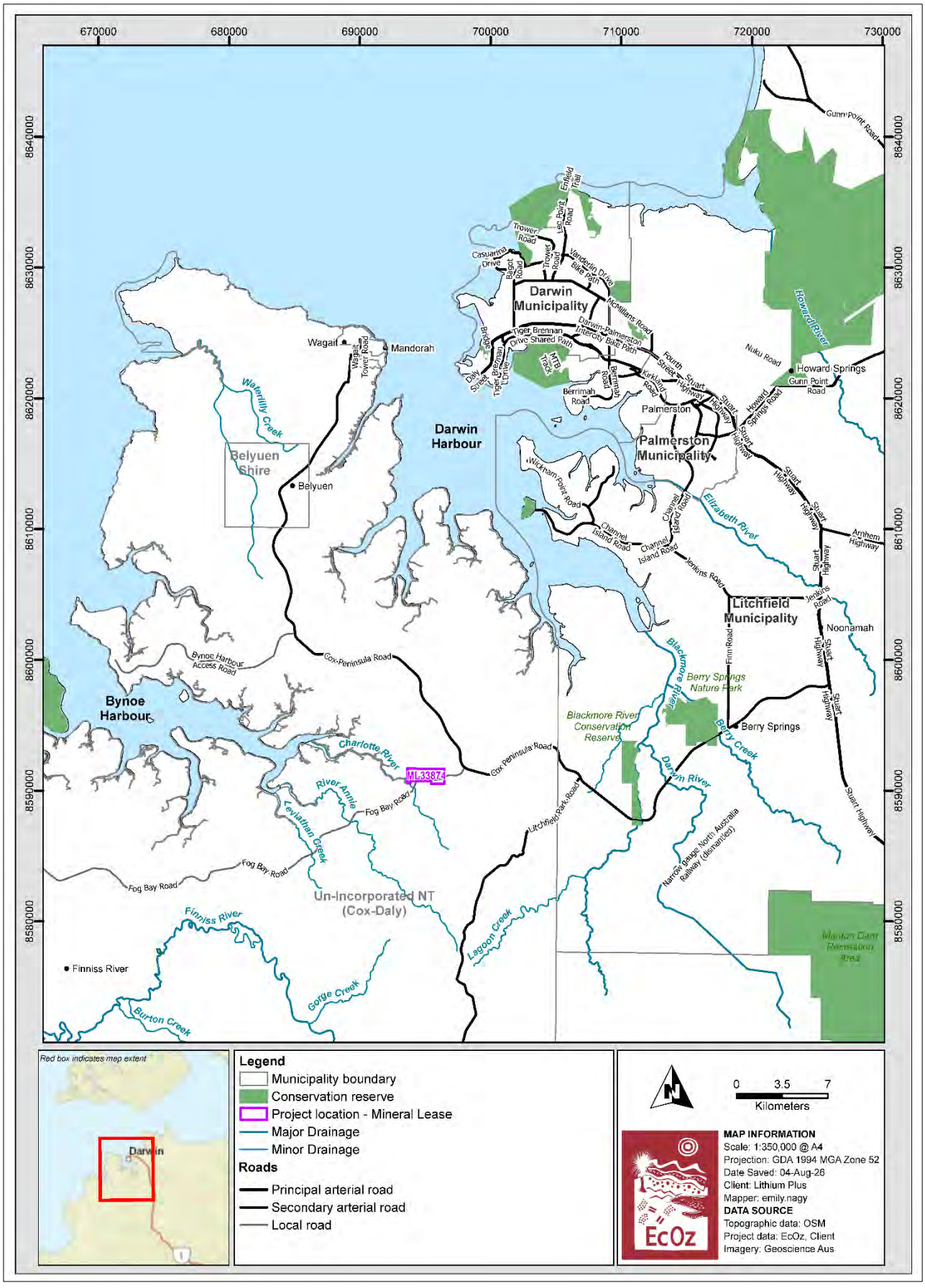



**FIGURE 1 – PROJECT LOCATION**

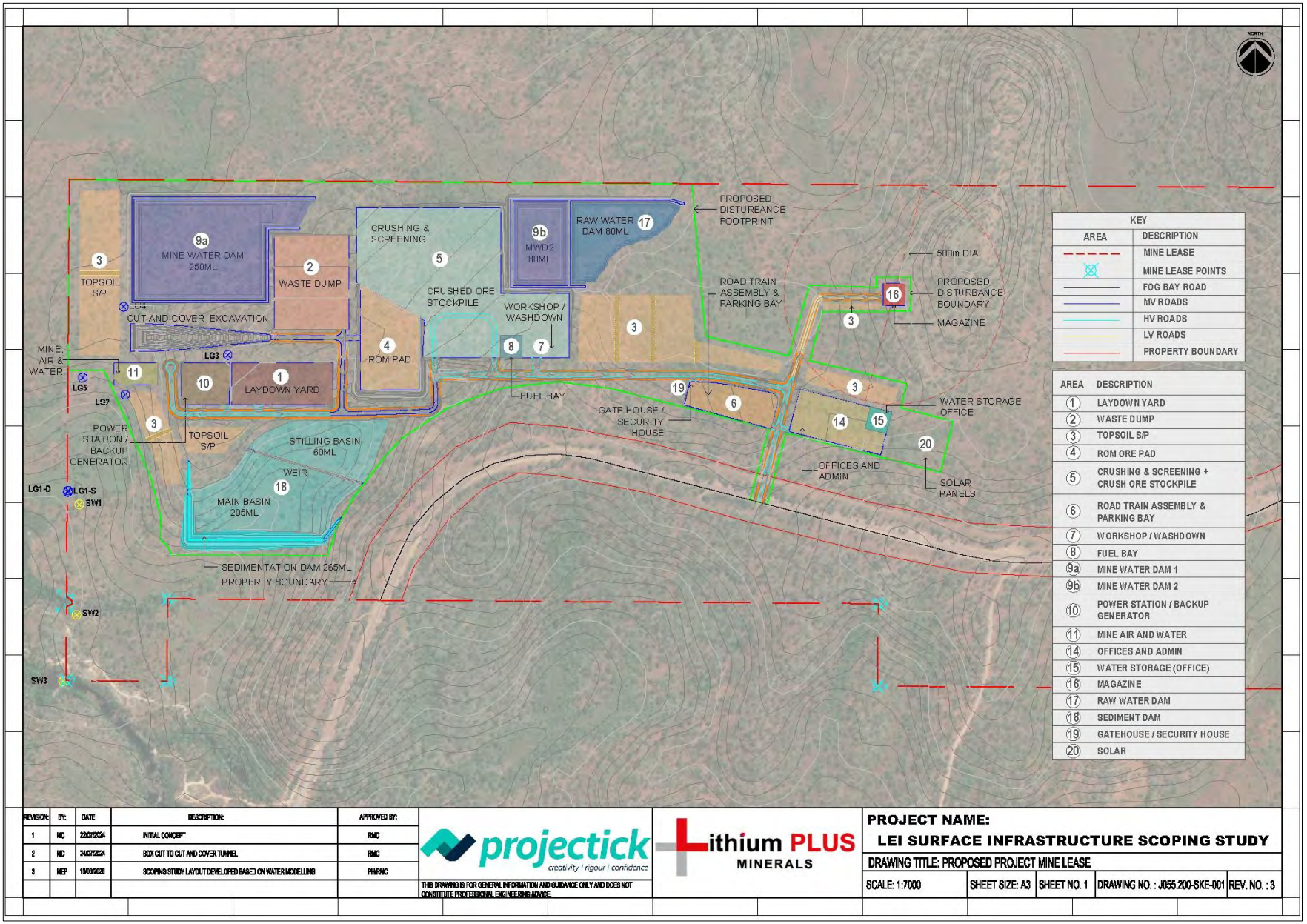



**FIGURE 2 – CONCEPTUAL MINE LAYOUT**

## 2.4. Project Setting

The Project is located on largely undeveloped vacant Crown land on the Cox Peninsula, approximately 30 km south of Darwin. It is situated in a rural part of the Darwin region near Belyuen, Berry Springs and Wagait Beach, with residents also located along the Cox Peninsula and Fog Bay Road corridors.

The surrounding area supports a range of land uses and values, including conservation, tourism, recreation, rural residential activities and Aboriginal cultural values. According to the NLC, the Traditional Owners of the Project area are the Larrakia People, although this is challenged by representatives of the Kungarakan and Gurindji People. Engagement with Traditional Owners, Aboriginal representative organisations and cultural heritage stakeholders will continue throughout the life of the Project and will inform closure planning and post-mining land-use considerations.

## 2.5. Current Environmental Values

The Project is located within the Charlotte River sub-catchment, which drains to Bynoe Harbour. Current environmental values relevant to closure planning include native woodland vegetation, fauna habitat, riparian and aquatic ecosystems, groundwater resources, groundwater-dependent values, soils and landforms, downstream estuarine and mangrove communities, and Aboriginal cultural heritage values.

The project area supports predominantly native Eucalyptus woodland vegetation characteristic of the Darwin Coastal Bioregion. Environmental assessments have identified habitat values associated with woodland vegetation, riparian corridors and mature hollow-bearing trees, including habitat for threatened species such as the Black-footed Tree-rat and Northern Brushtail Possum. Riparian vegetation along the Charlotte River and its tributaries provides habitat, biodiversity value and ecological connectivity. Downstream mangrove communities associated with the Charlotte River estuary and Bynoe Harbour are also recognised environmental values.

Key surface water values include the Charlotte River, its tributaries, associated riparian vegetation, and downstream estuarine and mangrove environments. Surface water monitoring undertaken since 2023 indicates both freshwater and tidally influenced brackish environments, with upstream reaches generally freshwater and downstream reaches influenced by tides from Bynoe Harbour. These waterways support aquatic ecosystem values and are protected under beneficial use declarations applicable to the Fog Bay area, Bynoe Harbour region and the Darwin Rural Water Control District.

Groundwater beneath the Project occurs within the Burrell Creek Formation fractured rock aquifer system. The aquifer is a relatively poor groundwater resource, with limited use for domestic, stock or agricultural supply, and groundwater levels generally respond to seasonal rainfall recharge through diffuse infiltration during the wet season. Local groundwater flow is interpreted to follow topographic gradients towards lower landscape positions, including the Charlotte River corridor.

The Bureau of Meteorology Groundwater Dependent Ecosystems Atlas identifies moderate potential aquatic groundwater-dependent ecosystems associated with the Charlotte River and broad areas of low to moderate potential terrestrial groundwater-dependent ecosystems within the surrounding savanna woodland. However, field investigations undertaken for the Project found no evidence of confirmed terrestrial groundwater-dependent ecosystems within the study area. Areas exhibiting elevated vegetation moisture were associated with shallow drainage depressions and prolonged soil moisture retention, rather than with a demonstrated reliance on groundwater. Groundwater-dependent values are therefore most likely associated with aquatic ecosystems linked to the Charlotte River, while terrestrial vegetation communities are generally sustained by seasonal soil moisture recharge following wet-season rainfall.

Landform and soil values comprise well-drained, gravelly, and sandy soils associated with the Bustard Land System and the Burrell Creek Formation geology. Geochemical characterisation indicates that waste rock and ore materials are generally low risk for acid and metalliferous drainage. Potential acid sulphate soils are not mapped within the Project footprint; however, areas associated with the Charlotte River alluvial corridor may contain them and therefore remain an environmental consideration for water and land management.

These environmental values provide the baseline for rehabilitation objectives, completion criteria and post-closure performance assessment. Ongoing monitoring of surface water, groundwater, vegetation, and rehabilitation will refine understanding of these values and inform future updates to closure planning.

# 3. CLOSURE CONSIDERATIONS

## 3.1. Closure Context

Several characteristics of the Project influence closure planning and provide opportunities to minimise long-term closure liabilities.

Key closure-related characteristics include:

- the Project is relatively small, with a disturbance footprint of less than 100 ha;
- mining is proposed as an underground operation rather than an open-cut mine;
- no tailings storage facility is proposed;
- waste rock is intended to be returned underground where practicable;
- on-site chemical processing of ore is not proposed; and
- progressive rehabilitation opportunities exist during operations.

These characteristics are expected to reduce the scale of long-term rehabilitation requirements compared with many conventional mining operations.

## 3.2. Closure Philosophy

The Lei Lithium Mine has been designed to minimise long-term environmental liabilities and facilitate progressive rehabilitation and closure throughout the life of the Project.

Key elements of the Project's closure philosophy are:

- closure planning will be integrated into project planning and operational decision-making throughout the life of the Project;
- disturbed areas will be progressively rehabilitated where practicable;
- waste rock will be returned underground;
- the Project will not include a tailings storage facility;
- disturbed areas will be rehabilitated to achieve a safe, stable, non-polluting and self-sustaining post-mining landscape;
- the disturbance footprint will be managed as a single rehabilitation domain, with localised Rehabilitation Management Areas (RMAs) established where additional monitoring, rehabilitation trials or adaptive management is required, as described in Section 6.5 Rehabilitation Domain Strategy; and
- closure planning, monitoring and stakeholder engagement will continue until completion criteria have been achieved and relinquishment requirements satisfied.

This closure philosophy forms the basis of the closure strategy, rehabilitation objectives, completion criteria and monitoring framework described in the remainder of this Concept Mine Closure Plan.

## 3.3. Conceptual Closure Strategy

At the concept stage, the preferred closure strategy comprises:

- backfilling and rehabilitation of mine access excavation, i.e. rehabilitation of backfilling over the cut-and-cover tunnel approach;

- decommissioning and removal of infrastructure no longer required;
- backfilling waste rock underground (for clarification, there will be residual voids due to the volume of DSO exported from the mine);
- reshaping of disturbed land to establish a stable, free-draining landform;
- replacement of topsoil and growth media where available;
- revegetation using native species consistent with surrounding vegetation;
- management of residual environmental risks;
- monitoring of rehabilitation performance and environmental outcomes; and
- eventual relinquishment following achievement of agreed completion criteria.

Progressive rehabilitation will be undertaken where disturbed areas are no longer required for mine operations. For example, the area above the cut-and-cover tunnel may be rehabilitated early in the mine life and used to trial revegetation methods, seed mixes and soil amendment approaches before final closure.

### 3.4. Closure Objectives

The overall objective of closure is to achieve a post-mining landscape that is:

- safe for people and wildlife;
- physically stable;
- chemically stable and non-polluting;
- capable of supporting agreed post-mining land uses; and
- self-sustaining without the need for ongoing active management.

The closure approach described in this Concept Mine Closure Plan has been developed to support achievement of these objectives and will be progressively refined throughout the life of the Project as additional information becomes available.

## 4. LEGAL OBLIGATIONS AND COMMITMENTS

### 4.1. Overview

LPM recognises that mine closure is an integral component of the Project lifecycle and that closure planning must be undertaken progressively from project development through to relinquishment. Closure activities associated with the Lei Lithium Mine will be planned, implemented and monitored in accordance with applicable Northern Territory and Commonwealth legislation, approval conditions, environmental management requirements and stakeholder commitments.

This Concept Mine Closure Plan (MCP) has been prepared to support the Supplementary Environmental Report (SER) and is intended to provide a framework for ongoing closure planning throughout the life of the Project. Future revisions of the MCP will be progressively refined as project design, operational knowledge, rehabilitation performance and stakeholder expectations evolve.

### 4.2. Legislative and Regulatory Framework

Closure planning and rehabilitation activities for the Project will be undertaken in accordance with relevant legislation, approvals and regulatory requirements applicable at the time of operation and closure.

Relevant legislation may include:

- Mineral Titles Act 2010 (NT);
- Environmental Protection Act 2019 (NT) and the Environment Protection Legislation Amendment Act 2023.

- Weeds Management Act (NT) 2001
- Water Act 1992 (NT);
- Waste Management and Pollution Control Act 1998 (NT);
- Heritage Act 2011 (NT);
- Northern Territory Aboriginal Sacred Sites Act 1989 (NT);
- Native Title Act 1993 (Cth); and
- any other legislation, licences and approval conditions applicable to the Project.

The specific closure obligations applying to the Project will continue to be reviewed throughout the life of the mine to ensure compliance with evolving legislative and regulatory requirements.

## 4.3. Approvals and Commitments

Closure planning will be undertaken having regard to conditions and commitments arising from:

- environmental assessment and approval processes;
- mining approvals and authorisations;
- environmental licences and permits;
- approved management plans;
- cultural heritage management requirements;
- stakeholder commitments; and
- any future closure-related regulatory requirements.

Commitments made during the environmental assessment process, including commitments relating to rehabilitation, environmental protection, monitoring and stakeholder engagement, will be incorporated into future revisions of the MCP and associated management plans.

## 4.4. Stakeholder Commitments Relevant to Closure

LPM recognises that closure planning extends beyond regulatory compliance and includes consideration of commitments made to stakeholders throughout the life of the Project.

The Community and Stakeholder Engagement Strategy identifies several matters relevant to closure planning, including:

- post-mining land use outcomes;
- rehabilitation approaches;
- cultural heritage protection;
- environmental protection and monitoring;
- long-term land stability;
- water management;
- biodiversity outcomes; and
- ongoing stakeholder consultation.

These commitments will continue to inform closure planning and rehabilitation objectives as the Project progresses.

### 4.5. Closure Planning Standards and Guidance

Closure planning for the Project has been informed by recognised industry guidance, including:

- Mine Closure Plan Guidance – How to Prepare in Accordance with the Statutory Guidelines (DMIRS, 2020);
- Integrated Mine Closure: Good Practice Guide (ICMM, 2019);
- Integrated Mine Transitions Framework (CRC TiME, 2021);
- Key Performance Indicators Tool for Closure (ICMM, 2020); and
- Mine Closure and Mine Rehabilitation – Leading Practice Sustainable Development Program for the Mining Industry (Commonwealth of Australia, 2016).

These guidelines promote early closure planning, stakeholder participation, progressive rehabilitation, risk-based decision making and continual improvement throughout the life of mine.

### 4.6. Closure Commitments

LPM's closure commitments are summarised below and are addressed in more detail throughout this Concept MCP. LPM is committed to integrating closure planning into mine planning and operations, undertaking progressive rehabilitation where practicable, maintaining a current MCP, engaging with stakeholders on closure and post-mining land use, monitoring rehabilitation performance, maintaining appropriate financial provision, and achieving a safe, stable, non-polluting and self-sustaining post-mining landscape capable of supporting agreed post-mining land uses.

### 4.7. Review and Continuous Improvement

This Concept MCP will be reviewed and updated periodically throughout the life of the Project to reflect:

- changes to legislation, approvals or regulatory requirements;
- updated closure risk matrices and preliminary closure risk assessments;
- rehabilitation performance and monitoring results;
- stakeholder feedback;
- changes to mine design or operational practices; and
- improvements in closure knowledge and industry practice.

This process will ensure that closure planning remains current, responsive and aligned with both regulatory obligations and stakeholder expectations throughout the life of the Project.

## 5. STAKEHOLDER ENGAGEMENT

### 5.1. Objectives

Stakeholder engagement is a fundamental component of mine closure planning and essential to achieving closure outcomes that are technically feasible, environmentally responsible, and aligned with stakeholder expectations.

The objectives of closure-related stakeholder engagement are to:

- provide stakeholders with information about closure planning and rehabilitation activities;
- seek stakeholder input into the development of closure objectives, post-mining land uses and completion criteria;
- identify and understand stakeholder concerns, interests and expectations relating to closure;

- incorporate relevant stakeholder knowledge into closure planning, monitoring and rehabilitation programs;
- demonstrate how stakeholder feedback has been considered in closure decision-making;
- maintain transparent and ongoing communication throughout the life of the Project; and
- support the achievement of closure outcomes that are acceptable to regulators, Traditional Owners, local communities and other stakeholders.

## 5.2. Engagement Principles

Closure engagement for the Project will be guided by the stakeholder engagement principles established in the Community and Stakeholder Engagement Strategy (CSES). These principles are consistent with the International Association for Public Participation (IAP2) Core Values and the Northern Territory Environmental Protection Authority's stakeholder engagement guidance. Engagement will be undertaken in a manner that is transparent, respectful, inclusive and responsive to stakeholder feedback.

LPM recognises that closure planning is not a single activity undertaken at the end of mine life. Rather, closure planning is an ongoing process that will be progressively refined through stakeholder engagement throughout the life of the Project. Stakeholders will be informed of closure planning activities and provided opportunities to contribute to decisions where appropriate.

Consistent with the CSES, engagement activities will seek to:

- provide information in plain English;
- use appropriate visual materials where beneficial;
- ensure communication methods are accessible to diverse stakeholder groups;
- provide opportunities for meaningful participation;
- maintain effective feedback mechanisms; and
- demonstrate how stakeholder input has influenced closure planning.

## 5.3. Key Closure Stakeholders

Stakeholders with an interest in closure planning may change throughout the life of the Project. At the concept stage, key stakeholders are expected to include:

- Traditional Owners and Aboriginal representative organisations;
- Northern Territory Government regulators and approval agencies;
- local government authorities;
- nearby communities including Belyuen, Berry Springs and Wagait Beach;
- landholders and residents in the vicinity of the Project and haulage routes;
- environmental and community interest groups;
- local businesses and industry organisations; and
- employees, contractors and shareholders.

The level of engagement undertaken with each stakeholder group will be commensurate with the stakeholder's level of interest, influence and connection to closure outcomes.

## 5.4. Traditional Owner and First Nations Engagement

The Project is located on the traditional country of the Larrakia People. Engagement with Traditional Owners regarding closure planning will continue throughout the life of the Project and will be undertaken alongside other statutory and cultural heritage engagement processes.

Closure-related engagement may include consultation on:

- cultural values associated with the Project area;
- post-mining land use opportunities;
- rehabilitation outcomes;
- protection and management of cultural heritage values;
- rehabilitation monitoring programs; and
- closure criteria relevant to cultural outcomes.

Engagement with Traditional Owners will continue to adopt culturally appropriate approaches and will have regard to Free, Prior and Informed Consent (FPIC) principles as described in the CSES.

## 5.5. Closure Topics for Consultation

Stakeholder engagement activities undertaken during the life of the Project will include consultation regarding matters relevant to closure planning and relinquishment.

Key matters expected to be discussed include:

- post-mining land use objectives;
- rehabilitation strategies and methodologies;
- progressive rehabilitation opportunities;
- environmental monitoring outcomes;
- rehabilitation trial results;
- completion criteria;
- management of residual risks;
- infrastructure decommissioning;
- closure performance reporting; and
- eventual site relinquishment.

The CSES identifies post-mining land use and rehabilitation approaches as matters that may be influenced by stakeholder feedback and should therefore remain active topics for engagement throughout the mine life.

## 5.6. Engagement Timing

Stakeholder engagement will occur throughout the life of the Project and will be linked to key closure planning milestones.

Indicative engagement activities are expected to occur during:

| Project Phase | Indicative Timing | Closure Engagement Focus |
|---|---|---|
| Approvals and Construction | 1 – 2 years before starting operations | Closure philosophy, post-mining land use concepts and rehabilitation objectives |
| Operations | Years 1-7 | Progressive rehabilitation, monitoring outcomes, rehabilitation trials and closure plan updates |
| Pre-closure | Final 1-2 years of operations | Final land use planning, completion criteria review and closure implementation planning |

| Project Phase | Indicative Timing | Closure Engagement Focus |
|---|---|---|
| Closure Implementation | Commencing at the cessation of mining and continuing for approximately 6 – 12 months | Closure progress, rehabilitation performance and decommissioning activities |
| Post-closure | Following active closure until completion criteria are achieved | Monitoring outcomes, achievement of completion criteria and relinquishment |

This staged approach reflects the principle that stakeholder engagement should be ongoing and evolve as project information and closure planning become more detailed.

### 5.7. Feedback and Continuous Improvement

Stakeholder feedback relevant to closure planning will be recorded, reviewed, and considered in future updates to the Mine Closure Plan.

Where practical and appropriate, stakeholders will be informed of how their feedback has been considered and incorporated into Project planning and decision-making. This "close-the-loop" approach is a key principle of the CSES and supports transparent and effective stakeholder participation.

Records of closure-related engagement activities, key issues raised, commitments made and actions taken will be maintained throughout the life of the Project and incorporated into future reviews of the Mine Closure Plan.

### 5.8. Future Review

Stakeholder engagement requirements will be reviewed periodically throughout the life of the Project to ensure that engagement activities remain relevant, effective and aligned with stakeholder expectations.

As closure planning matures, engagement activities will become increasingly focused on final land-use outcomes, the achievement of completion criteria, the fulfilment of relinquishment requirements, and verification that closure objectives have been met.

## 6. POST MINING LAND USE AND CLOSURE OUTCOMES

### 6.1. Closure Vision

The closure vision for the Lei Lithium Mine is to establish a safe, stable, non-polluting and self-sustaining post-mining landscape that is physically integrated with the surrounding environment and capable of supporting agreed post-mining land uses.

Consistent with the closure philosophy described in Section 2.4, disturbed areas will be rehabilitated and revegetated to achieve long-term landform stability, ecological function and environmental sustainability.

Closure planning will continue throughout the life of the Project and will be refined as additional operational, environmental and stakeholder information becomes available.

### 6.2. Post-Mining Land Use

The proposed post-mining land use for the Lei Lithium Mine is the restoration of the disturbance footprint to a predominantly natural landscape capable of supporting native vegetation, fauna habitat, and cultural land-use activities.

The Project is located in an area characterised by relatively intact remnant vegetation, dominated by Eucalypt savanna woodland. Following closure and rehabilitation, disturbed areas will be rehabilitated to provide land capability generally consistent with surrounding land uses and environmental values.The preferred post-mining land use is:

- Native vegetation and fauna habitat;
- Cultural and traditional land use activities;
- Conservation and environmental values consistent with surrounding land uses; and
- Passive recreational access where appropriate and consistent with land tenure and stakeholder expectations.

The final post-mining land use will continue to be refined through consultation with Traditional Owners, regulators, neighbouring landholders and other stakeholders throughout the life of the Project. Future consultation may identify opportunities for alternative or supplementary land uses which are compatible with the agreed closure objectives and final landform.

## 6.3. Alternative Post-Mining Land Uses

At the concept stage, no specific alternative post-mining land uses have been identified that would require retention of substantial Project infrastructure.

However, ongoing stakeholder consultation may identify opportunities for selective retention or transfer of infrastructure where doing so would provide community benefit without compromising environmental performance, public safety, or closure objectives.

Examples that may be considered during future closure planning include:

- Retention of selected access tracks;
- Retention of water management infrastructure where beneficial and agreed by stakeholders;
- Transfer of selected infrastructure to government, community or land management organisations; or
- Other agreed land uses identified through stakeholder consultation.

Any future retention of infrastructure would be subject to risk assessment, stakeholder consultation and regulatory approval.

## 6.4. Closure Outcomes

The intended closure outcomes for the Project are:

### *6.4.1. Public Safety*

The site will not present unacceptable risks to public safety.

Underground mine access points and other potential hazards will be permanently secured, decommissioned or otherwise managed to prevent unauthorised access and ensure long-term public safety.

### *6.4.2. Physical Stability*

The final landform will be stable under anticipated climatic conditions and will not be subject to unacceptable erosion, subsidence or instability.

A conceptual final landform design has been developed on the basis that waste rock will be returned underground, and that disturbed areas will be reshaped to create stable, free-draining surfaces with maximum slopes generally not exceeding 10%. The conceptual final landform is shown in **Figure 3 – Conceptual Final Landform**. This figure comprises drawing number: J055.000.00.DWG revision 0A. This and other concept final landform plans and sections have been provided in Annexure A – Conceptual Final Landform Plans and Sections.

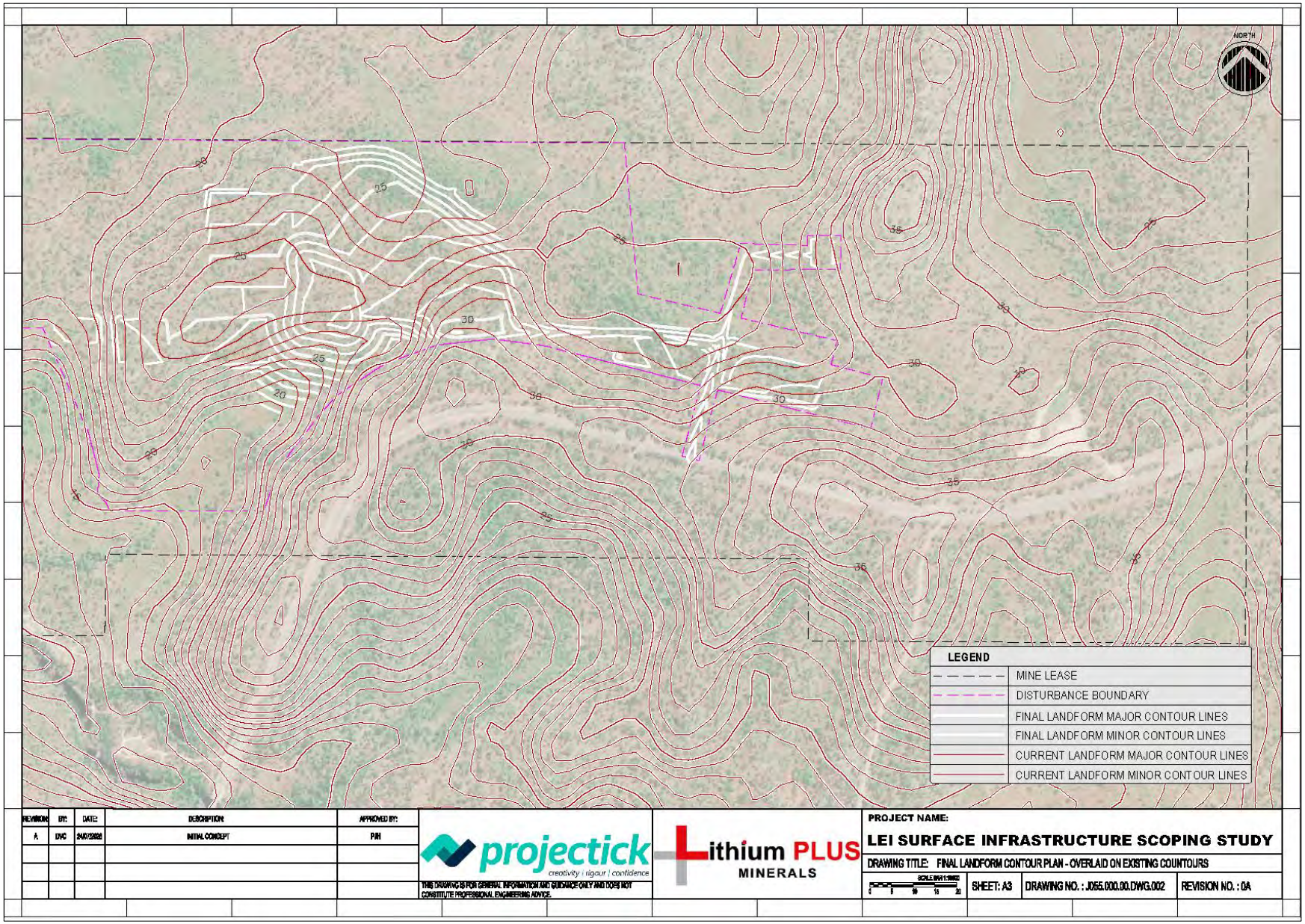



**FIGURE 3 – CONCEPTUAL FINAL LANDFORM**

### *6.4.3. Chemical Stability*

The site will not generate unacceptable impacts to surface water, groundwater, soils or ecological values following closure.

Closure planning has been developed on the basis that mine-affected materials will be appropriately managed, disturbed areas rehabilitated, and water management controls maintained until closure objectives and completion criteria have been achieved. Monitoring will continue following closure to verify environmental performance and confirm that the site remains non-polluting.

### *6.4.4. Ecological Sustainability*

Rehabilitation will establish vegetation communities that are consistent with the surrounding landscape and capable of developing without ongoing active management.

The rehabilitation objective is not necessarily to recreate pre-disturbance ecological conditions exactly, but rather to establish a self-sustaining ecosystem that provides similar ecological function, habitat values and resilience.

### *6.4.5. Social and Cultural Outcomes*

Closure planning will seek to minimise adverse social impacts associated with cessation of mining activities and maximise opportunities for positive long-term outcomes.

Consultation with stakeholders will continue throughout the life of the Project to inform closure objectives, completion criteria, relinquishment requirements and opportunities for future land use.

## 6.5. Rehabilitation Domain Strategy

For the purposes of this Concept Mine Closure Plan, the Project disturbance area is proposed to be managed as a single rehabilitation domain. The Project disturbance footprint is relatively small and is intended to support a common post-mining land use and rehabilitation outcome across the site. Although several closure features will exist within the Project area, including underground workings, the cut-and-cover tunnel, infrastructure areas and water management structures, these features will be rehabilitated in a manner consistent with the overall closure vision. Accordingly, separate rehabilitation domains are not considered necessary at the concept planning stage.

To support closure implementation and monitoring, Lithium Plus Minerals may establish **Rehabilitation Management Areas (RMAs)** where localised areas require additional monitoring, rehabilitation trials, maintenance, investigation or adaptive management. RMAs are a **project-specific management tool** developed for the Lei Lithium Mine and are not intended to represent separate rehabilitation domains or a formal industry classification. Rather, they provide a practical mechanism for identifying and managing localised areas that require focused attention while maintaining the overall site as a single rehabilitation domain.

Examples of RMAs may include:

- the rehabilitated cut-and-cover tunnel trial area;
- areas affected by erosion or landform instability;
- drainage lines or water management structures;
- areas requiring supplementary revegetation;
- weed or pest management areas; and
- other locations where monitoring indicates that closure performance is not meeting expectations.

RMAs may be established, modified or retired throughout the life of the Project as monitoring results, rehabilitation performance, and closure risks evolve. The use of RMAs will support adaptive management and continuous improvement while maintaining a consistent site-wide approach to rehabilitation and closure. This approach aligns with the Project's closure philosophy of managing the disturbance footprint as a single rehabilitation domain while applying targeted management where required.

The area above the cut-and-cover tunnel represents an opportunity for progressive rehabilitation during operations. Following completion of tunnel construction and backfilling of the tunnel excavation, the land surface above the tunnel may be progressively rehabilitated and may be managed as a Rehabilitation Management Area (RMA) to support rehabilitation trials. This area may be used to assess alternative revegetation methodologies, including seed mixes, planting densities, fertiliser regimes and establishment techniques. Results from these trials will be used to optimise rehabilitation strategies for the remainder of the Project at final closure.

# 7. DEVELOPMENT OF COMPLETION CRITERIA

## 7.1. Overview

Completion criteria provide the basis for measuring the success of closure and rehabilitation activities and demonstrating achievement of the closure objectives described in Section 5.

At the concept planning stage, completion criteria are necessarily preliminary because aspects of the Project design, operational performance, environmental monitoring datasets, rehabilitation trials and stakeholder expectations will continue to evolve throughout the life of the Project. Accordingly, the completion criteria presented in this Concept Mine Closure Plan are intended to establish the framework for future closure planning rather than define final relinquishment requirements.

LPM will progressively refine closure objectives, performance indicators and completion criteria throughout the operational life of the Project using information obtained from:

- Baseline environmental studies;
- Operational monitoring programs;
- Rehabilitation trials;
- Ongoing stakeholder consultation;
- Risk matrices and preliminary closure risk assessments;
- Geochemical investigations;
- Water quality monitoring;
- Regulatory requirements; and
- Closure performance monitoring.

Final completion criteria will be developed in consultation with regulators, Traditional Owners, landholders and other stakeholders and incorporated into future revisions of the Mine Closure Plan.

## 7.2. Closure Objectives

The principal closure objective for the Lei Lithium Mine is to achieve a safe, stable, non-polluting and self-sustaining post-mining landscape that supports agreed post-mining land uses and can eventually be relinquished without requiring ongoing active management.

To support this overarching objective, the following closure objectives have been established:

1. Legal and regulatory compliance.
2. Protection of public safety.

3. Long-term physical stability.
4. Long-term chemical stability.
5. Protection of surface water quality and environmental values.
6. Protection of groundwater quality and environmental values.
7. Establishment of self-sustaining native vegetation.
8. Re-establishment of fauna habitat and ecological function.
9. Management of weeds and invasive species.
10. Achievement of agreed stakeholder and cultural outcomes.
11. Successful decommissioning and removal of infrastructure.
12. Demonstration that closure objectives have been achieved through monitoring and reporting.

## 7.3. Development of Completion Criteria

The Project disturbance footprint is proposed to be managed as a single rehabilitation domain. Accordingly, completion criteria are established on a site-wide basis rather than by separate rehabilitation domains.

The criteria have been developed having regard to:

- The proposed post-mining land uses;
- Existing environmental values;
- The proposed final landform;
- Commitments contained within the SER;
- The Water Management Plan;
- The Community and Stakeholder Engagement Strategy;
- Waste characterisation investigations;
- The conceptual Final Landform Plan; and
- Relevant closure guidance documents.

The completion criteria are intended to be SMART wherever practicable. Some criteria will remain qualitative during the concept planning stage and will be refined using operational monitoring data and rehabilitation trial outcomes.

## 7.4. Preliminary Completion Criteria

| Closure Objective | Performance Indicator | Preliminary Completion Criteria |
|---|---|---|
| Legal compliance | Regulatory obligations satisfied | All closure obligations, approval conditions and regulatory commitments have been completed and documented. |
| Public safety | Residual hazards | No unacceptable public safety hazards remain. Underground mine access points are permanently secured, and access controls are removed only where approved. |
| Physical stability | Landform stability | Rehabilitated landforms remain stable and free-draining with no significant erosion, instability or subsidence requiring ongoing active management. |

| Closure Objective | Performance Indicator | Preliminary Completion Criteria |
|---|---|---|
| Physical stability | Erosion | No active gullying, rilling or sediment mobilisation that threatens closure outcomes or environmental values. |
| Surface water quality | Water quality monitoring results | Surface water quality remains consistent with approved Site Specific Trigger Values (SSTVs), baseline conditions and natural seasonal variability. |
| Surface water quality | Environmental values | No evidence that the Project is causing unacceptable impacts to downstream environmental values. |
| Groundwater quality | Groundwater monitoring results | Groundwater quality trends are stable or improving and do not indicate unacceptable Project-related impacts. |
| Groundwater quantity | Groundwater recovery | Groundwater levels demonstrate recovery or stabilisation consistent with post-mining hydrogeological predictions. |
| Chemical stability | Contamination | No significant ongoing source of contamination remains on site or is contained in a manner that doesn't cause contamination. |
| Vegetation establishment | Vegetation cover | Vegetation cover demonstrates a self-sustaining trajectory toward agreed rehabilitation outcomes. |
| Vegetation composition | Species diversity | Native vegetation communities contain endemic species representative of surrounding ecosystems. |
| Weed management | Weed abundance | Weed populations are controlled and do not exceed levels observed in surrounding reference areas. |
| Fauna habitat | Habitat function | Rehabilitated areas provide habitat values consistent with the agreed post-mining land use. |
| Surface drainage | Drainage performance | Drainage systems function as designed without causing erosion, ponding or environmental harm. |
| Mosquito and biting insect management | Standing water | Closure does not create persistent ponding or breeding habitat likely to support nuisance biting insects or mosquito populations. |
| Infrastructure removal | Decommissioning | Infrastructure is removed, decommissioned or retained only where approved through consultation and closure planning processes. |
| Stakeholder outcomes | Stakeholder consultation | Closure commitments arising from stakeholder consultation have been addressed and documented. |
| Cultural outcomes | Cultural values | Relevant cultural, heritage and Traditional Owner commitments have been satisfied. |

| Closure Objective | Performance Indicator | Preliminary Completion Criteria |
|---|---|---|
| Rehabilitation success | Monitoring outcomes | Monitoring demonstrates achievement of closure objectives and no requirement for ongoing active management. |
| Relinquishment | Regulatory acceptance | Closure outcomes satisfy relinquishment requirements established by regulators and stakeholders. |

## 7.5. Rehabilitation Trials and Progressive Improvement

The area above the cut-and-cover tunnel provides an opportunity to undertake progressive rehabilitation during the operational phase of the Project.

Following completion of tunnel construction and backfilling of the excavation associated with the cut-and-cover tunnel, rehabilitation may commence over the restored surface. This area will be used as a rehabilitation trial area to evaluate:

- Native seed mix selection;
- Planting densities;
- Tubestock species selection;
- Fertiliser requirements;
- Topsoil management techniques;
- Revegetation methods; and
- Erosion and drainage controls.

Outcomes from rehabilitation trials will be used to refine rehabilitation methodologies, monitoring programs and completion criteria for future revisions of this Mine Closure Plan.

## 7.6. Completion Criteria Review and Refinement

The completion criteria presented in this Concept Mine Closure Plan will be reviewed and updated throughout the life of the Project.

Review triggers may include:

- Completion of rehabilitation trials;
- Significant changes to mine design;
- New environmental monitoring information;
- Updates to the Risk Matrix and Preliminary Closure Risk Assessment;
- Regulatory changes;
- Material changes to stakeholder expectations;
- Amendments to environmental approvals; and
- Development of detailed closure and relinquishment requirements.

LPM will seek agreement with regulators and key stakeholders on refined closure objectives and completion criteria before commencement of final closure works.

## 7.7. Knowledge Gaps and Future Studies

As a concept-level document prepared during the environmental assessment phase, several aspects of closure planning remain subject to further investigation and refinement. Additional studies, operational monitoring, rehabilitation trials and stakeholder engagement will be used to progressively reduce uncertainty and improve confidence in closure outcomes, completion criteria and relinquishment requirements. **Table 1** identifies the principal closure-related knowledge gaps and the studies or activities proposed to address them.

**Table 1 – Knowledge Gaps and Future Studies or Activities**

| Knowledge Gap / Uncertainty | Relevance to Closure | Proposed Study / Activity | Indicative Timing |
|---|---|---|---|
| Long-term geotechnical stability of underground workings and residual voids | Influences public safety, subsidence risk and relinquishment requirements | Detailed geotechnical assessment and underground closure design studies | Pre-closure |
| Groundwater recovery following cessation of mining | Influences closure performance, monitoring duration and completion criteria | Groundwater monitoring | Post-closure |
| Long-term groundwater quality trends | Influences environmental outcomes and post-closure obligations | Ongoing groundwater quality monitoring and predictive modelling | Operations through Post-Closure |
| Surface water quality and drainage performance following closure | Influences achievement of closure objectives and environmental compliance | Closure water balance, drainage assessment and monitoring program refinement | Operations and Closure |
| Geochemical characteristics of waste rock and mine materials | Influences chemical stability and water quality outcomes | Additional geochemical testing and periodic review of material characterisation data | Operations |
| Final closure treatment of mine access points, ventilation raises and underground openings | Influences public safety and long-term stability | Detailed underground closure design and engineering studies | Pre-Closure |
| Long-term performance of rehabilitated landforms | Influences completion criteria and relinquishment | Landform and rehabilitation trials monitoring, erosion assessments and rehabilitation performance reviews | Operations through Post-Closure |
| Rehabilitation methodology and vegetation establishment success | Influences revegetation outcomes and completion criteria | Progressive rehabilitation trials above the cut-and-cover tunnel and monitoring of trial outcomes | Operations |

| Knowledge Gap / Uncertainty | Relevance to Closure | Proposed Study / Activity | Indicative Timing |
|---|---|---|---|
| Native vegetation composition and rehabilitation targets | Influences ecological sustainability objectives | Development of reference sites and rehabilitation benchmark studies | Operations |
| Topsoil availability and suitability for rehabilitation | Influences revegetation success and closure costs | Topsoil inventory, quality assessment and management planning | Construction and Operations |
| Weed and pest management requirements | Influences rehabilitation success and ecosystem development | Ongoing weed and pest monitoring and control effectiveness assessments | Operations through Post-Closure |
| Climate change impacts on closure performance | Influences landform stability, water management and revegetation outcomes | Periodic review of climate projections and closure design assumptions | Operations and Pre-Closure |
| Stakeholder expectations regarding post-mining land use | Influences closure objectives, completion criteria and relinquishment | Ongoing stakeholder engagement and periodic review of post-mining land use objectives | Entire Project Life |
| Traditional Owner expectations and cultural outcomes | Influences closure planning and relinquishment requirements | Ongoing consultation with Traditional Owners and review of cultural closure outcomes | Entire Project Life |
| Potential contamination associated with infrastructure areas | Influences decommissioning requirements and site relinquishment | Contamination assessments, validation sampling and remediation planning | Pre-Closure and Closure |
| Closure cost estimates and financial provisioning requirements | Influences financial assurance and closure planning | Periodic review and update of closure cost estimates | Annual Review |
| Quantitative completion criteria and relinquishment requirements | Influences closure verification and regulatory acceptance | Progressive refinement of completion criteria using monitoring results and stakeholder input | Operations and Pre-Closure |
| Monitoring duration required to demonstrate closure success | Influences closure schedule and relinquishment timing | Trend analysis of rehabilitation, water quality and groundwater monitoring data | Closure and Post-Closure |

## 7.8. Constraints and Assumptions

This Concept MCP provides the initial framework for ongoing development of the Mine Closure Plan throughout the life of the Project. Future revisions will be developed to progressively greater levels of detail as additional design, operational, environmental, rehabilitation and stakeholder information becomes available. The following constraints and assumptions are relevant to the ongoing development of the MCP.

- the Concept MCP has been prepared using the project design, environmental assessment information, stakeholder engagement outcomes and closure planning knowledge available at the time of preparation;
- the Project is at an early stage of development, and future MCP revisions will need to address detailed engineering design, final closure methodologies, quantitative completion criteria, monitoring requirements, closure cost estimates and relinquishment pathways;
- the disturbance footprint, mine layout, infrastructure requirements and closure domains may change as approvals, detailed design, construction and operational planning progress;
- the Project disturbance footprint is currently assumed to be managed as a single rehabilitation domain, with Rehabilitation Management Areas established where localised monitoring, rehabilitation trials, investigation or adaptive management are required;
- future MCP revisions will assume that closure objectives, rehabilitation methods, performance indicators and completion criteria can be progressively refined using operational experience, rehabilitation trial outcomes, environmental monitoring data and stakeholder feedback;
- future MCP revisions will need to address uncertainties relating to surface water, groundwater, geotechnical stability, geochemistry, rehabilitation performance, climate resilience and ecological outcomes as further studies and monitoring results become available;
- ongoing development of the MCP assumes that suitable topsoil, growth media, waste rock management options and native seed resources will be identified, managed and reviewed during construction and operations to support final rehabilitation requirements;
- ongoing development of the MCP will require continued consultation with regulators, Traditional Owners, landholders and other stakeholders to confirm post-mining land uses, completion criteria, monitoring duration and relinquishment requirements.

These constraints and assumptions will be reviewed during scheduled MCP updates and whenever material changes occur to project design, approvals, operational conditions, stakeholder expectations, closure risks or regulatory requirements.

# 8. IDENTIFICATION AND MANAGEMENT OF CLOSURE ISSUES

## 8.1. Overview

The identification and management of closure risks are fundamental components of integrated mine closure planning. Closure risks have the potential to affect the achievement of closure objectives, increase closure liabilities, delay relinquishment, or result in adverse environmental, social, cultural or financial outcomes. At this concept stage, closure risks have been considered using a risk matrix and preliminary closure risk assessment to support the identification of key issues requiring further investigation, monitoring and adaptive management.

The Project has been designed to minimise long-term closure liabilities through a relatively small disturbance footprint, the absence of a tailings storage facility and the planned return of waste rock underground where practicable. Nevertheless, several closure-related risks remain and will be progressively assessed, monitored and managed throughout the life of the Project. The closure risk matrix and preliminary closure risk assessment will be reviewed periodically as part of ongoing closure planning and future updates to this Concept Mine Closure Plan.

## 8.2. Closure Risk Management Approach

Closure risks will be identified, assessed and managed through existing environmental, operational and closure planning processes, supported by the Risk Matrix and Preliminary Closure Risk Assessment provided in **Annexure B**.

The risk management approach will include:

- periodic review of closure assumptions;
- integration of closure considerations into mine planning and operational decision-making;
- progressive rehabilitation and rehabilitation trials;
- ongoing environmental monitoring and adaptive management;
- stakeholder engagement throughout the mine life;
- periodic updates to closure cost estimates; and
- regular review of completion criteria and relinquishment requirements.

As knowledge of site conditions improves, the Risk Matrix and Preliminary Closure Risk Assessment will be reviewed and refined and incorporated into future revisions of the Mine Closure Plan.

## 8.3. Preliminary Closure Risk Matrix and Risk Assessment

A preliminary closure risk matrix and preliminary closure risk assessment have been developed to identify and assess the principal risks that may affect achievement of the Project's closure objectives, completion criteria and eventual relinquishment. These materials reflect the current stage of project development and will be reviewed and refined throughout the life of the Project as additional operational, environmental, stakeholder and rehabilitation information becomes available. The Risk Matrix and Preliminary Closure Risk Assessment are provided in Annexure B.

## 8.4. Key Closure Risks

### *8.4.1. Rehabilitation Performance*

A key closure risk is that rehabilitated areas may not achieve the desired level of vegetation establishment, ecological function or long-term sustainability.

Potential contributing factors may include:

- variable soil conditions;
- seasonal climatic variability;
- poor germination or plant survival;
- weed competition; and
- impacts from fire or extreme weather events.

To reduce this risk, LPM proposes to undertake progressive rehabilitation wherever practicable and use the rehabilitated cut-and-cover tunnel area as an early rehabilitation trial area. Lessons learned from rehabilitation trials will be incorporated into future rehabilitation activities and closure planning.

### *8.4.2. Landform Stability and Erosion*

Failure of rehabilitated landforms or drainage systems may result in erosion, sediment transport, or maintenance requirements that extend beyond the closure period.

This risk will be managed through:

- closure-oriented landform design;
- progressive monitoring and inspections;
- rehabilitation of disturbed drainage areas;
- implementation of erosion controls where required; and
- adaptive management of identified Rehabilitation Management Areas (RMAs).

### 8.4.3. *Surface Water Quality*

There is a risk that closure activities could adversely affect surface water quality through erosion, sedimentation or mobilisation of contaminants.

Management measures will include:

- implementation of the Water Management Plan;
- progressive rehabilitation;
- monitoring of surface water quality;
- maintenance of drainage controls; and
- development of closure-specific monitoring and TARP requirements.

### 8.4.4. *Groundwater Recovery and Hydrogeological Uncertainty*

Following cessation of mining, groundwater levels will recover over time. Variations between predicted and actual groundwater recovery behaviour may influence closure performance and environmental outcomes.

Management measures will include:

- continued groundwater monitoring;
- periodic review of hydrogeological assumptions;
- assessment of groundwater recovery trends; and
- adaptive management should monitoring identify unexpected conditions.

### 8.4.5. *Unexpected or Premature Closure*

Commodity market conditions, operational challenges or other unforeseen circumstances may result in an earlier-than-planned cessation of mining activities.

Unexpected closure may limit the time available to complete planned rehabilitation and closure works.

To manage this risk, closure planning will be maintained throughout the life of the Project, progressive rehabilitation will be undertaken where practicable, and closure cost estimates will be regularly reviewed to ensure sufficient financial provision is available.

### 8.4.6. *Stakeholder and Community Expectations*

Closure outcomes may not align with stakeholder expectations if consultation is not maintained throughout the mine life.

Potential issues include:

- differing views regarding post-mining land use;
- cultural heritage considerations;
- rehabilitation objectives;
- access arrangements; and
- relinquishment expectations.

This risk will be managed through ongoing stakeholder engagement and periodic reviews of closure objectives, in consultation with relevant stakeholders.

### 8.4.7. *Climate Change and Extreme Weather Events*

Long-term closure performance may be influenced by changing climatic conditions, including increased rainfall intensity, prolonged dry periods, bushfires and extreme weather events.

While future climate conditions remain uncertain, closure planning will continue to consider climate resilience principles, including:

- stable landform design;
- erosion-resistant drainage systems;
- resilient vegetation communities;
- adaptive monitoring programs; and
- ongoing review of closure risks as new information becomes available.

## 8.5. Closure Opportunities

In addition to identifying risks, closure planning seeks to identify opportunities that improve rehabilitation outcomes and reduce long-term liabilities. Potential closure opportunities include:

### *8.5.1. Progressive Rehabilitation*

Progressive rehabilitation provides an opportunity to reduce the disturbance footprint during operations, improve rehabilitation knowledge and reduce closure uncertainty prior to final closure.

### *8.5.2. Rehabilitation Trial Areas*

Early rehabilitation of the cut-and-cover tunnel area provides an opportunity to trial revegetation methodologies, seed mixes, planting densities and soil amendment techniques that may improve rehabilitation success across the broader site.

### *8.5.3. Continuous Improvement*

Monitoring outcomes collected during operations and closure will provide opportunities to refine rehabilitation techniques, improve closure performance and reduce long-term maintenance requirements.

### *8.5.4. Stakeholder Collaboration*

Ongoing engagement with Traditional Owners, regulators and other stakeholders provides opportunities to improve closure outcomes, strengthen community confidence and further refine long-term land use objectives.

## 8.6. Ongoing Review

Closure risks and opportunities will be reviewed periodically throughout the life of the Project and incorporated into future updates of the Mine Closure Plan. The level of detail and assessment will increase as operational experience, monitoring information and rehabilitation performance data become available.

The objective of this ongoing review process is to continually improve closure outcomes, reduce uncertainty, and support the eventual relinquishment of the Project in a condition that is safe, stable, non-polluting, and self-sustaining.

# 9. CLOSURE IMPLEMENTATION

## 9.1. Overview

*This Concept Mine Closure Plan has been prepared at the environmental assessment stage of the Project. (To be removed in future revisions of this Mine Closure Plan).*

The closure implementation measures described in this section are conceptual in nature and establish LPM's intended closure strategy. Closure planning will continue throughout the life of the Project, and future revisions of the Mine Closure Plan will incorporate improved operational, environmental, stakeholder and rehabilitation information.

Closure implementation comprises the planned activities required to decommission the Lei Lithium Mine, rehabilitate disturbed areas and achieve the post-mining land uses, closure outcomes and completion criteria described in Sections 5 and 6.

The overall closure objective is to establish a safe, stable, non-polluting and self-sustaining landform that is physically integrated with the surrounding environment and capable of supporting agreed post-mining land uses.

The conceptual final landform has been developed on the basis that:

- waste rock will be returned underground where practicable;
- the excavation associated with the cut-and-cover tunnel will be progressively backfilled during construction;
- infrastructure will be removed following completion of mining operations;
- disturbed surfaces will be re-contoured to create stable, free-draining landforms; and
- rehabilitated areas will be revegetated using endemic native species suitable for the surrounding environment.

The conceptual final landform is provided in Annexure A - Conceptual Final Landform Plans and Sections.

## 9.2. Closure Philosophy

Closure implementation will be undertaken in accordance with the Project closure philosophy described in Section 2.4.

Closure works will focus on:

- decommissioning and removal of infrastructure;
- underground mine closure;
- rehabilitation of disturbed land;
- water management;
- revegetation;
- monitoring and adaptive management; and
- achievement of completion criteria and eventual relinquishment.

The implementation measures described in this section translate the Project's closure philosophy into practical closure activities.

## 9.3. Progressive Rehabilitation

Opportunities for progressive rehabilitation at the Lei Lithium Mine are limited because most Project infrastructure and disturbed areas are required throughout mining operations.

Notwithstanding this limitation, the Project includes an opportunity to undertake progressive rehabilitation above the cut-and-cover tunnel.

Construction of the cut-and-cover tunnel requires excavation to install the concrete tunnel structure. Following installation, the excavation will be progressively backfilled, enabling early rehabilitation of the land surface above the tunnel.

The rehabilitated area above the cut-and-cover tunnel will serve as a trial area for rehabilitation. Rehabilitation trials may include assessment of:

- Native seed mixes;
- Tubestock selection;

- Planting densities;
- Fertiliser applications;
- Soil preparation techniques;
- Topsoil management methods; and
- Erosion control measures.

Monitoring of the trial area will provide site-specific information to refine rehabilitation methodologies and closure completion criteria prior to final closure.

## 9.4. Underground Mine Closure

Following completion of mining operations, the underground mine will be decommissioned and closed. Closure activities are expected to include:

- Removal of mobile plant and equipment;
- Removal of salvageable infrastructure and materials;
- Sealing of ventilation raises and other underground openings;
- Removal of underground services where practical;
- Backfilling of underground excavations using available waste rock and other suitable materials;
- Management of underground water accumulations; and
- Permanent closure of mine access points.

The closure design assumes that a portion of the underground void space will remain after backfilling, as approximately 3.1 Mt of mineralised material will have been exported from the site. Residual voids will therefore remain at closure.

Future closure planning will evaluate:

- Long-term geotechnical stability;
- Groundwater recovery;
- Groundwater quality;
- Potential subsidence risks; and
- Any implications for future land use.

Provided residual voids are shown to be stable and pose no unacceptable environmental or safety risks, complete underground backfilling is not currently anticipated.

## 9.5. Decommissioning and Removal of Infrastructure

At final closure, infrastructure that is not required for the agreed post-mining land uses will be removed from the site. Infrastructure expected to be removed includes:

- Crushing and processing facilities;
- Workshops;
- Offices and administration facilities;
- Crib facilities;
- Fuel storage facilities;
- Electrical infrastructure;
- Pumps and pipelines;
- Power distribution systems;

- Lighting;
- Fencing;
- Containers;
- Communications infrastructure; and
- Other ancillary facilities.

Decommissioning activities will include:

- Removal of equipment and structures;
- Recovery and recycling of materials where practicable;
- Disposal of wastes at appropriately licensed facilities;
- Remediation of contaminated areas where required; and
- Reinstatement of ground surfaces following removal of infrastructure.

Future stakeholder consultation may identify opportunities to retain or transfer selected infrastructure where doing so would provide long-term community benefit and not compromise closure objectives.

## 9.6. Rehabilitation of Disturbed Land

Following decommissioning activities, disturbed areas will be reshaped and rehabilitated to form part of the final landform. Rehabilitation activities are expected to include:

- Removal of unnecessary hardstand areas;
- Removal or treatment of compacted surfaces;
- Landform reshaping;
- Installation of drainage controls where required;
- Topsoil placement;
- Surface preparation;
- Seeding;
- Planting of native species where appropriate;
- Fertilisation where required; and
- Weed management.

A preliminary final landform has been developed to create free-draining, stable surfaces that minimise erosion and long-term maintenance requirements. Surface gradients will generally be designed to avoid excessive erosion risk while maintaining positive drainage and preventing ponding. The concept final landform plan is shown in Annexure A – Conceptual Final Landform Plans and Sections.

Special consideration will be given to ensuring that closure activities do not create persistent standing water that could result in mosquito breeding habitat or nuisance biting insect issues, consistent with stakeholder feedback received during the environmental assessment process.

## 9.7. Water Management During Closure

Water management during closure will be carried out in accordance with the principles set out in the Water Management Plan.

The principal objectives of closure water management are to:

- Protect downstream environmental values;
- Protect groundwater quality;

- Maintain separation of water types where required;
- Manage residual mine-affected water;
- Prevent uncontrolled releases;
- Support rehabilitation activities; and
- Demonstrate achievement of closure objectives.

Closure activities may include:

- Management and treatment of residual mine water;
- Controlled release of water in accordance with applicable approvals and licences;
- Decommissioning of water storages;
- Rehabilitation of drainage structures;
- Ongoing groundwater monitoring; and
- Validation of post-closure water quality performance.

Water management infrastructure will remain operational until monitoring demonstrates that closure performance criteria have been achieved.

## 9.8. Revegetation Strategy

The rehabilitation objective is to establish vegetation communities capable of developing into a self-sustaining ecosystem that is compatible with surrounding vegetation communities and agreed post-mining land uses.

The revegetation strategy is expected to include:

- Stripping of topsoil from areas to be disturbed and stockpiling it until mine closure;
- Use of endemic native seed species where practical;
- Supplementary planting of native trees and shrubs;
- Management of invasive species;
- Monitoring of vegetation establishment; and
- Adaptive management where rehabilitation performance does not meet expectations.

Information obtained from progressive rehabilitation trials above the cut-and-cover tunnel will be used to optimise revegetation methods for final closure.

## 9.9. Socioeconomic Closure Strategy

The Lei Lithium Mine is not expected to create the level of regional economic dependency associated with large-scale mining operations. Nevertheless, closure may result in employment and business impacts for employees, contractors and local service providers.

To assist in managing social transition, LPM will:

- Maintain ongoing stakeholder engagement throughout the life of the Project;
- Provide advance notice of closure planning activities;
- Consult regarding future land uses;
- Investigate opportunities for retention or transfer of useful infrastructure;
- Support workforce transition planning where appropriate; and
- Consider opportunities for training and skills development during the operational phase.

### 9.10. Closure Implementation Schedule

At the concept stage, closure implementation is expected to occur in four broad phases:

| Phase | Indicative Timing | Indicative Activities* |
|---|---|---|
| Operations | Years 1-7 | Monitoring, rehabilitation trials, topsoil management, progressive rehabilitation above the cut-and-cover tunnel, annual review of the closure plan and cost estimate. |
| Pre-Closure Planning | Final 1-2 years of operations | Finalisation of the closure plan, including completion criteria, and closure cost estimate update. |
| Active Closure | Commencing at the cessation of mining and continuing for approximately 6 – 12 months | Removal of infrastructure, underground closure works, landform reshaping, revegetation and decommissioning of water infrastructure |
| Post-Closure | Following active closure until completion criteria are achieved | Monitoring, maintenance, performance assessment and relinquishment activities |

*Stakeholder engagement will occur throughout the life of the Project.

The timing and duration of closure phases presented above are indicative only and have been provided to demonstrate how closure planning is integrated throughout the project lifecycle. Actual closure schedules, monitoring durations and relinquishment timing will be refined through future updates of the Mine Closure Plan in response to operational experience, rehabilitation performance, regulatory requirements and stakeholder expectations.

## 10. CARE AND MAINTENANCE AND UNPLANNED CLOSURE

### 10.1. Objectives

The objective of care and maintenance (C&M) is to ensure that the Project can be placed in a safe, environmentally responsible, and stable condition during any temporary suspension of operations, while maintaining the ability to recommence mining if circumstances permit. Unplanned closure planning aims to minimise environmental, social and financial risks should mining cease earlier than anticipated.

The Project is not expected to enter long-term care and maintenance as part of its planned life cycle. However, market conditions, operational issues, regulatory requirements or other unforeseen circumstances may result in a temporary suspension of operations or premature cessation of mining. Accordingly, provisions for care and maintenance, and for unplanned closure, will be maintained throughout the life of the Project and updated as closure planning matures.

### 10.2. Care and Maintenance Strategy

Should operations be temporarily suspended, LPM would implement a Care and Maintenance Plan appropriate to the scale and duration of the suspension.

The objectives of the Care and Maintenance Plan would be to:

- protect the health and safety of personnel and the public;
- maintain environmental compliance;
- manage environmental risks associated with suspended operations;
- preserve critical infrastructure where appropriate;
- maintain site security and access controls;

- continue environmental monitoring and reporting; and
- retain the ability to recommence operations when feasible.

The level of management and monitoring required would depend on the duration of the suspension, site conditions and applicable regulatory requirements.

### *10.2.1. Environmental Management During Care and Maintenance*

Environmental controls implemented during operations would be maintained during any care and maintenance period, where necessary, to manage environmental risks.

Key management activities may include:

- operation and maintenance of water management infrastructure;
- management of erosion and sediment controls;
- groundwater and surface water monitoring;
- maintenance of environmental monitoring programs;
- management of weeds and pests;
- inspections of rehabilitated areas;
- management of hazardous materials and wastes; and
- implementation of corrective actions where required.

Environmental monitoring programs would be reviewed periodically to ensure they remain appropriate to the risks present during care and maintenance.

### *10.2.2. Site Security and Infrastructure*

During care and maintenance, site infrastructure would be secured and managed to minimise risks to public safety and the environment.

Potential measures may include:

- restricting site access;
- maintaining security arrangements;
- securing underground access points;
- isolating utilities and services where appropriate;
- maintaining critical water management infrastructure; and
- undertaking routine inspections of site facilities.

Infrastructure that is no longer required may be progressively removed or decommissioned where this reduces ongoing environmental liabilities and maintenance requirements.

### *10.2.3. Progressive Rehabilitation During Care and Maintenance*

Where practicable, rehabilitation activities may continue during care and maintenance periods.

Potential rehabilitation activities may include:

- maintenance of previously rehabilitated areas;
- supplementary seeding and planting;
- erosion repairs;
- weed management;
- rehabilitation performance monitoring; and

- implementation of rehabilitation improvement measures identified through monitoring programs.

Continuing rehabilitation activities during care and maintenance can help reduce closure liabilities and improve confidence in long-term closure outcomes.

## 10.3. Unplanned or Early Closure

An unplanned or early closure may occur if mining operations cease permanently before the anticipated end of mine life.

Potential causes may include:

- adverse commodity market conditions;
- technical or operational constraints;
- regulatory or approval constraints;
- significant environmental incidents; or
- other unforeseen circumstances.

In the event of an unplanned closure, LPM would transition from operational management to closure implementation as soon as practicable and in consultation with relevant regulators and stakeholders.

Key actions may include:

- securing the site and protecting public safety;
- stabilising environmental risks;
- reviewing closure priorities;
- updating closure cost estimates;
- confirming available financial provisions;
- implementing rehabilitation and decommissioning activities;
- continuing stakeholder engagement; and
- maintaining monitoring and reporting programs.

The specific closure strategy adopted would depend on the circumstances prevailing at the time of closure and the site's condition.

## 10.4. Stakeholder and Regulatory Engagement

In the event of a care-and-maintenance period or unplanned closure, LPM would engage with regulators, Traditional Owners, landholders, local communities, and other relevant stakeholders regarding proposed management measures and closure activities.

Stakeholder engagement would be undertaken in accordance with applicable approval requirements and the Project's stakeholder engagement framework. Closure planning assumptions, rehabilitation priorities, and post-mining land-use considerations would be reviewed as part of this process.

## 10.5. Transition Back to Operations or Closure

Where the care and maintenance period is temporary, LPM may recommence operations following a review of site conditions, regulatory requirements, and operational readiness.

Where recommencement is not considered feasible, the Project would transition to closure implementation, including decommissioning, rehabilitation, monitoring, and the achievement of completion criteria, as described elsewhere in this Concept Mine Closure Plan.

### 10.6. Ongoing Review

Care and maintenance and unplanned closure provisions will be reviewed periodically throughout the life of the Project and updated as part of future revisions of the Mine Closure Plan.

This approach ensures that closure planning remains current, that sufficient financial provision can be maintained, and that the Project can respond effectively to changing operational circumstances while continuing to meet closure objectives and environmental obligations.

## 11. CLOSURE MONITORING AND MAINTENANCE

### 11.1. Objectives

The objective of post-closure monitoring and maintenance is to demonstrate that rehabilitation and closure outcomes are being achieved and that the site is progressing towards a safe, stable, non-polluting and self-sustaining condition. Monitoring will be used to assess performance against approved completion criteria, identify emerging risks, inform adaptive management, and provide evidence to support eventual relinquishment of the site.

Monitoring programs will be reviewed and refined throughout the life of the Project based on operational experience, rehabilitation performance, stakeholder feedback and regulatory requirements. The monitoring framework has been developed on the basis that the Project will comprise a single rehabilitation domain, with focused monitoring and management undertaken within Rehabilitation Management Areas (RMAs) where necessary.

### 11.2. Monitoring Framework

Closure monitoring will focus on verifying the achievement of rehabilitation objectives and completion criteria across the rehabilitated site.

Where monitoring identifies areas requiring additional attention, site-specific Rehabilitation Management Areas (RMAs) may be established to facilitate targeted monitoring, investigation and corrective actions. The establishment of an RMA does not create a separate rehabilitation domain but provides a practical mechanism for managing localised risks and rehabilitation performance issues.

Examples of RMAs may include:

- The rehabilitated cut-and-cover tunnel rehabilitation trial area.
- Areas affected by erosion or sediment transport.
- Drainage lines or water management structures.
- Areas requiring supplementary revegetation.
- Weed management areas.
- Any location where monitoring indicates rehabilitation performance is below target.

Monitoring requirements and RMA boundaries will be reviewed periodically and amended as rehabilitation performance improves or site conditions change.

Monitoring results will be compared against completion criteria and trigger values, where established. Monitoring programs may be modified over time to reflect performance trends, changing risks and regulator requirements.

### 11.3. Surface Water Monitoring

Surface water monitoring will be undertaken to confirm that rehabilitation activities do not adversely affect downstream environmental values and that rehabilitated drainage systems perform as intended.

Monitoring parameters may include:

- pH;
- electrical conductivity;
- turbidity;
- total suspended solids;
- major ions;
- dissolved metals, where relevant; and
- flow conditions and drainage behaviour.

Monitoring locations and parameters will be informed by the Water Management Plan and relevant environmental approval requirements.

Additional monitoring may be undertaken within RMAs where erosion, sediment mobilisation or surface water quality issues are identified.

Visual inspections will also be undertaken following significant rainfall events to assess drainage performance and identify emerging maintenance requirements.

## 11.4. Groundwater Monitoring

Groundwater monitoring will continue following cessation of mining activities to assess groundwater recovery and verify groundwater quality trends.

Monitoring will focus on:

- groundwater level recovery;
- groundwater quality;
- confirmation of predicted post-closure groundwater behaviour;
- assessment of groundwater mounding, if required; and
- potential interactions between groundwater and surface water systems.

Monitoring frequency may be adjusted over time where trends demonstrate that groundwater conditions have stabilised and closure objectives are being achieved.

## 11.5. Landform Stability and Erosion Monitoring

Monitoring will be undertaken to verify the long-term stability of rehabilitated landforms and drainage systems.

Monitoring activities may include:

- routine inspections;
- photographic monitoring;
- drainage inspections; and
- assessments following significant rainfall events.

Areas where excessive erosion, gullying, ponding, or instability are identified may be designated as RMAs until corrective actions are completed and the area is performing as intended.

## 11.6. Revegetation Monitoring

A revegetation monitoring program will be implemented to assess progress towards establishing a self-sustaining native vegetation community that is consistent with surrounding ecosystems.

Performance indicators may include:

- vegetation cover;
- species richness and diversity;
- survival and growth rates of planted species;
- native species recruitment;
- groundcover establishment;
- weed prevalence; and
- evidence of ecosystem development.

The rehabilitated area above the cut-and-cover tunnel is expected to provide an opportunity for early rehabilitation trials. This area may be managed as an RMA to evaluate the performance of different seed mixes, species compositions, planting methodologies and soil amendment treatments. Information obtained from these trials will be used to optimise rehabilitation practices across the broader site and improve confidence in closure outcomes.

## 11.7. Weed and Pest Monitoring

Monitoring will be undertaken to identify and manage weed infestations and pest species that may adversely affect rehabilitation success or ecological outcomes.

Where required, management measures may include:

- targeted weed control programs;
- eradication of declared weeds;
- pest animal management; and
- follow-up inspections to confirm treatment effectiveness.

Persistent infestations may be managed as dedicated RMAs until the performance criteria are met.

## 11.8. Fauna Monitoring

Fauna monitoring will be undertaken to assess the re-establishment of habitat values and ecological function within rehabilitated areas.

Monitoring methods may include:

- habitat condition assessments;
- opportunistic fauna observations;
- remote camera monitoring;
- bird surveys; and
- targeted ecological surveys where considered necessary.

Monitoring will focus on demonstrating progressive return of habitat values and utilisation of rehabilitated areas by native fauna.

## 11.9. Adaptive Management

Adaptive management will be applied throughout the closure and post-closure periods to ensure that monitoring outcomes are used to continually improve rehabilitation performance and to support the achievement of closure objectives and completion criteria. Adaptive management recognises that some aspects of closure performance may not be fully understood at the concept planning stage and that rehabilitation methodologies, monitoring programs and management measures may require modification in response to observed site conditions

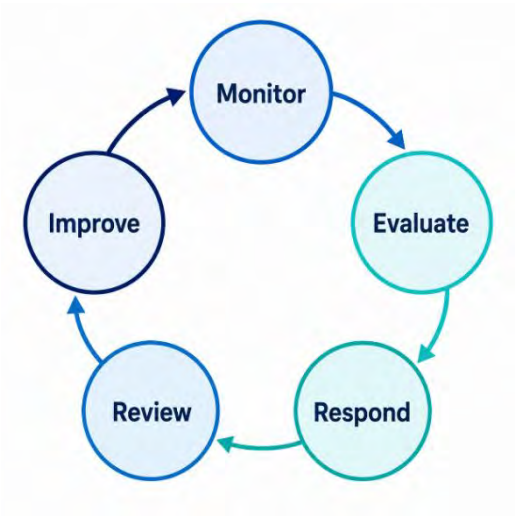
Monitoring results will be routinely reviewed to identify trends, assess performance against completion criteria and determine whether corrective actions or management changes are required. Where monitoring indicates that closure objectives are not being achieved, LPM will investigate the underlying causes and implement appropriate management responses. Responses may include:

- modification of rehabilitation methodologies;
- supplementary seeding, planting or soil treatments;
- erosion control and landform stabilisation works;
- drainage improvements;
- weed and pest management measures;
- refinement of water management controls;
- increased monitoring frequency; and
- revision of closure assumptions, performance indicators or completion criteria where justified by new information.

Adaptive management actions will be documented and incorporated into future revisions of the Mine Closure Plan, rehabilitation programs and monitoring frameworks. Outcomes from rehabilitation trials, monitoring programs and stakeholder engagement activities will be used to progressively improve closure planning and reduce uncertainty regarding long-term closure performance.

Where monitoring identifies localised areas that are not performing as expected, Rehabilitation Management Areas (RMAs) may be established to facilitate focused investigation, monitoring and corrective action. RMAs will remain in place until monitoring demonstrates that the relevant closure objectives and performance criteria are being achieved.

The adaptive management process will follow a continuous improvement cycle comprising:




This approach will ensure that closure planning remains responsive to site conditions, emerging risks, stakeholder expectations and evolving regulatory requirements throughout the life of the Project and during the post-closure period.

### 11.10. Trigger Action Response Plans (TARPs)

A series of Trigger Action Response Plans (TARPs) will be developed to facilitate a prompt response to monitoring results indicating that closure objectives may not be achieved.

Examples of closure monitoring triggers may include:

| Monitoring Outcome | Potential Response |
|---|---|
| Water quality exceeds trigger values | Investigate the cause, implement corrective measures and increase monitoring frequency |
| Excessive erosion or instability has been identified | Undertake remediation works and review drainage controls |
| Revegetation performance below target | Implement supplementary seeding, planting or soil treatments |
| Weed infestation exceeds targets | Implement targeted weed management measures |
| Unexpected groundwater recovery trends | Review hydrogeological assumptions and monitoring requirements |
| Public safety risks identified | Restrict access and undertake corrective works |

RMAs may be established where trigger exceedances require ongoing investigation, monitoring or adaptive management.

### 11.11. Monitoring Duration and Reporting

Monitoring will continue until completion criteria have been demonstrated and all regulatory closure requirements have been satisfied.

Monitoring results will be documented through periodic rehabilitation and closure reporting and used to assess progress towards closure objectives and eventual relinquishment.

As rehabilitation performance improves and completion criteria are progressively achieved, monitoring programs may be reduced in consultation with relevant regulators. RMAs will be progressively retired once monitoring demonstrates that rehabilitation outcomes have been achieved, and no further active management is required.

## 12. FINANCIAL PROVISIONING FOR CLOSURE

### 12.1. Objective

The objective of financial provisioning is to ensure that sufficient funds are available to implement rehabilitation, decommissioning, monitoring, maintenance and closure activities throughout the life of the Project and in the event of premature or unplanned closure. Financial provisioning supports the achievement of closure objectives and provides assurance that closure obligations can be met regardless of the Project's operational status.

### 12.2. Closure Costing Philosophy

Closure cost estimates will be developed and maintained throughout the life of the Project to assess the financial resources required to achieve approved closure outcomes.

At the concept stage, closure costing is based on the closure strategies and rehabilitation objectives described in this Concept Mine Closure Plan. Closure cost estimates will be refined as project design matures, operational experience is gained, rehabilitation performance data becomes available, and closure planning assumptions are progressively validated.

Consistent with good closure planning practice, closure cost estimates will consider the full scope of activities required to achieve closure objectives, rather than only the costs associated with physical rehabilitation works.

## 12.3. Closure Cost Components

Closure cost estimates will be developed having regard to the activities required to achieve a safe, stable, non-polluting and self-sustaining post-mining landform.

Relevant cost components may include:

- planning and closure management activities;
- demolition, removal and disposal of infrastructure;
- underground mine closure works;
- earthworks and landform rehabilitation;
- rehabilitation of disturbed areas;
- topsoil management and revegetation;
- erosion and drainage stabilisation works;
- water management infrastructure decommissioning;
- environmental monitoring programs;
- maintenance and adaptive management requirements;
- closure verification and reporting; and
- post-closure monitoring and maintenance where required.

Cost estimates will also consider activities that may be required in the event of temporary care and maintenance or unexpected closure.

## 12.4. Progressive Rehabilitation and Liability Reduction

The Project closure strategy incorporates progressive rehabilitation wherever practicable. Progressive rehabilitation provides an opportunity to reduce the area of disturbed land requiring rehabilitation at final closure and to progressively reduce closure uncertainty.

As rehabilitation areas are successfully established and performance is demonstrated through monitoring, closure liabilities may reduce over time. Information obtained from progressive rehabilitation and rehabilitation trial areas will also improve the reliability of future closure cost estimates by reducing uncertainty associated with rehabilitation performance and closure assumptions.

## 12.5. Review and Update of Closure Cost Estimates

Closure cost estimates will be reviewed and updated periodically throughout the life of the Project to reflect:

- changes to mine design or operational activities;
- updates to disturbance footprints;
- rehabilitation performance;
- revised closure strategies;
- changes in regulatory requirements;

- updated completion criteria; and
- improved understanding of closure risks and opportunities.

The frequency and methodology for updating closure cost estimates will be determined in accordance with applicable Northern Territory regulatory requirements and company procedures.

### 12.6. Financial Assurance

LPM will maintain financial assurance arrangements as required under applicable legislation, approvals and regulatory requirements.

Financial assurance mechanisms are intended to provide confidence that closure obligations can be met, and that rehabilitation and closure activities can be undertaken should the operator be unable to complete those activities. The amount of financial assurance required will be informed by current closure cost estimates and reviewed periodically as part of ongoing closure planning and regulatory reporting processes.

### 12.7. Integration with Closure Planning

Financial provisioning is an integral component of the closure planning process. Closure cost estimates, closure risks, rehabilitation performance and monitoring outcomes will be reviewed together to ensure that financial provisioning remains aligned with the current closure strategy.

As the Project progresses through operations and towards closure, the level of detail in closure cost estimates will increase, and the assumptions underpinning closure liabilities will be progressively validated. This approach supports continual improvement in closure planning and helps ensure that adequate resources remain available to achieve closure objectives and eventual site relinquishment.

## 13. MANAGEMENT OF INFORMATION AND DATA

### 13.1. Objective

The objective of information and data management is to ensure that information relevant to rehabilitation, mine closure and relinquishment is appropriately collected, maintained, protected and made available to support closure planning, regulatory reporting and demonstration of closure outcomes.

Effective information management provides the evidence necessary to demonstrate achievement of rehabilitation objectives, completion criteria and closure commitments throughout the life of the Project and during any post-closure monitoring period.

### 13.2. Closure Information Management Framework

Information relevant to closure planning and rehabilitation performance will be collected and managed throughout the life of the Project as part of LPM's environmental and operational management systems.

Closure-related information will be periodically reviewed and incorporated into updates of the Mine Closure Plan to ensure closure strategies remain based on current site conditions, monitoring outcomes and stakeholder expectations.

Where practicable, closure records will be maintained in electronic formats that support long-term storage, retrieval and reporting.

### 13.3. Closure Information and Records

Information retained to support closure planning may include:

- Mine Closure Plans and associated revisions;
- rehabilitation and closure studies;
- environmental approvals, licences and permit conditions;

- Risk matrices and preliminary closure risk assessments;
- operational management plans, including the Water Management Plan and the assessment of discharge and seepage;
- closure cost estimates and supporting assumptions;
- completion criteria and closure performance assessments;
- rehabilitation trial outcomes;
- stakeholder consultation records; and
- closure-related commitments and obligations.

These records will assist in demonstrating how closure planning has evolved throughout the life of the Project and how closure decisions have been informed by monitoring, consultation and operational experience.

## 13.4. Environmental Monitoring Data

Environmental monitoring information will form a key component of the closure evidence base.

Relevant datasets may include:

- surface water quality monitoring;
- groundwater monitoring;
- rehabilitation monitoring;
- erosion and landform stability inspections;
- vegetation and fauna monitoring;
- weed and pest monitoring;
- photographic monitoring records; and
- monitoring associated with Rehabilitation Management Areas (RMAs), where established.

Monitoring data will be used to assess progress towards completion criteria, identify trends and support adaptive management where required.

## 13.5. Rehabilitation and Progressive Closure Records

Records will be maintained for all significant rehabilitation and closure activities undertaken during the life of the Project.

Information may include:

- areas rehabilitated;
- rehabilitation methodologies;
- seed mixes and planting programs;
- soil and topsoil management practices;
- rehabilitation trial outcomes;
- maintenance and corrective actions; and
- rehabilitation performance assessments.

Particular emphasis will be placed on documenting outcomes from the progressive rehabilitation program and any rehabilitation trial areas established over the cut-and-cover tunnel, with lessons learned incorporated into future rehabilitation planning and implementation.

## 13.6. Spatial Data and Mapping

Spatial information will be maintained to support rehabilitation planning, monitoring and reporting.

Relevant information may include:

- disturbance footprints;
- rehabilitation extents;
- environmental monitoring locations;
- infrastructure locations;
- land tenure boundaries;
- surface water management features; and
- Rehabilitation Management Areas (RMAs), where applicable.

Spatial datasets will assist in tracking rehabilitation progress and demonstrating achievement of closure objectives over time.

## 13.7. Stakeholder Engagement Records

Records of stakeholder engagement activities will be maintained throughout the life of the Project.

Information may include:

- consultation activities;
- stakeholder feedback;
- commitments made during consultation;
- responses to stakeholder concerns; and
- closure-related engagement outcomes.

These records will assist in demonstrating that closure planning has been informed by ongoing consultation and that stakeholder expectations have been considered throughout the closure planning process.

## 13.8. Reporting and Knowledge Transfer

Closure information will be incorporated into periodic environmental and rehabilitation reporting as required by regulatory approvals, licence conditions and company management systems.

Knowledge gained through rehabilitation monitoring, progressive rehabilitation, and closure planning will be used to continuously improve rehabilitation practices, reduce closure uncertainty, and refine future updates to the Mine Closure Plan.

Where required, relevant closure records and supporting information will be provided to regulators as part of closure reporting, completion criteria assessment and eventual relinquishment processes.

## 13.9. Data Retention and Review

Closure-related information and supporting datasets will be retained for the duration of the Project and any post-closure monitoring period, or longer where required by legislation, approvals or company requirements.

Information and data management processes will be reviewed periodically to ensure that records remain accessible, relevant and suitable to support future closure planning, regulatory reporting and relinquishment activities.

# 14. GLOSSARY

## 14.1. Terms and Meanings

Unless otherwise defined, terms used in this Concept Mine Closure Plan have their ordinary meaning and should be read in conjunction with relevant Northern Territory legislation, environmental approvals and project management plans.

| Term | Meaning |
|---|---|
| Adaptive Management | A structured process of monitoring, evaluation and adjustment of management measures in response to observed outcomes. |
| Closure | The process of decommissioning, rehabilitating, monitoring and managing a mine site following the cessation of mining activities. |
| Closure Objective | A broad statement describing the desired post-closure outcome for the Project. |
| Completion Criteria | Specific, measurable criteria used to demonstrate that closure objectives have been achieved. |
| Concept Mine Closure Plan (MCP) | A high-level mine closure plan prepared during the project development phase and progressively refined throughout the life of mine. |
| Direct Shipping Ore (DSO) | Ore that can be exported without the need for on-site beneficiation or chemical processing. |
| DMIRS | Western Australian Department of Mines, Industry Regulation and Safety. The department responsible for publishing nationally recognised mine closure guidance. |
| Environmental Mining Licence (EML) | The primary environmental authorisation required to undertake a mining activity that causes substantial disturbance. |
| Environmental Protection Act | The Environmental Protection Act 2019 (NT). |
| Financial Assurance | Financial security maintained to provide assurance that rehabilitation and closure obligations can be completed if required. |
| Groundwater Recovery | The process by which groundwater levels return towards natural conditions following cessation of mine dewatering. |
| ICMM | International Council on Mining and Metals. |
| LPM | Lithium Plus Minerals Ltd. |
| Mine Closure Plan (MCP) | A document describing the planning, implementation and monitoring required to achieve successful mine closure outcomes. |
| Monitoring and Maintenance | Activities undertaken following rehabilitation to verify performance and address any issues that may arise before relinquishment. |
| Native Vegetation | Indigenous plant species and vegetation communities occurring naturally within the region. |
| NT | Northern Territory of Australia. |

| Term | Meaning |
|---|---|
| NT EPA | Northern Territory Environment Protection Authority. |
| Post-Mining Land Use | The agreed future land use of the site following closure and relinquishment. |
| Progressive Rehabilitation | Rehabilitation activities undertaken during operations rather than waiting until final closure. |
| Rehabilitation | Activities undertaken to return disturbed land to an agreed post-mining condition capable of supporting intended land uses. |
| Rehabilitation Management Area (RMA) | A project-specific closure management area established within the single rehabilitation domain to facilitate focused monitoring, rehabilitation trials, maintenance, investigation or adaptive management. An RMA is not a separate rehabilitation domain and is not intended to represent a formal rehabilitation classification. |
| Rehabilitation Trial Area | An area established to test rehabilitation methods, vegetation species, seed mixes, soil treatments or management practices. |
| Relinquishment | The stage at which regulatory closure obligations have been satisfied and responsibility for the site is formally transferred from the operator. |
| Risk Matrix | A tool used to categorise risk by considering consequence and likelihood and to support consistent assessment of closure-related risks. |
| Risk Assessment | A systematic process used to identify, evaluate and manage risks that may affect the achievement of closure objectives. |
| SER | Supplementary Environmental Report. |
| Self-Sustaining | A condition in which rehabilitated land can maintain agreed environmental and land use outcomes without ongoing active management. |
| Stakeholder | Any individual, organisation or community with an interest in, or potentially affected by, the Project. |
| Surface Water | Water occurring on the land surface, including drainage lines, creeks, runoff and water storage. |
| TARP | Trigger Action Response Plan. A framework that defines response actions when monitoring results exceed predetermined trigger levels. |
| Traditional Owners | Aboriginal people recognised as having traditional rights, interests and cultural connections to the Project area. |
| Waste Rock | Rock excavated during mining that does not contain sufficient mineralisation to be processed as ore. |

| Term | Meaning |
|---|---|
| Water Management Plan (WMP) | The Project's Water Management Plan describes measures for water management, monitoring, and response during operations and closure. |

## 14.2. Units and Acronyms

| Acronym / Unit | Definition |
|---|---|
| AHD | Australian Height Datum |
| ANZG | Australian and New Zealand Governments |
| C&M | Care and Maintenance |
| CSES | Community and Stakeholder Engagement Strategy |
| CRC TiME | Cooperative Research Centre – Transformations in Mining Economies |
| DSO | Direct Shipping Ore |
| EC | Electrical Conductivity |
| EML | Environmental Mining Licence |
| EP Act | *Environmental Protection Act 2019 (NT)* |
| FPIC | Free, Prior and Informed Consent |
| ha | Hectare |
| ICMM | International Council on Mining and Metals |
| km | Kilometre |
| L | Litre |
| LPM | Lithium Plus Minerals Ltd |
| m | Metre |
| $m^3$ | Cubic metre |
| mAHD | Metres Australian Height Datum |
| MCP | Mine Closure Plan |
| mg/L | Milligrams per litre |
| ML | Megalitre |
| Mt | Million tonnes |
| NT | Northern Territory |
| NT EPA | Northern Territory Environment Protection Authority |

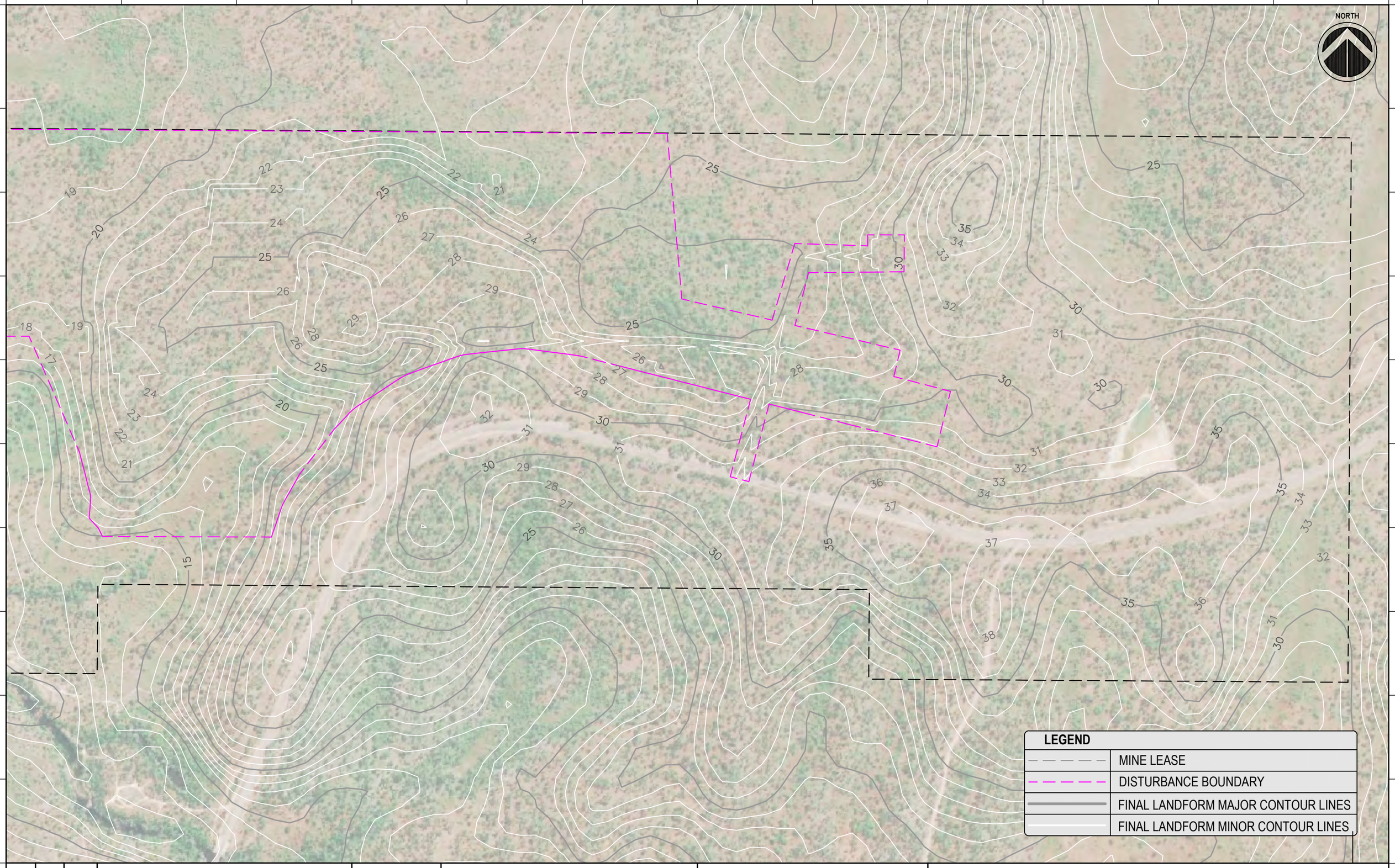
| Acronym / Unit | Definition |
|---|---|
| pH | Measure of acidity or alkalinity |
| RMA | Rehabilitation Management Area |
| ROM | Run of Mine |
| SER | Supplementary Environmental Report |
| SSTV | Site-Specific Trigger Value |
| TARP | Trigger Action Response Plan |
| TOs | Traditional Owners |
| TSF | Tailings Storage Facility |
| TSS | Total Suspended Solids |
| WMP | Water Management Plan |
| WQO | Water Quality Objective |

***Notes:***

- Units are expressed in accordance with the International System of Units (SI) unless otherwise stated.
- Abbreviations are defined on first use within the document where practical.
- The Project does not include a Tailings Storage Facility (TSF); however, the acronym has been included because it is a commonly used mine closure term and may be referenced when comparing the Project with other mining operations.
- Additional technical abbreviations may be incorporated into future revisions of the MCP as detailed engineering, operational and monitoring programs are developed.



# **Annexure A** - Conceptual Final Landform Plans and Sections




| REVISION: | BY: | DATE: | DESCRIPTION: | APPROVED BY: |
|---|---|---|---|---|
| A | DVC | 24/07/2026 | INITIAL CONCEPT | PJH |
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projectick
creativity | rigour | confidence

THIS DRAWING IS FOR GENERAL INFORMATION AND GUIDANCE ONLY AND DOES NOT CONSTITUTE PROFESSIONAL ENGINEERING ADVICE.

Lithium PLUS MINERALS

**PROJECT NAME:**

# LEI SURFACE INFRASTRUCTURE SCOPING STUDY

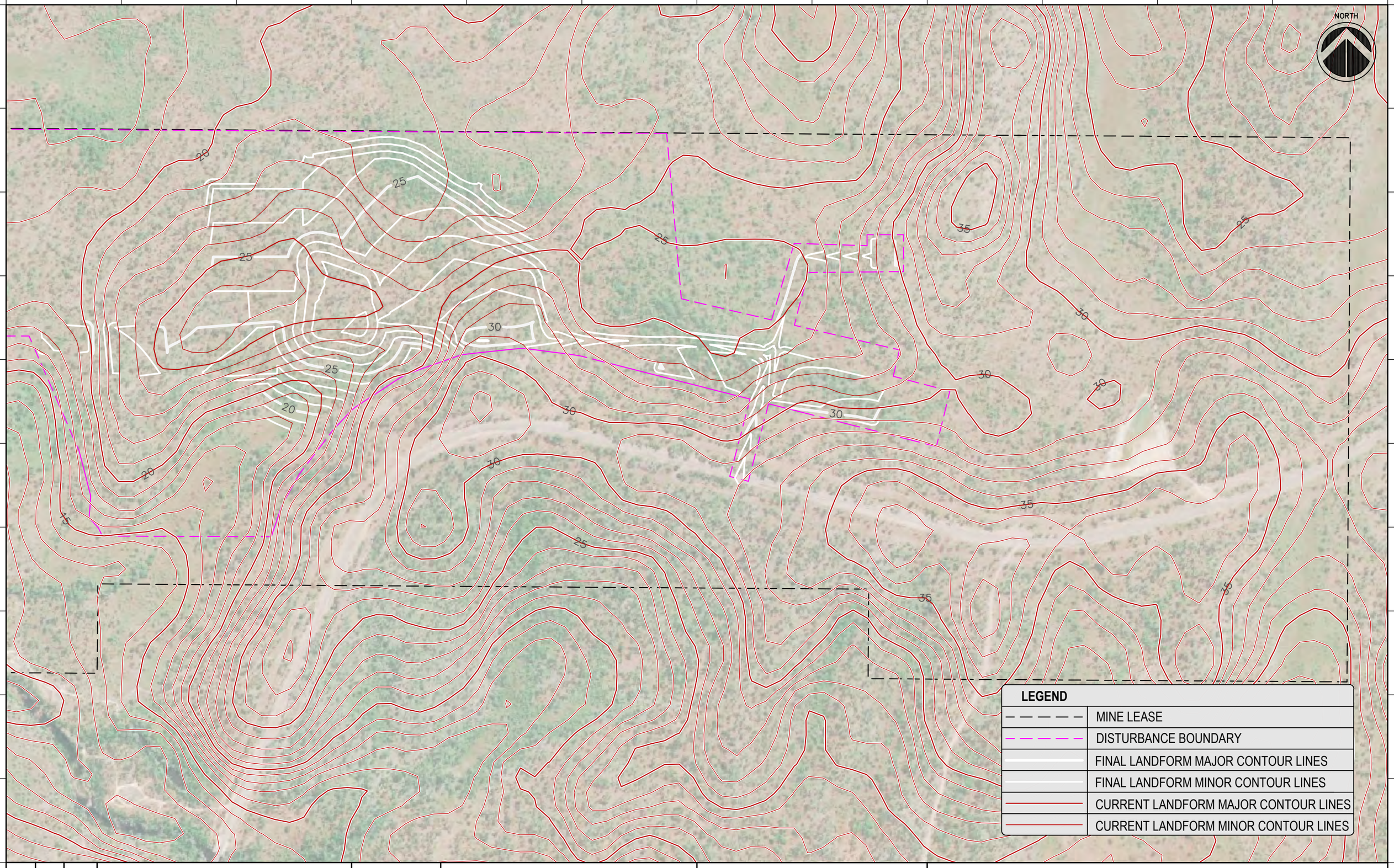
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Lithium PLUS MINERALS

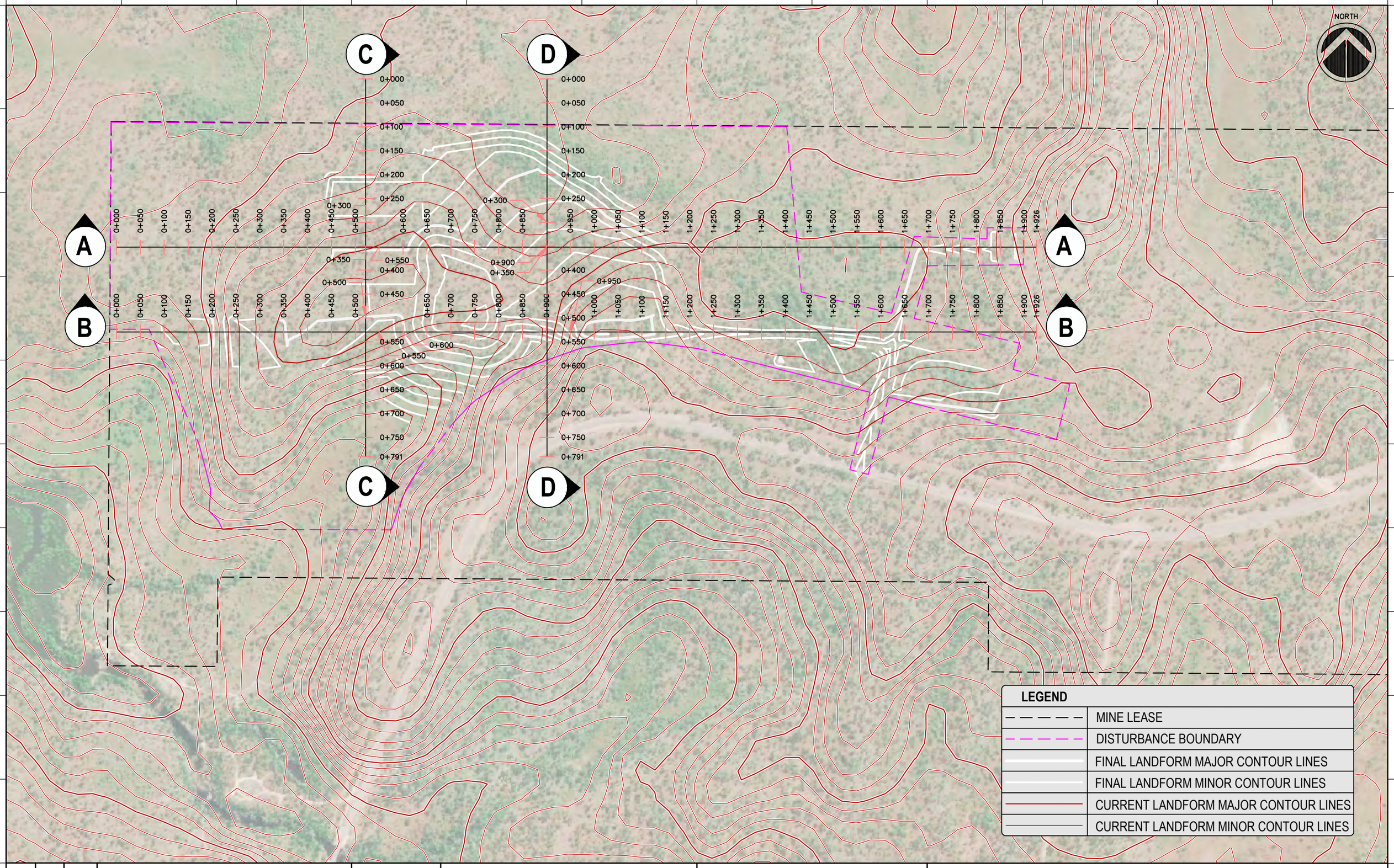
**PROJECT NAME:**

# LEI SURFACE INFRASTRUCTURE SCOPING STUDY

DRAWING TITLE: FINAL LANDFORM CONTOUR PLAN - OVERLAID ON EXISTING COUNTOURS

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SHEET: A3 | DRAWING NO. : J055.000.00.DWG.002 | REVISION NO. : 0A




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| A | DVC | 24/07/2026 | INITIAL CONCEPT | PJH |
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creativity | rigour | confidence

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Lithium PLUS MINERALS

**PROJECT NAME:**

# LEI SURFACE INFRASTRUCTURE SCOPING STUDY

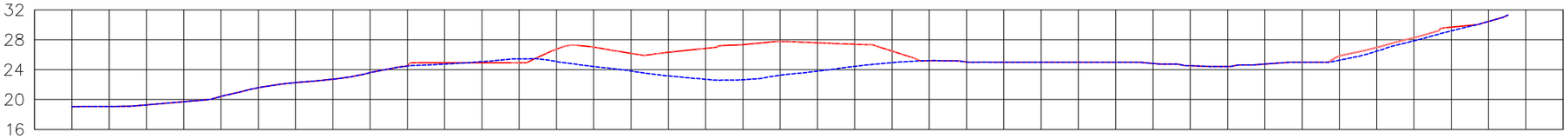
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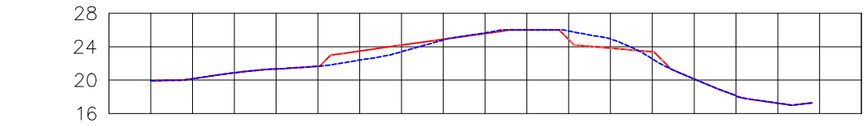
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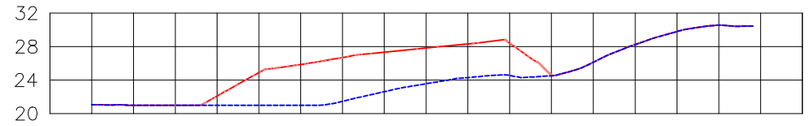
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|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| ELEVATION DIFFERENCE | | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 1.08 | 0.79 | 0.08 | −0.07 | 0.00 | −1.04 | −1.10 | 0.86 | 0.00 | 0.00 | 0.00 | |
| FINAL LANDFORM | | 19.91 | 20.16 | 20.88 | 21.34 | 21.66 | 23.48 | 24.19 | 24.89 | 25.58 | 26.00 | 24.84 | 23.82 | 23.41 | 20.13 | 18.13 | 17.25 | |
| EXISTING SURFACE | | 19.91 | 20.16 | 20.88 | 21.34 | 21.66 | 22.41 | 23.40 | 24.81 | 25.66 | 26.00 | 25.88 | 24.92 | 22.54 | 20.13 | 18.13 | 17.25 | |
| CHAINAGE | −0+050 | 0+000 | 0+050 | 0+100 | 0+150 | 0+200 | 0+250 | 0+300 | 0+350 | 0+400 | 0+450 | 0+500 | 0+550 | 0+600 | 0+650 | 0+700 | 0+750 | 0+800 | 0+850 |

## SECTION THRU C-C

HORIZONTAL SCALE 1:1000
VERTICAL SCALE 1:1000
VERTICAL EXAGGERATION 10X




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| ELEVATION DIFFERENCE | | 0.00 | 0.00 | 0.00 | 1.10 | 3.92 | 4.87 | 5.23 | 4.72 | 4.28 | 4.03 | 3.85 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | |
| FINAL LANDFORM | | 21.03 | 20.99 | 20.99 | 22.09 | 24.90 | 25.86 | 26.69 | 27.33 | 27.84 | 28.32 | 28.41 | 24.52 | 26.12 | 28.24 | 29.80 | 30.56 | |
| EXISTING SURFACE | | 21.03 | 20.99 | 20.99 | 20.99 | 20.98 | 20.99 | 21.46 | 22.61 | 23.56 | 24.29 | 24.56 | 24.52 | 26.12 | 28.24 | 29.80 | 30.56 | |
| CHAINAGE | −0+050 | 0+000 | 0+050 | 0+100 | 0+150 | 0+200 | 0+250 | 0+300 | 0+350 | 0+400 | 0+450 | 0+500 | 0+550 | 0+600 | 0+650 | 0+700 | 0+750 | 0+800 | 0+850 |

## SECTION THRU D-D

HORIZONTAL SCALE 1:1000
VERTICAL SCALE 1:1000
VERTICAL EXAGGERATION 10X

| REVISION: | BY: | DATE: | DESCRIPTION: | APPROVED BY: |
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| A | DVC | 24/07/2026 | INITIAL CONCEPT | PJH |
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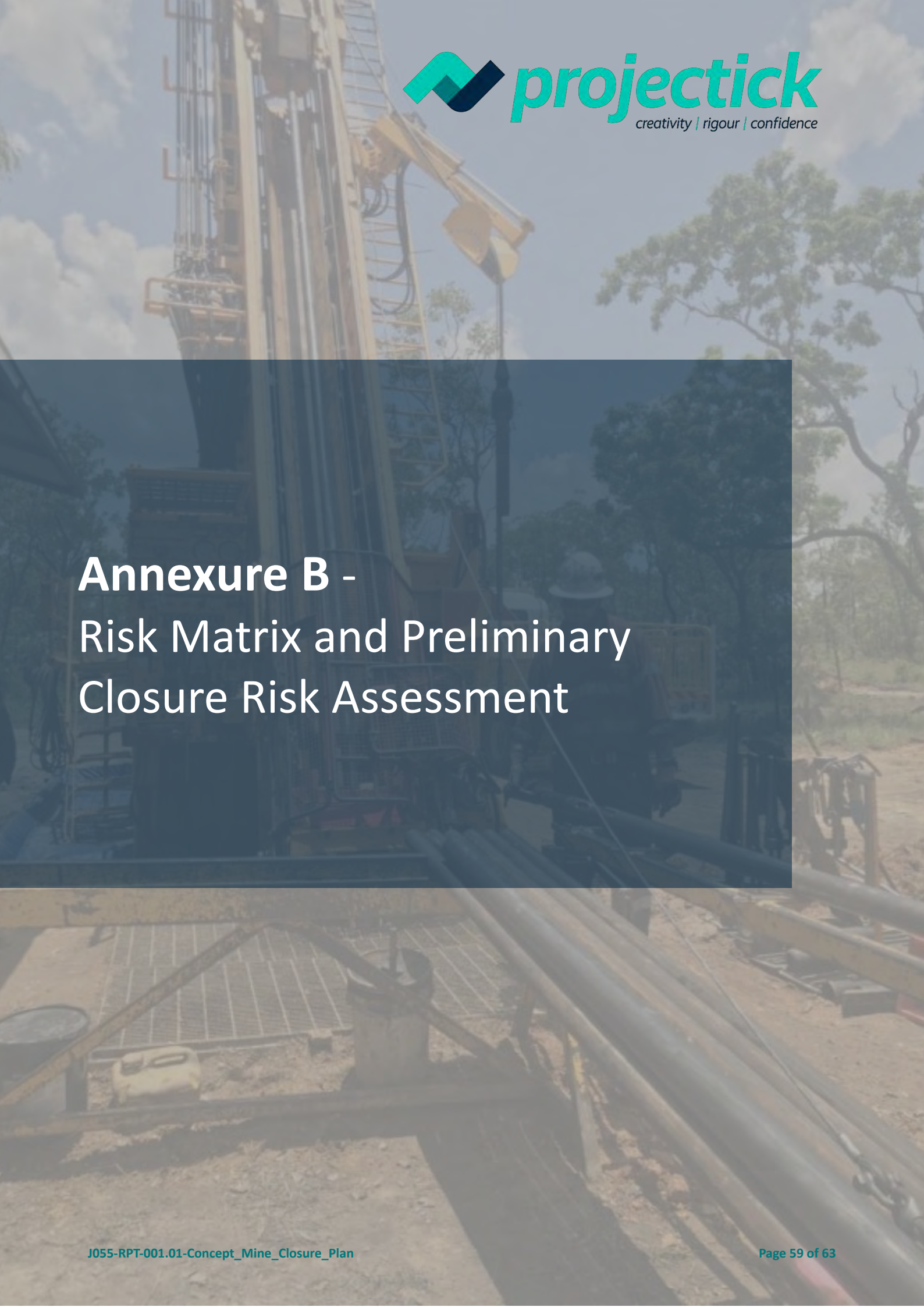
Lithium PLUS MINERALS

**PROJECT NAME:**

**LEI SURFACE INFRASTRUCTURE SCOPING STUDY**

DRAWING TITLE: FINAL LANDFORM CROSS SECTIONS

| SCALE: AS SHOWN | SHEET: A3 | DRAWING NO. : J055.000.00.DWG.005 | REVISION NO. : 0A |
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# Annexure B -
# Risk Matrix and Preliminary Closure Risk Assessment

This annexure presents the closure risk matrix and preliminary closure risk assessment used to support Section 8 of the Concept Mine Closure Plan. The assessment is preliminary and will be reviewed as project design, operational experience, monitoring outcomes and stakeholder input become available.

**RISK MATRIX**

| Likelihood of Risk | Consequence of Risk | | | | |
|---|---|---|---|---|---|
| | Insignificant | Minor | Moderate | Major | Catastrophic |
| **Almost Certain** | Medium | High | High | High | High |
| **Likely** | Low | Medium | High | High | High |
| **Possible** | Low | Medium | Medium | High | High |
| **Unlikely** | Low | Low | Medium | Medium | Medium |
| **Rare** | Low | Low | Low | Medium | Medium |

**PRELIMINARY CLOSURE RISK ASSESSMENT**

| Risk Event | Cause | Consequence | Initial Risk Classification | | | Risk Mitigation Treatment | Residual Risk Classification | | |
|---|---|---|---|---|---|---|---|---|---|
| | | | Likelihood | Consequence | Classification | | Likelihood | Consequence | Classification |
| Rehabilitation areas fail to establish sustainable vegetation cover | Poor soil quality, seasonal variability, weed competition, fire and unsuitable seed mix | Delayed achievement of closure objectives and completion criteria | Possible | Moderate | Medium | Use progressive rehabilitation, the cut-and-cover tunnel trial area, monitoring and adaptive management. Refine revegetation methods through trials, establish reference sites and update completion criteria using monitoring data. | Unlikely | Minor | Low |
| Excessive erosion or landform instability develops following closure | Inadequate drainage design, extreme rainfall events and vegetation failure | Landform degradation, sediment transport and increased maintenance requirements | Possible | Moderate | Medium | Apply closure-oriented landform design, drainage controls, monitoring and inspections. Complete erosion assessments, establish TARPs and manage RMAs where required. | Unlikely | Moderate | Medium |
| Surface water quality objectives are not achieved | Erosion, sediment mobilisation, contaminated runoff and ineffective water management infrastructure | Adverse impacts on downstream environmental values and delayed relinquishment | Possible | Moderate | Medium | Implement the Water Management Plan, progressive rehabilitation, water quality monitoring and drainage controls. Refine the closure water balance, validate post-closure drainage performance and implement closure-specific TARPs. | Unlikely | Moderate | Medium |
| Groundwater recovery differs from predictions | Hydrogeological uncertainty, unexpected inflows and groundwater rebound behaviour | Delayed closure, additional monitoring requirements and stakeholder concerns | Likely | Moderate | High | Continue groundwater monitoring, review hydrogeological assumptions and apply adaptive management. Develop and periodically update the post-closure groundwater model and recovery predictions. | Unlikely | Moderate | Medium |

| Risk Event | Cause | Consequence | Initial Risk Classification | | | Risk Mitigation Treatment | Residual Risk Classification | | |
|---|---|---|---|---|---|---|---|---|---|
| | | | Likelihood | Consequence | Classification | | Likelihood | Consequence | Classification |
| Residual underground voids create long-term stability concerns | Incomplete backfilling, geological uncertainty and unforeseen geotechnical behaviour | Subsidence, public safety risks and additional closure works | Possible | Moderate | Medium | Apply planned underground closure works, geotechnical assessment and closure planning reviews. Complete a detailed geotechnical assessment and define performance criteria for underground workings. | Unlikely | Moderate | Medium |
| Settlement occurs above the rehabilitated cut-and-cover tunnel | Differential compaction, groundwater changes and construction-related factors | Erosion, drainage issues and rehabilitation failure | Possible | Moderate | Medium | Progressive rehabilitation trials and monitoring of the rehabilitated tunnel area. Implement survey monitoring and take corrective action if significant subsidence occurs. | Unlikely | Minor | Low |
| Infrastructure decommissioning leaves contamination or residual liabilities | Historical spills, fuel storage, workshops and hazardous materials | Ongoing environmental liabilities and delayed relinquishment | Possible | Moderate | Medium | Decommission infrastructure and remediate contaminated areas where required. Complete contamination assessments, validation sampling and remediation planning before closure. | Unlikely | Minor | Low |
| Closure creates persistent standing water and mosquito breeding habitat | Poor drainage design, settlement and ineffective rehabilitation | Public nuisance, stakeholder concerns and additional maintenance requirements | Possible | Moderate | Medium | Design closure works to avoid persistent ponding and manage drainage. Include mosquito risk checks in final landform design and post-closure inspections, with corrective action where ponding occurs. | Unlikely | Minor | Low |
| Weed infestations compromise rehabilitation outcomes | Disturbance, inadequate weed control and extreme seasonal conditions | Reduced rehabilitation success and ecological performance | Possible | Moderate | Medium | Implement weed monitoring, weed control and adaptive management. Establish quantitative weed targets and compare results with reference sites. | Unlikely | Minor | Low |
| Closure outcomes do not align with agreed stakeholder expectations | Inadequate consultation, evolving stakeholder priorities and differing land-use expectations | Reputational impacts, regulatory delays and disagreement on closure outcomes | Possible | Moderate | Medium | Community and stakeholder engagement framework and ongoing consultation commitments. Maintain ongoing consultation and periodically review post-mining land use objectives. | Unlikely | Minor | Low |
| Traditional Owner cultural values and expectations are not adequately incorporated into closure planning | Insufficient engagement or changing cultural priorities | Delays to closure acceptance and dissatisfaction with closure outcomes | Possible | Moderate | Medium | Ongoing Traditional Owner engagement and consultation commitments. Continue collaborative review of closure objectives, land uses and completion criteria. | Unlikely | Moderate | Medium |
| Climate change and extreme weather reduce closure performance | Increased rainfall intensity, bushfires, prolonged dry periods and extreme weather | Increased erosion, vegetation failure and higher maintenance requirements | Likely | Moderate | High | Climate resilience principles incorporated into closure planning. Periodically review climate projections and update closure design assumptions. | Unlikely | Moderate | Medium |

| Risk Event | Cause | Consequence | Initial Risk Classification | | | Risk Mitigation Treatment | Residual Risk Classification | | |
|---|---|---|---|---|---|---|---|---|---|
| | | | Likelihood | Consequence | Classification | | Likelihood | Consequence | Classification |
| Closure cost estimates are insufficient to deliver the required closure outcomes | Underestimation of liabilities, design changes and regulatory changes | Increased financial liability and potential funding shortfall | Possible | Moderate | Medium | Review closure costs and financial assurance periodically. Update closure cost estimates annually and after significant project changes. | Unlikely | Moderate | Medium |
| Public safety hazards remain after closure | Incomplete sealing of underground access points, ventilation raises or other openings; ineffective access controls; or residual hazards not identified during closure verification | Unauthorised access, injury, regulatory non-compliance and delayed relinquishment | Possible | Major | High | Permanently close mine access points and secure underground openings. Complete closure designs for all openings, inspect residual hazards and verify that hazards have been removed or controlled. | Unlikely | Major | Medium |
| Final landform does not achieve free-draining design intent | Inadequate final landform design, poor drainage integration, settlement, erosion or blockage of drainage features | Ponding, erosion, sediment mobilisation, mosquito breeding habitat and additional maintenance requirements | Possible | Moderate | Medium | Design the final landform to be stable and free-draining. Validate drainage performance, inspect after significant rainfall and complete corrective works where required. | Unlikely | Moderate | Medium |
| Topsoil or growth media are insufficient or unsuitable for rehabilitation | Inadequate topsoil inventory, poor stripping or stockpile management, unsuitable soil chemistry, erosion of stockpiles or insufficient growth media availability | Reduced vegetation establishment, increased rehabilitation costs and delayed achievement of completion criteria | Possible | Major | High | Complete a topsoil inventory and quality assessment, protect stockpiles, identify supplementary growth media and update rehabilitation methods using trial results. | Unlikely | Moderate | Medium |
| Rehabilitation monitoring does not provide sufficient evidence for relinquishment | Insufficient baseline data, inadequate reference sites, poorly defined indicators, limited monitoring duration or incomplete monitoring records | Inability to demonstrate achievement of completion criteria, extended post-closure monitoring and delayed relinquishment | Possible | Moderate | Medium | Establish reference sites, define measurable indicators, maintain monitoring records and periodically review monitoring adequacy with regulators and stakeholders. | Unlikely | Moderate | Medium |
| Closure completion criteria are not sufficiently defined or agreed | Preliminary concept-level criteria, limited operational data, evolving regulatory expectations or unresolved stakeholder input | Uncertainty regarding closure success, regulatory delays and potential rework of closure strategies | Possible | Moderate | Medium | Refine completion criteria through monitoring, rehabilitation trials and stakeholder consultation. Develop SMART criteria, agree on indicators with regulators and stakeholders, and update the MCP as criteria mature. | Unlikely | Minor | Low |
| Water management infrastructure is not appropriately decommissioned or retained | Unclear closure function of dams, drains, pumps, pipelines or storages; stakeholder requests for retention; or inadequate decommissioning planning | Ongoing maintenance liability, water quality impacts, erosion, ponding or failure to satisfy closure objectives | Possible | Moderate | Medium | Confirm the closure function of each water management feature, assess retention risks, consult stakeholders and regulators, and document decommissioning or retention decisions. | Unlikely | Moderate | Medium |
| Cultural heritage values are not adequately protected during closure | Incomplete cultural heritage information, ineffective implementation of agreed protocols or insufficient consultation before closure works | Impacts to cultural heritage values, loss of stakeholder confidence, regulatory delays and additional management requirements | Possible | Major | High | Confirm cultural heritage requirements before closure works, maintain agreed protocols and document how cultural values are considered in closure decisions. | Unlikely | Major | Medium |

| Risk Event | Cause | Consequence | Initial Risk Classification | | | Risk Mitigation Treatment | Residual Risk Classification | | |
|---|---|---|---|---|---|---|---|---|---|
| | | | Likelihood | Consequence | Classification | | Likelihood | Consequence | Classification |
| Unplanned or early closure limits implementation of planned rehabilitation | Commodity market conditions, operational constraints, regulatory constraints, environmental incidents or other unforeseen events | Reduced opportunity for progressive rehabilitation, accelerated closure works, increased cost uncertainty and delayed closure outcomes | Possible | Major | High | Maintain closure readiness, update closure costs annually, preserve key environmental controls and consult regulators and stakeholders if early closure occurs. | Unlikely | Minor | Low |
| Post-mining land use is not agreed or proves impracticable | Evolving stakeholder expectations, land tenure constraints, ecological limitations or uncertainty regarding final land capability | Delayed agreement on closure outcomes, changes to completion criteria and potential additional closure works | Possible | Moderate | Medium | Continue consultation on post-mining land use, assess practicability against rehabilitation performance, and update completion criteria and closure strategies where required. | Unlikely | Minor | Low |
| Environmental records and spatial data are incomplete or unavailable at closure | Inadequate data management, incomplete monitoring records, loss of spatial datasets or poor documentation of rehabilitation and stakeholder commitments | Reduced ability to demonstrate closure performance, delayed regulatory acceptance and increased rework during relinquishment | Possible | Moderate | Medium | Maintain a closure evidence register, store key spatial and monitoring datasets, and periodically review records for completeness. | Unlikely | Moderate | Medium |