



**ENVIRONMENTAL EARTH
SCIENCES**
CONTAMINATION RESOLVED

INDEPENDENT ENVIRONMENTAL AUDIT, WOODLAWN MINE, NSW TARAGO OPERATIONS PTY LTD (HERON RESOURCES LIMITED)

20 AUGUST 2021

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VERSION 1.1



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Heron Resources Limited
Level 7, 191 Clarence Street
SYDNEY NSW 2000

Attention: **Zoe Read**
Environmental Officer

Independent Environmental Audit, Woodlawn Mine, NSW

Please find enclosed a copy of our report entitled as above. Thank you for the opportunity to undertake this work.

We appreciate your patience with the delays in issuing the report.

Should you have any queries, please do not hesitate to contact us on (03) 96871666.

For and on behalf of
Environmental Earth Sciences VIC

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1 INTRODUCTION

1.1 Background

Environmental Earth Sciences VIC was engaged by Tarago Operations Pty Ltd, a fully owned subsidiary of Heron Resources Limited (Heron), to conduct an Independent Environmental Audit (Audit) of its Woodlawn Mine, near Tarago, NSW. The Audit related to a review of environmental management practices as part of the construction phase of the mine, which began on 14 September 2017.

The purpose of the Audit was to satisfy:

- Condition 9 of Schedule 6 of the Project Approval (reference number 07_0143MOD2), which states:
 - Within one year of commencing construction of the project, and every three years thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project.
- NSW Environment Protection Authority (EPA) Environmental Protection Licence (EPL) Number 20821 (Licence Variation Notice Number: 1563873; dated: 7 May 2018); and
- Special Mining Lease 20 (SML 20).

1.2 Guidelines

The Audit was undertaken in accordance with the following auditing standards and guidance:

- AS/NZS ISO 19011 (2014), *Guidelines for auditing management systems*;
- NSW Department of Planning and Environment (DPE) (2015), *Independent Audit Guideline, Post-approval requirements for State Significant Developments, October 2015*, (DPE, 2015); and
- NSW Department of Planning and Environment (2018) *Independent Audit Post Approval Requirements* (DPE, 2018).

1.3 Audit team

The audit team comprised:

- Philip Mulvey – Lead Auditor and Senior Principal Scientist and Contaminated Land Auditor NSW and VIC.
- Geordie McMillan – Auditor and Principal / Certified Environmental Practitioner (Site Contamination) SC41089.
- Linda Lenihan – Auditor Assistant and Senior Environmental Scientist.

Specialist support provided by:

- Low Ecological Services: Dr Bill Low; and
- Mining One Pty Ltd: Mr Stephen Newman.

1.4 Audit objectives

The objective of the Independent Environmental Audit was to comply with Project Approval Schedule 6 Conditions 9 (Independent Environmental Audit) and 10 of the:

- Minister for Planning and Infrastructure, *Project Approval, Section 75J of the Environmental Planning and Assessment Act 1979, Woodlawn Mine Project* (Reference: 07_0143MOD2):

Within one year of commencing construction of the project, and every three years thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. The audit must:

- *be conducted by a suitably qualified, experienced and independent team of experts (including a mine site rehabilitation and water quality expert) whose appointment has been endorsed by the Secretary;*
- *include consultation with the relevant agencies;*
- *assess the environmental performance of the project and assess whether it is complying with the requirements in this approval and any relevant EPL or Mining Lease (including any assessment, plan or program required under these approvals);*
- *review the adequacy of strategies, plans or programs required under the abovementioned approvals; and*
- *recommend appropriate measures or actions to improve the environmental performance of the project, and/ or any assessment, plan or program required under the abovementioned approvals.*

Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Secretary.

Condition 10: Within six weeks of the completion of this audit, or as otherwise agreed by the Secretary, the Proponent shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.

1.5 Audit scope

To achieve the stated objectives, Environmental Earth Sciences undertook the following scope of works:

- Completion of the Audit by a team of suitably qualified team of experts with experience in mine site rehabilitation, mine construction, ecology, hydrogeology, geotechnical and landform stability, geochemistry and water quality;
- Submission of a document request to Heron requesting relevant regulatory approvals (compliance documentation) including, but not limited to, Construction Environmental Management Plans (CEMPs), Environmental Impact Assessments (EISs) and environmental monitoring results;
- Half day site inspection by relevant key Environmental Earth Sciences personnel to confirm details of the plans and approvals are being followed;
- Consultation with relevant persons from Heron and government agencies;
- Assess the environmental performance of the project and assess whether it is complying with the requirements in the Project Approval, EPL and Special Mining Lease (including any assessment, plan or program required under these approvals);
- Review the adequacy of strategies, plans or programs required under the abovementioned approvals;
- Recommend appropriate measures or actions to improve the environmental performance of the project, and/or any assessment, plant or program required under the abovementioned approvals; and
- Delivery of an Audit report detailing the results and recommendations of the Audit.

1.6 Audit period

The audit covers the period of 1 July 2017 to 30 June 2018, and considers the performance against the approved Mining Operations Plan and Project Approval 07_0143 MOD2.

2 AUDIT METHODOLOGY

2.1 Audit and assessment team

The audit and assessment process comprised the following members:

- Environmental Earth Sciences: Philip Mulvey, Geordie McMillan, and Linda Lenihan;
- Low Ecological Services: Dr Bill Low;
- Mining One Pty Ltd: Mr Stephen Newman.

2.2 Site interviews

The following personnel were either interviewed and/or were involved with communication throughout the duration of the audit and assessment process:

- Zoe Read – Heron Resources.

2.3 Site inspections

Site inspection and meeting associated with the audit was undertaken on 18 and 19 August 2018 by Philip Mulvey, Geordie McMillan, Stephen Newman (Mining One Pty Ltd), Dr Bill Low (Low Ecological Services) and Zoe Read (Heron Resources).

2.4 Community consultation

A Community Consultation Committee was set up in 2015 and included members of the local community and the local Council. During the 2018 to 2019 reporting period, there were four committee meetings. Community consultation meetings will continue to be held during operation of the site.

2.5 Compliance status descriptors

The findings from the Audit are assessed against the *Compliance Assessment Criteria* in DPE (2018) as detailed in **Table 1**.

Table 1: Compliance status descriptors

Status	Description
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not triggered	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

3 AUDIT RISK ASSESSMENT PROCESS

3.1 Purpose, objectives and scope of risk assessment

The audit risk assessment was undertaken to assess environmental risks associated with the Woodlawn operation, and based on data in the reporting period and observations made during the site inspection. The objectives of the risk assessment were to:

- identify environmental risks associated with the Woodlawn mining operation, which are considered significant in the opinion of the Independent Audit team; and

- evaluate whether environmental monitoring and assessment practices undertaken by Heron are adequate and appropriate to mitigate the risk of potential environmental impacts.

The scope of the risk assessment is intended to be in line with the scope of the technical audit report in that it focuses on issues that the Audit team considers to be of high-level risk. Lower level risk issues can be examined in subsequent Audit reports and regular engagement with regulators and stakeholders.

The focus of the risk assessment was consistent with the mine features of Table B (schedule 3.6), i.e.:

- Mine site (as a whole);
- Underground workings;
- Surface infrastructure;
- Waste rock dumps;
- Tailings dams;
- Evaporation dams;
- Rehabilitated slopes;
- Drainage lines;
- Revegetation area; and
- Community.

Scope of information input

Information was generally limited to the 2017-2018 reporting period; however observations made during the inspection and more recent information was also considered during the risk assessment, so the scope of the risk assessment comprised all information provided to the Auditor for this audit period.

Temporal and spatial scope of impacts

Both short-term and long-term potential environmental impacts were assessed. Similarly, the spatial scope of the risk assessment encompassed potential environmental impacts both within and outside the mining lease area.

3.2 Methodology

In general, the risk assessment was undertaken in accordance with the methodology advised within ISO 31000:2009 – *Risk Management Principals and Guidelines* (Standards Australia,

2009). Assumptions and exclusions as discussed in Section 1.5 apply to the risk assessment methodology.

3.3 Risk identification and analysis

Together with their own expert knowledge and experience, the Audit team used the following information resources to identify potential environmental risks:

- documentation provided by Heron;
- interviews with Heron personnel during site inspections.

Environmental risks were identified and systematically listed. Other aspects considered and recorded in the risk register include:

- potential duration of impact;
- location of impact;
- causes; and
- existing controls, monitoring or assessment undertaken.

3.4 Risk evaluation

Risk evaluation was conducted based on residual risk with known controls in place. Consequently, the risk rating derived is based upon the information sources provided to the Audit team.

Risk evaluation was undertaken through qualitative analysis, which was supported by data and other information provided by Heron. The risk associated with each potential impact was determined using a matrix of likelihood and potential consequence whereby:

$$\text{risk} = \text{consequence} + \text{likelihood}$$

‘Consequence’ was determined to be the reasonable maximum impact there may be on the environment if existing monitoring and assessment controls were inadequate or inappropriate. This consequence was considered regarding both the location and duration of the impact.

The reasonable consequence and likelihood of occurrence was considered for each impact in terms of the scales provided in the risk matrix and the results of the risk assessment are recorded in the risk register along with the risk matrix.

Table 2: Risk matrix

Consequence		Likelihood (regardless of potential time latency)				
		1	2	3	4	5
		Certain	Likely	Possible	Unlikely	Improbable
1	Catastrophic	2	3	4	5	6
2	Major	3	4	5	6	7
3	Moderate	4	5	6	7	8
4	Minor	5	6	7	8	9
5	Insignificant	6	7	8	9	10

Table 3: Risk rating explanations

Risk Matrix result	Risk Rating	Description
2 to 3	E	Extreme - Immediate intervention required to eliminate or reduce risk at a Senior Management/ Government level.
4 to 5	H	High Risk - It is essential to eliminate or reduce risk to a lower level by the introduction of monitoring and assessment measures implemented by senior management.
6 to 7	M	Moderate - Corrective action required, and monitoring and assessment responsibilities must be delegated.
8 to 10	L	Low Risk - Corrective action should be implemented where practicable, and risk should be managed by routine monitoring and assessment procedures.

Table 4: Key to risk register

Location of impact	
RI	Regional impact (>2km radius outside mining lease)
OM	Impact outside mine lease area - (<2km radius)
WM	Wide impact within mining lease boundaries

Location of impact	
L	Localised area within mining lease boundaries
P	Small point source within mining lease boundary
Potential Duration of impact	
G	Geological long term (>100 years)
L	Long term (30- 100)
M	Medium term (5-30 years)
S	Short term (1-5 years)
E	Ephemeral/seasonal impact

3.5 Outcomes of risk assessment

The thirteen (13) features of the site outlined in Section 3.1 were assessed for risk by the Audit team. No 'extreme' or 'low' risks were identified. These items are summarised below.

3.5.1 High risks

The Audit team identified four 'high' risk features, namely:

- Tailings dams;
 - Objective: All tailings contained within low permeability structures with no seepage to surrounding areas from tailings dams
 - Objective: Final landform and vegetation cover to be stable, self sustaining, free draining and consistent with surrounding rehabilitated areas.
- Evaporation dams; and
- Rehabilitated slopes.

The 'high' risk assigned to these features are considered to be predominantly from the legacy / brownfield nature of the Woodlawn operation. It is recommended these risk rankings are revisited during subsequent Audits, particularly as a function of tailings processing and progressive rehabilitation (i.e., semi-quantitative).

3.5.2 Moderate risks

The Audit team identified nine 'moderate' risk features, namely:

- Mine site (as a whole);
- Underground workings;
- Surface infrastructure;
- Waste rock dumps;
- Drainage lines;
- Revegetation area; and
- Community.

As this Audit was undertaken during the construction and commissioning phase of the Woodlawn operation, it is recommended that these risk rankings are revisited during subsequent Audits.

4 AUDIT FINDINGS

4.1 Documents reviewed

The documents reviewed as part of the Audit included:

- Coffey (2017), *Heron Resources Limited, South Tailings Dam Inspection Report, Tailings Storage Facilities at Woodlawn Mine, Tarago, NSW* (dated: 2 August 2017, reference: NTLGE201385AA).
- Coffey (2018), *Heron Resources Ltd, Woodlawn Project, Tarago, NSW, Construction Report Tailings Storage Facility 4 - Stage 1* (dated: 25 September 2018, reference: 754-NTLGE207895-AE Rev 0).
- Coffey (2019), *Heron Resources Ltd, Woodlawn Project, Tarago, NSW, Stage 1 TSF4 - Operation and Maintenance Manual* (dated: 11 January 2019 reference: 754-PERGE223510_TSF4 Ops Man Rev0).
- Douglas Partners (2018), *Woodlawn Dams Intermediate Surveillance Report 2018, Woodlawn Mine, Collector Road, Tarago, prepared for Heron Resources Limited* (dated: June 2018, reference: 89403.00. Rev 0,).
- Heron Resources Limited (2016), *Woodlawn Mine SML20, Annual Environmental Management Report July 2015 to June 2016* (dated: 31 August 2016).
- Heron Resources Limited (2017a), *Woodlawn Mine SML20, Annual Review July 2016 to June 2017* (dated: 1 September 2017).

- Heron Resources Limited (2017b), *Woodlawn Mine, SML20, Air Quality Management Plan* (dated: August 2017, reference: AQMP, Revision No. 8).
- Heron Resources Limited (2017c), *Woodlawn Mine, SML20, Noise and Blast Management Plan* (dated: April 2017, reference: NBMP, Revision No. 9).
- Heron Resources Limited (2017d), *Woodlawn Project, Blast Management Plan* (dated: April 2017, Revision 1).
- Heron Resources Limited (2017e), *Woodlawn Mine, SML20, Vegetation and Rehabilitation Management Plan* (dated: August 2017, reference: VRMP, Revision No. 8).
- Heron Resources Limited (2017f), *Woodlawn Mine, SML20, Water Management Plan* (dated: August 2017, reference: WMP, Revision No. 10).
- Heron Resources Limited (2017g), *Woodlawn Mine, SML20, Transport Management Plan* (dated: August 2017, reference: TMP, Revision No. 7).
- Heron Resources Limited (2017h), *Woodlawn Mine, SML20, Heritage Management Plan* (dated: August 2017, reference: HMP, Revision No. 6).
- Heron Resources Limited (2017i), *Woodlawn Mine, SML20, Pollution Incident Response Management Plan* (dated March 2017, reference: PIRMP, Revision No. 3).
- Heron Resources Limited (2018a), *Woodlawn Mine SML20, Annual Review July 2017 to June 2018* (dated: 31 August 2018).
- Heron Resources Limited (2018b), *Woodlawn Mine, SML20, Extraction Plan* (dated: April 2018, reference: Extraction Plan, Revision No. 5).
- Heron Resources Limited, Tarago Operations Pty Limited (2018c), *Woodlawn Mine, SML20, Paste Fill Management Plan* (dated: 9 August 2018, reference: PFMP Revision No. 3).
- Heron Resources Limited, Tarago Operations Pty Limited (2018d), *Woodlawn Mine, SML20, Waste Rock Management Plan* (reference: WRMP Revision No. 3; dated 9 August 2018).
- Heron Resources Limited (2019), *Woodlawn Zinc - Copper Project, Waste Rock Management Plan* (reference: TOP-SSE-MAN-0044 Revision No. 6; dated 19/07/2019).
- NSW Resources Regulator (2020), *Compliance audit program: Woodlawn Mine, Tarago Operations Pty Ltd* (dated: February 2020, revision RR20/1163).

4.2 Compliance performance

Appendix A – Table A, Table B and Table C lists the conditions imposed by the Project Approval and indicates the compliance status of each condition, along with recommendations for further information (where required).

4.3 Summary of agency notices, orders, penalty notices or prosecutions

DPE issued a \$15,000 Penalty Notice and two \$6,000 Penalty Notices to Heron in February 2020. The \$15,000 Penalty Notice was issued for the construction of the box cut (the entry point to the underground mine) and a waste rock storage area in locations which were not consistent with the development consent.

Two x \$6,000 Penalty Notices were issued to Heron for the construction of buildings on the site without having first obtained construction and occupation certificates as required under the *Environmental Planning and Assessment Act 1979*. Heron is currently consulting with the Department and local council to resolve the breaches.

([Penalty Notices issued to Heron Resources Limited - \(nsw.gov.au\)](#); accessed 23 December 2020).

4.4 Non-compliances

No non-compliances in relation to the review of documents listed in Section 3.1, but three non-compliances as a result of DPE audit undertaken in October 2017 and July 2018 (Heron Resources Limited (2018a)).

Three non-compliances were issued as a result of the DPE audit undertaken in October 2017 and July 2018 for the following conditions:

- Passive treatment system for Waste Rock Dump drainage;
- Construction certificates; and
- Vegetation Screening.

Appendix A – Table A and Table C detail the review of the Proposal Project and Annual Reviews, respectively.

A further audit conducted in November 2019 resulted in issuing of one non-compliance, five observations and two improvement suggestions:

- One non-compliance as onsite operations vary to the MOP.
- Five observations including:
 - Landscape function analysis baseline monitoring has not been undertaken.
 - Areas of erosion and vegetation failure.
 - Revise MOP and Waste Rock Management Plan (WRMP) for better management of potential acid forming material.
 - Rehabilitation strategy for Hickory's Paddock.
 - Regulator must be notified of breaches in operation of site.

- Two suggestions for improvement:
 - Further recording of site activities as per management plans detailed in Section 3.1: Document reviewed.
 - Improvements to recording and tracking system to ensure issues of concern are addressed.

For further details of the DEP audit, including Heron's response, refer to document:

- NSW Resources Regulator (2020), *Compliance audit program: Woodlawn Mine, Tarago Operations Pty Ltd* (dated: February 2020, revision RR20/1163).

4.5 Previous audit recommendations

From a review of previous audits, an improvement of recording keeping and reporting of issues including non-conformances is required.

Heron are to notify the DPE of any non-conformances and revise the SML and MOP and relevant management plans when changes to site conditions are needed.

Refer to Section 5 of Heron Resources Limited (2018a) for detailed review of actions required from reporting report July 2016 to June 2017.

4.6 Environmental management plans, subplans and post approval documents

Available environmental management plans (EMPs) as listed in Section 3.1: Documents reviews are reviewed against the Conditions of the Project Approval. Refer to **Appendix A Tables A – C** for a detailed review of each EMP and recommendations for further information.

4.7 Environmental management systems (EMS)

The Woodlawn operation does not have a standalone environmental management system (EMS); rather separate management plans have been prepared relating to project approval conditions in the MOP and EA.

4.8 Environmental performance

As mining operations are yet to commence, the review of environmental performance is limited to ongoing monitoring of dust and water monitoring completed onsite. Following a review of three consecutive Annual Reviews from July 2015 – June 2018, there are no exceedances above respective criteria for dust, noise, or water monitoring.

4.9 Complaints

On review of Annual Review reports (**Appendix A - Table C**) the following complaints were noted during the three-year reporting period:

- Two resident complaints and one information query for the year July 2015 – June 2016, however Heron Resources Limited (2018a) specifies four complaints for 2016.
 - Dead ewe in dam;
 - Noise from aero survey;
 - Light from drilling area; and
 - Noise.
- Two complaints were received during 2017 to 2018 reporting period
 - flying of a drone; and
 - dumping of rubbish on Currawang Road.
- One complaint received during 2018 to 2019 reporting period
 - Cracks in house 8 km from the site. A ground vibration monitoring event was undertaken and showed no impact to house and the resident was satisfied with report findings.

The above complaints are discussed in more details at the following Heron Resources web-site source: <https://www.heronresources.com.au/downloads/woodlawn/2019-11-30WoodlawnComplaintsRegister20190820.pdf> (accessed 23 December 2020).

4.10 Incidents

Following review of three Annual Reviews, there are incidents to report in relation to the following management conditions:

- Dust;
- Erosion and sedimentation control; and
- Surface water (creeks and dams).

4.11 Actual verses predicted environmental impacts

As mining operations are yet to commence, it is not feasible to comment on actual versus predicted environmental impacts.

4.12 Site interviews

Site interviews associated with the audit were undertaken on 18 and 19 August 2018 by Philip Mulvey, Georgie McMillan and Zoe Read of Heron.

4.13 Previous Annual Review or Compliance Report recommendations

Three annual environmental management reports were reviewed in accordance with *Schedule 6 Environmental Management, Reporting and Auditing* (Condition 4) of the Project Approval:

- Heron Resources Limited (2016), *Woodlawn Mine SML20, Annual Environmental Management Report July 2015 to June 2016* (dated 31 August 2016).
- Heron Resources Limited (2017a), *Woodlawn Mine SML20, Annual Review July 2016 to June 2017* (dated 1 September 2017).
- Heron Resources Limited (2018a), *Woodlawn Mine SML20, Annual Review July 2017 to June 2018* (dated 31 August 2018).

A detailed review of the documents is summarized in **Table C** in Appendix A, with the following observations:

- July 2015 – June 2016:
 - No mining operations occurred during the reporting period and works consisted of minor site improvements such as development of dewatering infrastructure for underground mine.
 - No exceedances were report for dust deposition and water monitoring.
 - An investigation into leakage from the evaporation dams commenced.
- July 2016 – June 2017:
 - Assessment of evaporation dam 1 (ED1) and ED2 was conducted by AECOM and the report concluded there is little evidence of offsite contamination.
 - Extraction Management Plan was prepared and issued to DPE for approval.
 - A methane management plan is being drafted.
- July 2017 – June 2018:
 - As detailed in Section 6.2.4 of Heron Resources Limited (2018a), a high-volume air sampler commenced in October 2017, however, there is a discrepancy between information in Table 6.7 and Graph 3. While Graph 3 shows two exceedances of total suspended particulates above 30 µg/m³, these exceedances are not listed on Table 6.7. Environmental Earth Sciences recommends clarifying the results.
 - Two blasting events occurred during the reporting period.
 - Construction works of tailing storage facility 4 (TSF4) resulted in no exceedances of dust deposition, erosion and sedimentation control, water or noise criteria.

- An Ecological Risk assessment was undertaken by Niche Environment and Heritage and concluded that ED2 is to be upgraded for better water control / seepage management.

4.14 Improvement opportunities

As per recommendations made by DEP audit:

- NSW Resources Regulator (2020), *Compliance audit program: Woodlawn Mine, Tarago Operations Pty Ltd* (dated: February 2020, revision RR20/1163):
 - Landscape function analysis baseline monitoring to be undertaken.
 - Areas of erosion and vegetation failure to be rehabilitated.
 - Revise MOP and WRMP for better management of potential acid forming material.
 - Rehabilitation strategy for Hickory's Paddock.
 - Regulator must be notified of breaches in operation of site.
 - Further recording of site activities as per management plans detailed in Section 3.1: Document reviewed.
 - Improvements to recording and tracking system to ensure issues of concern are addressed.

Due to the complexity of the Woodlawn wider operation (including bioreactor landfill, legacy mining impacts), the Auditor recommends separate independent surface water, groundwater, rehabilitation and closure monitoring and performance management reviews be undertaken every three (3) years to support the Independent Audit processes (i.e. MOP and approvals) for both facilities.

4.15 Key strengths

The Audit recommends continuing to present historical results in graphs as it provides an insight into the environmental performance of the site. The data and information sharing with Infigen and Veolia's bioreactor operation is an excellent feature given the complexity of the site and its history.

5 RECOMMENDATIONS

5.1 Non-compliances

No features were identified as being "non-compliant" for the Audit period. As the Woodlawn operation progresses from construction and commissioning to mining, subsequent Audits

should re-evaluate the risk ratings of features in conjunction with evaluation of compliance against project approval conditions.

5.2 Opportunities for improvement

As per recommendations made by DEP audit:

- NSW Resources Regulator (2020), *Compliance audit program: Woodlawn Mine, Tarago Operations Pty Ltd* (dated: February 2020, revision RR20/1163):
 - Landscape function analysis baseline monitoring to be undertaken.
 - Areas of erosion and vegetation failure to be rehabilitated.
 - Revise MOP and WRMP for better management of potential acid forming material.
 - Rehabilitation strategy for Hickory's Paddock.
 - Regulator must be notified of breaches in operation of site.
 - Further recording of site activities as per management plans detailed in Section 3.1: Document reviewed.
 - Improvements to recording and tracking system to ensure issues of concern are addressed.

Due to the complexity of the Woodlawn wider operation (including bioreactor landfill, legacy mining impacts), the Auditor recommends separate independent surface water, groundwater, rehabilitation and closure monitoring and performance management reviews be undertaken every three (3) years to support the Independent Audit processes (i.e. MOP and approvals) for both facilities.

6 CONCLUSION

Environmental Earth Sciences VIC was engaged by Heron Resource Limited (Heron) to conduct an Independent Environmental Audit (Audit) of its Woodlawn Mine, near Tarago, NSW.

Further information is required as per **Appendix A (Table A)**.

7 LIMITATIONS

This report has been prepared by Environmental Earth Sciences VIC ACN 109 404 024 in response to and subject to the following limitations:

1. The specific instructions received from Heron Resources Limited;
2. The specific scope of works set out in PO118113 issued by Environmental Earth Sciences VIC for and on behalf of Heron Resources Limited, is included in Section 3 (Scope of Work) of this report;
3. May not be relied upon by any third party not named in this report for any purpose except with the prior written consent of Environmental Earth Sciences VIC (which consent may or may not be given at the discretion of Environmental Earth Sciences VIC);
4. This report comprises the formal report, documentation sections, tables, figures and appendices as referred to in the index to this report and must not be released to any third party or copied in part without all the material included in this report for any reason;
5. The report only relates to the site referred to in the scope of works being located at Woodlawn Mine, near Tarago, NSW ("the site");
6. The report relates to the site as at the date of the report as conditions may change thereafter due to natural processes and/or site activities;
7. No warranty or guarantee is made in regard to any other use than as specified in the scope of works and only applies to the depth tested and reported in this report;
8. Our General Limitations set out at the back of the body of this report.

8 REFERENCES

AS/NZS ISO 19011 (2014), *Guidelines for auditing management systems*.

Coffey (2017), *Heron Resources Limited, South Tailings Dam Inspection Report, Tailings Storage Facilities at Woodlawn Mine, Tarago, NSW* (dated: 2 August 2017, reference: NTLGE201385AA).

Coffey (2018), *Heron Resources Ltd, Woodlawn Project, Tarago, NSW, Construction Report Tailings Storage Facility 4 - Stage 1* (dated: 25 September 2018, reference: 754-NTLGE207895-AE Rev 0).

Coffey (2019), *Heron Resources Ltd, Woodlawn Project, Tarago, NSW, Stage 1 TSF4 - Operation and Maintenance Manual* (dated: 11 January 2019 reference: 754-PERGE223510_TS F4 Ops Man Rev 0).

- Douglas Partners (2018), *Woodlawn Dams Intermediate Surveillance Report 2018, Woodlawn Mine, Collector Road, Tarago, prepared for Heron Resources Limited* (dated: June 2018, reference: 89403.00. Rev 0).
- Heron Resources Limited (2016), *Woodlawn Mine SML20, Annual Environmental Management Report July 2015 to June 2016* (dated: 31 August 2016).
- Heron Resources Limited (2017a), *Woodlawn Mine SML20, Annual Review July 2016 to June 2017* (dated: 1 September 2017).
- Heron Resources Limited (2017b), *Woodlawn Mine, SML20, Air Quality Management Plan* (dated: August 2017, reference: AQMP, Revision No. 8).
- Heron Resources Limited (2017c), *Woodlawn Mine, SML20, Noise and Blast Management Plan* (dated: April 2017, reference: NBMP, Revision No. 9).
- Heron Resources Limited (2017d), *Woodlawn Project, Blast Management Plan* (dated: April 2017, Revision 1).
- Heron Resources Limited (2017e), *Woodlawn Mine, SML20, Vegetation and Rehabilitation Management Plan* (dated: August 2017, reference: VRMP, Revision No. 8).
- Heron Resources Limited (2017f), *Woodlawn Mine, SML20, Water Management Plan* (dated: August 2017, reference: WMP, Revision No. 10).
- Heron Resources Limited (2017g), *Woodlawn Mine, SML20, Transport Management Plan* (dated: August 2017, reference: TMP, Revision No. 7).
- Heron Resources Limited (2017h), *Woodlawn Mine, SML20, Heritage Management Plan* (dated: August 2017, reference: HMP, Revision No. 6).
- Heron Resources Limited (2017i), *Woodlawn Mine, SML20, Pollution Incident Response Management Plan* (dated March 2017, reference: PIRMP, Revision No. 3).
- Heron Resources Limited (2018a), *Woodlawn Mine SML20, Annual Review July 2017 to June 2018* (dated: 31 August 2018).
- Heron Resources Limited (2018b), *Woodlawn Mine, SML20, Extraction Plan* (dated: April 2018, reference: Extraction Plan, Revision No. 5).
- Heron Resources Limited, Tarago Operations Pty Limited (2018c), *Woodlawn Mine, SML20, Paste Fill Management Plan* (dated: 9 August 2018, reference: PFMP Revision No. 3).
- Heron Resources Limited, Tarago Operations Pty Limited (2018d), *Woodlawn Mine, SML20, Waste Rock Management Plan* (reference: WRMP Revision No. 3; dated 9 August 2018).
- Heron Resources Limited (2019), *Woodlawn Zinc - Copper Project, Waste Rock Management Plan* (reference: TOP-SSE-MAN-0044 Revision No. 6; dated 19/07/2019).

NSW Resources Regulator (2020), *Compliance audit program: Woodlawn Mine, Tarago Operations Pty Ltd* (dated: February 2020, revision RR20/1163).

NSW Department of Planning and Environment (DPE) (2015), *Independent Audit Guideline, Post-approval requirements for State Significant Developments, October 2015*, (DPE, 2015); and

NSW Department of Planning and Environment (2018) *Independent Audit Post Approval Requirements* (DPE, 2018).

ENVIRONMENTAL EARTH SCIENCES GENERAL LIMITATIONS

Scope of services

The work presented in this report is Environmental Earth Sciences response to the specific scope of works requested by, planned with and approved by the client. It cannot be relied on by any other third party for any purpose except with our prior written consent. Client may distribute this report to other parties and in doing so warrants that the report is suitable for the purpose it was intended for. However, any party wishing to rely on this report should contact us to determine the suitability of this report for their specific purpose.

Data should not be separated from the report

A report is provided inclusive of all documentation sections, limitations, tables, figures and appendices and should not be provided or copied in part without all supporting documentation for any reason, because misinterpretation may occur.

Subsurface conditions change

Understanding an environmental study will reduce exposure to the risk of the presence of contaminated soil and or groundwater. However, contaminants may be present in areas that were not investigated, or may migrate to other areas. Analysis cannot cover every type of contaminant that could possibly be present. When combined with field observations, field measurements and professional judgement, this approach increases the probability of identifying contaminated soil and or groundwater. Under no circumstances can it be considered that these findings represent the actual condition of the site at all points.

Environmental studies identify actual sub-surface conditions only at those points where samples are taken, when they are taken. Actual conditions between sampling locations differ from those inferred because no professional, no matter how qualified, and no sub-surface exploration program, no matter how comprehensive, can reveal what is hidden below the ground surface. The actual interface between materials may be far more gradual or abrupt than an assessment indicates. Actual conditions in areas not sampled may differ from that predicted. Nothing can be done to prevent the unanticipated. However, steps can be taken to help minimize the impact. For this reason, site owners should retain our services.

Problems with interpretation by others

Advice and interpretation is provided on the basis that subsequent work will be undertaken by Environmental Earth Sciences VIC. This will identify variances, maintain consistency in how data is interpreted, conduct additional tests that may be necessary and recommend solutions to problems encountered on site. Other parties may misinterpret our work and we cannot be responsible for how the information in this report is used. If further data is collected or comes to light we reserve the right to alter their conclusions.

Obtain regulatory approval

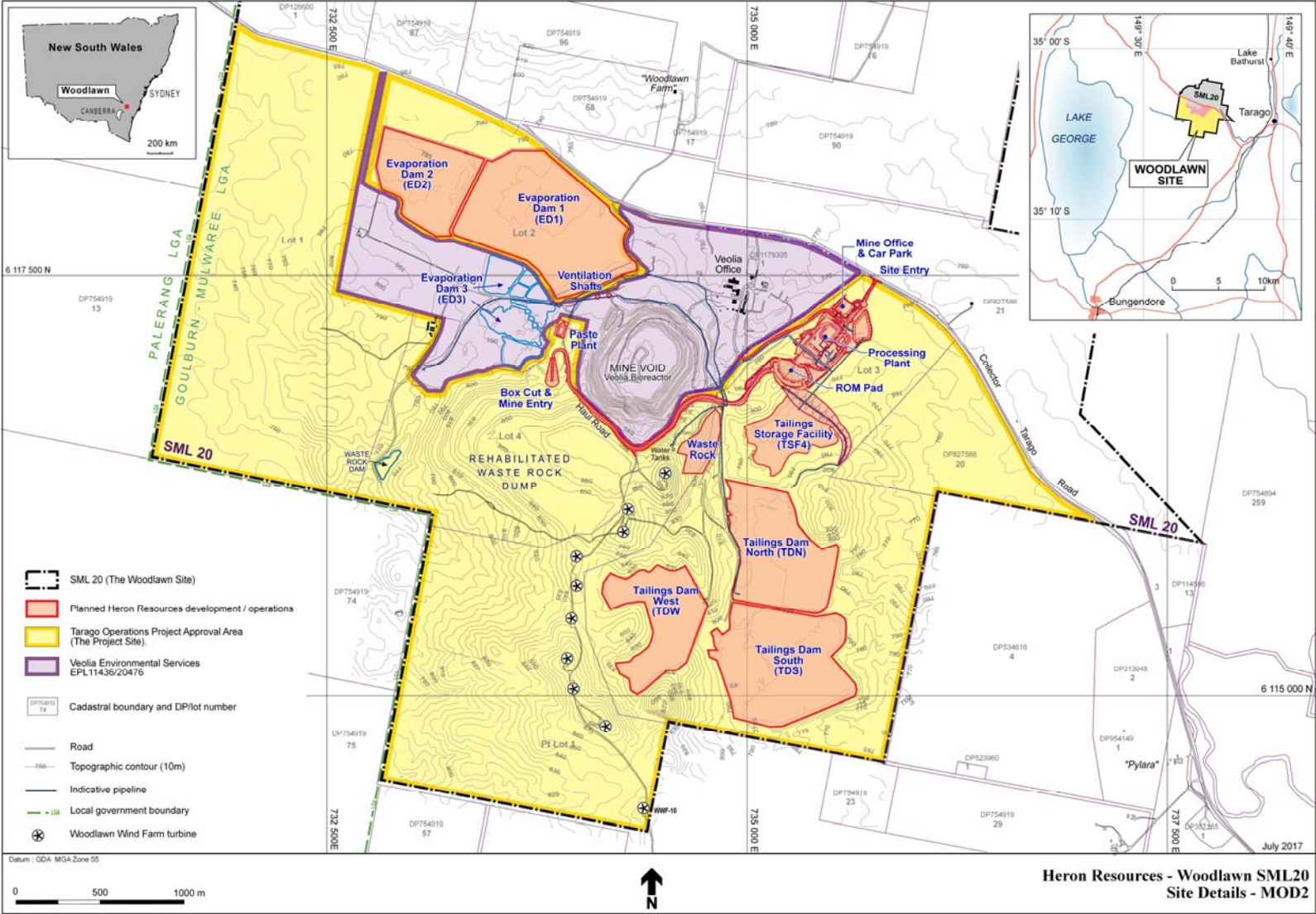
The investigation and remediation of contaminated sites is a field in which legislation and interpretation of legislation is changing rapidly. Our interpretation of the investigation findings should not be taken to be that of any other party. When approval from a statutory authority is required for a project, that approval should be directly sought by the client.

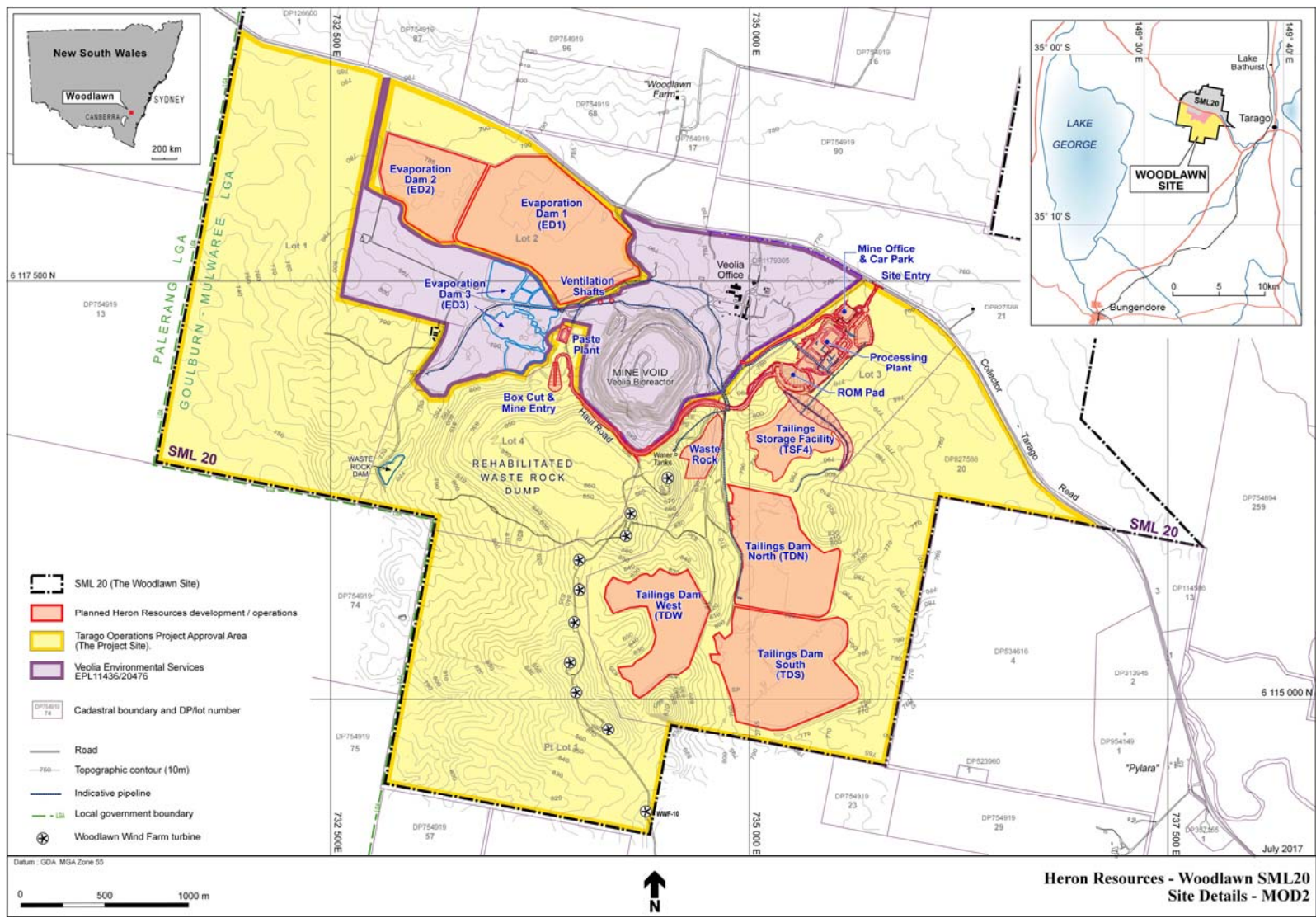
Limit of liability

This study has been carried out to a particular scope of works at a specified site and should not be used for any other purpose. This report is provided on the condition that Environmental Earth Sciences VIC disclaims all liability to any person or entity other than the client in respect of anything done or omitted to be done and of the consequence of anything done or omitted to be done by any such person in reliance, whether in whole or in part, on the contents of this report. Furthermore, Environmental Earth Sciences VIC disclaims all liability in respect of anything done or omitted to be done and of the consequence of anything done or omitted to be done by the client, or any such person in reliance, whether in whole or any part of the contents of this report of all matters not stated in the brief outlined in Environmental Earth Sciences VIC's proposal number and according to Environmental Earth Sciences general terms and conditions and special terms and conditions for contaminated sites.

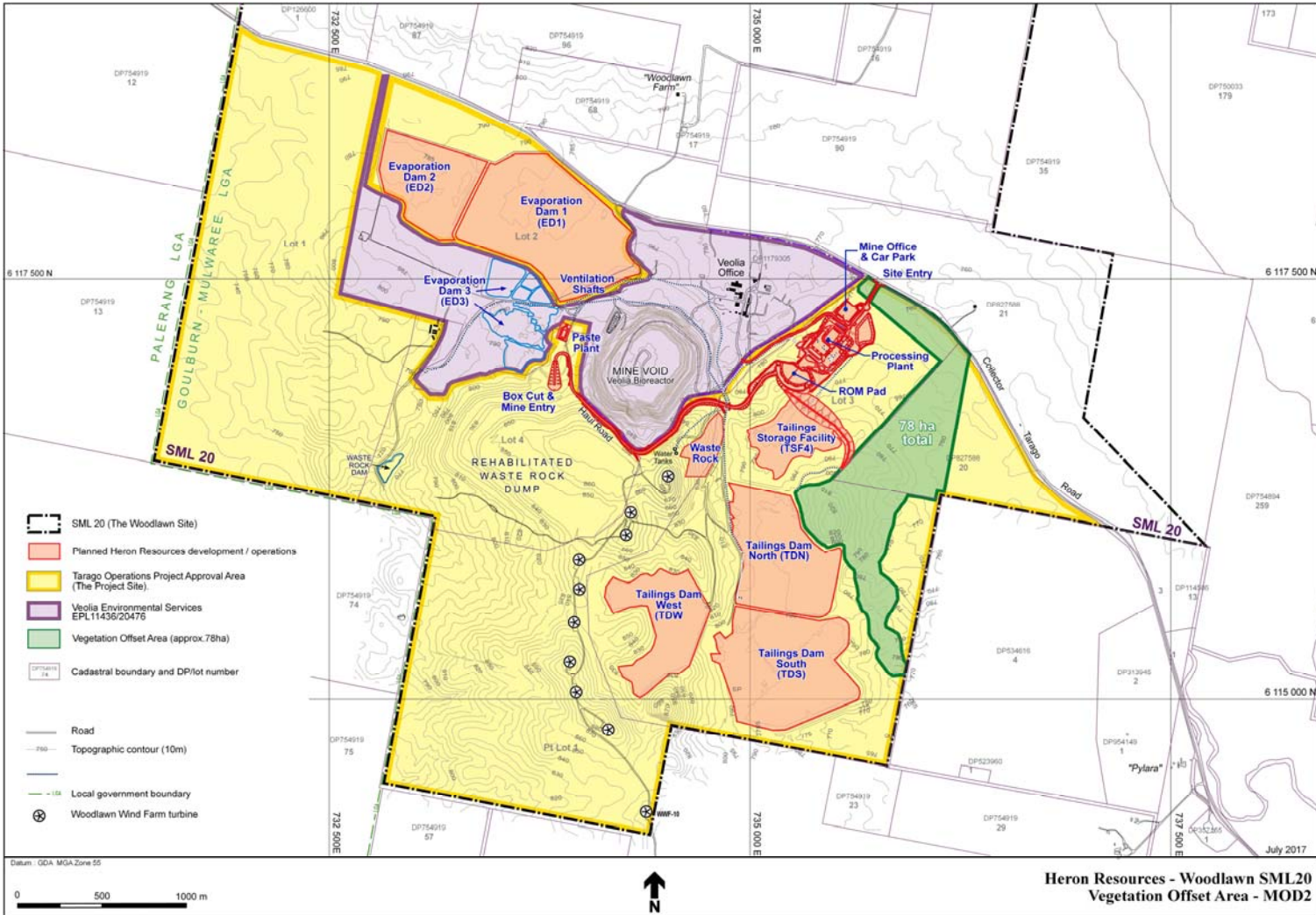
To the maximum extent permitted by law, we exclude all liability of whatever nature, whether in contract, tort or otherwise, for the acts, omissions or default, whether negligent or otherwise for any loss or damage whatsoever that may arise in any way in connection with the supply of services. Under circumstances where liability cannot be excluded, such liability is limited to the value of the purchased service.

APPENDIX 2 PROJECT LAYOUT

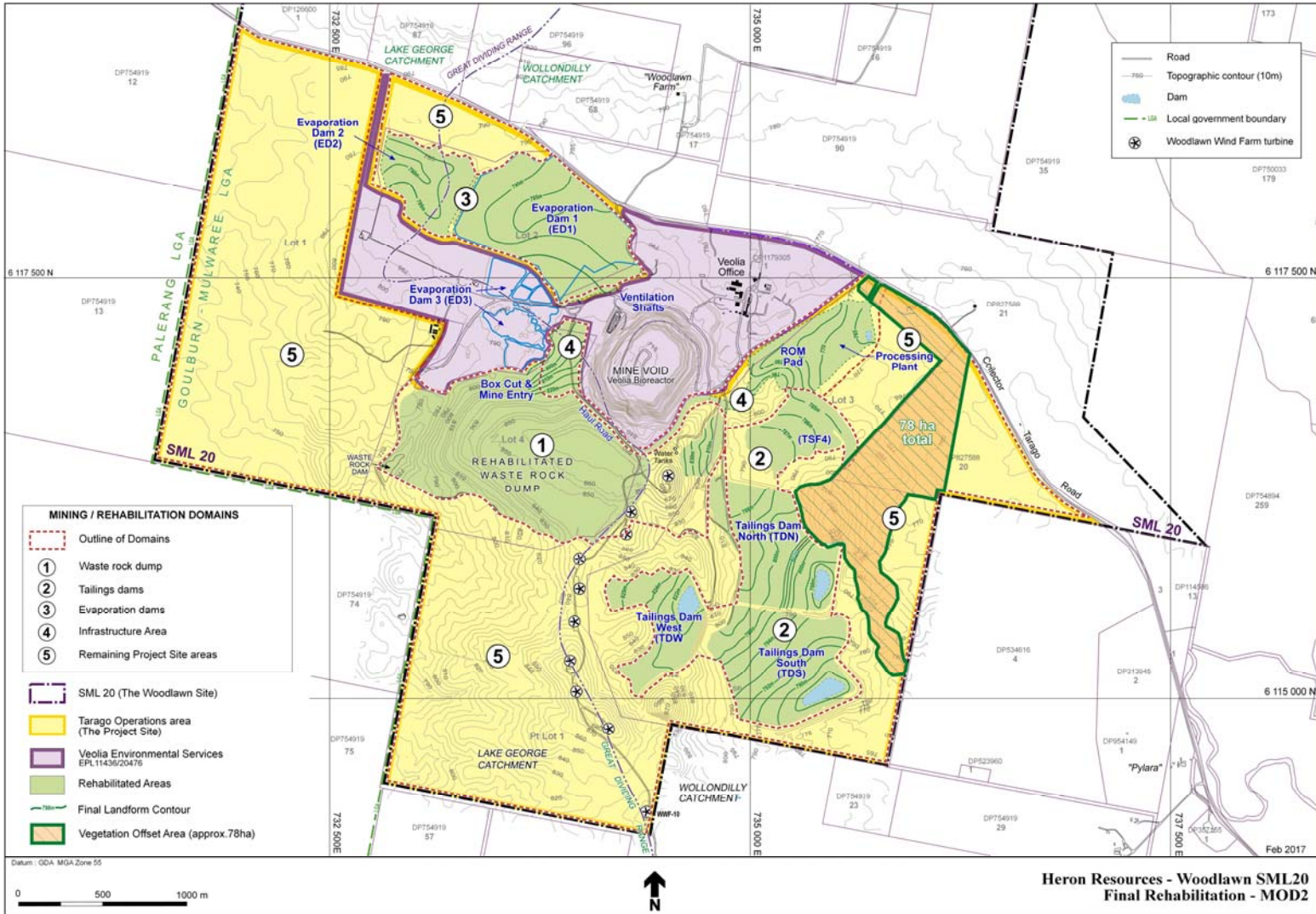




APPENDIX 3 REVEGETATION AREAS



APPENDIX 4 REHABILITATION PLAN



APPENDIX A: INDEPENDENT AUDIT TABLES

TABLE A - INDEPENDENT AUDIT

Approval (ID)	Number	Requirement	Evidence collected (Data/document author, date, title, reference number)	Compliance status	Independent Audit Comment & Recommendations	Proponent Response to Findings
Schedule 3 Environmental Performance Measures - TAILINGS DAMS Performance Measures	1	The Proponent shall ensure that the: (a) design of all tailings dams on the site is in accordance with the requirements of the Dam Safety Committee under the <i>Dams Safety Act 1978</i> ; (b) lining of the floor and walls of Tailings Storage Facility 4 (TSF4) achieves a permeability of no less than 1×10^{-9} m/s to a depth of at least 900 millimetres of clay (or equivalent) in accordance with the <i>EPA's Environmental Guidelines for Solid Waste Landfills</i> ; (c) material used to repair the facilities achieves a permeability of no less than 1×10^{-9} m/s to a depth of at least 900 millimetres of clay (or equivalent) if the floor and walls of Tailings Dams North, South and West require repairing; (d) capping of the tailings dams is generally consistent with the site capping requirements contained in the <i>EPA's Environmental Guidelines for Solid Waste Landfills</i> , and achieves a final landform that is safe, long term stable, and suitable for achieving the <i>Rehabilitation objectives</i> in Table 2 below;	(a) Chapter 4 of EA - Section 4.2.2 : Dams Safety Act 1978 - all dams are prescribed dams and require surveillance and protection. While Veolia have had responsibility for record keeping and ensuring safety of the dams, this will be the responsibility of TriAusmin will monitor and keep records to ensure compliance with <i>Dams Safety Act (1978)</i> ; (b) The clay was compacted in three x 0.3 metre (m) layers and tested by Douglas Partners and the average permeability within the basin was 6×10^{-10} m/s. Refer to Appendix D in the following report for individual results (ranging from 1×10^{-9} m/s to 4×10^{-11} m/s): <i>Coffey (2018), Heron Resources Ltd, Woodlawn Project, Tarago, NSW, Construction Report Tailings Storage Facility 4 - Stage 1</i> (dated 25 September 2018, reference: 754-NTLGE207895-AE Rev 0). (c) (d) AECOM undertook an assessment of ED1 and ED2 during 2016 - 2017 reporting period. Samples from existing linear material were found to be in accordance with the <i>EPA's Environmental Guidelines for Solid Waste Landfills</i> ; permeability specification (1×10^{-9} m/s) - reference: <i>Heron Resources Ltd, Woodlawn Mine SML20, Annual Review July 2016 to June 2017</i> (dated 1 September 2017). Refer to Rehabilitation objectives in Table B ;	Compliant	(a) Note update to <i>Dams Safety Act 2015 and NSW Department of Planning, Industry and Environment (2020), Dam Safety NSW, Guideline - Mining near declared dams. Future MOPs and relevant plans should be updated to reflect changes.</i> (c) Assessment to be completed following repairs when required and reported in Annual Review.	(a) Noted. MOP will be updated to reflect changes as required. (c) Noted
		(e) tailings and evaporation dams are maintained with a minimum freeboard of 600 mm or a minimum freeboard sufficient to accommodate a 1 in 100-year ARI, 72-hour rainfall event without overtopping at all times, whichever is greater;	(e) Stage 1 - Spillway Cutting Plan figure details: minimum "600 mm thick rip-rap rock armour over approved geotextile at spillway outlet" (Coffey (2018). Douglas Partners (2018), <i>Woodlawn Dams Intermediate Surveillance Report 2018, Woodlawn Mine, Collector Road, Tarago, prepared for Heron Resources Limited</i> (ref: 89403.00. Rev 0, dated June 2018) report details there is a 3 - 3.5 m freeboard on evaporation dam 1 (ED1), 1.5 m freeboard on west tailings dam (WTD). 4.8.2. Freeboard requirements <i>The TSF4 was designed to temporarily store rainfall and runoff (from within the TSF4 impoundment area and the natural catchment below the diversion drain) from a 1:1,000 AEP 72-hour storm event</i> Coffey (2019), <i>Heron Resources Ltd, Woodlawn Project, Tarago, NSW, Stage 1 TSF4 - Operation and Maintenance Manual</i> (dated 11 January 2019 reference: 754-PERGE223510_TS4 Ops Man Rev0).	Compliant	Compliant	Noted
		(f) the clean water diversion around Tailings Storage Facility 4 shall be designed, constructed and maintained to prevent the flood waters (up to the probable maximum flood level) from entering the facility; (g) source of seepage from Tailings Dam South (TDS) is identified and repaired within 3 years of commencing tailings reprocessing operations on the site; and (h) existing seepage collection area is lined with a low permeability geotextile membrane within 1 year of completing the repair work on Tailings Dams South, to the satisfaction of the Secretary. Alternative permeability and thickness standards for the lining and capping of tailings dams may be acceptable following completion of an appropriate risk assessment undertaken in accordance with the <i>Environmental Guidelines – Management of Tailings Storage Facilities</i> (VIC DPI, 2004) - or equivalent, with the written agreement of the Dam Safety Committee, EPA and the Secretary.	(f) 3.7 Spillway is located on the downstream side northeast of the facility (Coffey (2019)). Section 4.8.1 Surface water Runoff within the TSF4 will be only from incident rainfall. To reduce the rainfall and runoff from the natural upstream catchment, a diversion drain approximately 120m upstream of the eastern pipe bench is constructed. The TSF4 has been designed to temporarily store rainfall and runoff from within the TSF4 impoundment area and the natural catchment below the diversion drain, without embankment overtopping. (g) Coffey (2017), <i>Heron Resources Limited, South Tailings Dam Inspection Report, Tailings Storage Facilities at Woodlawn Mine, Tarago, NSW</i> (dated 2 August 2017 reference: NTLGE201385AA), undertook inspection of TDS and determined seepage was occurring through foundations and toe drains since the dam was commissioned and recommend a clay blanket or synthetic liner with clay liner. (h) To be completed.	Compliant	Ensure existing seepage collection area is lined with a low permeability geotextile membrane within 1 year of completing the repair work on Tailings Dams South, to the satisfaction of the Secretary.	

TABLE A - INDEPENDENT AUDIT

Approval (ID)	Number	Requirement	Evidence collected (Data/document author, date, title, reference number)	Compliance status	Independent Audit Comment & Recommendations	Proponent Response to Findings
Schedule 3 Environmental Performance Measures - Tailings Rehabilitation Strategy	2	The Proponent shall prepare and implement a Tailings Rehabilitation Strategy for the project to the satisfaction of the Secretary. The strategy must: (a) be prepared in consultation with Division of Resources and Geoscience within the Department of Planning and Environment (DRG); (b) be submitted to the Secretary for approval prior to commencement of construction on the site; (c) confirm there would be sufficient capping material to rehabilitate the tailings and evaporation dams; (d) confirm this material would be available in time for the progressive rehabilitation of the tailings and evaporation dams; (e) confirm that the physical characteristics of the capping material would be able to achieve the rehabilitation objectives for the tailings dams and the evaporation dams; (f) confirm the capping material would not result in any additional adverse environmental consequences; (g) confirm that manner in which the compost from the Veolia AWT is proposed to be used on the site is covered by a valid exemption issued by the EPA; and (h) include contingency measures to be implemented if the organic material proves to be unsuitable, including detailed plans of the location, nature and quantity of alternative rehabilitation material to be sourced from the site.	• <i>Heron Resources Limited (2017), Woodlawn Mine, SML20, Vegetation and Rehabilitation Management Plan</i> (dated August 2017, reference: VRMP, Revision No. 8): (a) and (b) issued to Department of Planning and Environment (DPE) on 12/09/2016. (c) If Veolia composting facility cannot provide sufficient organic material, non-acid forming (NAF) material currently stored onsite can be utilised. (d) As detailed in (c), there are two options for organic material and NAF is available onsite. (e) 4.1.2 Proposed Rehabilitation Methods, Multi-layer Rehabilitation Process using clay and crushed rock, covered with 300 - 500 mm of organic material from Veolia composting facility, covered with a further layer with a minimum of 100 mm crushed rock and repeat until there is a 2 m layer of organic material over the tailings. a 200 mm capping layer consisting of a combination of crushed rock and good quality compost. (f) (g) (h) see (c) above.	Compliant	Recommend that requirements: (f) confirm the capping material would not result in any additional adverse environmental consequences; and (g) confirm that manner in which the compost from the Veolia AWT is proposed to be used on the site is covered by a valid exemption issued by the EPA. are addressed and developed through progression of rehabilitation trials upon commencement of tailings reprocessing.	(f) Noted. Since Audit this matter has been overtaken by events as follows: EPA withdrew approval for used of MWOO. New criteria have been applied to production of new material called WOO. EPA RRO's & RRE's refer. Veolia are required to demonstrate compliance with new RRO/RRE and are to provide Heron with QA reports for ever 1000T of WOO provided. (g) Noted. The WOO trial has commenced with placement of material on trial plots. NEcessary EPA RRO/RREs exist for the trial to be conducted.

TABLE A - INDEPENDENT AUDIT

Approval (ID)	Number	Requirement	Evidence collected (Data/document author, date, title, reference number)	Compliance status	Independent Audit Comment & Recommendations	Proponent Response to Findings
Schedule 3 Environmental Performance Measures - UNDERGROUND MINING Performance Measures	3	The Proponent shall ensure that: (a) there is no measurable subsidence caused by underground mining beneath the Woodlawn Landfill, tailings dams, and evaporations dams on the site; (b) apart from the access decline, no underground mining is undertaken within 200 m of the perimeter of the Woodlawn Landfill; (c) remnant underground voids are long term stable to prevent subsidence; and (d) material used to backfill underground voids is physically and chemically stable and non-polluting.	• <i>Heron Resources Limited (2018), Woodlawn Mine, SML20, Extraction Plan</i> (dated April 2018, reference: Extraction Plan, Revision No. 5): - including Woodlawn Mine Subsidence Assessment (February 2018) prepared by Crosscut Consulting.	Compliant	Regular monitoring of geochemical and geotechnical characteristics of paste backfill should be undertaken in accordance with Paste Fill Management Plan.	Noted. QA/QC testing of pastefill in iaw PFMP is ongoing. No new paste has been placed since suspension of operations at Woodlawn in Mar 2020
Schedule 3 Environmental Performance Measures - Extraction Plan	4	The Proponent shall prepare and implement an Extraction Plan for all underground mining at the Woodlawn Mine, to the satisfaction of the Secretary. Each Extraction Plan must: (a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary; (b) be approved by the Secretary before the Proponent carries out any underground mining (including construction of the underground access decline) at the Woodlawn Mine that is covered by the Extraction Plan; (c) include detailed plans of existing and proposed underground workings and any associated surface development; (d) describe in detail the performance indicators and the actions that would be undertaken to ensure compliance with the performance measures in Condition 3 above, and manage or remediate any impacts and/or environmental consequences to meet the rehabilitation objectives in Condition 6 below; and (e) include a Subsidence Monitoring Program to assist with the management of the risks associated with subsidence, which validates the subsidence predictions, analyses the relationship between the predicted and resulting subsidence effects, and informs contingency planning and the adaptive management process in the underground workings.	• <i>Heron Resources Limited (2018), Woodlawn Mine, SML20, Extraction Plan</i> (dated April 2018, reference: Extraction Plan, Revision No. 5): (a) suitably qualified and experienced persons approved by DPE; (b) pending approval by the Secretary, issued to DPE on 07/05/2018; (c) Section 2 - Development of the Extraction Plan 2.2: Development of the mine plan. 3.2.1: Mine Plan - details key features of underground mine. 3.2.6: Extraction Methods Plan 2 - Extraction Plan Details (d) 4.3: Water Management Plan. 4.4: Land Management Plan. 4.5: Biodiversity Management Plan. 4.6: Heritage Management Plan. 4.7: Built Features Management Plan. 4.8: Public Safety Management Plan. 3.9: Trigger Action Response Plan. (e) 5 – Subsidence Monitoring Program - involving four GPS stations to monitor potential subsidence movement.	Compliant	Compliant	Noted
Schedule 3 Environmental Performance Measures Paste Fill	5	The Proponent shall commission a suitably qualified expert, whose appointment has been endorsed by the Secretary to: (a) carry out trials and testing to clarify the physical and leaching characteristics of the paste fill (b) prepare a program for the ongoing testing of the paste fill to ensure it meets the performance measures in Condition 3 above; and (c) prepare a report on the findings of trials and testing, and submit the report to the Secretary for approval prior to the commencement of underground mining operations on the site (excluding construction of the underground access decline).	• <i>Heron Resources Limited (2018), Woodlawn Mine, SML20, Paste Fill Management Plan</i> (dated July 2018, reference: PFMP, Revision No. 3): (a) 4 - Paste fill Testing and Analysis : initial testing completed by AMC Consultants in 2008 and between 2014 and 2016 by Outotec Consultants. (b) Section 5.1 - ongoing testing of paste fill to take place once the paste is produced by new processing plant. (c) 4 - Paste Fill Testing and Analysis pending approval by the Secretary, issued to DPE on 09/08/2018;	Compliant	Compliant	Noted. The PFMP was issued on 19 Jul 2019
Schedule 3 Environmental Performance Measures Rehabilitation Plan	6	The Proponent shall rehabilitate the site to the satisfaction of the Secretary. This rehabilitation must be generally consistent with the proposed rehabilitation plan described in the EA (and reproduced in Appendix 4), and comply with the rehabilitation objectives in Table 2.	Rehabilitation Plan issued to Department of Planning and Environment (DPE) on 12/09/2016: • <i>Heron Resources Limited (2017), Woodlawn Mine, SML20, Vegetation and Rehabilitation Management Plan</i> (dated August 2017, reference: VRMP, Revision No. 8). Refer to Rehabilitation objectives in Table B .	Compliant	Compliant	Noted
Schedule 4 Environmental Management Conditions - Water Supply	1	The Proponent shall ensure that it has sufficient water for all stages of the project, and if necessary, adjust the scale of mining operations to match its available water supply, to the satisfaction of the Secretary.	N/A	Not triggered		
Schedule 4 Environmental Management Conditions - Water discharges	2	Except as may be expressly provided by an EPL, the Proponent shall comply with Section 120 of the POEO Act during the carrying out of the project.	Section 120 of the POEO Act states it is an offense to pollute waters.	Compliant	Compliant	Noted. Heron also has a PIRMP for Woodlawn which is updated annually.

TABLE A - INDEPENDENT AUDIT

Approval (ID)	Number	Requirement	Evidence collected (Data/document author, date, title, reference number)	Compliance status	Independent Audit Comment & Recommendations	Proponent Response to Findings
Schedule 4 Environmental Management Conditions Existing Acid Drainage	3	Within 5 years of the date of this approval, the Proponent shall identify the passive system to treat seepage from the existing Waste Rock Dump in consultation with DRG, and implement the preferred system to the satisfaction of the Secretary	<i>Heron Resources Limited, Tarago Operations Pty Limited (2018d), Woodlawn Mine, SML20, Waste Rock Management Plan (reference: WRMP Revision No. 3; dated 9 August 2018). Section 3.3. Management of Existing and Historic Waste Rock Materials was submitted for approval.</i> <i>https://www.heronresources.com.au/downloads/woodlawn/2019-07-29-WoodlawnWasteRockManagementPlan.pdf</i> <i>Heron Resources Limited (2019), Woodlawn Zinc - Copper Project, Waste Rock Management Plan (reference: TOP-SSE-MAN-0044 Revision No. 6; dated 19/07/2019). Section 3.3. Management of Existing and Historic Waste Rock Materials was submitted for approval.</i>	Compliant	Monitoring of performance of passive water treatment system be reported as per MOPs and AEMR and independently reviewed on 3-year basis.	Noted. Woodlawn entered care and maintenance in Mar 2020. Consequently, identification of a passive treatment system has been delayed. Performance reports/reviews will be implemented after installation of the PTS.
Schedule 4 Environmental Management Conditions Water Management Plan	4	The Proponent shall prepare and implement a Water Management Plan for the project to the satisfaction of the Secretary. This plan must be prepared in consultation with EPA, DPI - Water, Water NSW, Infigen Energy and Veolia, by suitably qualified and experienced persons whose appointment has been approved by the Secretary, and submitted to the Secretary for approval prior to the commencement of mining operations under this approval. This plan must include: (a) a Site Water Balance that includes details of: • sources of water supply; • water use on site, including any potable water use; • water transfers to/from the site; and • any off-site water discharges; (b) a Surface Water Management Plan, which includes: • baseline data on surface water flow and quality in natural waterbodies that could be affected by the project; • a detailed description of the surface water management system on the site, including the: - clean water diversions; - erosion and sediment controls; - water storage structures; and - tailings and evaporation dams;	• <i>Heron Resources Limited (2017), Woodlawn Mine, SML20, Water Management Plan</i> (dated August 2017, reference: WMP, Revision No. 10): This plan was issued to EPA, DPI - Water, Water NSW, Infigen Energy and Veolia on 26/05/2016, and approved by the Secretary by 11/05/2017. This plan includes: (a) 2. Site Water Balance that includes details of: • 2.1: Sources of Water Supply; • 2.2: Water Usage on Site, potable water usage will be approximately 3,500 litres per day (L/d); and • 2.4: Water Discharges; (b) 3. Surface Water Management Plan • 3.1 Baseline Surface Water Data refer to Table 3.2 and Table 3.3 for historic surface water results from 2000 to 2016. • 3.2 Description of Surface Water Management System, includes • 3.2.1: Clean Water Diversions; • 3.4: Erosion and Sediment Controls; • 3.2.2: Water Storage Structures; and • 3.2.4 Existing Tailings Dams • 3.2.5 New Tailings Dam • 3.2.6 Evaporation Dams	Compliant	Monitoring of performance of site water treatment system be reported as per MOPs and AEMR and independently audited as per Department requirements. This should include peer review of OPSIM, GoldSIM or similar water models and evaluation against industry best practice and regulatory requirements.	Noted. Water treatment system was decommissioned after Woodlawn entered care and Maintenance in Mar 2020. Alternate water management options are being designed in preparation for a future restart. A site water balance has been prepared for restart.
		c) design objectives and performance criteria for the following: - the surface water management system; - tailings and evaporation dams; and - waterbodies that could be affected by the project; • a program to monitor: - the effectiveness of the water management system; - surface water flows, quality, and impacts on other water users; - potential acid rock drainage from the waste rock dumps; - potential seepage from tailings and evaporation dams; and - post-closure water quality;	3.3: Design Objectives • 5.1 Environmental Monitoring • the effectiveness of the water management system - monitoring will include weekly inspections of pollution control facilities without extra inspections following rainfall events. Monthly sampling of pollution control pond and installation of additional groundwater wells • potential acid rock drainage from the waste rock dumps: 3.6 Managing Acid Forming Materials;	Compliant	As above	Noted.

TABLE A - INDEPENDENT AUDIT

Approval (ID)	Number	Requirement	Evidence collected (Data/document author, date, title, reference number)	Compliance status	Independent Audit Comment & Recommendations	Proponent Response to Findings
		(d) a Groundwater Management Plan, which includes: • baseline data of all groundwater levels, yield and quality of any privately-owned groundwater bores that could be affected by the project; • groundwater assessment criteria; • definition of areas of existing groundwater contamination; • a program to monitor: - existing groundwater contamination identified on the site; - impacts on the groundwater supply of potentially affected landowners; - the volume of groundwater inflow into the underground workings; - regional groundwater levels and quality in potentially affected aquifers; - potential groundwater quality impacts from paste fill operations; - potential acid rock drainage; - potential seepage from tailings and evaporation dams; and - the effectiveness of the seepage collection, treatment and storage system associated with the tailings dams, waste rock dumps, evaporation dams and all other water storages that receive contaminated or salt-laden water; • reporting procedures for the results of the monitoring program;	(d) Heron Resources Limited (2017), <i>Woodlawn Mine, SML20, Water Management Plan</i> (dated August 2017, reference: WMP, Revision No. 10): • 4.2 Baseline Groundwater Data: <i>a network of over 50 monitoring bores and piezometers. Graphs plotted with water data from 1995 to 2016 demonstrate the site is not causing contamination to offsite receptors.</i> • 5.2 Trigger Action Response Plan: <i>An appropriate trigger set-point, referred to as the assessment criteria, would be the development of trends which would indicate that the changes are not related to natural variability. For each of the listed background sites, the water quality trigger is therefore a change of greater than 20% in each water quality parameter measured over sequential quarterly periods during any 12 month period.</i> 4.5.3.: Water Chemistry: <i>All monitoring will be conducted in accordance with Murray Darling Basin Groundwater Quality sampling Guidelines, August 1997, National Environment Protection (Assessment of Site Contamination) Measure (NEPM) or Australian and New Zealand Environment and Conservation Council (ANZECC) guidelines or the latest equivalent.</i> • 5.1 Environmental Monitoring: <i>There has been some concerns about potential leakage from ED1, however monitoring results do not show an increase in metal concentration or conductivity or reduced pH.</i>	Compliant	Compliant	Noted. Monitoring is ongoing. ED1 is subject to separate criteria under Veolia's consent and EPL.

TABLE A - INDEPENDENT AUDIT

Approval (ID)	Number	Requirement	Evidence collected (Data/document author, date, title, reference number)	Compliance status	Independent Audit Comment & Recommendations	Proponent Response to Findings
		(d) a Groundwater Management Plan, which includes: • baseline data of all groundwater levels, yield and quality of any privately-owned groundwater bores that could be affected by the project; • groundwater assessment criteria; • definition of areas of existing groundwater contamination; • a program to monitor: - existing groundwater contamination identified on the site; - impacts on the groundwater supply of potentially affected landowners; - the volume of groundwater inflow into the underground workings; - regional groundwater levels and quality in potentially affected aquifers; - potential groundwater quality impacts from paste fill operations; - potential acid rock drainage; - potential seepage from tailings and evaporation dams; and - the effectiveness of the seepage collection, treatment and storage system associated with the tailings dams, waste rock dumps, evaporation dams and all other water storages that receive contaminated or salt-laden water; • reporting procedures for the results of the monitoring program;	• 4.5 Groundwater Monitoring of 4.5.1 water levels, 4.5.2 mine water pumping, 4.5.3 water chemistry and 4.5.4 rainfall. • impacts on the groundwater supply of potentially affected landowners; • 4.1 Background: small inflows to the pit of 1 – 2 L/sec. • 4.3.1 Construction Phase Groundwater Management: groundwater to be contained within the mine with low risk of impacting regional aquifers. • potential groundwater quality impacts from paste fill operations refer to 4.4 Management of Paste Fill. • potential acid rock drainage refer to 3.6: Managing Acid Forming Materials. • Refer to 5.1 Environmental Monitoring: The existing monitoring program includes a number of monitoring bores around surface water storages and other bores which are designed to monitor seepage from the Rehabilitated Waste Rock Dump and associated seepage collection dam. • 5.1 Environmental Monitoring: <i>the effectiveness of the monitoring program will be reviewed annually to ensure it captures sufficient data to determine the potential for seepage from structures, acid drainage from rock dumps and the potential for off site impacts .</i> • 4.5.5: Reporting: reporting procedures - results will be reported to DPE and reported on the Heron website and included in the Annual Review of the site.	Compliant	Compliant	Noted
		(e) a Surface and Groundwater Response Plan that includes: • trigger levels for investigating any potential adverse surface water and groundwater impacts of the project, including but not limited to seepage of contaminated water from the tailings dams, waste rock dumps, evaporation dams and the Woodlawn Landfill; • a protocol for the investigation, notification and mitigation of existing groundwater contamination on the site and any exceedances of the surface water and groundwater assessment criteria; • measures to mitigate and/or compensate potentially affected landowners (including compensatory water supply if required); • the procedures that would be followed to determine any appropriate action to be taken to mitigate or offset any surface or groundwater impacts caused by the project that constitute material harm to the environment. Note: The effectiveness of the Water Management Plan is to be reviewed and audited in accordance with the requirements in Schedule 6. Following this review and audit the plan is to be revised to ensure it remains up to date (see Condition 5 of Schedule 6).	(e) 3.9 Surface Water Trigger Action Response Plan 4.6 Groundwater Trigger Action Response Plan 5.2 Trigger Action Response Plan • for trigger levels refer to Table 5.1 - Trigger Action Response Plan; • 5.3 Response to Monitoring Triggers: for the investigation, notification and mitigation of existing groundwater contamination. • 4.3.1 Construction Phase Groundwater Management: <i>Mitigation and management measures will include:</i> • <i>provision of oil/water separators;</i> • <i>bunding around the maintenance areas;</i> • <i>bunding of washdown areas;</i> • <i>waste collection facilities; and</i> • <i>spill response strategies.</i> • 5.2 Trigger Action Response Plan	Compliant once measures to mitigate and/or compensate potentially affected landowners (including compensatory water supply if required), is addressed.	No discussion on compensating potentially affected landowners (including compensatory water supply if required). Audit Team understands data sharing undertaken with Veolia Bioreactor facility, including surface and groundwater monitoring. Understood TARPs for surface water and groundwater developed over time with DPI and relevant authorities. Due to scale and complexity of Woodlawn facility (mine and landfill), Auditor recommends separate independent surface water and groundwater monitoring and performance management reviews undertaken every three (3) years to support Independent Audit processes (i.e. DA and approvals) for both facilities.	(i) Rational for this? Woodlawn is a no-discharge site. No evidence of off-site contamination caused by the mining operaiton. Is this a standard contingency requirement? (ii) Noted. Responsibility for different monitoring ponts now clearly delineated in respective Heron & Veolia EPLs. Heron or successor will arrange appropriate triennial reviews.

TABLE A - INDEPENDENT AUDIT

Approval (ID)	Number	Requirement	Evidence collected (Data/document author, date, title, reference number)	Compliance status	Independent Audit Comment & Recommendations	Proponent Response to Findings
Water Management Performance Measures	4A	The Proponent shall comply with the performance measures to the satisfaction of the Secretary. - Erosion and Sediment - General Design, install and maintain erosion and sediment controls generally in accordance with the series Managing Urban Stormwater: Soils and Construction – Volume 1 and Volume 2E Mines and Quarries - Paste Fill Plant Design, install and maintain the paste fill plant to minimise potential for uncontrolled flows of tailings, materials, chemicals or waters (including but not limited to bunding of the tailings storage tanks) in accordance with the relevant Australian Standards.	Erosion and Sediment - General 3.3 Design Objectives of <i>Heron Resources Limited (2017), Woodlawn Mine, SML20, Water Management Plan</i> (dated August 2017, reference: WMP, Revision No. 10): details that the design, installation and maintenance of erosion and sediment controls will be in accordance with the series Managing Urban Stormwater: <i>Soils and Construction – Volume 1 and Volume 2E Mines and Quarries</i>. 3.4 Erosion and Sedimentation Control: Sediment controls will also adhere to <i>“Managing Urban Stormwater: Soils and Construction – 4th Edition”, Landcom 2004 (Blue Book)</i>. • <i>Heron Resources Limited (2017), Woodlawn Mine, SML20, Paste Fill Management Plan (dated August 2018, Revision No. 3):</i> - Paste Fill Plant 3.2 Description of Surface Water Management System: <i>Runoff from the Paste Fill Plant will be contained in a separate bund while the new box cut and surrounding area will be contained in surface drains which discharge into ED1. The Paste Fill Plant bunding will be designed to contain uncontrolled flows of tailings materials, chemicals or waters (including but not limited to bunding of the tailings storage tanks).</i>	Not triggered	Under construction. Post-construction monitoring and performance management subject to next Independent Audit.	Noted.

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Approval (ID)	Number	Requirement	Evidence collected (Data/document author, date, title, reference number)	Compliance status	Independent Audit Comment & Recommendations	Proponent Response to Findings
Schedule 4 Environmental Management Condition Noise Criteria	5	The Proponent shall ensure that the noise generated by the project does not exceed the following criteria at any residence on privately-owned land. • All residential receivers - Day/Evening 35 (LAeq(15-minute)) • All residential receivers - Night (LA1(max)) 45 • Note: After the first review of any EPL granted for this project under Section 78 of the POEO Act, nothing in this approval prevents the EPA from imposing stricter noise limits on the mining operations on site under the EPL. • Appendix 6 sets out the meteorological conditions under which these criteria apply, and the requirements for evaluating compliance with these criteria. • However, these criteria do not apply if the Proponent has an agreement with the relevant owner(s) to exceed the criteria, and the Proponent has advised the Department in writing of the terms of this agreement.	• Heron Resources Limited (2017), Woodlawn Mine, SML20, Noise and Blast Management Plan (dated April 2017, reference: NBMP, Revision No. 9): • 2.1 Noise Assessment Criteria • Specifically that monthly attended noise monitoring be undertaken and unless otherwise approved by DPE, all monitoring is to be conducted in accordance with the NSW Industrial Noise Policy relating to: • monitoring locations for the collection of representative noise data; • meteorological conditions during which collection of noise data is not appropriate; • equipment used to collect noise data, and conformity with Australian Standards relevant to such equipment; and • modifications to noise data collected, including for the exclusion of extraneous noise and/or penalties for modifying factors apart from adjustments for duration .	Compliant	Compliant	Noted
Schedule 4 Environmental Management Condition Operating Conditions	6	The Proponent shall implement best management practice, including all reasonable and feasible noise mitigation measures, to minimise the construction, operational, low frequency and road noise from the project, to the satisfaction of the Secretary.	• Heron Resources Limited (2017), Woodlawn Mine, SML20, Noise and Blast Management Plan (dated April 2017, reference: NBMP, Revision No. 9): • 2.1 Noise Assessment Criteria: Tarago Operations shall implement best management practice, including all reasonable and feasible noise mitigation measures, to minimise the construction, operational, low frequency and road noise from the project.	Compliant	Compliant	Noted
Schedule 4 Environmental Management Condition Noise Management Plan	7	7. The Proponent shall prepare and implement a Noise Management Plan for the project to the satisfaction of the Secretary. The plan must: (a) be prepared in consultation with the EPA, and submitted to the Secretary for approval prior to commencing construction on the site; (b) describe the measures that would be implemented to minimise noise generated by the project, including road noise at the St Andrews Anglican Church; (c) include a monitoring program that: • uses attended monitoring to evaluate the performance of the project; • includes a protocol for determining exceedances of the criteria identified in Table 3; • evaluates and reports on the effectiveness of the noise management system on site; and (d) describe how noise management and monitoring on the site would be integrated with the Woodlawn Landfill.	• Heron Resources Limited (2017), Woodlawn Mine, SML20, Noise and Blast Management Plan (dated April 2017, reference: NBMP, Revision No. 9): (a) prepared in consultation with Julian Thompson and Michael Heinz from the EPA and submitted to the Secretary for approval and approved following comments from DPE on 01/05/2017; (b) 3.1: Noise Management Initiatives - noise mitigation measures include: weekly noise checks of plant and equipment, monthly attended monitoring at Pylara. 1.5: Project Approval Requirements Tarago Operations would consult with representatives from the St Andrews Anglican Church (Tarago) to further investigate potential noise impacts from Project operational traffic and explore reasonable and feasible mitigation measures, in consultation with the Church . (c) 5.1: Attended Noise Monitoring • 5.2: Action Trigger Levels • 5.3: Reporting Procedures (d) 3.3 Integration with Veolia Operations: The key receptor for Heron's operation is the Pylara Homestead which is owned by Veolia. The monitoring program for noise includes the Pylara Homestead but in the spirit of the Cooperation Agreement, Heron will endeavour to meet the required noise criteria at this location.	Compliant	Compliant	Noted

Approval (ID)	Number	Requirement	Evidence collected (Data/document author, date, title, reference number)	Compliance status	Independent Audit Comment & Recommendations	Proponent Response to Findings
Schedule 4 Environmental Management Condition BLASTING Blasting Frequency Operating Conditions	8 to 11	Blasting Frequency 10. In relation to above ground blasting, the Proponent may carry out a maximum of 1 blast per day, unless an additional blast is required following a blast misfire. This condition does not apply to blasts required to ensure the safety of the site or its workers, and to minor additional blasts required during the construction of the box cut to access the underground workings. Operating Conditions 11. During operation of the project, the Proponent shall implement best management practice to: (a) protect the safety of people and livestock in the surrounding area; (b) protect public or private infrastructure/property in the surrounding area from any damage; and (c) minimise the dust and fume emissions from any blasting; and to the satisfaction of the Secretary.	• <i>Heron Resources Limited (2017), Woodlawn Mine, SML20, Noise and Blast Management Plan</i> (dated April 2017, reference: NBMP, Revision No. 9): 10: 2.2: Blasting Criteria: <i>Only one surface blast per day is to be undertaken although this may consist of several charges in multiple holes set up on a quick succession time delay.</i> 11: 3.4: Operating Conditions of Heron Resources Limited (2017), Woodlawn Project, Blast Management Plan (dated April 2017, Revision 1): lists (a) protect the safety of people and livestock in the surrounding area; (b) protect public or private infrastructure/property in the surrounding area from any damage; and (c) minimise the dust and fume emissions from any blasting; and to the satisfaction of the Secretary.	Compliant	Compliant	Surface blasting was only associated with development of the box cut. Underground blasting was conducted in accordance with consent criteria. No blasting is being carried out during care and maintenance. Underground blasting is likely when operations resume.

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Approval (ID)	Number	Requirement	Evidence collected (Data/document author, date, title, reference number)	Compliance status	Independent Audit Comment & Recommendations	Proponent Response to Findings														
Schedule 4 Environmental Management Conditions Blast Management Plan	12	The Proponent shall prepare and implement a Blast Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with the Veolia and Infigen Energy, and submitted to the Director- General for approval prior to commencing blasting on the site; (b) describe the process for incrementally developing and monitoring blasting design; (c) describe the blast mitigation measures that would be implemented to ensure compliance with the blasting criteria; and (d) include a blast monitoring program to evaluate the performance of the project.	• Heron Resources Limited (2017), Woodlawn Mine, SML20, Noise and Blast Management Plan (dated April 2017, reference: NBMP, Revision No. 9) (a) The Blast Management Plan was prepared in consultation with Veolia and Infigen Energy, and submitted to the DPE on 13/09/2016 for approval . (Refer to 4: Communication and Reporting). (b) Heron Resources Limited (2017), Woodlawn Project, Blast Management Plan (dated April 2017, Revision 1) included as Appendix C of the NBMP describe the process for incrementally developing and monitoring blasting design: 1. Blasting for the excavation of the boxcut portal; 2. Blasting for underground mine development; and 3. Underground production blasting (stopping). Refer to Figure 4.1 for a schematic of the Blast design and monitoring and 5: Monitoring for details of when vibration monitoring will be undertaken. (c) 4.1: Boxcut Blasting Control Measures details best practise control methods and 4.6: Underground Blasting Control Measures and 6. Mitigation of Blast Effects describe the blast mitigation measures that would be implemented to ensure compliance with the blasting criteria; and (d) 5: Monitoring details when vibration monitoring will be undertaken. 10. Blast Management Plan Review: will be reviewed annually and an independent audit will be conducted if requested by a land-owner.	Compliant	Compliant															
Schedule 4 Environmental Management Conditions AIR QUALITY Odour Greenhouse Gas Emissions Air Quality Criteria	13	13. The Proponent shall ensure that no offensive odours generated by the project are emitted from the site, as defined under the POEO Act. Greenhouse Gas Emissions 14. The Proponent shall implement all reasonable and feasible measures to minimise the release of greenhouse gas emissions from the site to the satisfaction of the Secretary. Air Quality Criteria 15. The Proponent shall ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the project do not exceed the criteria listed below at any residence on privately-owned land <table><tr><td>Long term impact assessment criteria for particulate matter</td><td>Total</td></tr><tr><td>suspended particulate (TSP) matter 90 µg/m³ annual</td><td>Particulate</td></tr><tr><td>matter < 10 µm (PM10) 30 µg/m³ annual</td><td>Short term</td></tr><tr><td>impact assessment criterion for particulate matter</td><td>Particulate matter < 10 µm (PM10) a 50 µg/m³ - 24 hour period</td></tr><tr><td>Long term impact assessment criteria for deposited dust</td><td>Maximum</td></tr><tr><td>increase in deposited dust level 2 g/m²/month annual</td><td>Maximum total</td></tr><tr><td>deposited dust level 4 g/m²/month annual</td><td></td></tr></table>	Long term impact assessment criteria for particulate matter	Total	suspended particulate (TSP) matter 90 µg/m ³ annual	Particulate	matter < 10 µm (PM10) 30 µg/m ³ annual	Short term	impact assessment criterion for particulate matter	Particulate matter < 10 µm (PM10) a 50 µg/m ³ - 24 hour period	Long term impact assessment criteria for deposited dust	Maximum	increase in deposited dust level 2 g/m ² /month annual	Maximum total	deposited dust level 4 g/m ² /month annual		• Heron Resources Limited (2017), Woodlawn Mine, SML20, Air Quality Management Plan (dated August 2017, reference: AQMP, Revision No. 8): 13: 3.1 Dust and Air Quality Management Initiatives: Previous dust and air quality assessments suggest that the majority of wind blown dust falls out within 500 m of the source with a significant portion of the dust falling out within a 250 m radius. The closest residence is located approximately 3 km away, therefore dust related impacts on the local community are unlikely, even during construction. 14. 3.2 Greenhouse Gas Mitigation and Management. Table 9: Greenhouse Gas Management Practices at the Woodlawn Mine Project and Appendix B: Air Quality Management Plan - Section 6 Greenhouse Gas Mitigation and Management. 15. Refer to Section 2: Air Quality Criteria and Applicable Legislation in Appendix B.	Compliant	Compliant	Noted
Long term impact assessment criteria for particulate matter	Total																			
suspended particulate (TSP) matter 90 µg/m ³ annual	Particulate																			
matter < 10 µm (PM10) 30 µg/m ³ annual	Short term																			
impact assessment criterion for particulate matter	Particulate matter < 10 µm (PM10) a 50 µg/m ³ - 24 hour period																			
Long term impact assessment criteria for deposited dust	Maximum																			
increase in deposited dust level 2 g/m ² /month annual	Maximum total																			
deposited dust level 4 g/m ² /month annual																				
Schedule 4 Environmental Management Conditions AIR QUALITY Operating Conditions	16	The Proponent shall: (a) implement best practice air quality management on site, including all reasonable and feasible measures to minimise the off-site odour, fume and dust emissions generated by the project; and (b) minimise any visible air pollution generated by the project; to the satisfaction of the Secretary.	(a) 3.1 Dust and Air Quality Management Initiatives - refer to Table 7: Dust Management Measures at the Woodlawn Mine Project and Table 8: Fume Management Measures at the Woodlawn Mine Project. There are not expected to be any odour emissions from the proposed operation. (b) AQMP issued to DPE on 13/09/2016 and approved by 11/05/2017 (Revision 7 - Operational Version).	Compliant	Compliant	Noted														

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Approval (ID)	Number	Requirement	Evidence collected (Data/document author, date, title, reference number)	Compliance status	Independent Audit Comment & Recommendations	Proponent Response to Findings
Schedule 4 Environmental Management Conditions AIR QUALITY Air Quality Management Plan	17	The Proponent shall prepare and implement an Air Quality Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with the EPA, and be submitted to the Secretary for approval prior to commencing construction on the site; (b) describe the measures that would be implemented to ensure compliance with Conditions 13 to 16 above; (c) include an air quality monitoring program that: • uses a combination of high volumes samplers and dust deposition gauges to evaluate the performance of the project; and • includes a protocol for determining exceedances of the relevant conditions of this approval; and (d) describe the measures that would be implemented to minimise the release of greenhouse gas emissions from the site.	(a) AQMP was prepared in consultation with Julian Thompson from the EPA, and issued to DPE on 13/09/2016 and approved by 11/05/2017 (Revision 7 - Operational Version). (b) 3.1 Dust and Air Quality Management Initiatives - refer to Table 7: Dust Management Measures at the Woodlawn Mine Project and Table 8: Fume Management Measures at the Woodlawn Mine Project. (c) include an air quality monitoring program that: • refer to 5.1 Environmental Monitoring ; and • 5.2 Action Trigger Levels : an investigation of dust impacts will be conducted if exceedances are reported, following confirming results with laboratory. ; and (d) Appendix B: Air Quality Management Plan - Section 6 Greenhouse Gas Mitigation and Management .	Compliant	Compliant	Noted
Schedule 4 Environmental Management Conditions AIR QUALITY Meteorological Monitoring	18	For the life of the project, the Proponent shall ensure that there is a suitable meteorological station operating in the vicinity of the site that complies with the requirements in the <i>Approved Methods for Sampling of Air Pollutants in New South Wales guideline</i> .	Data for determining meteorological conditions shall be collected from the Veolia owned meteorological station and in compliance with NSW EPA guideline (NSW EPA, 2005) <i>Approved Methods for the Sampling and Analysis of Air Pollutants in NSW</i> .	Compliant		EPL20821 ID No. 5 identified the Veolia met station as the approved monitoring station
Schedule 4 Environmental Management Conditions LAND MANAGEMENT Waste Rock Management Plan	19	The plan must: (a) be developed in consultation with DRG, EPA and DPI – Water; (b) be submitted for the approval of the Secretary; (c) include a detailed description of the procedures to be implemented to monitor and manage potential acid forming material, including: - testing for potentially acid forming waste rock prior to it being brought to the surface; - prioritising the relocation of potential acid forming material to suitable underground locations prior to oxidation; - using all reasonable and feasible measures to prevent waste rock emplaced underground from further oxidising or causing impacts on groundwater; - trigger levels for any material that has oxidised to the extent that it cannot be placed underground without impacting groundwater quality, and procedures for adequate capping and sealing of such material at the surface; - effective isolation and/or neutralisation of potential acid forming material in waste rock dumps; and (d) reflect the groundwater and surface water monitoring programs to monitor potentially acid forming waste rock and any leachate generated, including appropriately designed detection and response systems for acid generation(covering monitoring methods, trigger levels and proposed management and/or treatment actions).	<i>Heron Resources Limited (2018), Woodlawn Mine, SML20, Waste Rock Management Plan</i> (dated May 2018, reference: WRMP, Revision No. 2) a) issued to DPE on 20/05/2018; (b) pending approval by the Secretary; (c) 3.2.1 Waste Rock Characterisation Procedures - testing for potentially acid forming waste rock will be completed in the underground mining area. • the relocation of potential acid forming material is to be determine by mine geological personnel. • Section 3.2 hydrated lime and cement and waste water will be mixed together and pH is to be raised to pH 10. • 4. Monitoring of Acid Forming Material . • 3.2.5 Blending of PAF Waste Rocks . (d) groundwater and surface water monitoring programs to be undertaken in accordance with EPL No. 20821 and as per Table 5: Monitoring Parameters and Testing Frequency .	Compliant	(a) No evidence consultation with DRG, EPA and DPI – Water 1.6 Consultation : states <i>Schedule 4 Condition 19 of the Project Approval requires this WRMP to be prepared in consultation with tDRG, EPA and DPI-Water prior to being submitted to the Secretary of DPE for approval</i> . (c) Recommendation: - trigger levels for any material that has oxidised to the extent that it cannot be placed underground without impacting groundwater quality, and procedures for adequate capping and sealing of such material at the surface. It is expected 5% cut-off grades will be developed by Heron (and independently peer reviewed) and be integrated with Paste Fill Management Plan processes.	(a) WRMP was submitted to the Department after the Audit. (c) Noted. Procedures for management and disposal of waste material are incorporated in the WRMP and PFMP.

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Schedule 4 Environmental Management Conditions LAND MANAGEMENT Vegetation Management Plan	20	The Proponent shall prepare and implement a Vegetation Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with OEH and submitted to the Secretary for approval prior to commencing construction; (b) describe how the additional 71 hectares of revegetation area would be integrated with the overall rehabilitation of the site; (c) describe the short, medium, and long term measures that would be implemented to: - manage the remnant vegetation and habitat on the site and in the revegetated area/s; and - implement revegetation, including detailed performance and completion criteria;	<i>Heron Resources Limited (2017), Woodlawn Mine, SML20, Vegetation and Rehabilitation Management Plan</i> (dated August 2017, reference: VRMP, Revision No. 8): (a) prepared in consultation with OEH and submitted to the DPE for approval on 12/09/2016 and approved by 11/05/2017 (Revision 7 -Operational); (b) 2.3 Vegetation Offsets: <i>The initiative involves the rehabilitation of up to 71 ha of previously cleared agricultural land to Western Tablelands Dry Forest vegetation community.</i> • 3.2: Vegetation offset: planning for revegetation of 78 ha area. • 3.2.1 Integration with Rehabilitation Plan • Table 4.2 - Woodlawn Rehabilitation Completion Criteria • Plan 3 - Woodland Project - Vegetation and Rehabilitation Management Plan • Plan 4: Woodlawn Site - Final Rehabilitation - Plan 3 and 4 shows the location of proposed 78 hectare revegetation area. (c) 3.5: Managing Remnant Vegetation • 3.7: Habitat Enhancement • 4.4.3 Completion Criteria • Table 4.2 - Woodlawn Rehabilitation Completion Criteria	Compliant	Compliant	Noted
		(d) include a detailed description of the procedures to be implemented for: - minimising the impacts on fauna on site, including pre-clearance surveys; - enhancing the quality of existing vegetation and fauna habitat; - restoring native vegetation and fauna habitat on the revegetated area through focusing on assisted natural regeneration, targeted vegetation establishment and the introduction of fauna habitat features, including establishing and maintaining bat habitat for the Eastern Bent-wing Bat and Yellow-bellied Sheathtail-bat; - establishing a revegetation planting density that is consistent with the rehabilitation objectives in Table 2 of Schedule 3; - maximising the salvage of resources within the approved disturbance area – including vegetative and soil resources – for beneficial reuse in the rehabilitation of the site; - collecting and propagating seed; - bushfire management; - controlling weeds, feral pests, erosion and access to the revegetation areas; and (e) include a seasonally-based program to monitor and report on the effectiveness of these measures, and progress against the detailed performance and completion criteria; and (f) include details of who would be responsible for monitoring, reviewing and implementing the plan.	Refer to Rehabilitation objectives in Table B. (d) 2. Flora and Fauna Resources • 2.2 Fauna details measures to minimise impact on fauna, including: pre-clearing surveys, sediment control measures, vegetation control, management of weeds. • <i>The construction program will have minimal impact on existing native vegetation and therefore the anticipated impact on fauna and fauna habitat is equally minimal.</i> • 3.3 Revegetation Methods: There are four revegetation methods to be employed including spray seeding, direct sowing with cultivation, tubstock planting and brushmatting and natural regeneration. 3.2.1 Integration with Rehabilitation Plan: <i>Develop specific activities to encourage habitat development for the Eastern Bent-wing Bat and Yellow-bellied Sheathtail-bat.</i> • 3.4.2: Planting density; • 3.8 Resource Salvage <i>All natural resources generated during the construction phase will be salvaged and reused including topsoil and vegetative materials,</i> • 3.8.4 Seed Collection: <i>Given the very small quantity of vegetation to be cleared, it is not a viable proposition to undertake a separate seed collection program .;</i> • 3.11 Bushfire Management; • 3.9 Weed Management, 3.10 Feral Animal Control, 5.1.1 Monitoring Methodology (e) 5. Verification and Adaptive Management; (f) 1.3 Woodlawn Mine Key Personnel and Responsibilities	Compliant	Compliant	Noted
Schedule 4 Environmental Management Conditions LAND MANAGEMENT Progressive Rehabilitation	21	The Proponent shall carry out rehabilitation of the site progressively, that is, as soon as reasonably practicable after disturbance. All reasonable and feasible measures must be taken to minimise the total area exposed for dust generation at any time. Interim rehabilitation strategies shall be employed when areas prone to dust generation cannot be permanently rehabilitated until later in the project life.	Heron Resources Ltd, <i>Woodlawn Mine SML20, Annual Review July 2017 to June 2018</i> (dated 31 August 2018). 6.8.2 Further Improvements: As a result of the prevailing drought, native animal grazing has provided additional pressure on vegetation around the construction site. It is proposed to progressively install kangaroo proof fencing around the processing plant site and revegetation areas to exclude access.	Not triggered		

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Schedule 4 Environmental Management Conditions LAND MANAGEMENT Rehabilitation Management Plan	22	The Proponent shall prepare and implement a Rehabilitation Management Plan for the project to the satisfaction of the Director- General. This plan must: (a) be prepared in consultation with the DRG, EPA, DPI - Water, Water NSW and Council; (b) be submitted to the Secretary for approval prior to carrying out mining operations on the site; (c) be prepared in accordance with any relevant Division of Resources and Geoscience within the Department of Planning and Environment (DRG) guideline; (d) outline the procedures to be implemented to achieve the rehabilitation objectives in Condition 6 of Schedule 3; (e) outline the operational procedures (including testing, monitoring and performance criteria) used to verify the ongoing suitability of the compost material to be used in rehabilitation; (f) include detailed designs for the short term and long term rehabilitation of tailings and evaporation dams, including surface water management and capping design which takes into account total predicted settlement; (g) include detailed performance and completion criteria for evaluating the performance of the rehabilitation of the site; (h) describe the measures that would be implemented to ensure compliance with the relevant conditions of this approval, and address all aspects of rehabilitation including mine closure, final landform, and final land use; and (i) include a program to monitor, independently audit and report on the ongoing effectiveness of the measures and progress towards the detailed performance and completion criteria.	• Heron Resources Limited (2017), Woodlawn Mine, SML20, Vegetation and Rehabilitation Management Plan (dated August 2017, reference: VRMP, Revision No. 8): (a) prepared in consultation with the DRG, EPA, DPI - Water, Water NSW and Council; (b) submitted to the Secretary / DPE for approval on 12/09/2016 and approved by 11/05/2017 (Revision 7 - Operational); (c) 1.4 Legislative Requirements; 4.4.2 Summary of Final Rehabilitation Activities: Installation of final seals in accordance with NSW Department of Industry Resources and Energy Mine Safety guidelines. (d) outline the procedures to be implemented to achieve the rehabilitation objectives in Condition 6 of Schedule 3; (e) outline the operational procedures (including testing, monitoring and performance criteria) used to verify the ongoing suitability of the compost material to be used in rehabilitation; (f) include detailed designs for the short term and long term rehabilitation of tailings and evaporation dams, including surface water management and capping design which takes into account total predicted settlement; (g) include detailed performance and completion criteria for evaluating the performance of the rehabilitation of the site; (h) describe the measures that would be implemented to ensure compliance with the relevant conditions of this approval, and address all aspects of rehabilitation including mine closure, final landform, and final land use; and (i) include a program to monitor, independently audit and report on the ongoing effectiveness of the measures and progress towards the detailed performance and completion criteria.	Compliant	Compliant	Noted

Approval (ID)	Number	Requirement	Evidence collected (Data/document author, date, title, reference number)	Compliance status	Independent Audit Comment & Recommendations	Proponent Response to Findings
Schedule 4 Environmental Management Conditions TRANSPORT Dangerous Goods Access Road and Intersection Construction Monitoring of Concentrate Transport	23 to 25	Dangerous Goods 23. Transportation of all dangerous goods to or from the site shall be undertaken in strict accordance with Australian Code for the Transport of Dangerous Goods by Road and Rail. Access Road and Intersection Construction 24. The Proponent shall construct the site access road for heavy vehicles, and associated intersection of this access road, prior to commencing construction of other components of the project on the site. The intersection shall be designed and constructed to the satisfaction of Council and in accordance with the applicable AUSTROADS standards. Monitoring of Concentrate Transport 25. The Proponent shall: (a) keep accurate records of the: • amount of copper, lead and zinc concentrate transported from the site (on a monthly basis); and • the date and time of loaded heavy vehicle movements from the site; and (b) provide the Secretary with a summary of these heavy vehicle movements in the Annual Review.	• <i>Heron Resources Limited (2017), Woodlawn Mine, SML20, Transport Management Plan</i> (dated August 2017, reference: TMP, Revision No. 7): 23. 1.5 Legislative Requirements: Australian Code for the <i>Transport of Dangerous Goods by Road and Rail 2015</i> . 24. Appendix C - Intersection Design and Section 138 Approval. 25. (a) 4.4: Record Keeping and Reporting: amount of copper, lead and zinc concentrate transported from the site (on a monthly basis (refer to 5.1: Transport Related Monitoring); and (b) Annual Review as per 5.2 Reporting Procedures .	Compliant	Recommendation: examples of tracking and registering the date and time of loaded heavy vehicle movements from the site be provided as part of plan(s) in future.	Noted. During operations such records were maintained.
Schedule 4 Environmental Management Conditions TRANSPORT Road Transport Protocol	26	The Proponent shall prepare and implement a Road Transport Protocol for the project, to the satisfaction of the Secretary. The protocol shall: (a) be prepared in consultation with the RMS and Council; (b) be submitted to the Secretary for approval prior to carrying out any development on the site; (c) include a detailed Transport Code of Conduct that addresses: • measures to ensure that heavy vehicles adhere to the designated haulage route in Condition 7 of Schedule 2; • staggering of heavy vehicle departures in consultation with Veolia to minimise impacts on the road network; • driver behaviour including adherence to speed limits, safe overtaking, and maintaining appropriate distances between vehicles; • contingency plans when the designated haulage route is disrupted; and • procedures for ensuring compliance with and enforcement of the Code.	(a) prepared in consultation with RMS (issued to RMS on 12/05/2017) and Council (issued to Council on 09/09/2015); (b) submitted to the Secretary DPE for approval on 13/06/2017. (c) 3: Transport Code of Conduct: • Condition 7 of Schedule 2 details the <i>transport all concentrate from the site via Collector Road (east of the site), the Tarago-Bungendore Road (north of Collector Road), Braidwood Road and the Hume Highway</i> (refer to 2.1: Road Network). • 3.8: Truck Dispatch: <i>The Woodlawn Project Approval requires that heavy vehicle departures are staggered to minimise impacts on the road network.</i> • 3.2 Heavy Vehicle Speed, 3.3 Driver Fatigue, 3.4 Heavy Vehicle Control, 3.10: Interaction with School Buses • contingency plans: refer to 2.1: Road Network: Should any of these roads be blocked due to road works or traffic incident, alternative routes must be approved by Heron. An alternative route exists which utilises Collector road to the west of the site entrance.	Compliant	Recommendation: • procedures for ensuring compliance with and enforcement of the Code be further developed in future plan(s).	Noted.
Schedule 4 Environmental Management Conditions HERITAGE	27	The Proponent shall prepare and implement a Heritage Management Plan for the project to the satisfaction of the Secretary. The Plan must: (a) be prepared in consultation with OEH and the Aboriginal stakeholders (in relation to the management of Aboriginal heritage values); (b) be submitted to the Secretary for approval prior to commencing construction on site; (c) include consideration of the Aboriginal and non-Aboriginal cultural context and significance of the site; (d) include programs/procedures and management measures for appropriate identification, management, conservation and protection of both Aboriginal and non-Aboriginal heritage items identified on the site.	• <i>Heron Resources Limited (2017), Woodlawn Mine, SML20, Heritage Management Plan</i> (dated August 2017, reference: HMP, Revision No. 6): (a) prepared in consultation with Allison Treweek from OEH and the Aboriginal stakeholders are yet to be nominated. 4.1 Aboriginal Stakeholder Involvement. (b) submitted to the Secretary for approval on 13/09/2016; (c) 3. Management of Heritage Values. (d) 3.1: Mapping of Identified Aboriginal Sites. 3.2: Management of Unidentified Aboriginal Sites.	Compliant	Recommendation: Develop and include programs/procedures and management measures for appropriate identification, management, conservation and protection of both Aboriginal and non-Aboriginal heritage items identified on the site.	Noted. Aboriginal Stakeholder involvement during EA. The Site has no known heritage value. The Woodlawn Heritage Management Plan will be reviewed and revised if necessary to incorporate the recommendation.
Schedule 4 Environmental Management Condition VISUAL	28	The Proponent shall: (a) establish a vegetation screen along the fence line next to Collector Road within 6 months of commencement of construction; (b) implement all reasonable and feasible measures to minimise the visual impacts of the project; and (c) ensure that all external lighting associated with the project complies with Australian Standard AS4282 (INT) 1995 – Control of Obtrusive Effects of Outdoor Lighting, to the satisfaction of the Secretary.	Heron Resources Ltd, <i>Woodlawn Mine SML20, Annual Review July 2017 to June 2018</i> (dated 31 August 2018). 10.1 Audit undertaken by Department of Planning and Environment: Due to the prevailing drought conditions, planting of trees along Collector Road has been delayed. Tubestock and planting materials have been purchased and work will proceed when weather conditions permit.	Compliant	Noted that commitment to plant visual tree screen along Collector Road in 11.1 Planned Activities for 2018-19 Reporting Period. Check in future audits.	Screen along Collector Road was planted in 2019.

Approval (ID)	Number	Requirement	Evidence collected (Data/document author, date, title, reference number)	Compliance status	Independent Audit Comment & Recommendations	Proponent Response to Findings
Schedule 4 Environmental Management Condition WASTE	29	29. The Proponent shall: (a) minimise the waste generated by the project; (b) ensure that the waste generated by the project is appropriately characterised, stored, handled and disposed of in accordance with the Waste Classification Guidelines (EPA, 2009), or its latest version; and (c) manage on-site sewage treatment and disposal in accordance with the requirements of Council, to the satisfaction of the Secretary.	Section 4 of: Heron Resources Ltd, <i>Woodlawn Mine SML20, Annual Environmental Management Report July 2017 to June 2018</i> .	Compliant	Coordinated with Veolia's strategies.	Waste generated by Heron at Woodlawn is managed and disposed of via commercial services provided by Veolia and other commercial waste collection providers. There is no direct arrangement with the Bioreactor for waste disposal.
Schedule 4 Environmental Management Condition BUSHFIRE MANAGEMENT	30	The Proponent shall: (a) ensure that the project is suitably equipped to respond to any fires on site; and (b) assist the Rural Fire Service and emergency services as much as possible if there is a fire in the surrounding area.	Section 3.16 of : Heron Resources Ltd, <i>Woodlawn Mine SML20, Annual Environmental Management Report July 2015 to June 2016</i> (dated 31 August 2016). Rural Fires Act 1997. The proposed measures (firebreaks, minimize quantity of dead timber, onsite water storage will be available for fire fighting if required) are considered appropriate at this stage and no additional improvements are considered necessary.	Compliant	Compliant	Noted
Schedule 5 Additional Procedures Notification of Landowners	1	Notification of Landowners (i.e. evidence of notification to landowners pertaining to air quality and noise criteria) Within two weeks of obtaining monitoring results showing: (a) an exceedance of any relevant noise criteria in Schedule 4, the Proponent shall notify affected landowners and/ or tenants in writing of the exceedance, and provide regular monitoring results to each of these affected parties until the project is again complying with the relevant criteria; and (b) an exceedance of any relevant air quality criteria in Schedule 4, the Proponent shall send the affected landowners and/ or tenants a copy of the NSW Health fact sheet entitled "Mine Dust and You" (as may be updated from time to time).	(a) <i>Heron Resources Limited (2017), Woodlawn Mine, SML20, Noise and Blast Management Plan</i> (dated April 2017, reference: NBMP, Revision No. 9): 4.3 Public Access to Information: Heron will notify affected landowners and/ or tenants within two weeks, and notify Veolia and the DPE. Heron will conduct an Independent Review if requested in writing by land owner and will comply with the recommendations of the Independent Review. (b) an exceedance of any relevant air quality criteria in Schedule 4, the Proponent shall send the affected landowners and/ or tenants a copy of the NSW Health fact sheet entitled "Mine Dust and You" (as may be updated from time to time).	Compliant	Recommendation: Part 4.3 Public Access to Information: should specify that Heron will notify affected landowners and/ or tenants in writing for noise and blast activities pertinent to these receptors.	Noted.
Schedule 5 Additional Procedures INDEPENDENT REVIEW	2	If an owner of privately-owned land considers the project to be exceeding the relevant criteria in Schedule 4, then he/she may ask the Secretary in writing for an independent review of the impacts of the project on his/her land. If the Secretary is satisfied that an independent review is warranted, then within two months of the Secretary's decision the Proponent shall: (a) commission a suitably qualified, experienced and independent person, whose appointment has been approved by the Secretary, to: ☐ consult with the landowner to determine his/ her concerns; ☐ conduct monitoring to determine whether the project is complying with the relevant criteria in Schedule 4; and ☐ if the project is not complying with these criteria then identify measures that could be implemented to ensure compliance with the relevant criteria. (b) give the Secretary and landowner a copy of the independent review. 3. If the independent review determines that the project is complying with the relevant criteria in Schedule 4, then the Proponent may discontinue the independent review with the approval of the Secretary. 4. If the independent review determines that the project is not complying with the relevant criteria in Schedule 4, then the Proponent shall: (a) implement all reasonable and feasible mitigation measures, in consultation with the landowner and appointed independent person, and conduct further monitoring until the project complies with the relevant criteria; or (b) secure a written agreement with the landowner to allow exceedances of the relevant criteria, to the satisfaction of the Secretary.	Referenced in various reports.	Compliant	Compliant	Noted

Approval (ID)	Number	Requirement	Evidence collected (Data/document author, date, title, reference number)	Compliance status	Independent Audit Comment & Recommendations	Proponent Response to Findings
Schedule 6 Environmental Management, Reporting and Auditing Environmental Management Strategy	1	The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Secretary. This strategy must: (a) be submitted for approval to the Secretary within 12 months of this approval; (b) provide the strategic framework for the environmental management of the project; (c) identify the statutory approvals that apply to the project; (d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project; (e) describe the procedures that would be implemented to: • keep the local community and relevant agencies informed about the operation and environmental performance of the project; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise during the course of the project; • respond to any non-compliance; • respond to emergencies; and (f) include: • copies of any strategies, plans and programs approved under the conditions of this approval; and • a clear plan depicting all the monitoring required to be carried out under the conditions of this approval.	• <i>Heron Resources Ltd, Woodlawn Mine SML20, Annual Environmental Management Report July 2015 to June 2016</i> (dated 31 August 2016). • <i>Heron Resources Ltd, Woodlawn Mine SML20, Annual Review July 2016 to June 2017</i> (dated 1 September 2017). • <i>Heron Resources Ltd, Woodlawn Mine SML20, Annual Review July 2017 to June 2018</i> (dated 31 August 2018). Refer to Table C for detailed audit of the three Annual Reviews from 2015 - 2018. Mining Operations Plan and sub-plans.	Compliant		Noted
Schedule 6 Environmental Management, Reporting and Auditing Environmental Management Adaptive Management	2	2. The Proponent shall assess and manage project-related risks to ensure that there are no exceedances of the criteria and/or performance measures in Schedules 3 and 4. Any exceedance of these criteria and/or performance measures constitutes a breach of this approval and may be subject to penalty or offence provisions under the EP&A Act or EP&A Regulation. Where any exceedance of these criteria and/or performance measures has occurred, the Proponent shall, at the earliest opportunity: (a) take all reasonable and feasible measures to ensure that the exceedance ceases and does not recur; (b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing those options and any preferred remediation measures or other course of action; and (c) implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary.	• <i>Heron Resources Ltd, Woodlawn Mine SML20, Annual Environmental Management Report July 2015 to June 2016</i> (dated 31 August 2016). • <i>Heron Resources Ltd, Woodlawn Mine SML20, Annual Review July 2016 to June 2017</i> (dated 1 September 2017). • <i>Heron Resources Ltd, Woodlawn Mine SML20, Annual Review July 2017 to June 2018</i> (dated 31 August 2018). Refer to Table C for detailed audit of the three Annual Reviews from 2015 - 2018. Mining Operations Plan and sub-plans.	Compliant		Noted

Approval (ID)	Number	Requirement	Evidence collected (Data/document author, date, title, reference number)	Compliance status	Independent Audit Comment & Recommendations	Proponent Response to Findings
Schedule 6 Environmental Management, Reporting and Auditing Management Plan Requirements	3	The Proponent shall ensure that the management plans required under this approval are prepared in accordance with any relevant guidelines, and include: (a) a description of: - the relevant statutory requirements (including any relevant approval, licence or lease conditions); - any relevant limits or performance measures/criteria; - the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the project or any management measures; (b) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria; (c) a program to monitor and report on the: - impacts and environmental performance of the project; - effectiveness of any management measures (see b above); (d) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible; (e) a protocol for managing and reporting any: - incidents and complaints; - non-compliances with statutory requirements and exceedances of the impact assessment criteria and/or performance criteria; and (f) a protocol for periodic review of the plan.	<i>Heron Resources Ltd, Woodlawn Mine SML20, Annual Environmental Management Report July 2015 to June 2016</i> (dated 31 August 2016). <i>Heron Resources Ltd, Woodlawn Mine SML20, Annual Review July 2016 to June 2017</i> (dated 1 September 2017). <i>Heron Resources Ltd, Woodlawn Mine SML20, Annual Review July 2017 to June 2018</i> (dated 31 August 2018). Refer to Table C for detailed audit of the three Annual Reviews from 2015 - 2018. Mining Operations Plan and sub-plans.	Compliant		Noted
Schedule 6 Environmental Management, Reporting and Auditing Annual Review	4	(i.e. the past three (3) Annual Reviews submitted to regulator(s)) 4. By the end of December each year (or other such timing as agreed by the Secretary), the Proponent shall review the environmental performance of the project to the satisfaction of the Secretary. This review must: (a) describe the development (including any rehabilitation) that was carried out in the past year, and the development that is proposed to be carried out over the next year; (b) include a comprehensive review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the: - the relevant statutory requirements, limits or performance measures/criteria; - requirements of any plan or program required under this approval; - the monitoring results of previous years; and - the relevant predictions in the EA; (c) identify any non-compliance over the past year, and describe what actions were (or are being) taken to ensure compliance; (d) identify any trends in the monitoring data over the life of the project; (e) identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies; and (f) describe what measures will be implemented over the next year to improve the environmental performance of the project.	<i>Heron Resources Ltd, Woodlawn Mine SML20, Annual Environmental Management Report July 2015 to June 2016</i> (dated 31 August 2016). <i>Heron Resources Ltd, Woodlawn Mine SML20, Annual Review July 2016 to June 2017</i> (dated 1 September 2017). <i>Heron Resources Ltd, Woodlawn Mine SML20, Annual Review July 2017 to June 2018</i> (dated 31 August 2018). Refer to Table C for detailed audit of the three Annual Reviews from 2015 - 2018.	Compliant. Refer to Table C for detailed audit of the three Annual Reviews from 2015 - 2018.	Compliant. Refer to Table C for detailed audit of the three Annual Reviews from 2015 - 2018.	Noted

TABLE A - INDEPENDENT AUDIT

Approval (ID)	Number	Requirement	Evidence collected (Data/document author, date, title, reference number)	Compliance status	Independent Audit Comment & Recommendations	Proponent Response to Findings
Schedule 6 Environmental Management, Reporting and Auditing Management Plan Requirements Revision of Strategies, Plans and Programs		5. Within three months of: (a) the submission of an annual review under Condition 4 above; (b) the submission of an incident report under Condition 7 below; (c) the submission of an audit under Condition 9 below; or (d) any modification to the conditions of this approval (unless the conditions require otherwise), the Proponent shall review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the Secretary. Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the project.	<i>Heron Resources Ltd, Woodlawn Mine SML20, Annual Environmental Management Report July 2015 to June 2016</i> (dated 31 August 2016). <i>Heron Resources Ltd, Woodlawn Mine SML20, Annual Review July 2016 to June 2017</i> (dated 1 September 2017). <i>Heron Resources Ltd, Woodlawn Mine SML20, Annual Review July 2017 to June 2018</i> (dated 31 August 2018).	Compliant		Noted
Schedule 6 Environmental Management, Reporting and Auditing Community Consultative Committee	6	Community Consultative Committee (i.e. evidence of minutes of committee meetings, response to community queries, etc.) The Proponent shall establish and operate a CCC for the project in general accordance with the Guidelines for Establishing and Operating Community Consultative Committees for Mining Projects (Department of Planning, 2007, or its latest version), and to the satisfaction of the Secretary. This CCC must be operating prior to commencing construction of the project. Notes: • The CCC is an advisory committee. The Department and other relevant agencies are responsible for ensuring that the Proponent complies with this approval; and • In accordance with the guideline, the Committee should be comprised of an independent chair and appropriate representation from the Proponent, Council, recognised environmental groups and the local community.	A Community Consultation Committee was set up in 2015 and included members of the local community and the local Council. During the 2018 to 2019 reporting period, there were four committee meetings. Community consultation meetings will continue to be held during operation of the site. Meetings of CCC are available online https://www.heronresources.com.au/woodlawn-community.php	Compliant	Compliant	Noted
Schedule 6 Environmental Management, Reporting and Auditing Incident Reporting	7	7. The Proponent shall notify the Secretary and any other relevant agencies of any incident associated with the project as soon as practicable after the Proponent becomes aware of the incident. Within seven days of the date of the incident, the Proponent shall provide the Secretary and any relevant agencies with a detailed report on the incident.	• Heron Resources Limited (2017), Woodlawn Mine, SML20, Pollution Incident Response Management Plan (dated March 2017, reference: PIRMP, Revision No. 3).	Compliant	Compliant	Noted
Schedule 6 Environmental Management, Reporting and Auditing Regular Reporting	8	8. The Proponent shall provide regular reporting on the environmental performance of the project on its website, in accordance with the reporting arrangements in any approved plans of the conditions of this approval.	https://www.heronresources.com.au/woodlawn-environment-health-and-safety	Compliant	Compliant	Noted

TABLE A - INDEPENDENT AUDIT

Approval (ID)	Number	Requirement	Evidence collected (Data/document author, date, title, reference number)	Compliance status	Independent Audit Comment & Recommendations	Proponent Response to Findings
Schedule 6 Environmental Management, Reporting and Auditing INDEPENDENT ENVIRONMENTAL AUDIT	9	Within one year of commencing construction of the project, and every three years thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. The audit must: (a) be conducted by a suitably qualified, experienced and independent team of experts (including a mine site rehabilitation and water quality expert) whose appointment has been endorsed by the Secretary; (b) include consultation with the relevant agencies; (c) assess the environmental performance of the project and assess whether it is complying with the requirements in this approval and any relevant EPL or Mining Lease (including any assessment, plan or program required under these approvals); (d) review the adequacy of strategies, plans or programs required under the abovementioned approvals; and (e) recommend appropriate measures or actions to improve the environmental performance of the project, and/ or any assessment, plant or program required under the abovementioned approvals. Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Secretary. 10. Within six weeks of the completion of this audit, or as otherwise agreed by the Secretary, the Proponent shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.		Compliant	Compliant	Noted
Schedule 6 Environmental Management, Reporting and Auditing ACCESS TO INFORMATION	11	Access to Information (i.e. evidence of information made publicly available on proponent's website) Prior to the commencement of construction on the site, the Proponent shall: (a) make copies of the following publicly available on its website: • the documents referred to in Condition 1 of Schedule 2; • all relevant statutory approvals for the project; • all approved strategies, plans and programs required under the conditions of this approval; • a comprehensive summary of the monitoring results of the project, reported in accordance with the specifications in any approved plans or programs required under the conditions of this or any other approval; • a complaints register, which is to be updated on a monthly basis; • minutes of CCC meetings; • the annual reviews required under this approval; • any independent environmental audit of the project, and the Proponent's response to the recommendations in any audit; • any other matter required by the Secretary; and (b) keep this information up-to-date, to the satisfaction of the Secretary.	• Monthly reports containing Environmental Monitoring Data published online - Web address: http://www.heronresources.com.au/woodlawn-environment.php	Compliant	Compliant	Noted

TABLE A - INDEPENDENT AUDIT

Approval (ID)	Number	Requirement	Evidence collected (Data/document author, date, title, reference number)	Compliance status	Independent Audit Comment & Recommendations	Proponent Response to Findings
APPENDIX 5 NOISE COMPLIANCE ASSESSMENT		Applicable Meteorological Conditions 1. The noise criteria in Table 3 of the conditions are to apply under all meteorological conditions except the following: (a) during periods of rain or hail; (b) average wind speed at microphone height exceeds 5 m/s; (c) wind speeds greater than 3 m/s measured at 10 m above ground level; or (d) temperature inversion conditions greater than 3°C/100 m. Determination of Meteorological Conditions 2. Except for wind speed at microphone height, the data to be used for determining meteorological conditions shall be that recorded by the meteorological station located on the site. Compliance Monitoring 3. Unless otherwise agreed with the Secretary, monthly attended monitoring is to be used to evaluate compliance with the relevant conditions of this approval. 4. Unless otherwise agreed with the Secretary, this monitoring is to be carried out in accordance with the relevant requirements for reviewing performance set out in the NSW Industrial Noise Policy (as amended from time to time), in particular the requirements relating to: (a) monitoring locations for the collection of representative noise data; (b) meteorological conditions during which collection of noise data is not appropriate; (c) equipment used to collect noise data, and conformity with Australian Standards relevant to such equipment; and (d) modifications to noise data collected, including for the exclusion of extraneous noise and/or penalties for modifying factors apart from adjustments for duration.	<i>Heron Resources Limited (2017), Woodlawn Mine, SML20, Noise and Blast Management Plan</i> (dated April 2017, reference: NBMP, Revision No. 9): 1. (a) - (d) refer to 2. Noise Criteria and Table 4: Applicable Meteorological Conditions. 2. Data for determining meteorological conditions shall be collected from the Veolia owned meteorological station (Appendix B - Noise Management Plan - Section 3.2: Meteorology). 3. Monthly attended monitoring will be used to evaluate compliance with the relevant conditions of this approval. 4. Noise monitoring will be carried out in accordance with NSW Industrial Noise Policy, (3: Noise and Blast Management) in particular the requirements relating to: (a) 6.1 Protocol for Compliance Evaluation in Appendix C. (b) Appendix B - Noise Management Plan - Section 3.2: Meteorology (c) equipment used to collect noise data will conform with the following Australian Standards: • Australian Standard (2004) “<i>AS IEC 61672.1:2004 – Sound Level Meters</i>; and • Australian Standard (1997), “<i>AS 1055.1,2,3:1997 Acoustics – Description and measurement of environmental noise</i>” (Appendix C - 10: References); and (d) Refer to 5.1 Attended Noise Monitoring in Appendix C.	Compliant	Compliant	Noted
		Notes:				
		Complaint				
		Non-compliant				
		Not triggered				

TABLE B - REHABILITATION OBJECTIVES

Feature	Objectives	Evidence collected	Compliance status	Independent Audit Comment & Recommendations
Mine site (as a whole)	• Safe, stable and non-polluting with no final voids on the surface.	AEMR, MOPs, site inspection.	Compliant	Continue monitoring and management against approval conditions.
	• Integrated with the rehabilitation of the Woodlawn Landfill.		Compliant	
	• Revegetated with plant species characteristic of Western Tablelands Dry Forest vegetation community.	Viewed progressive rehabilitation trials on site.	Compliant	
Underground workings	• No measurable subsidence effects on the Woodlawn Landfill, evaporation dams and tailings dams on the site.	• Heron Resources Limited (2018), <i>Woodlawn Mine, SML20, Extraction Plan</i> (dated April 2018, reference: Extraction Plan, Revision No. 5): - including <i>Woodlawn Mine Subsidence Assessment</i> (February 2018) prepared by Crosscut Consulting. Site inspection observations	Compliant	Mine in construction phase.
Surface infrastructure	• To be decommissioned and removed, unless otherwise agreed with the Secretary.		Not triggered	
Waste rock dumps	• Any seepage from the waste rock dumps to be contained and treated on the site.	3.3 Management of Existing and Historic Waste Rock Materials of <i>Heron Resources Limited (2018), Woodlawn Mine, SML20, Waste Rock Management Plan</i> (dated May 2018, reference: WRMP, Revision No. 2) .	Compliant	3.3 Management of Existing and Historic Waste Rock Materials of <i>Heron Resources Limited (2018), Woodlawn Mine, SML20, Waste Rock Management Plan</i> (dated May 2018, reference: WRMP, Revision No. 2) .
Tailings dams	• All tailings contained within low permeability structures with no seepage to surrounding areas from tailings dams	<i>Douglas Partners (2018), Woodlawn Dams Intermediate Surveillance Report 2018, Woodlawn Mine, Collector Road, Tarago, prepared for Heron Resources Limited</i> (ref: 89403.00. Rev 0, dated June 2018), assessment of the dams reported: • North Tailings Dam - no seepage observed in North or East Wall. • South Tailings Dam - <i>previously observed seepage is being managed appropriately and there was no visible seepage from toe of east wall during inspection.</i> • West Tailings Dam - dam was full at time of inspection and is checked weekly. Repairs to the piping are scheduled as noted on Heron Resources Ltd ' <i>Monthly Dams Inspection Checklist</i> ' dated 23/02/2018. • <i>Coffey (2019), Heron Resources Ltd, Woodlawn Project, Tarago, NSW, Stage 1 TSF4 - Operation and Maintenance Manual (dated 11 January 2019 reference: 754-PERGE223510_ TSF4 Ops Man Rev0), TSF4 is comprised with a low permeability clay.</i> Site inspection and interviews with Heron personnel.	Compliant	<i>Douglas Partners (2018), Woodlawn Dams Intermediate Surveillance Report 2018, Woodlawn Mine, Collector Road, Tarago, prepared for Heron Resources Limited</i> (ref: 89403.00. Rev 0, dated June 2018), assessment of the dams reported: • North Tailings Dam - no seepage observed in North or East Wall. • South Tailings Dam - <i>previously observed seepage is being managed appropriately and there was no visible seepage from toe of east wall during inspection.</i> • West Tailings Dam - dam was full at time of inspection and is checked weekly. Repairs to the piping are scheduled as noted on Heron Resources Ltd ' <i>Monthly Dams Inspection Checklist</i> ' dated 23/02/2018. • <i>Coffey (2019), Heron Resources Ltd, Woodlawn Project, Tarago, NSW, Stage 1 TSF4 - Operation and Maintenance Manual (dated 11 January 2019 reference: 754-PERGE223510_ TSF4 Ops Man Rev0), TSF4 is comprised with a low permeability clay.</i>
	• Final landform and vegetation cover to be stable, self sustaining, free draining and consistent with surrounding rehabilitated areas.	Douglas Partners (2018) reported: • South Tailings Dam - is in good condition during inspection. • West Tailings Dam - is in good condition with some small punctures which are to be repaired. • Evaporation Dam 1 - upstream face and crest are in good condition. • Evaporation Dam 2 - not in use and upstream face, crest, downstream face and toe were in good condition. Site inspection and interviews with Heron personnel. Rehabilitation Plan viewed.	Not triggered	Mine in construction phase. Auditor recommends regular evaluation of rehabilitation trials and mine closure and rehabilitation success criteria to ensure objectives are met.

TABLE B - REHABILITATION OBJECTIVES

Feature	Objectives	Evidence collected	Compliance status	Independent Audit Comment & Recommendations
Evaporation dams	Final landform and vegetation cover to be stable, self sustaining, free draining and consistent with surrounding rehabilitated areas.	Heron Resources Limited (2017), Woodlawn Mine, SML20, Vegetation and Rehabilitation Management Plan (dated August 2017, reference: VRMP, Revision No. 8): 4.4.3 Completion Criteria Table 4.2 - Woodlawn Rehabilitation Completion Criteria. Site inspection and interviews with Heron personnel. Rehabilitation Plan viewed.	Not triggered	Mine in construction phase. Auditor recommends regular evaluation of rehabilitation trials and mine closure and rehabilitation success criteria to ensure objectives are met.
Rehabilitated slopes	All rehabilitated slopes to be less than 10 degrees and free draining (except for the dam walls which are permitted to have a final slope of up to 18 degrees).	Heron Resources Limited (2017), Woodlawn Mine, SML20, Vegetation and Rehabilitation Management Plan (dated August 2017, reference: VRMP, Revision No. 8): 4.4.3 Completion Criteria Table 4.2 - Woodlawn Rehabilitation Completion Criteria.	Not triggered	Mine in construction phase. Auditor recommends regular evaluation of rehabilitation trials and mine closure and rehabilitation success criteria to ensure objectives are met.
Drainage lines	Hydraulically and geomorphologically stable, with vegetation that is in the same condition or better than that which existed prior to mining under this approval.	Heron Resources Limited (2017), Woodlawn Mine, SML20, Vegetation and Rehabilitation Management Plan (dated August 2017, reference: VRMP, Revision No. 8): 4.4.3 Completion Criteria Table 4.2 - Woodlawn Rehabilitation Completion Criteria	Not triggered	Mine in construction phase. Auditor recommends regular evaluation of rehabilitation trials and mine closure and rehabilitation success criteria to ensure objectives are met.
Revegetation area	Establish at least 71 hectares of the Western Tablelands Dry Forest vegetation community in either Area A and/or Area B shown in Appendix 3.	Heron Resources Limited (2017), <i>Woodlawn Mine, SML20, Vegetation and Rehabilitation Management Plan</i> (dated August 2017, reference: VRMP, Revision No. 8): 3.2: Vegetation offset: planning for revegetation of 78 ha area.	Compliant	Auditor recommends regular evaluation of success of offset planting to ensure objectives are met.
Community	Minimise the adverse socio-economic effects associated with mine closure.		Not triggered	

Notes:	
Complaint	
Non-compliant	
Not triggered	

TABLE C - REVIEW OF ANNUAL REVIEWS

		July 2015 to June 2016	July 2016 to June 2017	July 2017 to June 2018
(a)	describe the development (including any rehabilitation) that was carried out in the past year,	• Development of dewatering infrastructure for underground mine. • Progressive removal of the dolerite stockpile to access the mine entry box cut location, further resource evaluation, exploration, design and planning activities. • No mining occurred during the reporting period. • Exploration drilling took place. • Refurbishment of the Core Shed and storage facilities, upgrading of the mine office. Section 5.1: Buildings: no new buildings constructed or demolished during reporting period. Section 5: Rehabilitation activities included site clean-up and relocation of metal concentrates to the tailings dams. Section 3.15: Material Prone to Generating Acid Mine Drainage: Rehabilitation of the main waste rock emplacement has been completed. Section 3.5.5: Evaporation Dam Leakage Assessment: Investigation into leakage from evaporation dams commenced.	2. Operations During the Reporting Period Commencement of dewatering. the development of dewatering infrastructure for the underground mine and commencement of dewatering; • completion of test work for the future water treatment systems; • progressive removal of the dolerite stockpile to access the mine entry box cut location; • work on the recovery of an existing haul road between the mine access and processing plant location. • No mining occurred during the reporting period. • Exploration drilling of 19 holes located south of the Kate Lens. 2.2 Land Preparation: dolerite stockpile relocated. Section 5.1: Buildings: no new buildings or infrastructure constructed or demolished during reporting period.	4. Operations Summary: Operations during the reporting period included: • Completion of the earthworks associated with the new TSF4 facilities area; • Completion of the box cut for the new entry site; • Completion of the haul road between the new entry site and the processing site; • Over 80% of civil concrete placement and 93% equipment procurement associated with the new processing plant site. • No mining occurred during the reporting period.
	and the development that is proposed to be carried out over the next year;	6.1 Planned Activities for 2016-17 Reporting Period: Main processing area and mine portal is to be constructed. Relocation of dolerite stockpile. Dewatering of underground workings to commence.	6.1 Planned Activities for 2017-2018 Reporting Period • Initial surface disturbance and construction area set up • Earthworks and installation of required erosion and sedimentation controls. • Erection of temporary buildings and contractors facilities. • Erection of permanent buildings, infrastructure, hardstand and car parking. • Construction of the process plant including installation of processing equipment, material handling and storage areas. • Construction of a new tailings storage facility. • Construction of the box cut, portal and underground entry area including paste fill plant. • Construction of the new haul road between the underground entry site and the processing plant area. • Erection of tailings retreatment equipment and infrastructure. • Establishment of the out of pit rock emplacement. • Temporary and permanent revegetation work.	11.1 Planned Activities for 2018-19 Reporting Period: • complete erection of permanent buildings, infrastructure, hardstand and car parking; • complete construction of the process plant including installation of processing; • equipment, material handling and storage areas; • commissioning of the new processing facility; • commence decline construction; • commence extraction of tailings in Tailings Dam South; • completion of Paste Plant and trial paste production; • establishment of the waste rock emplacement. • additional rehabilitation works to occur.

TABLE C - REVIEW OF ANNUAL REVIEWS

		July 2015 to June 2016	July 2016 to June 2017	July 2017 to June 2018
(b)	include a comprehensive review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the: • the relevant statutory requirements, limits or performance measures/criteria; • requirements of any plan or program required under this approval; • the monitoring results of previous years; and • the relevant predictions in the EA;	Groundwater management: <i>It is not possible to determine receiving environmental criteria as outlined in the ANZECC 2000 Water Quality Guidelines.</i>	Environmental Protection Licence (EPL) 20821 granted in May 2017.	
	Dust Deposition Monitoring	Monthly monitoring of three dust deposition gauges. Analysis in accordance with AS2724.1 <i>Ambient Air - Particulate Matter</i> . Results reported as total solids in accordance with AS3580.10.1 – <i>Methods for sampling and analysis of ambient air</i> . There were no reportable dust incidents during the reporting period and dust concentrations at nearest receptor, Pylara, has decreased.	Section 3.2: Four dust deposition gauges - dust levels below the criteria limits and no reportable incidents for the reporting period. The rolling annual average graph presents a downward trend of dust in the western area, with results remaining similar in the nearby farm assessment location (Pylara).	6.2.3: slight increase in dust deposition levels during the construction works in Hickory's Paddock and the haul road and box cut excavation, however, the nearest receptor, Pylara did not record an increase in dust levels. While dust levels increased, the use of a water cart for dust suppression showed a reduction in dust levels.
	Atmospheric Dust Monitoring			• Section 6.2.4: High volume air sampler commenced in October 2017, however, there is a discrepancy between information in Table 6.7 and Graph 3. While Graph 3 shows two exceedances at TSP above 30 ug/m3, these exceedances are not listed on Table 6.7. Clarification is needed.
	Erosion and Sediment Control	Section 3.3: <i>As no construction has commenced in relation to the Woodlawn Mine development, no specific erosion or sedimentation controls have been installed other than minor provisions required for the ongoing drilling program.</i> No reportable incidents during reporting period.	Section 3.3: <i>All erosion control measures will be maintained in accordance with the principles specified in the "Managing Urban Stormwater: Soils and Construction – 4th Edition", Landcom 2004 (Blue Book).</i> No reportable incidents during 2016 - 2017 reporting period.	Section 6.3: As part of the construction program in Hickory's Paddock, Heron installed appropriate erosion control structures prior to soil disturbance. All runoff from the construction site passed through at least one sedimentation control structure prior to discharge into the new pollution control pond. The erosion control measures were designed to safely convey water from disturbed areas, reduce runoff velocity, increase batter and bench stability and reduce solids loading prior to entering the pollution control structures. Surface stability was improved where possible by the use of temporary and permanent revegetation measures, although these were less effective as anticipated due to the prevailing drought. Erosion control structures were inspected regularly, particularly after heavy rainfall, and upgraded or repaired where necessary during the reporting period. No reportable incidents during reporting period.
	Surface Water Monitoring - Creeks	Section 3.4.1: 11 surface water sampling locations sampled quarterly - three creeks and nine dam locations with results compared to ANZECC (2000) <i>Water Quality Guidelines</i> for 95% ecosystem protection. pH ranged from 6.33 - 8.03 and Conductivity (K): 162 - 3,710 µS/cm for creek samples. Sulfate (SO ₄) and Zinc (Zn) concentrations fluctuated from May 2014 - May 2016.	Section 3.4.1: Due to dry weather conditions, some sample locations were not able to be sampled as they were dry. pH, K, SO ₄ and metals (Zn, Pb, Cu) inline with historical trends. No reportable incidents during reporting period.	Section 6.4: Table 6.8: pH results ranging from: pH 4.52 - 7.72 and EC ranging from 297 to 2,190 µS/cm. <i>The results show little if any influence on water quality as a result of the mining operation.</i>

TABLE C - REVIEW OF ANNUAL REVIEWS

		July 2015 to June 2016	July 2016 to June 2017	July 2017 to June 2018
	Surface Water Monitoring - Dams	Section 3.4.2: pH ranged from 2.42 - 8.32 and K: 977 - 31,300 uS/cm for dam samples. pH and K generally consistent since 2007. No reportable incidents for surface water monitoring.	Section 3.4.2: Water quality results (pH and K) similar to previous years, with pH results ranging from: pH 2.48 - 7.73 and K ranging from 1,060 - 32,300 µS/cm. No reportable incidents during 2016 - 2017 reporting period.	Table 6.9: pH results ranging from: pH 2.39 - 8.74 and EC ranging from 1,630 - 33,300 µS/cm. Section 6.4.3: <i>There have been no reportable incidents in relation to releases of surface water into the surrounding environment during the reporting period.</i>
	Ground water Management	Section 3.5: <i>There are no specific assessment criteria in relation to groundwater quality however the EA made a commitment that the site will remain nil discharge for surface water and would not adversely impact groundwater as a result of on site storages. As natural groundwater varies in quality as a result of naturally occurring sulphide ore, it is difficult to establish background levels as well as determine if these levels are being influenced by the operation.</i> <i>All groundwater bores have been compared with surface water quality to determine if groundwater is impacted from infiltration from contaminated mine areas.</i> The natural variability makes it difficult to determine whether or not surface storages are leaking or otherwise posing a risk to surface and groundwater systems.	2.8.1: no adverse effects on environment following 20 years of operations. Section 3.5: pH at MB3 (background groundwater quality) has risen to pH 8 and EC has decreased to 1,640 µS/cm - consistent with 2016 results. SO ₄ result inline with previous results and metal results reported at trace levels. <i>Long term average results for MB7 are pH 6.9, conductivity 8,800 µS/cm, sulphate 190 mg/L, zinc 1.44 mg/L, copper 0.11 mg/L and lead 0.002 mg/L.</i> MB10, MB13 and MB2 groundwater results remain consistent with previous monitoring events.	6.5 Groundwater Management: <i>All groundwater bores have been compared with surface water quality to determine if groundwater is impacted from infiltration from contaminated mine areas.</i> 6.5.3 Background Groundwater Quality: pH and EC at MB3 and MB7 are consistent with previous events, while SO ₄ increased significantly for one monitoring event at MB3, the SO ₄ concentration decreased and was in line with previous results for the third and fourth monitoring events of 2018. A decrease in Sulphate concentrating was also noted at MB7. Groundwater wells downstream of ED1 and EDA show similar results to previous monitoring events.
	Evaporation Dam Leakage Assessment	Investigation into leakage from evaporation dams commenced during 2015 - 2016.	Section 3.5.5: assessment of ED1 and ED2 undertaken by AECOM. <i>The study included geophysical investigations, inspection and sampling of the clay liner material, installation of 14 additional monitoring bores and an analysis of historic data.</i> The investigation concluded that there is little evidence of offsite contamination.	Section 6.5.6: an Ecological Risk assessment was undertaken by Niche Environment and Heritage. Based on findings <i>ED2 will be developed into a series of HDPE lined cells in order to better manage water removed from the underground workings.</i>
	Ecological risk Assessment		Recommended by AECOM during assessment and accepted by Veolia and Heron. This will assist Heron on the future management and maintenance of the evaporation dams.	
	Rehabilitated Waste Rock Dump	Section 3.5.6: MB15 results in-line with previous events. MB16 has shown fluctuations in Zinc ranging from <1000 mg/l to >7,500 mg/l. MB17 showing increasing trend in Zinc concentration. The results from MB5 (located on the southern side of the Rehabilitated Waste Dump) appear to be more consistent with the natural sulphide ore body than leachate from the dump which is collected in the Waste Rock Dam.	Section 3.5.6: MB15, MB16 and MB17 are analysed to determine if seepage is occurring from the waste rock dump. MB16 shows an increase in Zinc and SO ₄ since July 2016. Zn concentration at MB17 fluctuated with highest result (> 26,000 mg/L) reported recently. This result has decreased in last monitoring round and is consistent with previous trends. Results at MB5 remain consistent since end of 2014.	Section 6.5.7: results remain consistent with previous reporting period.
	North Tailings Dam	Section 3.5.7: <i>Water quality results in NTP1, NTP2, SP2C and SP3C are consistent with background groundwater quality in MB7 and do not indicate seepage in these areas.</i>	Section 3.5.7: water quality results consistent since 2007 at NTP1 and ETP8. NTP2 reports decrease in K in last monitoring event at NTP2 while SP11B remain consistent since 2014.	Section 6.5.8: Increase in K and decrease in pH during reporting period. Does not indicate any leakage from NTD.
	Tailings Dam South	Section 3.5.8: Seven piezometers and two monitoring bores. Tailings Dam South is known to be leaking and a collection dam and return pumping system has been installed. MB22: Sulphate has increased from 200 to 600 mg/L and all other analytes are within previous trends.	Section 3.5.8: Results are consistent with previous events.	Section 6.5.9: Sulfate concentration has fluctuated at E3, with a significant increase noted at MB22 from > 250 mg/L to 930 mg/L. <i>There are no trends found in the data and no indication that this bore is detecting leakage from the tailings dam.</i>

TABLE C - REVIEW OF ANNUAL REVIEWS

		July 2015 to June 2016	July 2016 to June 2017	July 2017 to June 2018
	Other Groundwater Wells	Section 3.5.9: There are three additional monitoring bores which are relevant to the future mining operation. Groundwater quality is consistent with historical results.	Section 3.5.9: Results are consistent with recent monitoring events.	Section 6.5.10: Results are consistent with recent monitoring events.
	Threatened Flora	Section 3.6: No clearing of vegetation has occurred.	No change to previous report.	Section 6.6.1: No clearing of vegetation has occurred.
	Threatened Fauna	Section 3.7: a Fauna survey concluded that no threatened fauna will be impacted by future activities.	No change to previous report.	Section 6.6.2: No change to previous report and impact to fauna is considered to be low.
	Weeds	Section 3.8: Serrated Tussock is the weed of concern.	No change to previous report.	Section 6.7.2: No change to previous report.
	Pests	Section 3.9: Pests: monthly baiting program around the perimeter of the mine void arranged by Veolia to manage potential populations of rodents associated with the waste in the Bioreactor.	No change to previous report.	6.8.2 Further Improvements: <i>As a result of the prevailing drought, native animal grazing has provided additional pressure on vegetation around the construction site. It is proposed to progressively install kangaroo proof fencing around the processing plant site and revegetation areas to exclude access.</i>
	Blasting	Section 3.10: No blasting undertaken during the reporting period.	Section 3.10: No blasting undertaken during the reporting period.	Section 6.9: two blasting events took place. A test blast on 20 April 2018 and second blast on 24 April 2018. Four blast monitors were set up and according to Table 6.11 - Blast Monitoring Results - no exceedances occurred.
	Operational noise	Section 3.11: <i>With the closest private residence being located approximately 6 km away, the risk of noise exceedance or noise nuisance is considered low. Results of the noise monitoring program and effectiveness of these mitigation measures will be reported in subsequent AEMRs.</i>	Section 3.11: <i>No further improvements are considered necessary at this stage.</i>	6.10.2: monthly noise monitoring was conducted at three locations and results are within the noise criteria limits showing the site has a low impact on the receptors. <i>As the earthworks component of the construction program is now complete, it is unlikely that further improvements would be required.</i>
	Visual and Stray Light	Section 3.12: No further improvements are considered necessary at this stage.	Section 3.12: <i>No further improvements are considered necessary at this stage.</i>	Section 6.11: <i>No further improvements are considered necessary at this stage.</i>
	Aboriginal and European Heritage	Section 3.13: <i>no areas of Aboriginal or European Heritage are to be impacted and a Heritage Management Plan has been prepared should significant heritage items be observed.</i>	Section 3.13: No change to previous report.	Section 6.12: No further improvements are considered necessary at this stage.
	Spontaneous Combustion	Section 3.14: <i>The ore, waste rock and process residues do not contain the mineral contents capable of supporting spontaneous combustion.</i>	Section 3.14: <i>No further improvements are considered necessary at this stage.</i>	
	Material Prone to Generating Acid Mine	Section 3.15: Table 3.10 details <i>Waste Rock Classification and Management. As the Project is yet to commence, the effectiveness of the acid mine drainage control strategy has yet to be tested. The ongoing monitoring program and reporting framework will determine if further improvements are necessary.</i>	Section 3.15: No change to previous report.	6.13.1 Effectiveness of Site Strategies: <i>As the mine has yet to produce PAF material, the effectiveness of the acid mine drainage control strategy has yet to be tested.</i>

TABLE C - REVIEW OF ANNUAL REVIEWS

		July 2015 to June 2016	July 2016 to June 2017	July 2017 to June 2018
	Bushfire	Section 3.16: Rural Fires Act 1997. <i>The proposed measures (firebreaks, minimize quantity of dead timber, onsite water storage will be available for fire fighting if required) are considered appropriate at this stage and no additional improvements are considered necessary.</i>	Section 3.16: No change to previous report.	Section 6.14: No change to previous report.
	Mine Subsidence	Section 3.17: Ongoing investigations and monitoring will be undertaken throughout the life of the Project, to assess and mitigate against potential underground mining impacts as necessary. As described in the EA, the use of tight paste fill in underground extraction areas will remove the potential for surface subsidence to occur.	Section 3.17: Extraction Plan has been prepared in accordance with the Project Approval and a draft has been provided to DPE for review.	6.15: Extraction Management Plan expected to be approved during 2018 - 2019 reporting period.
	Hydrocarbon Contamination	Section 3.18: all fuel and oil tanks are to be bunded.	Section 3.18: No change to previous report.	6.16: There is no known hydrocarbon contamination within the Hickory's Paddock or the proposed new mine entry site.
	Methane Drainage and Ventilation	Section 3.19: Historically, the Woodlawn Mine did not generate methane. However the vicinity of the underground portal to the Bioreactor and the potential for future leakages into the workings has required Heron to incorporate methane gas detection equipment at the future exhaust fan site to monitor methane concentration within the mine atmosphere.	Section 3.19 : An operational management plan is being developed to take into account methane management systems.	Section 6.17: No change since previous report.
	Public Safety	Section 3.20: The mine property is currently fenced and a lockable gate has been installed at the entrance.	Section 3.20: No change to previous report.	Section 6.18: No change since previous report.
(c)	identify any non-compliance over the past year, and describe what actions were (or are being) taken to ensure compliance;	Two resident complaints and one information query.	No complaints and no non-compliances during reporting period.	Four non-compliances as result of DPE audit undertaken in October 2017 and July 2018: Passive treatment system for Waste Rock Dump drainage; Construction certificates; Vegetation Screening and erosion and sedimentation controls. Two complaints were received during the 2017-18 reporting period - flying of a drone and dumping of rubbish on Currawang Road. Table 9.1 – Complaint Summary - total of six complaints from 2013 - 2018.
(d)	identify any trends in the monitoring data over the life of the project;			7.1.1 Summary of Surface Water Quality - pH levels remain generally consistent from 2004 - 2018 - generally between pH 2 and 4. Salinity fluctuates from 10,000 to 30,000 µS/cm.

TABLE C - REVIEW OF ANNUAL REVIEWS

		July 2015 to June 2016	July 2016 to June 2017	July 2017 to June 2018
(e)	identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies; and			Four non-compliances as result of DPE audit undertaken in October 2017 and July 2018: Passive treatment system for Waste Rock Dump drainage; Construction certificates; Vegetation Screening and erosion and sedimentation control
(f)	describe what measures will be implemented over the next year to improve the environmental performance of the project.	6.1 Planned Activities for 2016-17 Reporting Period: Relocation of dolerite stockpile. Dewatering of underground workings to commence. Section 3.11.1: Noise mitigation measures to be implemented during construction and operation of the mine.	3.5.11 Groundwater Pollution Monitoring - Future Improvements: Under the provisions of the Project Approval, additional monitoring bores are required to specifically monitor aspects of the future mining operation. Section 5: During the 2017-2018 reporting period, more substantive rehabilitation activities will commence as part of the construction program. Activities for the 2017-2018 reporting period will include: • Commencement of the rehabilitation trials on the northern portion of TDN. • Use of MBT compost to topdress poor growth areas of the Rehabilitated Waste Rock Emplacement. • Continuation of the mine dewatering program including additional monitoring and reporting requirements specified by the EPA.	11.1 Planned Activities for 2018-19 Reporting Period: • additional rehabilitation works to occur.

Risk no.	Feature	Objective	Risk Issue- Potential Hazard/ loss scenario	Potential duration of impact	Location of impact	Existing Controls/ Monitoring and Assessment undertaken	Consequence	Likelihood	Matrix Result	Risk Rating	Additional controls, monitoring, assessment or actions recommended
1	Mine site (as a whole)	Safe, stable and non-polluting with no final voids on the surface.	Resulting landform and receiving environment at risk from inadequate geochemical and geotechnical management.	L	OM	- Heron Resources Limited (2017), Woodlawn Mine, SML20, Vegetation and Rehabilitation Management Plan (dated August 2017, reference: VRMP, Revision No. 8) - AEMR, MOPs	2	4	6	M	Regular evaluation of rehabilitation trials and mine closure and rehabilitation success criteria to ensure objectives are met. Due to scale and complexity of Woodlawn facility (mine and landfill), recommend separate independent surface water, groundwater, rehabilitation and closure monitoring and performance management reviews undertaken every three (3) years to support Independent Audit processes (i.e. DA and approvals) for both facilities.
2	Mine site (as a whole)	Integrated with the rehabilitation of the Woodlawn Landfill.	Inconsistent rehabilitation and closure objectives resulting in disparate landscapes, increasing risk of rehabilitation failure.	L	OM		2	4	6	M	
3	Mine site (as a whole)	Revegetated with plant species characteristic of Western Tablelands Dry Forest vegetation community.	Failure to meet successful rehabilitation, increased risk of weed infestation / loss of biodiversity.	L	OM		2	4	6	M	
4	Underground workings	No measurable subsidence effects on the Woodlawn Landfill, evaporation dams and tailings dams on the site.	Geotechnical and landform failure of landfill and mine waste impoundments (tailings and evaporation dams, waste rock dumps); failure to meet regulatory and stakeholder requirements	M	WM	- Heron Resources Limited (2017), Woodlawn Mine, SML20, Vegetation and Rehabilitation Management Plan (dated August 2017, reference: VRMP, Revision No. 8) - Waste Rock Management Plan - Paste Fill Management Plan - Subsidence Management Plan - AEMR, MOPs	2	4	6	M	Regular evaluation of mining and landfilling subsidence and geotechnical performance to ensure Woodlawn precinct regulatory and geotechnical performance objectives are met. Due to scale and complexity of Woodlawn facility (mine and landfill), recommend separate independent subsidence and geotechnical monitoring and performance management review undertaken every three (3) years to support Independent Audit processes (i.e. DA and approvals) for both facilities.
5	Surface infrastructure	To be decommissioned and removed, unless otherwise agreed with the Secretary.	Legacy safety and environmental risk should surface infrastructure remain; failure to meet rehabilitation and closure objectives	M	OM	- Heron Resources Limited (2017), Woodlawn Mine, SML20, Vegetation and Rehabilitation Management Plan (dated August 2017, reference: VRMP, Revision No. 8) - AEMR, MOPs	3	4	7	M	Ensure decommissioning and associated costs are incorporated into mine closure planning and financial assurances.

Risk no.	Feature	Objective	Risk Issue- Potential Hazard/ loss scenario	Potential duration of impact	Location of impact	Existing Controls/ Monitoring and Assessment undertaken	Consequence	Likelihood	Matrix Result	Risk Rating	Additional controls, monitoring, assessment or actions recommended
6	Waste rock dumps	Any seepage from the waste rock dumps to be contained and treated on the site.	Seepage from waste rock dumps migrates outside of treatment system domain and poses risk to receptors.	G	OM	- Heron Resources Limited (2017), Woodlawn Mine, SML20, Vegetation and Rehabilitation Management Plan (dated August 2017, reference: VRMP, Revision No. 8) - Waste Rock Management Plan - Paste Fill Management Plan - Subsidence Management Plan - AEMR, MOPs	2	4	6	M	Regular evaluation of rehabilitation trials and mine closure and rehabilitation success criteria to ensure objectives are met. Due to scale and complexity of Woodlawn facility (mine and landfill), recommend separate independent surface water, groundwater, rehabilitation and closure monitoring and performance management reviews undertaken every three (3) years to support Independent Audit processes (i.e. DA and approvals) for both facilities.
7	Tailings dams	All tailings contained within low permeability structures with no seepage to surrounding areas from tailings dams	Seepage from tailings dams migrates outside of domain and poses risk to receptors, rehabilitation success not met.	L	WM	- Heron Resources Limited (2017), Woodlawn Mine, SML20, Vegetation and Rehabilitation Management Plan (dated August 2017, reference: VRMP, Revision No. 8) - Waste Rock Management Plan - Paste Fill Management Plan - Subsidence Management Plan - Water Management Plan - AEMR, MOPs	2	3	5	H	Regular evaluation of rehabilitation trials and mine closure and rehabilitation success criteria to ensure objectives are met. Due to scale and complexity of Woodlawn facility (mine and landfill), recommend separate independent surface water, groundwater, rehabilitation and closure monitoring and performance management reviews undertaken every three (3) years to support Independent Audit processes (i.e. DA and approvals) for both facilities.
8	Tailings dams	Final landform and vegetation cover to be stable, self sustaining, free draining and consistent with surrounding rehabilitated areas.	Resulting landform and receiving environment at risk from inadequate geochemical and geotechnical management, inadequate cover materials used resulting in failure of rehabilitation objectives.	L	Loc	- Heron Resources Limited (2017), Woodlawn Mine, SML20, Vegetation and Rehabilitation Management Plan (dated August 2017, reference: VRMP, Revision No. 8) - Waste Rock Management Plan - Paste Fill Management Plan - Subsidence Management Plan - Water Management Plan - AEMR, MOPs	2	3	5	H	Regular evaluation of rehabilitation trials and mine closure and rehabilitation success criteria to ensure objectives are met. Due to scale and complexity of Woodlawn facility (mine and landfill), recommend separate independent surface water, groundwater, rehabilitation and closure monitoring and performance management reviews undertaken every three (3) years to support Independent Audit processes (i.e. DA and approvals) for both facilities.
9	Evaporation dams	Final landform and vegetation cover to be stable, self sustaining, free draining and consistent with surrounding rehabilitated areas.	Resulting landform and receiving environment at risk from inadequate geochemical and geotechnical management, inadequate cover materials used resulting in failure of rehabilitation objectives.	L	Loc	- Heron Resources Limited (2017), Woodlawn Mine, SML20, Vegetation and Rehabilitation Management Plan (dated August 2017, reference: VRMP, Revision No. 8) - Waste Rock Management Plan - Paste Fill Management Plan - Subsidence Management Plan - Water Management Plan - AEMR, MOPs	2	3	5	H	Regular evaluation of rehabilitation trials and mine closure and rehabilitation success criteria to ensure objectives are met. Due to scale and complexity of Woodlawn facility (mine and landfill), recommend separate independent surface water, groundwater, rehabilitation and closure monitoring and performance management reviews undertaken every three (3) years to support Independent Audit processes (i.e. DA and approvals) for both facilities.
10	Rehabilitated slopes	All rehabilitated slopes to be less than 10 degrees and free draining (except for the dam walls which are permitted to have a final slope of up to 18 degrees).	In absence of site-specific geomorphic landform design, steep slopes can exacerbate erosion risk and undermine geotechnical and geochemical stability.	L	Loc	- Heron Resources Limited (2017), Woodlawn Mine, SML20, Vegetation and Rehabilitation Management Plan (dated August 2017, reference: VRMP, Revision No. 8) - Waste Rock Management Plan - Paste Fill Management Plan - Subsidence Management Plan - Water Management Plan - AEMR, MOPs	3	2	5	H	Regular evaluation of rehabilitation trials and mine closure and rehabilitation success criteria to ensure objectives are met. Due to scale and complexity of Woodlawn facility (mine and landfill), recommend separate independent surface water, groundwater, rehabilitation and closure monitoring and performance management reviews undertaken every three (3) years to support Independent Audit processes (i.e. DA and approvals) for both facilities.

Risk no.	Feature	Objective	Risk Issue- Potential Hazard/ loss scenario	Potential duration of impact	Location of impact	Existing Controls/ Monitoring and Assessment undertaken	Consequence	Likelihood	Matrix Result	Risk Rating	Additional controls, monitoring, assessment or actions recommended
11	Drainage lines	Hydraulically and geomorphologically stable, with vegetation that is in the same condition or better than that which existed prior to mining under this approval.	Inadequate erosion and sediment control, hydrology, rehabilitation material source characterisation and vegetation selection can pose unacceptable safety and environmental risk.	L	WM	- Heron Resources Limited (2017), Woodlawn Mine, SML20, Vegetation and Rehabilitation Management Plan (dated August 2017, reference: VRMP, Revision No. 8) - Waste Rock Management Plan - Subsidence Management Plan - Water Management Plan - AEMR, MOPs	3	4	7	M	Regular evaluation of rehabilitation trials and mine closure and rehabilitation success criteria to ensure objectives are met. Due to scale and complexity of Woodlawn facility (mine and landfill), recommend separate independent surface water, groundwater, rehabilitation and closure monitoring and performance management reviews undertaken every three (3) years to support Independent Audit processes (i.e. DA and approvals) for both facilities.
12	Revegetation area	Establish at least 71 hectares of the Western Tablelands Dry Forest vegetation community in either Area A and/or Area B shown in Appendix 3.	Rehabilitation success criteria not met; underperformance / failure to meet biodiversity and rehabilitation goals.	L	OM	- Heron Resources Limited (2017), Woodlawn Mine, SML20, Vegetation and Rehabilitation Management Plan (dated August 2017, reference: VRMP, Revision No. 8) - AEMR, MOPs	3	4	7	M	Regular evaluation of rehabilitation trials and mine closure and rehabilitation success criteria to ensure objectives are met.
13	Community	Minimise the adverse socio-economic effects associated with mine closure.	Loss of "social licence to operate" and stakeholder support for rehabilitation and post-mining land use approaches.	L	RI	- Heron Resources Limited (2017), Woodlawn Mine, SML20, Vegetation and Rehabilitation Management Plan (dated August 2017, reference: VRMP, Revision No. 8) - AEMR, MOPs	2	4	6	M	Integrity testing of fuel tanks and pipelines should be undertaken along with testing of the integrity of all bund walls and floors. Risk assessment of potential sources of spills and leaks should be conducted following the audit, and re-evaluation of management and mitigation procedures.

APPENDIX B: INDEPENDENT AUDIT DECLARATION FORM

Independent Audit Report Declaration Form	
Project Name	Woodlawn Mine Project
Consent Number	07_0143MOD2
Description of Project	Review of Environmental Management Practices as part of Construction Phase of Mine.
Project Address	Woodlawn Mine, Tarago NSW EPL20821
Proponent	Heron Resources
Title of Audit	Independent Environmental Audit, Woodlawn Mine, NSW. Version 1.1
Date	20 August 2021

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

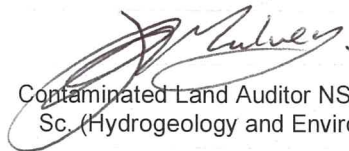
- a) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Independent Auditor Declaration

Name of Auditor

Philip Mulvey

Signature



Qualification

Contaminated Land Auditor NSW, B. Sc Ag; M. App
Sc. (Hydrogeology and Environmental Geology)

Company

Environmental Earth Sciences NSW

Company Address

PO Box 380, North Sydney NSW 2059

APPENDIX C: SITE INSPECTION PHOTOGRAPHS



1. View of proposed Tailings Storage Facility (TSF4) facing north.



2. Eastern portion of site- east of Tailings DamNorth (TDN).



3. Seepage evident south of Tailings Dam South (TDS).



4. View of TDS facing north.



5. View of TDS facing north.



6. TDN facing east.



7. Western area of TDN.



8. Rehabilitated waste rock dump facing north.



9. Construction of TSF4 – facing north west.



10. Veolia composting facility