

Environmental Management Strategy			AUR-
Author	J Coffey (SLR)	Created	June 2012
Approved	M Williams	Review date	June 2019
Version	Rev 3	Updated	June 2019

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ENVIRONMENTAL MANAGEMENT STRATEGY

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1 Introduction

Hera Mine is an underground metalliferous mine owned by Hera Resources Pty Ltd (Hera Resources), a wholly owned subsidiary of Aurelia Metals Limited (Aurelia). The mine is located approximately 100km southeast of Cobar and approximately 4km south of Nymagee in the central west of New South Wales (NSW) (refer **Figure 1**).

This Environmental Management Strategy has been prepared in accordance with Schedule 5, Condition 1 of Project Approval (PA) 10_0191 which was issued by the Department of Planning and Environment (DPE) on 31 July 2012 under Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act). PA 10_0191 has since been modified five times with the most recent modification (MOD 5) being approved on 3rd December 2019. The site also operates in accordance with Environment Protection Licence (EPL) 20179, as well as Mining Lease (ML) 1686 (issued 16 May 2013) and ML 1746 (issued 7 December 2016) issued under the *Mining Act 1992* (Mining Act).

The objectives of this Strategy are as follows:

- Provide a strategic framework for environmental management for the operation;
- Identify legislative requirements which are applicable to the operation;
- Identify how to communicate environmental performance to the local community, stakeholders, government agencies and internal employees and contractors; and
- Identify how to resolve any disputes, non-compliances and emergencies which may occur at the site.

This strategy is limited in scope to the Project Approval boundary.

Hera Mine (as approved) involves the following aspects (refer **Figure 2**):

- Extraction of waste rock and metalliferous ore using underground open stope mining methods and underground load and haul operations until 31 December 2022, from ML1686 and ML1746.
- Backfilling of underground stope voids created during underground mining using waste rock including waste rock transferred from the surface Waste Rock Emplacements (WREs).
- Use of surface infrastructure required for the underground mine, including a box cut, portal and decline, magazines, fuel store, ventilation rises and power and water store.
- Use of a processing plant, including a Run of Mine (ROM) pad, WRE, crushing, grinding and screening operations, gravity separation and flotation circuits to process up to 505,000 tonnes per annum (tpa) of metalliferous ore to produce gold and silver doré (unrefined bars) and a zinc/lead concentrate.
- Use of the Northern and Southern WREs for the placement of waste rock (to date only the Southern WRE is constructed).
- Use of a Tailings Storage Facility (TSF), including cyanide detoxification of tailings prior to discharge to the TSF.
- Use of ancillary facilities, including a ventilation rise, escapeway, Site Office, car park, Contractors Office, Laydown area and workshop, a Reagent Store, plant workshop, ablutions facilities, crib room, hardstand, laydown areas, concentrate storage shed, and an explosives magazine.

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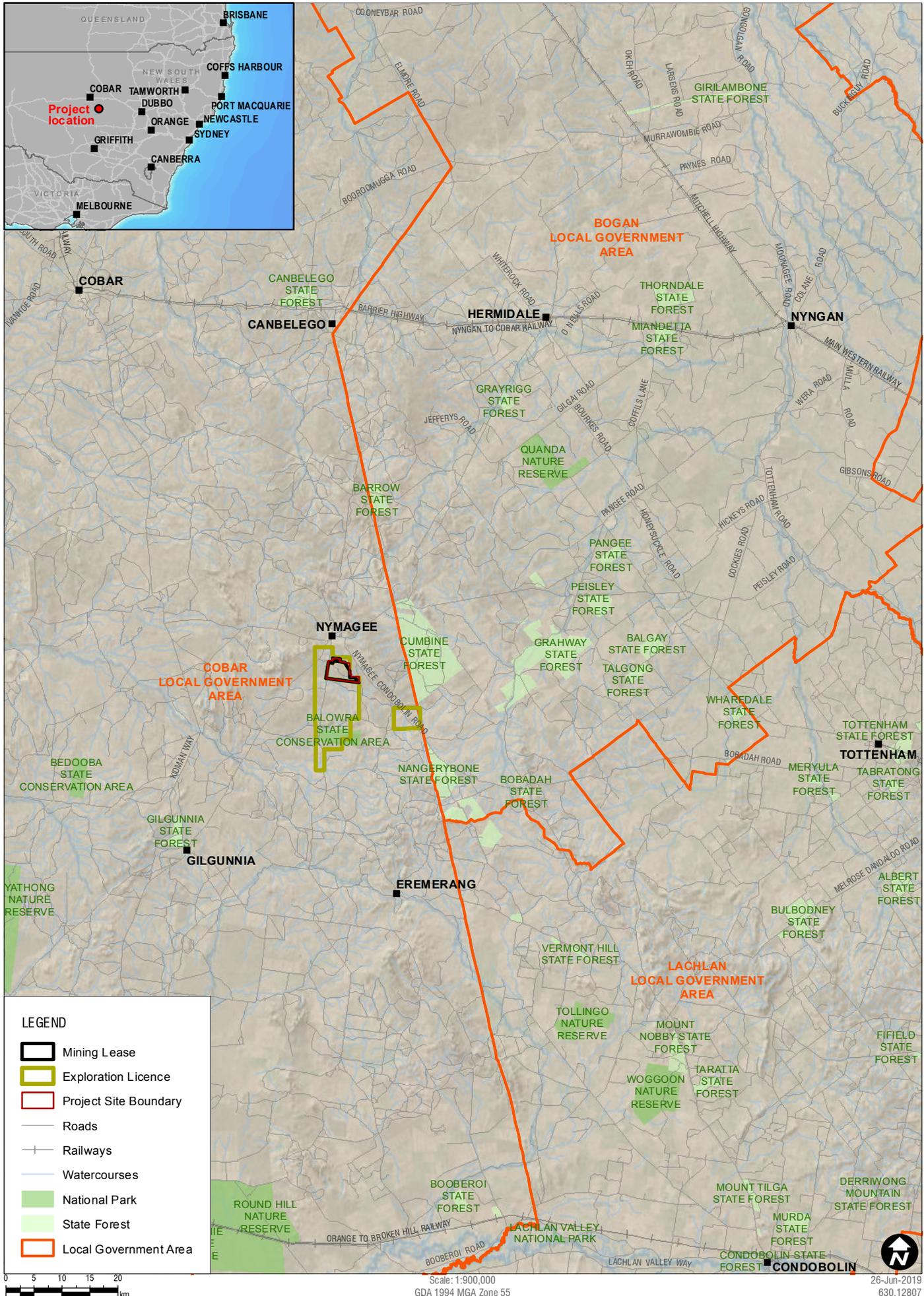
- Use of a water management system to enable the harvesting and supply of water for environmental flows.
- Use of a Light Vehicle Access Road and a Main Site Access Road and intersection to allow site access from Burthong Road.
- Transportation of zinc/lead concentrate from the Mine to Hermidale via the Principal Concentrate Transportation Route, or when unavailable, via the Secondary Concentrate Transportation Route.

This version of the Environmental Management Strategy has been updated following approval of MOD 5, which included the following aspects:

- Increasing the rate of transportation of concentrate from Hera Mine to the Hermidale rail siding from 50 000 tonnes (t) per calendar year to 60 000 t per calendar year, including an increase of daily truck movements from 4 to 8;
- Installation of a 13.7 hectare (ha), 204 Mega litre (ML) to crest height Water Management Dam to act as an external decant pond for the existing TSF;
- Receipt of water from dewatering of the Nymagee Copper Mine for use in processing operations at the Hera Mine or evaporation within the Water Management Dam; and
- Increasing the approved maximum elevation of the Southern WRE from 10m above ground level to 15m above ground level, or approximately 350m AHD.

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Figure 1. Locality Plan.



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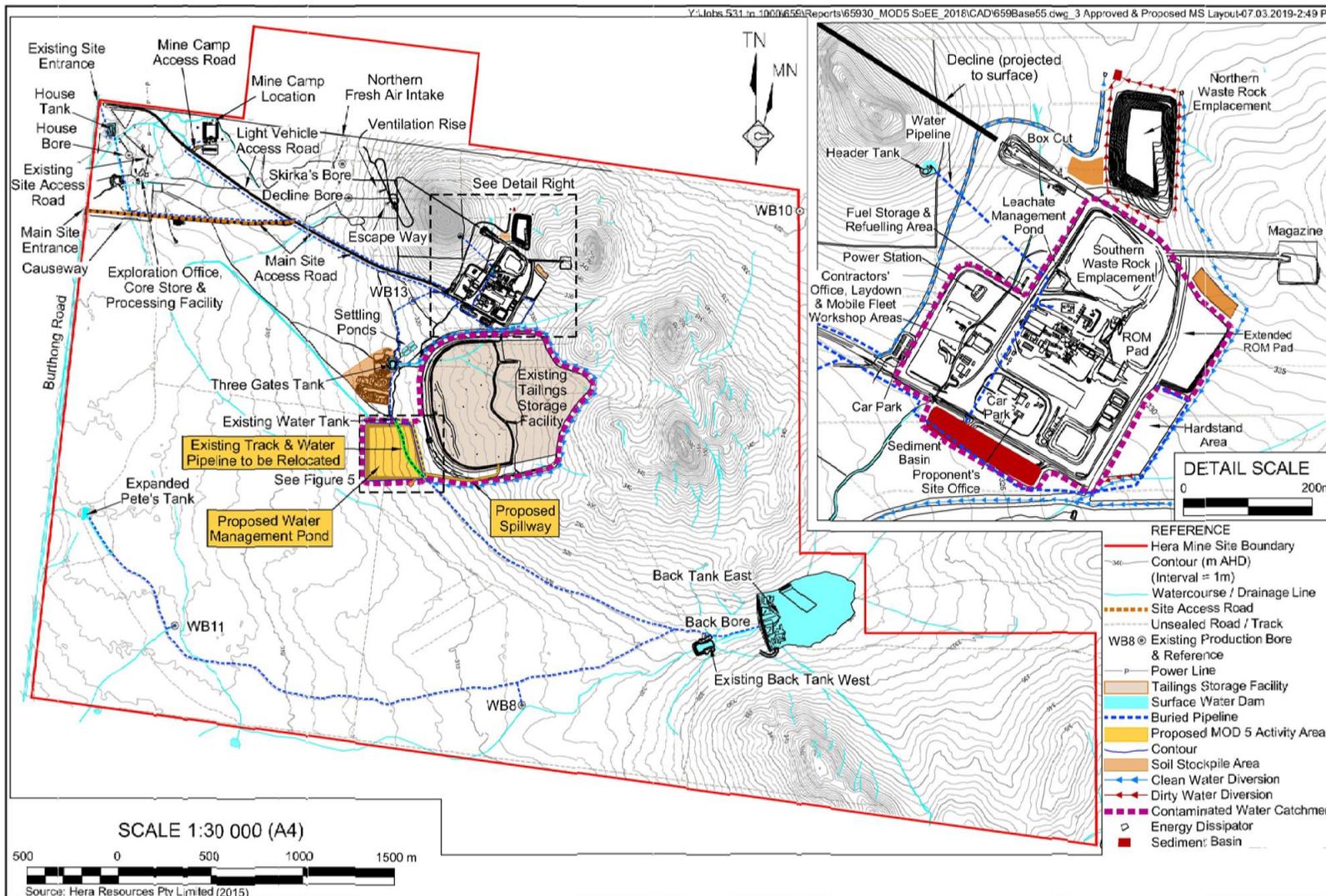


Figure 2 Approved Site Layout

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2 Consultation

The first revision of this strategy was approved by the Secretary on 30 Nov 2012. This revision has been prepared following approval of MOD 5.

3 Legal and Other Requirements

Schedule 5, Condition 1(c) of PA 10_0191 requires this strategy to identify the statutory approvals that apply to the operation. The site is operated in accordance with PA 10_0191, EPL 20179, ML 1686 and ML 1746.

PA 10_0191 conditions that directly relate to the development and maintenance of this strategy have been replicated in **Section 3.1**.

3.1 Project Approval 10_0191

PA 10_0191 stipulates the required criteria that the construction and operational activities of the operation must comply with and sets out the core requirements of this strategy. Relevant conditions associated with this strategy, and where they have been addressed within the document, are reproduced in **Table 1**.

Table 1 Project Approval Conditions

Condition No.	Condition	Where addressed
Schedule 2, Condition 1	OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT In addition to meeting the specific performance criteria established under this approval, the Proponent shall implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation or rehabilitation of the project.	This EMS and component plans
Schedule 5, Condition 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:	This document
	(a) be submitted for approval to the Secretary within six months of this approval;	Section 2
	(b) provide the strategic framework for the environmental management of the project;	Section 5
	(c) identify the statutory approvals that apply to the project;	Section 3
	(d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;	Section 10
	(e) describe the procedures that would be implemented to: (i) keep the local community and relevant agencies informed about the operation and environmental performance of the project;	Section 6

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Condition No.	Condition	Where addressed
	(ii) receive, handle, respond to, and record complaints;	Section 8
	(iii) resolve any disputes that may arise during the course of the project;	Section 8
	(iv) respond to any non-compliance;	Section 7
	(v) respond to emergencies; and	Section 7
	(f) include: (i) copies of any strategies, plans and programs approved under the conditions of this approval; and	Section 5.2
	(ii) a clear plan depicting all the monitoring required to be carried out under the conditions of this approval.	Section 5.3
Schedule 5, Condition 2	<p>Adaptive Management</p> <p>The Proponent shall assess and manage project-related risks to ensure that there are no exceedances of the criteria and/or performance measures in schedule 3. 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.</p> <p>Where any exceedance of these criteria and/or performance measures has occurred, the Proponent shall, at the earliest opportunity:</p> <p>(a) take all reasonable and feasible measures to ensure that the exceedance ceases and does not recur;</p> <p>(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</p> <p>(c) implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary.</p>	Section 7

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Condition No.	Condition	Where addressed
Schedule 5, Condition 4	<p>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:</p> <p>(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;</p> <p>(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:</p> <p>(i) the relevant statutory requirements, limits or performance measures/criteria;</p> <p>(ii) requirements of any plan or program required under this approval;</p> <p>(iii) the monitoring results of previous years; and</p> <p>(iv) the relevant predictions in the EA;</p> <p>(c) identify any non-compliance over the past year, and describe what actions were (or are being) taken to ensure compliance;</p> <p>(d) identify any trends in the monitoring data over the life of the project;</p> <p>(e) identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies; and</p> <p>(f) describe what measures will be implemented over the next year to improve the environmental performance of the project.</p>	Section 9
Schedule 5, Condition 5	<p>Revision of Strategies, Plans and Programs</p> <p>Within three months of:</p> <p>(a) the submission of an annual review under condition 4 above;</p> <p>(b) the submission of an incident report under condition 7 below;</p> <p>(c) the submission of an audit under condition 9 below; or</p> <p>(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.</p> <p><i>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></p>	Section 12

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Condition No.	Condition	Where addressed
Schedule 5, Condition 6	<p>Community Consultative Committee</p> <p>6. The Proponent shall establish and operate a Community Consultative Committee (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 within six months of this approval.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> • 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, CSC, recognised environmental groups and the local community. 	Section 6
Schedule 5, Condition 7A	<p>REPORTING</p> <p>Incident Reporting</p> <p>The Proponent must immediately notify the Department and any other relevant agencies immediately after it becomes aware of an incident. The notification must be in writing and identify the development (including the development application number and name) and set out the location and nature of the incident.</p>	Section 7
Schedule 5, Condition 7B	<p>Non Compliance Notification</p> <p>Within seven days of becoming aware of a non-compliance, the Proponent must notify the Department of the non-compliance. The notification must be in writing and identify the development (including the development application number and name), set out the condition of this consent that the development is non-compliant with, why it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.</p> <p><i>Note: A non-compliance which has been notified as an incident does not need to also be notified as a noncompliance.</i></p>	Section 7
Schedule 5, Condition 8	<p>Regular Reporting</p> <p>The Applicant must provide regular compliance reporting to the Department on the development in accordance with relevant <i>Compliance Reporting</i> requirements (DPE 2018).</p>	Section 6

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Condition No.	Condition	Where addressed
Schedule 5, Condition 9	<p>INDEPENDENT ENVIRONMENTAL AUDIT</p> <p>Within one year of commencement of development on the site under this approval, 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:</p> <ul style="list-style-type: none"> (a) be prepared in accordance with the relevant Independent Audit Post Approval requirements (DPE 2018); (b) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary; (c) be carried out in consultation with the relevant agencies; (d) assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and (e) recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent. 	Section 9.2
Schedule 5, Condition 10	<p>Within 3 months of commencing an Independent Environmental Audit, or unless otherwise agreed by the Secretary, a copy of the audit report must be submitted to the Secretary, and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The recommendations of the Independent Environmental Audit must be implemented to the satisfaction of the Secretary.</p>	Section 9.2

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Condition No.	Condition	Where addressed
Schedule 5, Condition 11	<p>ACCESS TO INFORMATION</p> <p>Prior to the commencement of construction on the site, the Proponent shall:</p> <ul style="list-style-type: none"> (a) make copies of the following publicly available on its website: <ul style="list-style-type: none"> (i) the documents referred to in condition 2 of Schedule 2; (ii) all relevant statutory approvals for the project; (iii) all approved strategies, plans and programs required under the conditions of this approval; (iv) 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; (v) a complaints register, which is to be updated on a monthly basis; (vi) minutes of CCC meetings; (vii) the annual reviews required under this approval; (viii) any independent environmental audit of the project, and the Proponent’s response to the recommendations in any audit; (ix) any other matter required by the Secretary; and (b) keep this information up-to-date, to the satisfaction of the Secretary. 	Section 6

3.2 EPL 20179

Relevant conditions of EPL 20179 associated with this strategy, and where they have been addressed within the document, are reproduced in **Table 2**.

Table 2 EPL 20179 Conditions

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Condition No.	Condition	Where addressed
Condition M5	<p>M5 Recording of Pollution Complaints</p> <p>M5.1 The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.</p> <p>M5.2 The record must include details of the following:</p> <ul style="list-style-type: none"> a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken. <p>M5.3 The record of a complaint must be kept for at least 4 years after the complaint was made.</p> <p>M5.4 The record must be produced to any authorised officer of the EPA who asks to see them.</p>	Section 8
Condition M6	<p>M6 Telephone Complaints Line</p> <p>M6.1 The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.</p> <p>M6.2 The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.</p> <p>M6.3 The preceding two conditions do not apply until three months after the date of the issue of this licence.</p>	Section 8
Condition R2	<p>Notification of Environmental Harm</p> <p>R2.1 Notifications must be made by telephoning the Environment Line service on 131 555.</p> <p>Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.</p> <p>R2.2 The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.</p>	Section 7

4 Objectives and Outcomes

The objectives of the Mine Site have been defined in the Environmental Policy (**Appendix A**).

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5 Implementation of Environmental Management Strategy

5.1 Environmental Policy

The Company Environmental Policy identifies objectives and targets that enable the implementation of actions which support the principles within the policy and result in positive outcomes. The Environmental Policy is presented in **Appendix A**.

5.2 Environmental Management Plans

The Company Environmental Management Plans have been prepared in accordance with PA 10_0191 conditions in consultation with various agencies. These plans have been listed below, with copies available on the Aurelia Metals website:

- Noise Management Plan;
- Blast Management Plan;
- Hazardous Materials Management Plan;
- Water Management Plan;
- Waste Rock Management Plan;
- Air Quality and Greenhouse Gas Management Plan;
- Traffic Management Plan;
- Biodiversity Management Plan (incorporating Stewardship Agreement)
- Heritage Management Plan; and
- Rehabilitation Management Plan/Mining Operations Plan (MOP).

The strategic framework for the environmental management of the operation is presented in **Figure 3**.

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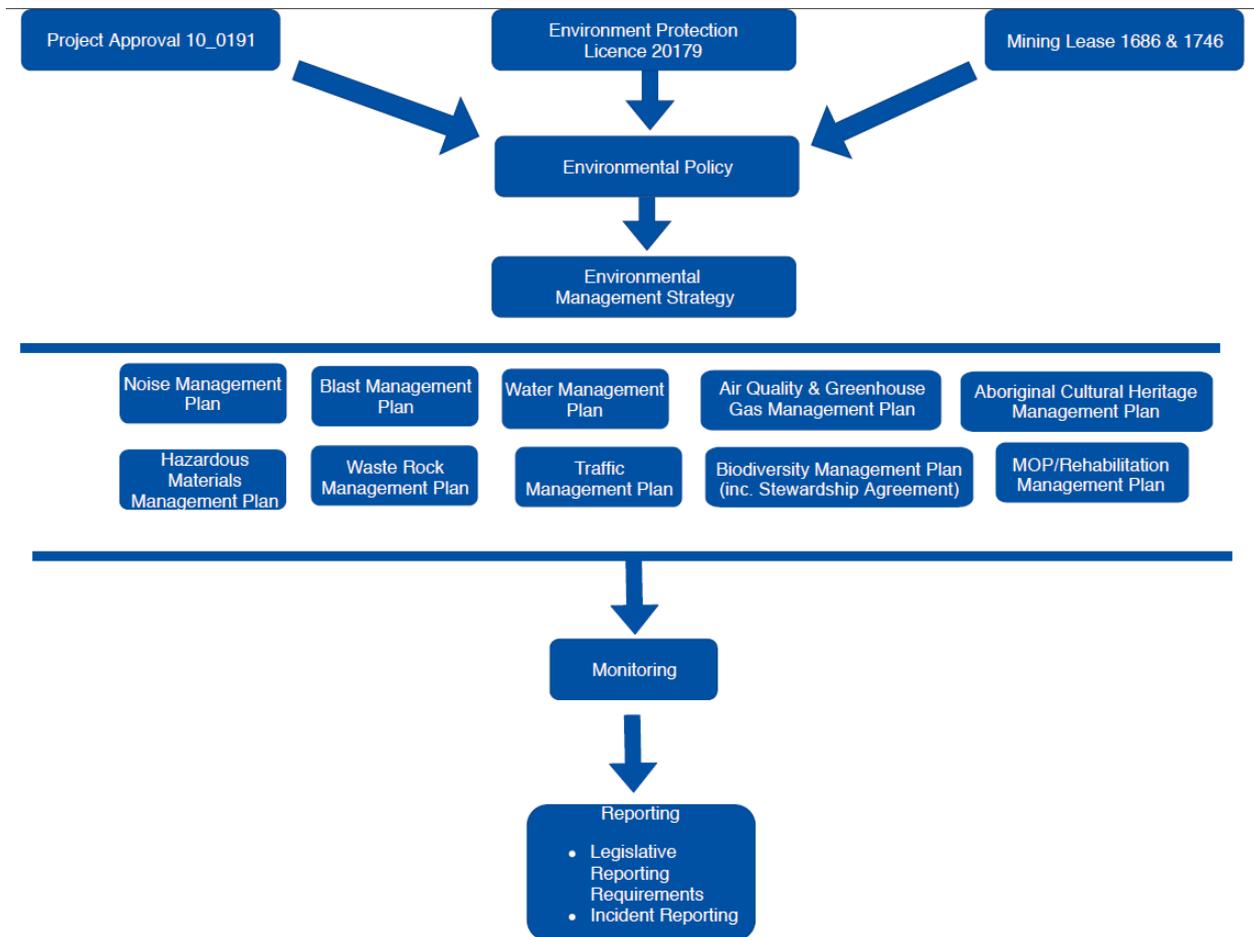


Figure 3 Environmental Management Strategic Framework

5.3 Environmental Monitoring Requirements

Schedule 5, Condition 1 of PA 10_0191 requires the Company to provide a clear plan depicting all monitoring required under the conditions of the approval. The monitoring locations have been presented on **Figure 4** and **Figure 5**, and **Table 3** summarises the monitoring requirements of the management plans listed in **Section 5.2**. For further information regarding monitoring requirements, refer to the specific management plans.

Table 3 Summary of the Environmental Monitoring Requirements Associated with PA10_0191.

Aspect	Monitors	Frequency	Parameters
Blast	Residence R3	Each blast	Blast Vibration (mm/s) and overpressure (dB(Lin Peak))
Noise	Residences R1, R2, R3 and R4	As needed	LAeq(15-minute) and LA1(max)
Air Quality	DDG 1 and DDG2	Monthly	g/m ² /month
	HVAS	24 hour period every sixth day	µg/m ³

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Aspect	Monitors	Frequency	Parameters
Meteorology	Met station	Continuous	Rainfall, wind speed @ 10meters, wind direction @ 10 meters, temperature @ 2 meters and 10m, sigma theta @ 10 meters, solar radiation
Surface Water	EPA Point 1, EPA Point 2	Daily during any discharge	Cyanide (weak acid dissociable)
	EPA Point 3, EPA Point 4	Daily during any discharge	EC, pH, TSS, Cyanide (weak acid dissociable), Al, As, B, Cd, Cu, Pb, Mn, Ni, N (total), Oil and grease, Ag, Total P (filtered), Zn
	EPA Point 25, EPA Point 26	Daily during any discharge	EC, pH, TSS, Cyanide (weak acid dissociable), Al, As, B, Cd, Cu, Pb, Mn, Ni, N (total), Oil and grease, Ag, Total P (filtered), Zn
Groundwater Monitoring	WB4 (EPA 7), WB015 (EPA 27), WB016 (EPA 28), WB018 (EPA29), WB020 (EPA 30), TSF OB01 (EPA 34), TSFOB02 (EPA 35), TSFOB03 (EPA 36), TSFOB04 (EPA 37), TSFOB05 (EPA 38), WB10 (EPA 40).	Quarterly	SWL
	WB4 (EPA 7), WB8 (EPA 9), House Bore (EPA 19), WB015 (EPA 27) WB016 (EPA 28) WB018 (EPA29) WB020 (EPA 30), HWB021 (EPA 31), HWB024 (EPA 32), HWB025 (EPA 33), WB10 (EPA 40).	Quarterly	EC, pH, TSS, As, HCO3, B, Cd, Ca, CO3, Cl, Cr, Cu, Cyanide (free, total & WAD), Fe, Pb, Mg, Hg, Mn, Mo, Ni, K, Ag, Na, Sb, Sn, Zn
	TSF monitoring bores: TSFOB1, TSFOB2, TSFOB3, TSFOB4, TSFOB5.	Quarterly (sample when water is present)	Cn (free, total and WAD) EC pH

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Aspect	Monitors	Frequency	Parameters
Ecology	Hera Site:		
	MPP1 to MPP13	Monthly or after >25mm rain	Site inspection and verification
		Annually	BioMetric Vegetation Condition Benchmark
	MPP4, MPP5 and MPP13	Annually	Landscape Function Analysis
	Various	Six Monthly	Weeds and Pests
		Annually	Fauna Monitoring
	Chelsea Property:		
	MPC1 to MPC6	Quarterly or after >25mm rain	Site inspection and verification
		Annually	Plot BioMetric Vegetation Condition Benchmark
	MPC1, MPC2 and MPC3	Annually	Landscape Function Analysis
	Various	Six Monthly	Weeds and Pests
		Annually	Fauna monitoring
Concentrate Transported	N/A	Monthly	Tonnes transported

6 Communication of Environmental Objectives and Targets

The Company will implement the following procedures to inform the local community and relevant agencies about the operation and environmental performance of the operation:

- Key documents relating to the operation will be made available on the Company website in accordance with Schedule 5, Condition 11 of PA 10_0191 including but not limited to:
 - The original Environmental Assessment and subsequent modifications;
 - PA 10_0191;
 - EPL 20179;
 - ML 1686 and ML 1746;
 - All approved strategies, plans and programs required under the Project Approval;
 - Comprehensive monitoring results required under the Project Approval and EPL;
 - Complaints Register;
 - Minutes of the Community Consultative Committee (CCC) meetings;
 - Annual Reviews;
 - Independent Environmental Audits; and
 - Any other information required by the Secretary
- A community newsletter will be distributed to the local community on an ad-hoc basis. These will also be made available on the website;
- Open days will be held allowing the community and relevant agencies an opportunity to tour the site; and



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- The CCC will be operated in accordance with Schedule 5, Condition 6 of PA 10_0191 and with the *Community Consultative Committee Guideline* (NSW Government, 2019). The meetings will be held at a frequency as agreed by the community representatives.

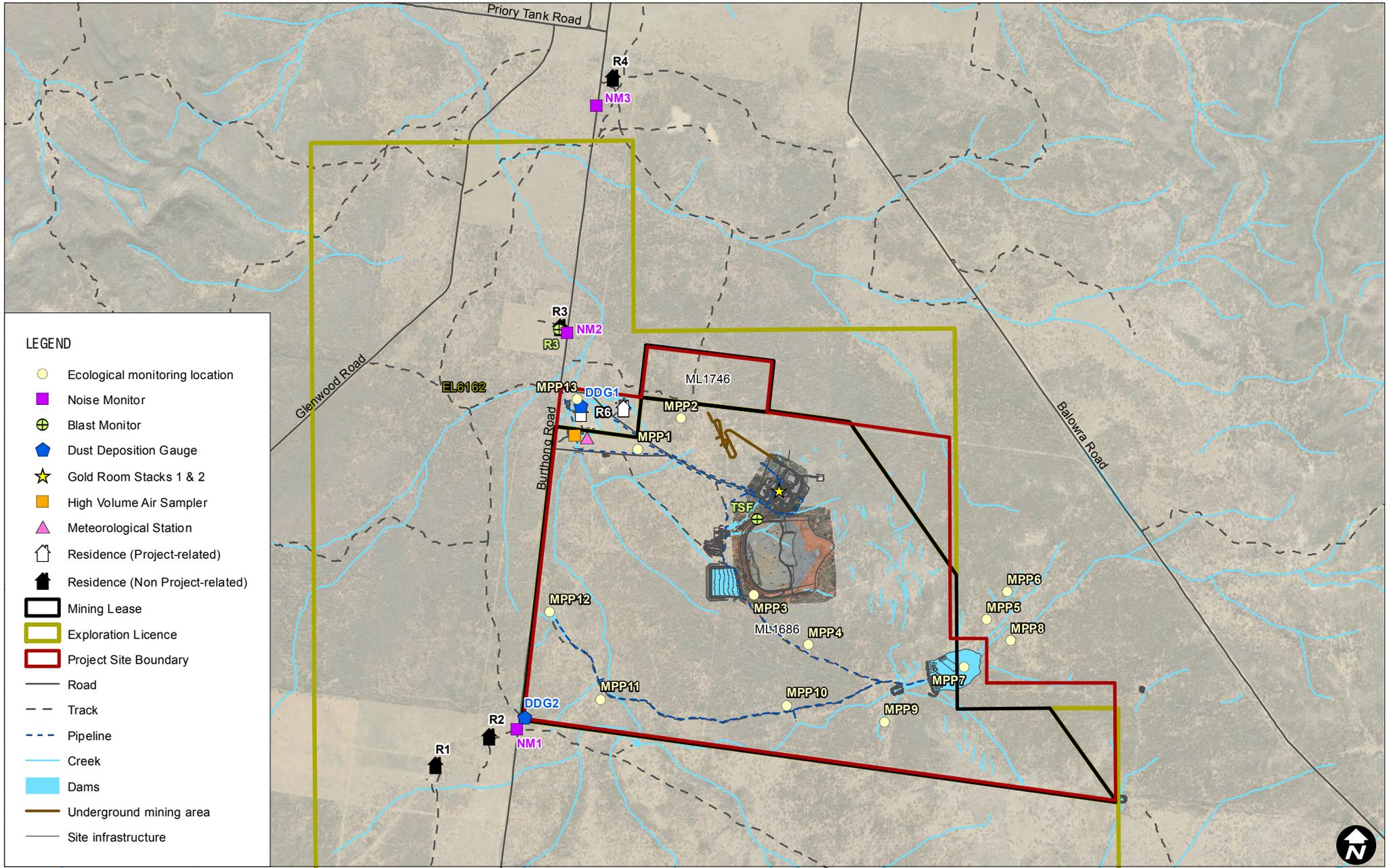
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Figure 4 Environmental Monitoring Locations

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LEGEND

- Ecological monitoring location
- Noise Monitor
- ⊕ Blast Monitor
- ◆ Dust Deposition Gauge
- ★ Gold Room Stacks 1 & 2
- High Volume Air Sampler
- ▲ Meteorological Station
- 🏠 Residence (Project-related)
- 🏠 Residence (Non Project-related)
- Mining Lease
- Exploration Licence
- Project Site Boundary
- Road
- - - Track
- - - Pipeline
- Creek
- Dams
- Underground mining area
- Site infrastructure



Scale: 1:50,000
GDA 1994 MGA Zone 55



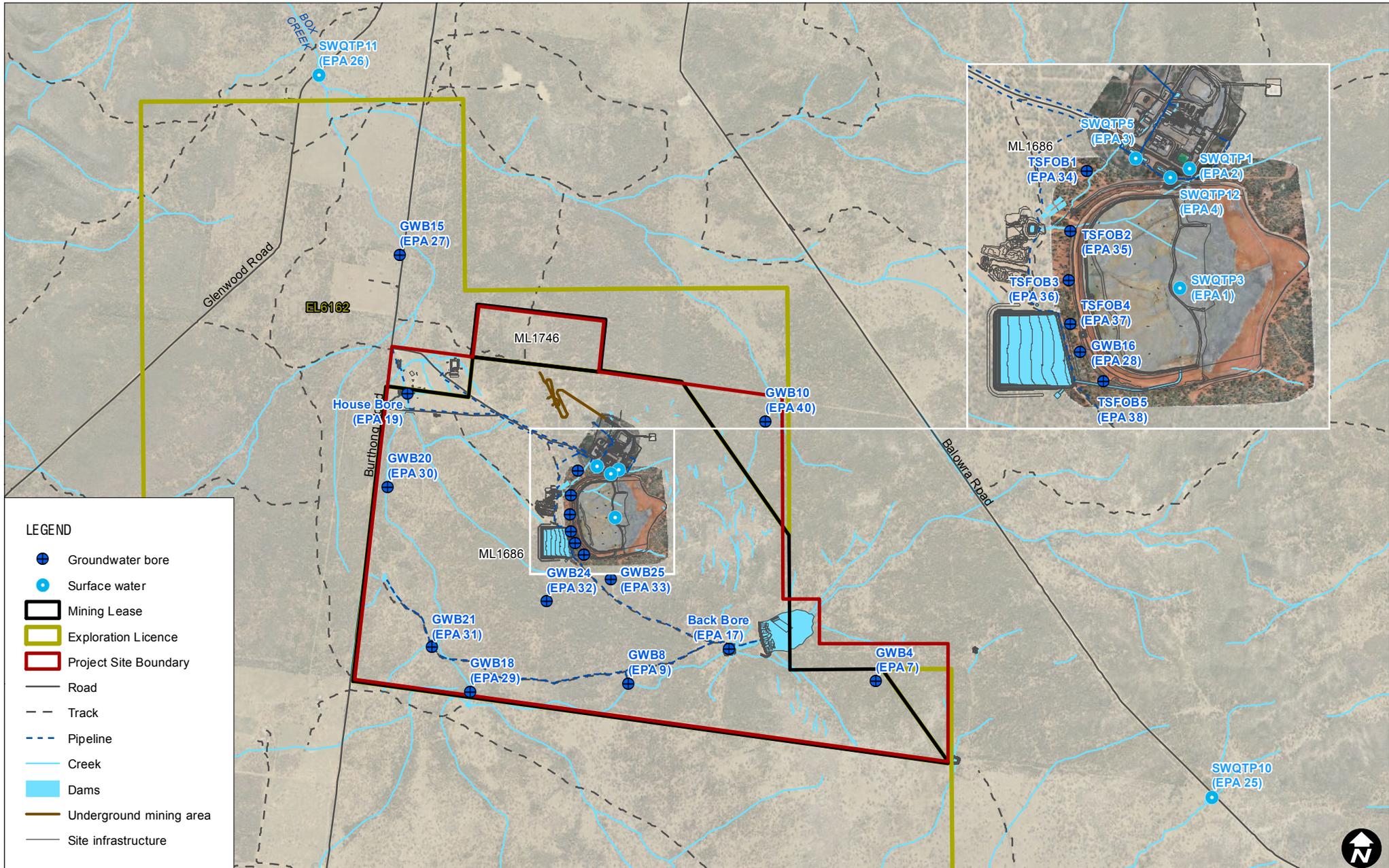
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Figure 5 Water Monitoring Locations

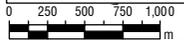
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H:\Projects\SLR\630-SwMTL\630-WTL\630-12807\Hera Gold Mine Management Plan\Revisions\06_SLR_Datav01_CADD\GIS\arcgis\SLR\63012807_Water\Monitoring_01.mxd



LEGEND

- ⊕ Groundwater bore
- Surface water
- Mining Lease
- Exploration Licence
- Project Site Boundary
- Road
- - - Track
- - - Pipeline
- Creek
- Dams
- Underground mining area
- Site infrastructure



Scale: 1:50,000
GDA 1994 MGA Zone 55



09-Aug-2019
630.12807

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Author	J Coffey (SLR)	Created	June 2012
Approved	M Williams	Review date	June 2019
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7 Incident Reporting and Emergency Response

Incident Reporting will be in accordance with Schedule 5, Condition 7A and 7B of PA 10_0191. In the event of an environmental incident or non-compliance with the Project Approval, the Company will initiate an investigation. The incident will be reported immediately after the Company becomes aware of an incident and the subsequent investigation will be reported to the relevant departments within seven days of the initial report. 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;
- Whether appropriate controls were implemented to prevent the incident; and
- Recommendations for corrective and/or preventative actions that could be implemented to reduce the likelihood of the incident reoccurring.

Incident investigations will be communicated to all personnel through toolbox meetings and/or company memorandums. If required, strategies, plans or programs will be reviewed and amended in consultation with the relevant agencies.

Where any exceedance of criteria in Schedule 3 and/or performance measures has occurred, the Company shall assess and manage this exceedance in accordance with Schedule 5, Condition 2 of PA 10_0191. The Company shall, at the earliest opportunity:

- Take all reasonable and feasible measures to ensure that the exceedance ceases and does not recur;
- Consider all reasonable and feasible options for remediation (where relevant) and submit a report to the DPIE describing those options and any preferred remediation measures or other course of action; and
- Implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary.

In the case of an environmental emergency that causes or has potential to cause environmental harm (as per the *Protection of Environment Operations Act 1997* (POEO Act)) the Pollution Incident Response Management Plan (PIRMP) will be implemented. **Figure 6** presents a flowchart of the incident reporting process. Critical steps involved in this plan are:

- Notification of emergency incident to internal (staff and contractors) and external (relevant authorities, immediate neighbours and local community) stakeholders;
- Safety of all personnel and immediately affected neighbours; and
- Protection of the environment.

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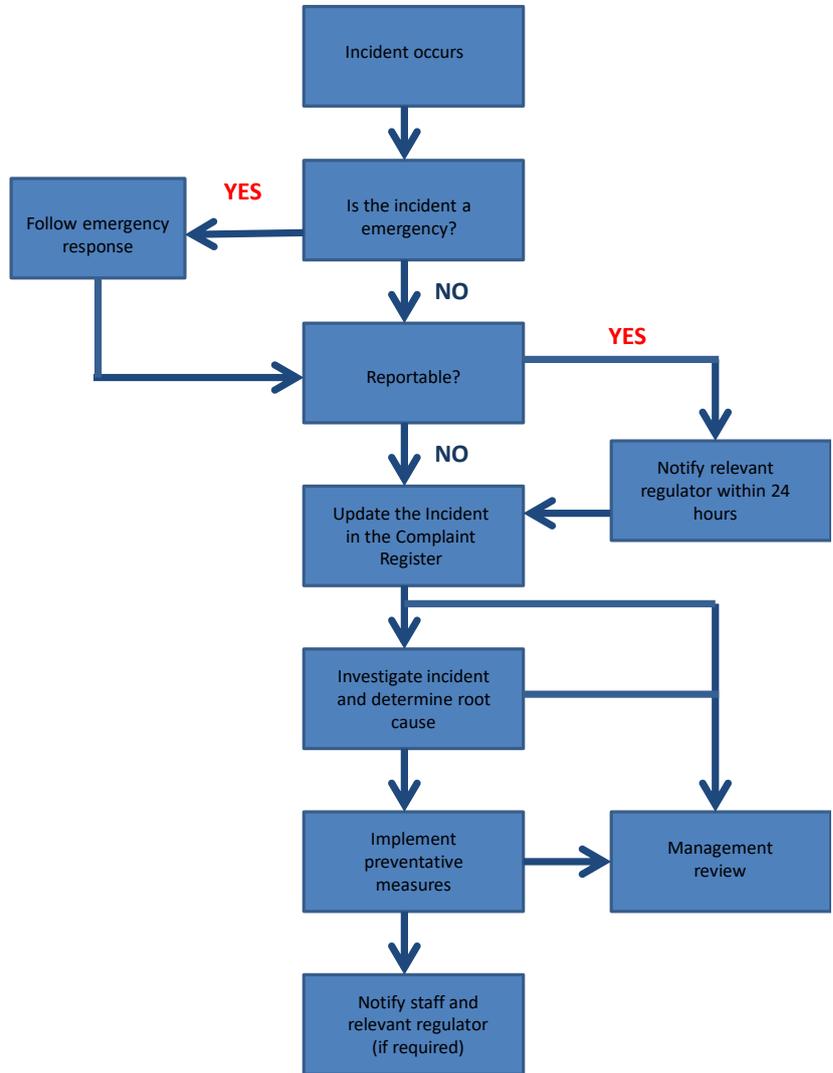


Figure 6 Incident Reporting Flowchart.

8 Complaint Management and Dispute Resolution

Complaints can be directed to the Company via phone or email 24 hours a day, 7 days a week. Contact details are presented in **Table 4** and are advertised to the local community on the Aurelia Metals website.

Table 4 Contact details for the Complaints Directory.

Method	Details
Email	complaints@aureliametals.com.au
Telephone	1300 016 240

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As per Condition 11, Schedule 5 the Company maintains a Complaint Register which is updated as required and available on the Company website. **Figure 7** presents a flowchart of the complaint management process.

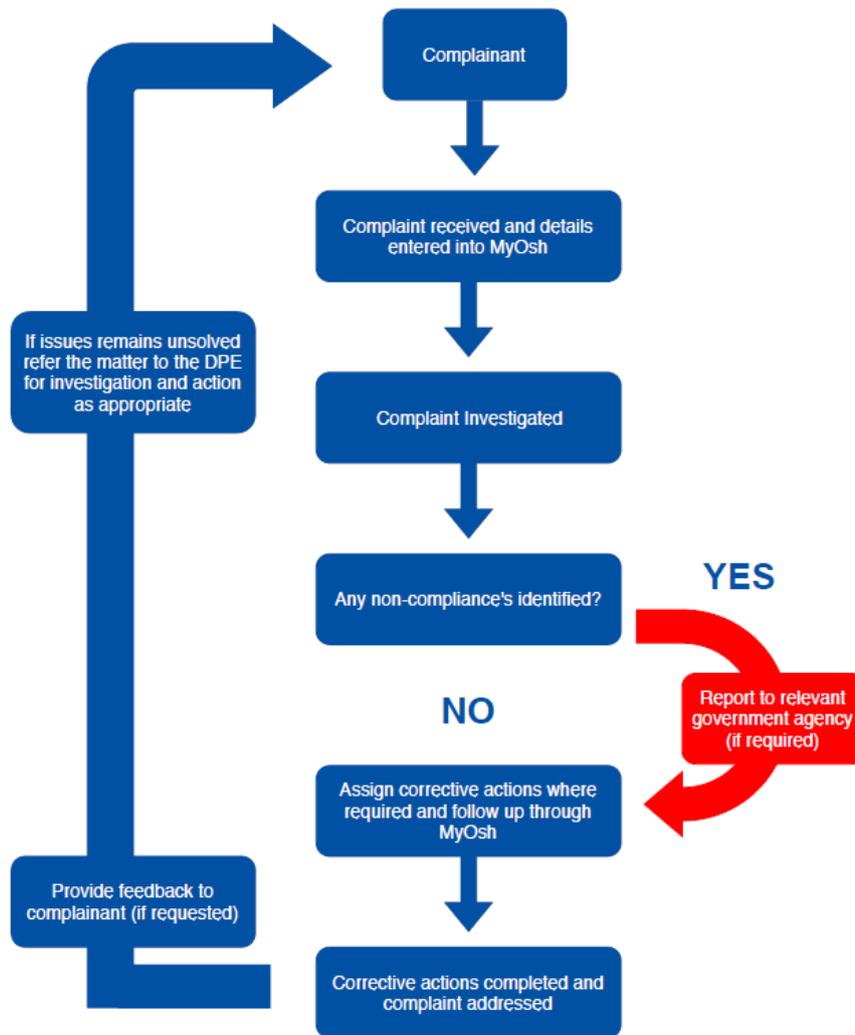


Figure 7 Complaint Management Flowchart.

In the event that a complainant does not consider the Company’s response adequately addresses their concerns, the following dispute resolution procedure will be adopted:

- A meeting will be organised with the Company and complainant to seek resolution of the matter. The complainant will be provided with a written response from the Company detailing the results of actions to date and the agreed further actions to be taken;
- On implementation of the further actions, contact will be made with the complainant to check if the outcomes from the action are to the satisfaction of the complainant; and
- If following the above steps the issue remains unresolved and no further agreement can be reached the matter will be referred to DPIE for investigation and action as required.

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9 Reporting and Evaluation of Compliance

9.1 Annual Reporting

Hera Resources will provide a summary of the environmental performance of the Mine against the relevant criteria in the Annual Review. The Annual review will:

- Describe the operations (including any rehabilitation) that were carried out in the past year, and that are proposed to be carried out over the next year;
- Review the monitoring results and complaints records over the past year, which includes a comparison of these results against the:
 - relevant statutory requirements;
 - requirements of any plan or program;
 - monitoring results of previous years; and
 - relevant predictions in the EA;
- Identify any non-compliances and describe what actions are being taken to ensure compliance;
- Identify any trends in the monitoring data over the life of the operation;
- Identify any discrepancies between the predicted and actual impacts of the project; and
- Describe what measures will be implemented to improve the environmental performance of the project.

The Annual Review will be submitted to the relevant government agencies, community groups, and will be made publically available on the Aurelia Metals website.

A summary of compliance, monitoring and complaints against the EPL 20179 criteria will also be provided to the EPA in the EPL Annual Return.

9.2 Independent Environmental Audits

Every three years, Hera resources will commission an Independent Environmental Audit of the operation. The audit will:

- be prepared in accordance with the relevant Independent Audit Post Approval requirements (DPE 2018);
- be led and conducted by a suitably qualified, experienced and independent team of expert whose appointment has been endorsed by the Secretary;
- be carried out in consultation with the relevant agencies;
- assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and
- recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent.

Within three months from the commencement of the audit , Hera resources will submit a copy of the audit report to the Secretary, and any other agencies who request it, together with its response to any

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recommendations contained in the audit report. This audit report will be made publically available on the Aurelia Metals website.

10 Roles and Responsibilities

Table 5 lists the roles and responsibilities for this strategy.

Table 5 Roles and Responsibilities

Position	Accountable Task
General Manager – Hera Mine	<ul style="list-style-type: none"> • Must ensure adequate resources are available to enable implementation of this strategy and management plans. • Accountable for the overall environmental performance of the operation, including the outcomes of this strategy. • Review and support corrective actions associated with significant or potentially significant environmental issues.
Environment Advisor	<ul style="list-style-type: none"> • Ensure the implementation of this strategy. • Ensure all site personnel are competent through training and awareness programs. • Provide guidance, co-ordination and management on environmental issues to management, the workforce and contractors. • Work with site personnel to ensure that emissions to atmosphere, water and land comply with environmental requirements. • Manage the collection of environmental monitoring data and communicate performance information to the community. • Investigate and resolve community concerns and complaints. • Work closely with all contractors to ensure that appropriate environmental controls are in place. • Attend meetings and presentations as required.

11 Training and Awareness

All personnel shall be made aware of environmental and legislative obligations via the competency based site induction program. The requirement of this strategy may also be reinforced by formal training or other means such as toolbox meetings, pre-shift communications and awareness posters.

12 Review

Strategies, management plans and programs will be reviewed in accordance with Schedule 5, Condition 5 of PA 10_0191. Revision is required within three months of:

- The submission of an annual review under Condition 4;
- The submission of an incident report under Condition 7;
- The submission of an audit under Condition 9; or

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- Any modification to the conditions of the Project Approval (unless the conditions require otherwise), the Company shall review, and if necessary revise, the strategies, plans and programs required under this approval to the satisfaction of the Secretary.

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 operation and or any strategy, plan or program will be incorporated into this strategy.



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Appendix A – Environmental Policy

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	Environmental Policy		AUR -C-ENV-POL-164	
	Author	J Thompson	Created	05/08/2012
	Approved	Scott Ramsay	Review date	
	Version	V 1.1	Updated	13/11/2017

Environmental Policy

Aurelia Metals recognises that environmental performance is a critical component of our business. Aurelia’s commitment is to not only maintain but enhance our ‘licence to operate’ and our goal is to achieve compliance through active environmental leadership and effective communication with all stakeholders. Aurelia Metals is committed to monitoring and managing the environmental impacts of our activities to secure a sustainable environmental future for communities surrounding our sites, even after our operations cease.

Our Environmental Policy commits us to:

- Integrate environmental management into all facets of our business;
- Inform and consult with the community about Aurelia’s activities and projects;
- Manage environmental risks on a site-specific basis to achieve planned environmental outcomes;
- Comply with applicable environmental laws and regulations as a minimum standard;
- Continually strive to improve overall environmental performance;
- Identify opportunities for the efficient use of energy and water, minimise waste and reduce the Company’s environmental footprint;
- Contribute to conservation of biodiversity and integrated approaches to land use planning;
- Rehabilitate sites or areas disturbed by company activities to comply with the applicable Environmental Management Plan
- Report annually to shareholders and the community on Aurelia’s environmental performance;

Environmental matters are considered during all stages of our activities. This policy will ensure Aurelia’s operations positively contribute to the environment and local communities in which we are operating.



Jim Simpson
Chief Executive Officer & Managing Director

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