

ENVIRONMENTAL MANAGEMENT STRATEGY

MANAGEMENT PLAN

25/01/2023



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DOCUMENT CONTROL

Version	Approved By	Revision Date	Description of Changes	Author
1	AJ Saverimutto	03/04/2012	Original	R.W. Corkery
2	AJ Saverimutto	21/09/2012	Review	R.W. Corkery
3	James Dornan	01/04/2014	Review	Unity Mining
4	DMPL	20/09/2017	Review	Len Sharp
5		22/08/2019	Review	James Dornan
6		16/01/2023	Template update Mod5 review	E. Guarino

1. INTRODUCTION

Dargues Gold Mine is an underground metalliferous mine owned by Big Island Mining Limited, a wholly owned subsidiary of Aurelia Metals Limited. Dargues Gold Mine is located approximately 60km southeast of Canberra, 13km south of Braidwood and immediately north of the village of Majors Creek.

The Dargues Gold Mine consists of an underground gold mine, a run-of-mine (ROM) pad, temporary waste rock emplacement, processing plant, tailings storage facility and associated infrastructure and ancillary activities

This document is the sixth revision of the Environmental Management Strategy for the Dargues Gold Project and has been prepared following granting of Modified Project Approval (MP) 10_0054 MOD5 (see Section 3.1).

This document has been prepared in satisfaction of Condition 5(1) of MP 10_0054 MOD5.

The Project is fully described in the following documents and no further background information is provided in this document.

- *Environmental Assessment* dated September 2010 and associated documentation prepared to support the application for Project approval.
- *Mining Operations Plan* dated May 2017.
- *Environmental Assessment – Modification 1* dated April 2012.
- *Response to Government Agency and Public Submissions for the Dargues Reef Gold Project - Modification 1* dated June 2012.
- *Environmental Assessment – Modification 2* dated July 2013.
- *Response to Government Agency and Public Submissions for the Dargues Reef Gold Project - Modification 2* dated September 2013.
- *Environmental Assessment – Modification 3* dated August 2016.
- *Response to Government Agency and Public Submissions for the Dargues Gold Mine - Modification 3* dated November 2015.
- *Statement of Environmental Effects for the Dargues Gold Mine – Modification 4*, dated November 2018.
- *Response to Submissions for the Dargues Gold Mine – Modification 4*, dated January 2019.
- *Dargues Gold Mine – Modification 5 Report* dated August 2022.
- *Dargues Gold Mine – Modification 5 Submissions Report* dated November 2022.

In addition, a range of management plans have been prepared to guide operations within the Project Site. These include the following.

- *Blast Management Plan.*

- Noise Management Plan.
- Air Quality and Greenhouse Gas Management Plan.
- Biodiversity Management Plan.
- Aboriginal Heritage Management Plan.
- Traffic Management Plan.
- Waste Management Plan.
- Bushfire Management Plan.
- Water Management Plan.
- Rehabilitation Management Plan (incorporated into the Mining Operations Plan).

2. STRATEGY

This *Environmental Management Strategy* (EMS) forms part of the integrated Environmental Management System for the Project. It describes the overall framework for environmental management for the construction and ongoing operation of the Project. The EMS addresses the principal strategies to be adopted by the Company, including compliance management and monitoring, conflict resolution and consultation / information dissemination processes.

3. LEGAL AND OTHER REQUIREMENTS

3.1. PROJECT APPROVAL

Project Approval 10_0054 was issued for the Dargues Reef Gold Project, by the Land and Environment Court on 7 February 2012.. Modification 1 for the use of paste fill within the Project Site was subsequently approved on 12 July 2012. Modification 3 for an extension of the mine life and increase in the resource extracted was subsequently approved on 10 August 2016. Modification 4 for the relocation of the approved heavy vehicle crossing of Spring Creek and the reinstatement of the previously approved access track from the Site Access Road to the Tailings Storage Facility was subsequently approved on 23 May 2019. Modification 5 for increased processing rate and to support water security measures on site, including a water storage dam and supply of water.

This Environmental Management Strategy has been prepared in accordance with Condition 5(1) of MP 10_0054 MOD5 (Table 1) and generally conforms to the AS/NZS ISO 14001:2016 Environmental Management System guidelines. It is required to be submitted for approval by the Secretary of the Department of Planning, and Environment (DPE).

The Company is committed to complying with all regulatory requirements and standards relevant to the environmental management of the Project. Copies of the relevant Acts, Regulations, Standards, Licences, Leases and Approvals will be maintained by the Environmental Supervisor at the Mine and can be readily accessed when required.

Table 1 presents where each requirement identified in Condition 5(1) has been addressed in this document.

TABLE 1: Relevant Conditions - MP 10_0054

Requirement	Section
Condition 5(1)	
Environmental Management Strategy	
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 to the Secretary for approval prior to construction;	
b) provide the strategic framework for environmental management of the project;	Entire Document

Requirement	Section
c) identify the statutory approvals that apply to the project;	4
d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;	3.1, 3.2, 3.3 12
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;	8, 11
– receive, handle, respond to, and record complaints	9.1
– resolve any disputes that may arise during the course of the project	9.2
– respond to any non-compliance.	6.7
– respond to any emergencies; and	
f) include:	
– copies of any strategic plans and programs approved under the conditions of this approval; and	3.4
– a clear plan depicting all the monitoring required to be carried out under the conditions of this approval.	5

3.2. MINERAL AUTHORITIES

Mineral authorities issued to the mine are listed in Table 2.

TABLE 2: Mineral authorities

Issuing Authority	Approval number	Date of Issue	Expiry
Minister for Trade and Investment, Regional Infrastructure and Services - Resources and Energy	Mining Lease 1675	12 April 2012	12 April 2045
	Exploration Licence 6548	5 April 2006	5 April 2023
	Exploration Licence 8372	21 May 2015	20 May 2027

3.3. LICENCES

The various licences, permits and consents issued to the company for the mine are listed in Table 3.

TABLE 2: Mineral authorities

Issuing/Responsible Authority	Type	Consent / Approval number	Date of Issue	Expiry	Comments
Land & Environment Court	Project Approval	10_0054	7 February 2012	13 August 2018	
Minister for Planning	Project Approval (Modification 1)	10_0054 MOD1	12 July 2012	13 August 2018	Permits use of paste fill.
Minister for Planning	Project Approval (Modification 2)	10_0054 MOD2	24 October 2013	13 August 2018	Regularisation of Project Layout.

Issuing/Responsible Authority	Type	Consent / Approval number	Date of Issue	Expiry	Comments
Planning Assessment Commission	Project Approval (Modification 3)	10_0054 MOD3	10 August 2016	30 June 2025	Additional infrastructure and mine life extension.
Department of Planning and Environment	Project Approval (Modification 4)	10_0054 MOD4	23 May 2019	30 June 2025	Spring Creek crossing relocation.
Department of Planning and Environment	Project Approval (Modification 5)	10_0054 MOD5	21 December 2022	30 June 2025	Processing increase & water security.
Environment Protection Authority (EPA)	Environmental Protection Licence	20095	18 May 2012	-	Identifies discharge points and discharge limits and concentrations.
Environment Protection Authority (EPA)	Environmental Protection Licence	20095	30 June 2012	-	Anniversary date changed.
Environment Protection Authority (EPA)	Environmental Protection Licence	20095	18 July 2013	-	Pollution Studies and Prevention Program added to licence
Environment Protection Authority (EPA)	Environmental Protection Licence	20095	9 May 2014		Decrease in monitoring to reflect care and maintenance
Environment Protection Authority (EPA)	Environmental Protection Licence	20095	16 November 2018		Operational EPL in place for construction activities.
Environment Protection Authority (EPA)	Environmental Protection Licence	20095	18 June 2019		Addition of spillway sample point.
Environment Protection Authority (EPA)	Environmental Protection Licence	20095	28 October 2022		Monitoring site updates
Minister for Trade and Investment, Regional Infrastructure and Services - Resources and Energy	Mining Lease	1675	13 April 2012	12 April 2045	
Department of Planning and Environment, Division of Resources and Geoscience	Mining Lease	1675	8 December 2017	12 April 2045	Renewal of ML
Regional NSW	Exploration Lease	EL6003	3 October 2002	2 October 2014	Replaced by EL8372
Regional NSW	Exploration Lease	EL8372	21 May 2015	20 May 2027	Replaced EL6003
Regional NSW	Exploration Lease	EL6548	5 April 2006	5 April 2023	
Regional NSW	Exploration Lease	EL6012	22 October 2002	22 October 2023	
Regional NSW	Exploration Lease	EL8243	7 March 2014	7 March 2023	
Regional NSW	Exploration Lease	EL8244	7 March 2014	7 March 2023	
Regional NSW	Exploration Lease	EL8373	20 May 2015	20 May 2028	

Issuing/Responsible Authority	Type	Consent / Approval number	Date of Issue	Expiry	Comments
Regional NSW	Exploration Lease	EL9402	10 May 2022	10 May 2028	
NSW Office of Water	Water Licences	10WA119513 & WAL39281	29 March 2017		Extraction of groundwater from Dargues Gold Mine, Snobs workings, Stewart and Mertons workings, and United Miners workings.
		10WAL119515 & WAL39282	19 October 2017		
		10WAL119519 & WAL39287	29 March 2017		
		10WAL199517 & WAL39292	29 March 2017		
Dams Safety Committee	Tailings Storage Facility	Dargues TSF	9 December 2016		TSF design confirmation
SafeWork NSW	Explosives Storage Licence	XSTR200092	16 July 2018	23 April 2023	
Essential Energy	High Voltage Permit	-	-	-	

3.4. MANAGEMENT PLANS

The Management Plans, and their status, as required by MP10_0054 MOD5 for the project are listed in Table 4.

TABLE 4: Management Plans

Approval Authority	Title	Approval Date	Review Date
Department of Planning and Environment	Noise Management Plan	24/07/2017	As identified by Condition 5(4) of MP10_0054.
	Blast Management Plan	18/08/2022	
	Air Quality & Greenhouse Gas Management Plan	8/1/2019	
	Water Management Plan	22/09/2022	
	Biodiversity Management Plan	15/11/2022	
	Heritage Management Plan	8/1/2019	
	Waste Management Plan	02/09/2022	
	Traffic Management Plan	02/08/2022	
	Bushfire Management Plan	15/09/2022	
	Erosion & Sediment Control Plan	22/09/2022	
Department of Planning and Environment, and Resources Regulator.	(incorporating Rehabilitation Management Plan, Forward Program)	27/07/2022	As identified by Condition 5(4) of MP10_0054

3.5. ACTS

The key reference documents include the following Acts and their respective Regulations.

- *Contaminated Land Management Act 1997.*
- *Dangerous Goods (Road and Rail Transport) Act 2008.*
- *Environmental Planning and Assessment Act 1979.*
- *Environment Protection and Biodiversity Conservation Act 1999.*
- *Local Government Act 1993.*
- *Work Health and Safety (Mines and Petroleum Sites) Act 2013.*
- *National Parks and Wildlife Act 1974.*
- *Work Health & Safety Act 2011.*
- *Protection of the Environment Administration Act 1991.*
- *Protection of the Environment Operations Act 1997.*
- *Roads Act 1993.*
- *Soil Conservation Act 1938.*
- *Biodiversity Conservation Act 2016.*
- *Water Act 1912.*
- *Water Management Act 2000.*
- *Mining Act 1992.*

3.6. STANDARDS

The following standards are, or are potentially, of relevance to the Project's Environmental Management System. AS refers to an "Australian Standard", NZS refers to "New Zealand Standard" and ISO refers to the "International Standards Organisation".

- AS/NZS 3580.1.1:2016 – *Methods for sampling and analysis of ambient air – Guide to siting air monitoring equipment.*
- AS/NZS 3580.14:2014 – *Methods for sampling and analysis of ambient air – Meteorological monitoring for ambient air quality monitoring applications.*
- AS/NZS 3580.10.1:2016 – *Methods for sampling and analysis of ambient air – Determination of particulate matter – Deposited matter – Gravimetric method.*
- AS/NZS 3580.9.3:2015 – *Methods for sampling and analysis of ambient air – Determination of suspended particulate matter – Total Suspended Particulate Matter (TSP) – High volume sampler gravimetric method.*
- AS/NZS 3580.9.6:2015 – *Methods for sampling and analysis of ambient air – Determination of suspended particulate matter – PM10 high volume sampler with size-selective inlet – Gravimetric method.*
- AS 1055:2018 – *Acoustics – Description and measurement of environmental noise.*
- AS/NZS IEC 61672.1:2019 – *Electroacoustics – Sound level meters - Specifications.*
- AS 2187.2 – 2006 *Explosives – Storage and use – Use of Explosives.*
- AS/NZS 4282:2019 – *Control of the obtrusive effects of outdoor lighting.*
- AS 1940:2017 – *The storage and handling of flammable and combustible liquids.*
- AS/NZS 1596:2014 – *The storage and handling of LP Gas.*
- AS/NZS ISO 14001:2016 – *Environmental management systems – Requirements with guidance for use.*
- ISO 19011:2018 – *Guidelines for auditing management systems.*

3.7. GUIDELINES

The following guidelines are, or are potentially, of relevance to the Mine's Environmental Management System.

- *Australian Dangerous Goods Code* – Edition 7.5.
- *Community Consultative Committee Guideline* – published by the Department of Planning and Environment in 2019.
- *Managing Urban Stormwater: Soils and Construction* – Volume 1 - published by Department of Housing in 2004.
- *Managing Urban Stormwater: Soils and Construction* – Volume 2C – Unsealed Roads published by Department of Environment and Climate Change in 2008.
- *Managing Urban Stormwater: Soils and Construction* – Volume 2E – Mines and Quarries published by Department of Environment and Climate Change in 2008.
- *National Water Quality Management Strategy: Australian Guidelines for Water Quality Monitoring and Reporting* published by ANZECC/ARMCANZ in 2000.
- *NSW EPA Approved Methods for the Sampling and Analysis of Air Pollutants in NSW* published by Environment Protection Authority in 2007.
- *NSW EPA Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* published by Environment Protection Authority in 2017.
- EPA 454/R-99-005 *Meteorological monitoring guidance for regulatory modelling applications* published by United States Environment Protection Authority in 2000.
- *NSW Road Noise Policy* published by Environment Protection Authority in 2011.
- *Noise Policy for Industry* published by Environment Protection Authority in 2017.
- *Murray Darling Basin Groundwater Quality Sampling Guidelines, August 1997, Technical Report No. 3* published by Murray Darling Basin Commission.
- *Waste Classification Guidelines* published by Environment Protection Authority in 2014.

4. OBJECTIVES AND OUTCOMES

The Company's principal objectives and key performance outcomes in the development and operation of the Project are listed in **Table 5**. These objectives and key performance outcomes will be updated following any review or modification of the relevant Management Plans to improve environmental performance for the Project.

TABLE 5: Environmental objectives and outcomes

Objectives	Key Performance Outcomes
Water	
(a) To ensure compliance with all relevant Project Approval and Environmental Protection Licence criteria and reasonable community expectations.	(i) Compliance with all relevant criteria and reasonable community expectations, as determined in consultation with the relevant government agencies.
(b) To ensure sufficient water is available during all phases of the life of the Project for environmental and operation purposes.	(ii) Sufficient water is available for all Project-related purposes, including for environmental and operational purposes.
(c) To ensure that appropriate sediment and erosion control measures are implemented and maintained.	(iii) All water management structures constructed and maintained in accordance with Landcom (2004) and DECC (2008).
(d) To ensure that appropriate chemical and hydrocarbon management is implemented and maintained.	(iv) All chemicals and hydrocarbons stored and used in accordance with manufactures instructions, Material Data Safety Sheet requirements and Australian Standards in a manner that ensure risk of water contamination is reduced to an acceptable level.

Objectives	Key Performance Outcomes
(e) To ensure that the permeability of the floor and embankment of the Tailings Storage Facility complies with the requirements of MP10_0054 MOD5.	(v) Tailings Storage Facility meets all requirements during construction and seepage from the facility is less than the design criteria.
(f) To ensure that water within the Project Site is used in an efficient and environmentally responsible manner.	(vi) Water resources are managed in a manner that maximises environmental flows and minimises the potential for adverse impacts to water resources.
(g) To ensure that appropriate aquatic ecology and stygofauna monitoring programs are implemented throughout the life of the Project.	(vii) Aquatic and groundwater ecological monitoring programs are sufficiently robust to detect any adverse impacts associated with the Project.
(h) To ensure that an appropriate surface water and groundwater monitoring program is implemented throughout the life of the Project.	(viii) Water monitoring programs are sufficiently robust to detect any adverse water quality or quantity impacts associated with the Project to allow appropriate adaptive management measures to be implemented.
(i) To ensure that appropriate contingency and emergency management plans are in place and regularly reviewed.	(ix) Contingency and emergency management plans are prepared for all relevant contingencies and regularly reviewed and upgraded.
(j) To implement an appropriate incident reporting program, if required.	(x) Incidents (if any) reported in an appropriate manner.
(k) To ensure that all relevant water-related information is made available in a timely and accessible manner.	(xi) All water-related information is available in a timely manner on the Project website.

Objectives	Key Performance Outcomes
Ecology	
(a) To ensure compliance with all relevant Project Approval conditions, statements of commitment and reasonable community expectations.	(i) Compliance with all relevant criteria and reasonable community expectations, as determined in consultation with the relevant government agencies.
(b) To implement appropriate biodiversity management and mitigation measures during all stages of the Project.	(ii) All identified biodiversity management and mitigation measures implemented.
(c) To appropriately determine the degree of groundwater dependence of vegetation within the Project Site and determine the nature and significance of adverse Project-related impacts, if any.	(iii) Degree of groundwater dependence determined and appropriate ongoing monitoring program implemented.
(d) To appropriately manage and offset Project-related adverse impacts, if any, on phreatophytic vegetation within the Project Site.	(iv) Off-site Biodiversity Offset Strategy identified and implemented with the identified timeframes.
(e) To appropriately implement and manage the approved On-site Biodiversity Offset Strategy.	(v) On-site Biodiversity Offset Strategy identified and implemented with the identified timeframes.
(f) To appropriately manage those sections of the Project Site not within the On-site Biodiversity Offset Area to achieve the approved final landform and land use.	(vi) Identified areas managed in a manner that does not result in off-site impacts and ensures that the identified final landform and land use is established.
(g) To implement an appropriate complaints handling and response protocol.	(vii) Complaints (if any) handled and responded to in an appropriate manner.
(h) To implement appropriate corrective and preventative actions, if required.	(viii) Corrective and preventative actions implemented, if required.
(i) To implement an appropriate incident reporting program, if required.	(ix) Incidents (if any) reported in an appropriate manner.

Objectives	Key Performance Outcomes
Traffic	
a) To effectively manage Project-related traffic to minimise conflict between vehicles using Majors Creek Road.	(i) Effective management of traffic in a manner that ensures that there is minimal conflict between vehicles using Majors Creek Road.
b) To ensure that Project-related traffic does not result in unacceptable impacts on traffic within Braidwood.	(ii) Effective management of traffic in a manner that ensures that there is minimal adverse impact on traffic within Braidwood.

Objectives	Key Performance Outcomes
Noise	
(a) To ensure compliance with all relevant Project Approval and Environmental Protection Licence criteria and reasonable community expectations.	(i) Compliance with all relevant criteria and reasonable community expectations, as determined in consultation with the relevant government agencies.
(b) To implement appropriate noise management and mitigation measures during all stages of the Project.	(ii) All identified noise management and mitigation measures implemented.
(c) To implement an appropriate attended and unattended noise monitoring program to establish compliance or otherwise with relevant criteria during all stages of the Project.	(iii) All identified monitoring undertaken in accordance with the relevant procedures and at the relevant intervals.
(d) To implement an appropriate complaints handling and response protocol.	(iv) Complaints (if any) handled and responded to in an appropriate manner.
(e) To implement appropriate corrective and preventative actions, if required.	(v) Corrective and preventative actions implemented, if required.
(f) To implement an appropriate incident reporting program, if required.	(vi) Incidents (if any) reported in an appropriate manner.

Objectives	Key Performance Outcomes
Air Quality	
(a) To ensure compliance with all relevant Project Approval and Environmental Protection Licence criteria and reasonable community expectations.	(i) Compliance with all relevant criteria and reasonable community expectations.
(b) To implement appropriate air quality management and mitigation measures during all stages of the Project.	(ii) All identified air quality management and mitigation measures implemented.
(c) To implement a monitoring program to establish compliance or otherwise with relevant criteria during all stages of the Project.	(iii) All identified monitoring undertaken in accordance with the relevant procedures and at the relevant intervals.
(d) To implement an appropriate complaints handling and response protocol.	(iv) Complaints (if any) handled and responded to in an appropriate manner.
(e) To implement appropriate corrective and preventative actions, if required.	(v) Corrective and preventative actions implemented, if required.
(f) To implement an appropriate incident reporting program, if required.	(vi) Incidents (if any) reported in an appropriate manner.

Objectives	Key Performance Outcomes
Rehabilitation	
(a) To rehabilitate the boxcut with slopes of approximately 1:3 (V:H).	(i) Provide a low maintenance, geotechnically stable, non-polluting and safe landform which blends with

Objectives	Key Performance Outcomes
(b) To appropriately sealed ventilation rise. (c) To appropriately shaped and cover a free draining tailings storage facility with appropriate surface water management structures and embankment slopes of approximately 1:3 (V/H) or less. (d) To shape, cover and vegetate processing plant and office area with all agreed infrastructure removed. (e) To appropriately rehabilitate the site access road. A suitable light vehicle track will remain to permit access to the areas under rehabilitation. (f) To revegetate the Project site in accordance with the <i>Biodiversity Management Plan</i>.	surrounding landforms and provides land suitable for the final land use of nature conservation and/or agriculture.

Objectives	Key Performance Outcomes
Heritage	
(a) To implement protocols for the management and protection of Aboriginal objects/sites located within the Project Area. (b) To describe measures that would be implemented if any Aboriginal objects are encountered during the life of the Project. (c) To describe measures that would be implemented if any Aboriginal skeletal remains are encountered during the life of the Project. (d) To implement protocol for the ongoing consultation and involvement of the Aboriginal community in the conservation and management of the Aboriginal heritage of the Project Site.	(i) Compliance with all relevant criteria and government requirements.

Objectives	Key Performance Outcomes
Bushfire	
(a) To ensure that Project activities are managed in a manner that reduces to an acceptable level the risk of ignition of bushfires within the Project Site. (b) To ensure that measures are implemented to allow appropriate management of bushfires within the Project Site.	(i) No bushfires are initiated within the Project Site as a result of Project activities. (ii) Any ignition within the Project Site is managed/ extinguished without harm to life or property.

Objectives	Key Performance Outcomes
Blasting	
(a) To ensure compliance with all relevant Project Approval and Environmental Protection Licence criteria and reasonable community expectations. (b) To implement appropriate blast management and mitigation measures	(i) Compliance with all relevant criteria and reasonable community expectations. (ii) All identified noise management and mitigation measures implemented.

Objectives	Key Performance Outcomes
during all stages of the Project.	
(c) To implement an appropriate blast monitoring program to establish compliance or otherwise with relevant criteria during all stages of the Project.	(iii) All identified monitoring undertaken in accordance with the relevant procedures and at the relevant intervals.
(d) To implement an appropriate complaints handling and response protocol.	(iv) Complaints (if any) handled and responded to in an appropriate manner.
(e) To implement appropriate corrective and preventative actions, if required.	(v) Corrective and preventative actions implemented, if required.
(f) To implement an appropriate incident reporting program, if required.	(vi) Incidents (if any) reported in an appropriate manner.

Objectives	Key Performance Outcomes
Waste	
(a) Employees are educated in the importance of waste stream segregation for recycling.	(i) Informed workforce on the management of waste and recycling.
(b) The ease of waste storage, handling, disposal and tracking is improved.	(ii) Efficient waste management strategies implemented.
(c) The potential for contamination of general waste streams is reduced.	(iii) The potential for contamination by general waste has been minimised.
(d) An income from recyclable waste streams can potentially be generated.	(iv) Recycling efficiencies and income have been implemented.
(e) The costs of disposal for some items can potentially be reduced.	(v) Disposal of general waste minimised.

5. MONITORING

In order to meet the objectives and key performance outcomes listed in **Section 4**, the following monitoring strategy is outlined in **Table 6** and **Figures 1 and 2**. The HSEC Superintendent will be responsible for the implementation of the monitoring strategy and the continued monitoring requirements of the Mine.

More information regarding the implementation of the various monitoring programs is provided in the relevant management plans for the Mine.

TABLE 6: Monitoring Requirements

Environmental Monitoring Requirements	Monitoring Locations	Frequency	Criteria	Timing	Characterisation/Quantification	Record of Information
Noise Management Plan						
Attended Noise Monitoring	R20 R27 R29 R34 R108	Quarterly (Day, evening, night)	35 dB(A) $L_{Aeq}(15 \text{ minutes})$ (Day, evening, night) 45 dB(A) $L_{A1}(1 \text{ minute})$ (Night)	15 minute measurement period	L_{Amax} L_{A1} L_{A10} L_{A50} L_{A90} L_{Amin} L_{Aeq}	Operator's Name. Location of Monitoring. Recording Intervals (date and time). Meteorological conditions. Statistical noise level descriptor with notes identifying principal noise sources. Instrument make, model, serial number and calibration details. Brief description of activities occurring within Project Site. Relevant fixed plant and mobile equipment, operating shift logs and location.
Unattended Noise Monitoring	Southern Section of Project Site (or as required to investigate noise emissions)	Real Time	33dB(A)	Constant	Statistical Noise parameters including L_{A1} , L_{A10} , L_{A90} , L_{Aeq} (15 min) in 1/3 octaves. Periodic audiofiles.	-
Traffic Noise Monitoring	600 Majors Creek Road	Annually	55dB(A) $L_{Aeq}(1 \text{ hour})$ (Day) 50dB(A) $L_{Aeq}(1 \text{ hour})$ (Night)	-	-	Automated traffic counter (7day period) at residence. Project Site - count of vehicles leaving site (7 day period).
Blast Management Plan						
Blast Monitoring	R27 R29 R108	Every Blast	As per condition 3(6) of MPI0_0054	Instantaneous	-	Ground vibration (mm/s) Airblast overpressure (dB(L))

Environmental Monitoring Requirements	Monitoring Locations	Frequency	Criteria	Timing	Characterisation/Quantification	Record of Information
Air Quality & Greenhouse Gas Management Plan						
PM ₁₀ , PM _{2.5}	R20	24 hour, one-day-in six	As per condition 3(14) of MP10_0054	Minimum of 12 months.	HVAS and depositional dust gauges to determine compliance with Condition 3(14) of MP10_0054.	Meteorological – temperature, wind speed and direction and sigma-theta. PM ₁₀ dust concentration
Deposited dust	DD1-R20 DD2-R29 DD3-North of Processing Plant DD4-Southeast of Processing Plant DD5-East of TSF	Monthly	Maximum Increase 2 g/m ² /month. Maximum Total 4 g/m ² /month	-	DD1 and DD2 to be used for determining compliance. DD3 and DD5 to be used for determining the upwind deposited dust levels	Meteorological – temperature, wind speed and direction and sigma-theta. Deposited dust levels
Greenhouse	Electrical and Diesel usage	Collated quarterly.	-	-	-	-
Water Management Plan						
Water Balance	Water transfer points as identified on Figure 1 of the Water Management Plan	Continuous	Nil	Continuous	Flows – L/month	Flows – monthly recording
	Harvestable rights dams (water levels)	Continuous	Nil	Continuous	Levels – mm (to be converted to capacity in dam)	Levels – continuous recording, monthly data download
Surface Water	See Table 7	See Table 7	See Tables 8, 9 and 10	See Table 7	-	Date and time of sampling Water quality/flow
Aquatic Ecology	AE-1 – below escarpment AE-2 – below escarpment AE-3 – above escarpment AE-4 – above escarpment AE-5 – Spring Creek AE-6 – Spring Creek AE-7 – Majors Creek AE-8 – Majors Creek	6 monthly	Comparison with baseline monitoring	Spring and Autumn	-	Date and time of sampling Tabulated aquatic health data
Groundwater quality	See Table 11.	See Table 11	See Tables 12 and 13	See Table 11	-	Date and time of sampling Water quality

Environmental Monitoring Requirements	Monitoring Locations	Frequency	Criteria	Timing	Characterisation/Quantification	Record of Information
Construction Management Plan						
Water Quality	In addition to monitoring frequency in Table 7 , SW1 to SW10 will be measured for turbidity (TSS)	Within 24 hours of the cessation of a significant rainfall event (>10mm in 24 hours) if safe to do so	See table 10 (TSS)	As required	Determines adequate control of sedimentation and erosion	Date and time of sampling Water quality
On-site sediment control structure monitoring	Inspection of existing sediment and erosion controls prior to construction activities taking place.	Inspection of all sediment and erosion controls prior to predicted Significant Rainfall (25mm in a 24hr period).	Each control measure is rated as either compliant or non-compliant. Where an existing sediment and erosion control structure is in place and is either effective or requires maintenance.	As required	Existing sediment and erosion control structures will be in a serviceable condition prior to commencement of construction works.	Site records kept for audit purposes.
Biodiversity Management Plan						
Phreatophytic Vegetation Monitoring	Within zone of groundwater drawdown (ridge tops, upper- and mid-slopes and within and adjacent to Spring Creek) Outside zone of groundwater drawdown (ridge tops and upper- and mid-slopes in Tableland Basalt Forest EEC)	Continuous	Comparison with baseline monitoring	Continuous	Continuous water use, continuous water stress, stem increment, and vapour pressure deficit.	Methodology employed. Results of the monitoring program. Recommendations for further monitoring.
On-site Vegetation monitoring program	Within the Project Site – 4 x quadrats Outside Project Site – 2 x quadrats	Six monthly	Comparison with baseline monitoring	Spring and autumn	-	Methodology employed. Results of the monitoring program. Recommendations for further monitoring.
On-site fauna monitoring program	Various as per Gaia (2010)	Annual	Comparison with baseline monitoring	Summer and Late Winter (Little Eagle nest survey)	-	Methodology employed. Results of the monitoring program. Recommendations for further monitoring.
Stygofauna	Dargues Reef workings Snobs workings 2 x bore holes within Project Site	Six monthly	Comparison with baseline monitoring	Spring and autumn	-	Date and time of sampling Tabulated stygofauna diversity and abundance data.

Environmental Monitoring Requirements	Monitoring Locations	Frequency	Criteria	Timing	Characterisation/Quantification	Record of Information
	2 x boreholes outside of Project Site					
Traffic Management Plan						
Heavy vehicle traffic volume	Project Site entrance	Constant	As per Condition 3(41) of MP10_0054	Constant	-	Dates and times of concentrate vehicle departures
Bushfire Management Plan						
Fire breaks and access tracks.	Various	As required	-	-	-	-
Vegetation Fuel Loads	Various	As required	-	-	-	-
Fire Fighting Equipment	Various	Daily during very high or above fire danger periods.	-	-	-	-

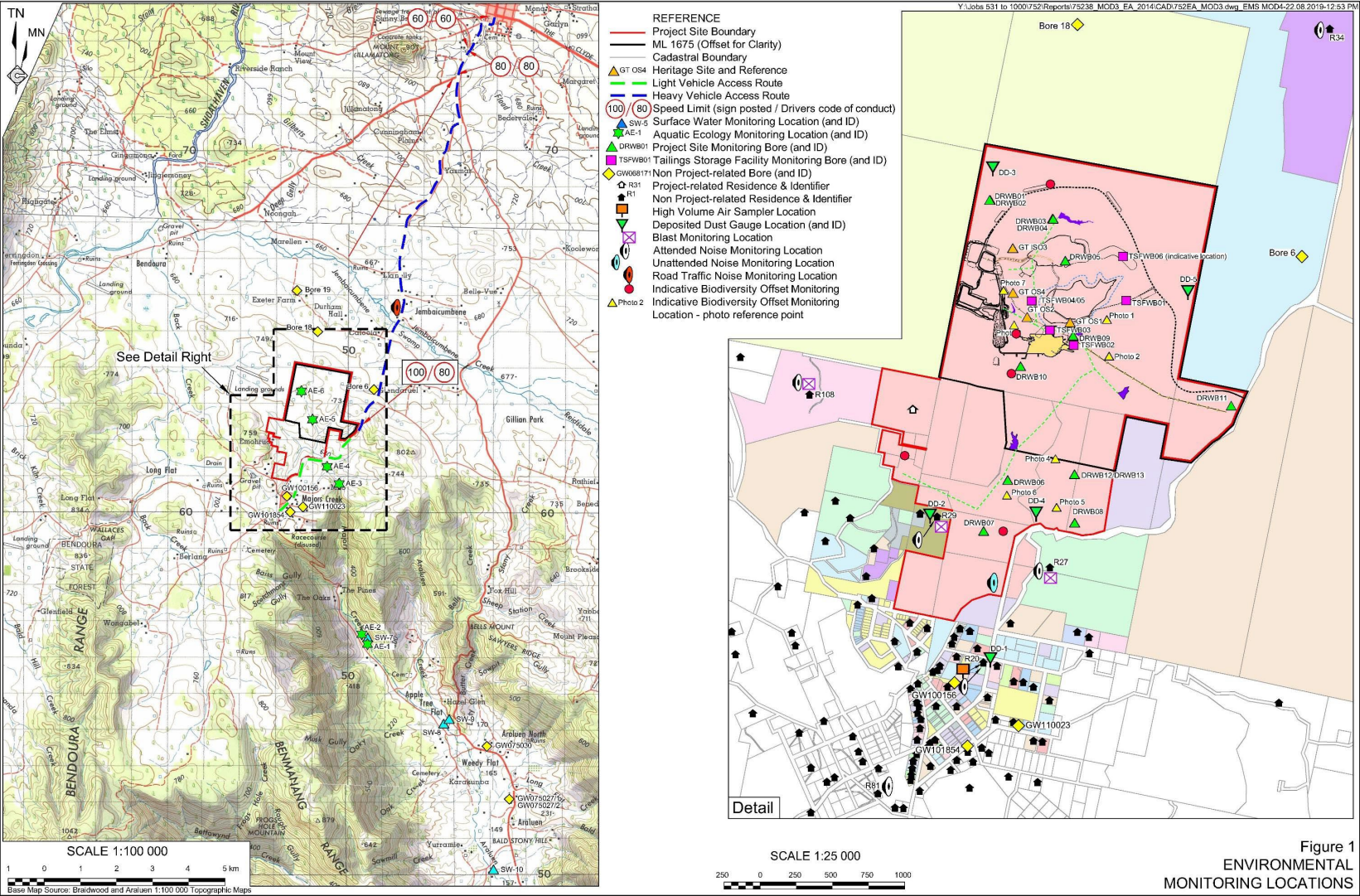


Figure 1: Environmental Monitoring Locations

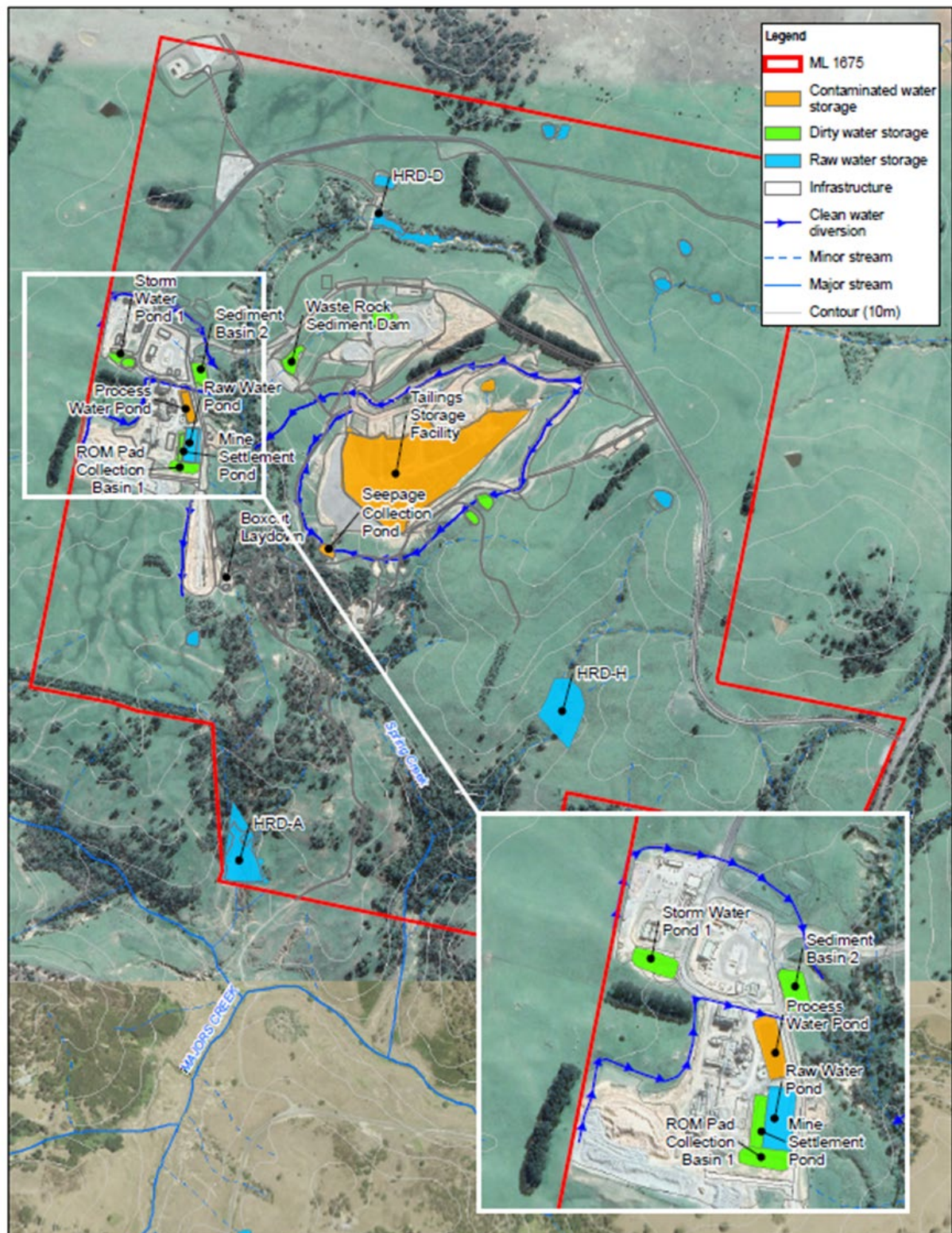


Figure 2: Mine Site Water Storages

TABLE 7: Surface Water Monitoring Program

[illegible]

TABLE 8: Surface Water Quality Trigger Values - Surrounding Waters

Analyte	Unit	Trigger Value
pH value	pH	6.5-8.5
Oil and Grease	mg/L	>10
Total suspended solids	mg/L	>50
Electrical Conductivity	µS/cm	>450
Bicarbonate Alkalinity as CaCO ₃	mg/L	>85
Carbonate Alkalinity as CaCO ₃	mg/L	>1.0
Hydroxide Alkalinity as CaCO ₃	mg/L	>5
Total Alkalinity as CaCO ₃	mg/L	>85
Chloride	mg/L	>75
Sulphate	mg/L	>25
Calcium	mg/L	>35
Magnesium	mg/L	>15
Sodium	mg/L	>25
Potassium	mg/L	>2.5
Nitrate as N	mg/L	>0.65
Nitrite as N	mg/L	>0.02
Total Oxidized Nit. As N	mg/L	-
Total Phosphorus as P	mg/L	>0.20
Arsenic	mg/L	>0.013
Cadmium	mg/L	>0.0016 ²
Chromium	mg/L	>0.001
Copper	mg/L	>0.0099 ²
Lead	mg/L	>0.063 ²
Mercury	mg/L	>0.0006
Nickel	mg/L	>0.078 ²
Zinc	mg/L	>0.057 ²

Groundwater levels and water quality monitoring requirements are listed in **Table 9**. Monitoring locations are presented on **Figure 1** and relevant trigger values are presented in **Tables 10** and **11**.

TABLE 9: Groundwater Monitoring Program - On site

Bore	Monitoring Frequency	Sampling Water	pH	Electrical Conductivity	Dissolved Oxygen	REDOX ²	Temperature	Major Cations ²	Major anions	TKN ²	TON ²	Ammonia Nitrogen	Phosphorus ²	Metals ²	Xanthates	Alkalinity (CaCO ₃)	Pumping Rate
Project Site Monitoring Bores																	
DRWB01	Monthly/quarterly	D	F, L	F, L	F	F	F	L	L	L	L	L	L	L			
DRWB02	Monthly/quarterly	D	F, L	F, L	F	F	F	L	L	L	L	L	L	L			
DRWB03	Monthly/quarterly	D															
DRWB04	Monthly/quarterly	D	F, L	F, L	F	F	F	L	L	L	L	L	L	L			
DRWB05	Annual	M	Dry since construction														
DRWB06	Monthly/quarterly	D	F, L	F, L	F	F	F	L	L	L	L	L	L	L	L		
DRWB07	Monthly/quarterly	D	F, L	F, L	F	F	F	L	L	L	L	L	L	L	L		
DRWB08	Monthly/quarterly	M	F, L	F, L	F	F	F	L	L	L	L	L	L	L	L		
DRWB09	Weekly/monthly	M	F, L	F, L	F	F	F	L	L	L	L	L	L	L	L		M
DRWB10	Monthly/quarterly	M	F, L	F, L	F	F	F	L	L	L	L	L	L	L	L		M
DRWB11	Monthly/quarterly	M															
DRWB12	Monthly/quarterly	M	F, L	F, L	F	F	F	L	L	L	L	L	L	L	L		
DRWB13	Monthly/quarterly	M	F, L	F, L	F	F	F	L	L	L	L	L	L	L	L		
Deep Granodiorite Aquifer																	
MW01	Monthly/quarterly	M	F, L	F, L	F	F	F	L	L	L	L	L	L	L	L		
Tailings Storage Facility Monitoring Bores																	
TSFWB01	Weekly/monthly	M	F, L	F, L	F	F	F	L	L	L	L	L	L	L	L	L	
TSFWB02	Weekly/monthly	M	F, L	F, L	F	F	F	L	L	L	L	L	L	L	L	L	
TSFWB03	Weekly/monthly	M	F, L	F, L	F	F	F	L	L	L	L	L	L	L	L	L	
TSFWB04	Weekly/monthly	M	F, L	F, L	F	F	F	L	L	L	L	L	L	L	L	L	
TSFWB05	Weekly/monthly	M	F, L	F, L	F	F	F	L	L	L	L	L	L	L	L	L	
TSFWB06	Weekly/monthly	M	F, L	F, L	F	F	F	L	L	L	L	L	L	L	L	L	
Irrigation bores																	
WSDMB01	Monthly	M	L	L	L	L	L	L	L	L	L	L	L	L	L	L	M
WSDMB02	Monthly	M	L	L	L	L	L	L	L	L	L	L	L	L	L	L	M
Historic Workings																	
Snobs	Monthly/quarterly	M	F	F, L	F, L	F	F	L	L	L	L	L	L	L		L	M
Stewart and Mertons	Monthly/quarterly	M	F	F, L	F, L	F	F	L	L	L	L	L	L	L		L	M
United Mines	Monthly/quarterly	M	F	F, L	F, L	F	F	L	L	L	L	L	L	L		L	M
Registered Private Bores - <3km																	
GW100156	Quarterly/annual	M	F	F, L	F, L	F	F	L	L	L	L	L	L	L		L	
GW110023	Quarterly/annual	M	F	F, L	F, L	F	F	L	L	L	L	L	L	L		L	
GW101854 ⁵	Quarterly/annual		F	F, L	F, L	F	F	L	L	L	L	L	L	L		L	
Note 1	Monitoring Frequency (Standing Water Level and Field Water Quality/Laboratory Water Quality). Where practicable, groundwater and surface water quality monitoring is to be undertaken at the same time																
Note 2	D = Data logger (Six-hourly measurements) M = manual measurement																
Note 3	REDOX = Oxygen reduction potential Major cations = sodium, potassium, calcium Major anions = chloride and sulphate TKN = Total Kjeldahl NNitrogen TON = Total, xidised Nitrogen																

Bore	Monitoring Frequency	Sampling Water	pH	Electrical Conductivity	Dissolved Oxygen	REDOX ²	Temperature	Major Cations ²	Major anions	TKN ²	TON ²	Ammonia Nitrogen	Phosphorus ²	Metals ²	Xanthates	Alkalinity (CaCO ₃)	Pumping Rate
	Phosphorous = total phosphorus and reactive phosphorus Metals = Al, As, Cd, Cr, Co, Fe, Hg, Mg, Mn, Ni, Pb, Zn																
Note 4	F = field measurement L = Laboratory measurement																
Note 5	Bore equipped with a pump. Not suitable for monitoring of standing water levels.																
Note 6	Landholder has requested standing water level monitoring only.																
Note 7	Nested bore or adjacent bores. Both bores to be monitored.																

TABLE 10: Groundwater Trigger Values - Project Site and Surrounds

Analyte	Unit	Trigger Value
pH value	pH	6.5-8.5
Electrical Conductivity	µS/cm	>1300
Dissolved Oxygen	%sat	-
REDOX	mV	-
Bicarbonate Alkalinity as CaCO ₃	mg/L	>200
Carbonate Alkalinity as CaCO ₃	mg/L	>0.1
Hydroxide Alkalinity as CaCO ₃	mg/L	>0.1
Total Alkalinity as CaCO ₃	mg/L	>200
Chloride	mg/L	>300
Sulphate	mg/L	>110
Calcium	mg/L	>110
Magnesium	mg/L	>50
Sodium	mg/L	>60
Potassium	mg/L	>1.8
Nitrate as N	mg/L	>3.2
Nitrite as N	mg/L	>0.02
Total Oxidized Nit. As N	mg/L	>3.2
Total Phosphorus as P	mg/L	>0.71
Aluminium	mg/L	-
Arsenic	mg/L	>0.002
Cadmium	mg/L	>0.0005
Chromium	mg/L	>0.001
Copper	mg/L	>0.0007
Iron	mg/L	-
Lead	mg/L	>0.0012
Mercury	mg/L	>0.0002
Nickel	mg/L	>0.003

Analyte	Unit	Trigger Value
Zinc	mg/L	>0.057
Xanthate	mg/L	-

TABLE 11: Groundwater Trigger Values - Non-Project Related Bores

Parameter	Aquifer	Trigger Value
Standing water level in non-project related bores	Granodiorite or Regolith	Standing water level below 10 th percentile measured level
	Alluvial Aquifer	
	All Aquifers - actively used bores	Standing water level below intake during normal operation of the bore.

6. EVALUATION OF COMPLIANCE

Dargues mine monitoring reports are available on the company website <https://aureliametals.com/dargues-mines-compliance-and-regulatory-information/>. Where appropriate, this may be limited to a *Monthly Environmental Monitoring Report* to be prepared by the Environmental advisor

The Environmental advisor, or their delegate, will review all reports and associated monitoring results against the relevant trigger values and implement the relevant actions identified in the Management Plans in the event that exceedances of the trigger values are identified.

7. CORRECTIVE AND PREVENTATIVE ACTIONS

Where an exceedance of the relevant trigger values are observed the Environmental advisor may identify a range of Corrective and preventative actions. Alternatively, such actions may be an outcome of the identified action described above.

Corrective and/or preventative actions will be assigned to relevant Company personnel. Actions will be communicated by the Mining Manager or the Environmental advisor internally through planning meetings and toolbox talks and outstanding actions will be monitored for their effectiveness upon completion.

A copy of the investigation report and regular updates on the status of the identified corrective and/or preventative actions will be provided to the relevant government agencies and, if required, any complainant. In addition, a copy of all reports will be included in the Annual Review.

8. INCIDENT, INVESTIGATION AND REPORTING

In the event of an accident, incident, the Company will initiate an investigation. The investigation will seek to determine:

- what occurred at the time of the incident;
- the root cause of the incident;
- any contributing factors which led to the incident; and
- whether appropriate controls were implemented to prevent the incident.

Corrective and/or preventative actions will be assigned to relevant responsibilities as a result of the investigation. Actions will be communicated through planning meetings and toolbox talks. Where required, Management Plan will be amended and all personnel with responsibilities under the updated Plan will be required to review the amended plan. Outstanding actions will be monitored for their effectiveness upon completion.

All reports associated with complaints or incidents will be retained for a period of no less than four years.

Incident Notification

The Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the project (including the application number and the name of the project if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in the notification and reporting requirements (as per Appendix 8 of the Consolidated Consent)

Non-Compliance Notification

The Secretary must be notified in writing via the Department's Major Projects Website within 7 days after the Applicant becomes aware of any non-compliance with the conditions of this approval. The notification must identify the project and the application number for it, set out the condition of approval that the project is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been done, or will be, undertaken to address the non-compliance.

Incident Notification and Reporting Requirements

- A written incident notification addressing the requirements set out below must be submitted to the Secretary via the Major Projects website within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under Condition 6 of Schedule 5 or, having given such notification, subsequently forms the view that an incident has not occurred.
- Written notification of an incident must:
 - (a) identify the project and application number;
 - (b) provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);
 - (c) identify how the incident was detected;
 - (d) identify when the Applicant became aware of the incident;
 - (e) identify any actual or potential non-compliance with conditions of approval;
 - (f) describe what immediate steps were taken in relation to the incident;
 - (g) identify further action(s) that will be taken in relation to the incident; and
 - (h) identify a project contact for further communication regarding the incident.
- Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Secretary, the Applicant must provide the Secretary and any relevant public authorities (as determined by the Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.
- The Incident Report must include: (a) a summary of the incident; (a) outcomes of an incident investigation, including identification of the cause of the incident; (b) details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and (c) details of any communication with other stakeholders regarding the incident

9. COMPLAINTS HANDLING AND DISPUTE RESOLUTION

9.1. COMPLAINTS HANDLING

The Company has established the following methods by which complaints may be received and subsequently recorded and responded to in a timely manner.

- Directly via the 24-hour, 7 day per week Community Information Line (1800 732 002). This number is advertised widely in the local media, on signage at the Project Site entrance and on the Project web site.
- Directly via a dedicated email address (DGM.Community@aureliametals.com.au) which will be advertised in a similar manner to the Community Information Line.

- Directly via the Project website (www.aureliametals.com.au).
- Indirectly via the relevant government agencies.

All complaints will be registered in a database and responded to within one business day from receipt of the complaint. The following information will be recorded (where it can be reasonably obtained) in the database.

- The date / time the complaint was made.
- Complainant's name.
- Complainant's contact details, including telephone number and/or email address.
- The nature of the complaint.

The nature of the response will depend on the nature and source of the complaint but will include one or more of the following actions.

1. Liaison with the complainant to ascertain all details, to identify the nature and source of the complaint and to provide supplementary details for the log. Details recorded in the log will include:
 - the date and time of the complaint;
 - the method by which the complaint was made;
 - details of the person making the complaint;
 - the nature of the complaint;
 - action taken in relation to the complaint including any follow-up contact; and
 - if no action, the reason why.
2. As appropriate, the initiation of monitoring or other investigations to verify or otherwise the exceedance or non-compliance with approval or licence condition(s).
3. Initiation of appropriate changes in operating practices or procedures.
4. Conducting a follow-up interview with the resident to determine their level of satisfaction with the response and the resultant outcome.

A copy of the complaint report sheet will be supplied to the complainant, if requested. The complaints database will be updated on the Company's website monthly and a summary of the complaints received in each 12-month period will also be included in each *Annual Environmental Management Report*. The Environment and Community Superintendent will be responsible for the recording of the complaint, response action requirements and updating of the database and website.

9.2. DISPUTE RESOLUTION

In the event that any complainant does not consider that the response or reactions adequately address their concerns, the following procedure will be adopted.

- 1 A meeting will be convened with the Mining Manager or other senior Company personnel to seek resolution of the matter. The complainant will be provided with a written response, detailing the results of investigations undertaken and the agreed actions to be taken regarding the measures to be implemented.
- 2 On implementation of the nominated measures, a further meeting will be convened to seek advice of satisfaction, or otherwise, regarding the outcomes.

If, after 21 days following Steps 1 and 2, the complainant believes the matter remains unresolved and no further agreement can be reached as to additional measures to be undertaken, the matter will be referred to an independent Dispute Facilitator for independent review (**Figure 3**).

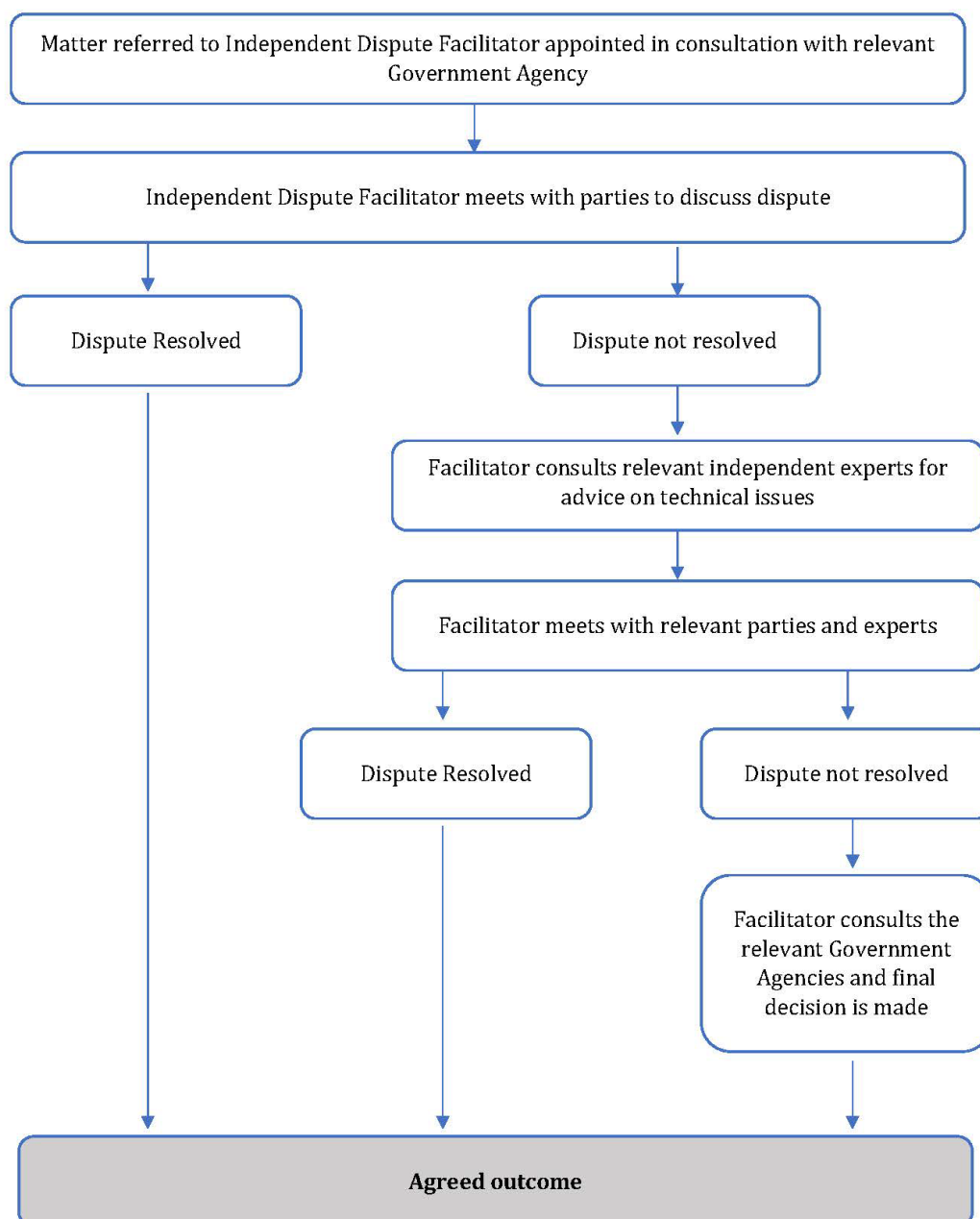


Figure 3: Independent Dispute Resolution Process

10. EMERGENCY RESPONSE

A detailed Emergency Response Plan will be developed for the Project in consultation with the relevant emergency services (Police, Ambulance, Fire Service and Rural Fire Service).

The Plan will include detailed response plans for the following, both on surface and underground.

- Fire emergency.
- Medical emergency.
- Structural stability emergency (both underground and Tailings Storage Facility related).
- Major chemical spill emergency.

The Environmental advisor will be responsible for the implementation and updating of the emergency response procedure.

11. STAKEHOLDER AND COMMUNITY CONSULTATION

The Company will undertake consultation with all relevant stakeholders to allow for consideration of all reasonable views and timely feedback to any issues that are raised. The approach to be taken would be constructive to ensure that the required environmental management of the Project meets with expectations described in the *Environmental Assessment* and subsequent review of any approvals. All personnel will be responsible for ensuring that any issues raised are dealt with through the appropriate pathways as stated by the relevant Management Plans.

Relevant stakeholders include, but are not limited to, the following.

- Department of Planning, Industry and Environment.
- Environment Protection Authority.
- Queanbeyan – Palerang Regional Council.
- Eurobodalla Shire Council.
- Registered Aboriginal Parties.
- Dargues Gold Mine Community Consultative Committee.
- Local community.

Communication, consultation and information dissemination strategies will include the following.

- Regular community newsletters and meetings.
- Regular meeting with the Dargues Gold Mine Community Consultative Committee.
 - Individual meetings on request with surrounding landholders and interested community groups.
 - Placement of all relevant environmental management monitoring and other relevant documents on the Project website.

12. ROLES AND RESPONSIBILITIES

The roles and responsibilities for the Environmental Management Strategy are listed in Table 12.

TABLE 12: Roles and Responsibilities

Roles	Responsibilities
General Manager	Will ensure adequate resources are available to enable the implementation of this Strategy and all Environmental Management Plans.
Senior Environment advisor	Accountable for the overall environmental performance of the Mine, including the following. • Key performance outcomes of this Strategy. • Evaluation of Compliance. • Corrective and Preventative Actions. • Incident Reporting. • Dispute Resolution. • Review of this Strategy. • Consultation Strategies
Environmental Advisor	Ensure the implementation of this Strategy, including the following. • Ensure employees are competent through training and awareness programs. • Monitoring. • Corrective Action and Preventative Action in consultation with the Mine Manager. • Complaints handling.

Roles	Responsibilities
All personnel	• Consultation Strategies Ensure compliance with this EMS including consultation strategies approved by the Environmental Supervisor.

13. COMPETENCE TRAINING AND AWARENESS

All personnel shall undergo environmental management awareness training. Environmental management shall be a component of the competency based site induction program. The following areas will be covered in the induction.

- Noise management.
- Blast management.
- Air quality management.
- Water management, including hydrocarbon and chemical management.
- Biodiversity management.
- Aboriginal heritage management.
- Waste management.
- Traffic management.
- Reporting of incidents.
- Community consultation.

The Environment and Community Superintendent shall be responsible for ensuring the appropriate Environmental Management training is included in the induction.

14. REVIEW

In accordance with Condition 5(4) of MP10_0054 MOD5, this Strategy will be reviewed and, if required, revised within 3 months of:

- the submission of an annual review under Condition 5(3);
- the submission of an incident report under Condition 5(6);
- the submission of an audit report under Condition 5(8); and
- any modification to the conditions of MP10_0054.

This review will include the adequacy of strategies, plans and programs as required under the Project Approval. Recommendations for appropriate measures or actions to improve the environmental performance of the Project and/or any assessment, plan or program will be incorporated into this Strategy.