

	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation	Hera Resource Action Plan	Hera Action Due Date	
S2.1	Terms of 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.	1. EPA Show Cause Notice relating to cyanide contaminated water leaks, EPA Reference 1508094, dated13 June 2019. 2. EPA Cleanup Notice 15/7818.			As a result of two (two) reported by Hera) leaks of contaminated water, the EPA issue a Clean Up Notice and subsequently in response to their assessment that these incidents evidenced potential or actual Material Harm and were therefore potential breaches of Sections 44, 42 and 14CA of the POEC Act.	Non-Compliance	The cleanup actions relating to the incidents have been completed - there are no further actions required.	PA Observation 1 - Noted.	Complete.	
S2.2		The Proponent shall carry out the project generally in accordance with the: (a) EA and (b) conditions of this approval.	1. Email from S. Heinrich (Senior Surveyor) to M. Williams (Senior Environmental Advisor) titled "Notice Not Over Height", dated 3 May 2019. The email notified the Environmental Advisor that the survey of the stockpile had confirmed that the stockpile height had been exceeded.	1. J. Thompson 29 November 2019. An exceedance in stockpile height occurred in May 2019.	1. The stockpile is not visible from any adjacent properties or public roads.	During the Audit period, the Waste Rock stockpile height exceeded the 10m height limit. The Auditor notes that the proposed Modification 5 seeks to increase the Waste Rock stockpile height to 15m. It is the Auditor's view that an increase in stockpile height will not result in an additional impact on the environment.	Non-Compliance	Ensure that the waste rock dump height is maintained below the approved height.	1. The new approved WRE height has been increased to 15m above ground level and was approved in MCO5, which was approved on 6 December 2019. 2. The current height of the WRE continues to be reduced as waste rock is used to build/empty slopes.	Complete.	
S2.3		If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this approval shall prevail to the extent of any inconsistency.						Noted			
S2.4		The Proponent shall comply with any reasonable requirements of the Director-General arising from the Department's assessment of: (a) any reports, plans, programs or correspondence that are submitted in accordance with this approval; and (b) the implementation of any actions or measures contained in these reports, plans, programs or correspondence.	1. Correspondence related to an exceedance of the bench heights of the tailing storage facility (in early 2016) and subsequent correspondence with DPE indicating that the issue had been dealt with. This correspondence related to an incident in 2016. No further records of directions from DPE were identified.	1. J. Thompson 29 November 2019. No directions were received from DPE during the audit period.		No directions for action (to be taken) were found relating to directions from DPE	Not Triggered				
S2.5	Mining Operations	The Proponent may carry out Mining operations on the site until 31 December 2022.				Administrative Statement	Noted				
S2.6	Ore Extraction and Processing	The Proponent shall not: (a) process more than 505,000 tonnes of ore from the site in any calendar year. (b) transport more than 50,000 tonnes of concentrate from the site in any calendar year.	1. Aurila Metals Limited 2017 Annual Report 2. Aurila Metals Limited 2018 Annual Report 3. Hera Annual Review 2019	1. J. Thompson 20 November 2019. The mine has not exceeded the ore processing or concentrate transport limits during the audit period.		The corporate annual reports and Annual Reviews provide a summary of production data for each year. These were: 2017 Financial Year: 368,086 tonnes of ore processed, 32,308 tonnes of concentrate transported from site. 2018 Year: 407,131 tonnes of ore processed, 40,756 tonnes of concentrate transported from site. 2019 Year: 468,358 tonnes of ore processed, 31,206 tonnes of concentrate transported from site.	COMPLIANCE				
S2.7	Hours of Operation	The Proponent shall comply with the operating hours: (a) Vegetation Clearing: 7am to 5pm, 7 days a week (b) Construction: 24 hours, 7 days a week (c) Mining, maintenance and processing: 24 hours, 7 days a week (d) Rehabilitation: Day Evening (e) Transportation of Concentrate and Gold Ore: 7am to 10pm, 7 days a week.	1. Letter to DPE from J. Thompson, dated 7 December 2017 notifying DPE of two non-compliances: (a) 29 September 2017 concentrate truck departed site at 0600 (b) 28 November 2017 weak acid dissociable (WAD) cyanide discharge to the TSF exceeded licence conditions. 2. Driver Training and/or Induction Materials 3. Complaints Register (uploaded to the Hera website).	1. Interview J. Thompson, 19 November 2019. Hera has complied with the operating hours specified in the Approval except for one instance where a concentrate truck departed the site prior to 7am. Specifically, no significant vegetation clearing has occurred during the Audit Period. No construction works have been undertaken during the Audit Period. No rehabilitation works have been undertaken on any area of the site. Transportation of concentrate has been confined to daylight hours.	One non-compliance (concentrate truck departure at 0600) occurred during the Audit Period. No complaints relating to ore or hours of hours works (including truck movements to and from site) are recorded on the complaints register that has been uploaded to the Hera website. The Drivers Code of Conduct includes the requirement that no concentrate transport should occur outside of daylight hours (specifically 0700 to 1800).	Non-Compliance	No action required, the drivers code of conduct is up to date.	PA Observation 2 - Noted.	Complete.		
S2.8	Structural Adequacy	The Proponent shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.	Plant and associated facilities Construction Certificates - CC 3792013 issued 16 April 2013 - CC 20130148 issued 2 October 2013 - CC 17 22014 issued 20 March 2014 - CC 17 22014 issued 4 April 2014 Plant and associated facilities Occupation Certificates - CO 20130148 issued 28 January 2014 - CO 379 12013 issued 3 March 2014 - CO 172014 issued 6 July 2017 - CO 3802017 issued 25 August 2017 Tailing Storage Facility - "Tailings Storage Facility Design Report (MWP/0076MAA-AC Design Rep F18) Revd" - Dam Safety Committee TSP Surveillance Report issued 14 April 2018 - Letter from Dam Safety Committee dated 16 July 2014 confirming acceptance of the Stage 1 Construction report for the TSF. Other: - Johnson Explosives letter dated 27 August 2012 confirming compliance of the Explosives Magazine with AS2187.1 - Structural Condition Assessment (transportable Buildings) prepared by Geosley, dated December 2017 - Building Certificate issued by CSC (related to office building and ablation blocks) dated 21 February 2018.	1. J. Thompson 20 November 2019. No new construction works have been undertaken during the audit period.		The present processing plant, workshops and associated office facilities were constructed prior to this Project Approval and were approved by the DPI in 2008 under Part 5 of the EPA Act 1975. No new construction works were undertaken during the audit period. However the previous audit failed to cover approval of the TSF and therefore the Auditor has reassessed the compliance against this condition covering the current and previous Audit Periods. Note that the previous audit recorded a Non-Compliance against this condition. The review of the construction documentation undertaken during this audit has found that sufficient documentation has been obtained by Hera to demonstrate that appropriate quality assurance measures were implemented during construction works and the required CCs and OCs have been obtained. Approval under the Dam Safety Act for the TSF have been obtained.	COMPLIANCE				
S2.9	Demolition	The Proponent shall ensure that all demolition work is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version.	1. Records of demolition 2. Contracts / specifications for demolition works	1. Interview L. Richards, 19 November 2019. No demolition works were undertaken during the Audit Period. A decommissioned structure was demolished.		No demolition works have been undertaken during the audit period.	Not Triggered				
S2.10	Protection of Public Infrastructure	The Proponent shall: (a) repair, or pay the full costs associated with repairing, any public infrastructure damaged by the project; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure.	1. Incident Register	1. Interview J. Thompson, 19 November 2019. No requests have been received requesting repairs be made to any public infrastructure.		No instances of damage to public infrastructure have been identified for the Audit Period.	Not Triggered				
S2.11	Operation of Plant and Equipment	The Proponent shall ensure that all plant and equipment used at the site, or to transport extractive materials from the site, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Interview T. Cox Maintenance Supervisor: 1. Pronto (asset and facility management software) is used to plan and track routine maintenance of fixed and moving plant. 2. Hera takes steps to ensure that all the plant and equipment used at the site is maintained in a proper and efficient condition. These steps include: -The mining contractor (PYBAR) is contracted to perform all mining vehicle plant maintenance functions on site and Hera maintains surface plant and equipment. -All equipment on site has to be MDO5 compliant (audit interview) -All equipment maintenance register (signed for both Hera and PYBAR) -A maintenance schedule system is in place and current for plant (see above). -The concentrate transporter's (OPC Bulk) trucks are under a Maintenance Management system with the MRF (National Heavy Vehicle Register) which requires them to be audited every twelve months.	1. Demonstration of Pronto software. The auditor witnessed the processes used to setup, manage and monitor fixed and mobile plant maintenance. 2. Fixed and mobile plant signed during the audit was operational and appropriately maintained.	The mine operates a popular maintenance management system. Maintenance records signed (on the Pronto System) demonstrated that a comprehensive proactive maintenance program is in place.	COMPLIANCE					
S2.12	Staged Submission of Plans and Programs	With the approval of the Director-General, the Proponent may submit any strategy, plan or program required by this approval on a progressive basis.	Correspondence from DPE approving staging of any plans or programs	1. Interview L. Richards. There are no plans to submit any strategy plan or program required by this approval on a progressive basis at this stage.		This condition has not been triggered.	Not Triggered				
S2.13		Until they are replaced by an equivalent strategy, plan or program approved under this approval, the Proponent shall implement the existing strategies, plans or programs for the site that have been approved under the approved exploration activities described in Review of Environmental Effects entitled "Exploration Decline at the Hera Deposit within Exploration Licence 6162".	1. Review of Environmental Effects entitled "Exploration Decline at the Hera Deposit within Exploration Licence 6162".	The Environmental Management Strategy has been approved. The only plans that have not been approved since project inception are the Water Management Plan and Biodiversity Management Plan. The draft plans are substantially the same as the documents included in the REF. Therefore, Hera is operating in general accordance with the Review of Environmental Factors (REF) for the Exploration Decline.		The Environmental Management Strategy and related sub-plans required by this Approval have been drafted. All of the plans are not up to date and / or approved (by DPE). The unapproved plans are being implemented as opposed to the plans provided in the REF. The management plans that are loaded onto the company website are assumed to be those that are current and being implemented. The majority of those plans were prepared in 2012/13 and may no longer provide up to date process information or mitigation measures relevant to the current operations. Each of the Plans has been reviewed by the Auditor and while generally technically sufficient contain some inaccurate information, for example regulatory references.	Non-Compliance	Review and update all plans required under the EMS, consult with the relevant authorities and then seek DPE approval for the revised plans.	Consultation and submission of all Management Plans is on schedule and if an update is required, they will be submitted within three months of this EA.	4 July 2020.	
S2.14	Planning Agreement	By 31 July 2016 unless otherwise agreed by the Secretary, the Proponent shall amend the planning agreement with CSC in accordance with Division 6 of Part 4 of the EPA Act, which provides for contributions to CSC. The terms of the planning agreement shall be consistent with the general terms of agreement between CSC and Hera Resources Pty Limited outlined in Appendix 2.	1. Deed of Variation of Original Planning Agreement between Cobarr Shire Council and Hera Resources Pty Ltd. 10 April 2013. 2. Email from Cobarr Shire Council (S. Pooley) to DPE (E. Donnelly) titled "Modification of Planning Agreement - Condition No.14 of the first roofed consent", dated 22 September 2018. The email confirms the execution of the deed of variation and compliance with Condition 52 C14 of the Approval. 3. Tax Invoice issued by Cobarr Shire Council on 3 May 2018 for the voluntary Planning Agreement Contributions of \$32,672 and \$61,260.			Hera entered into a planning agreement with Cobarr Shire Council (CSC) in accordance with Division 6 of Part 4 of the EPA Act. Schedule 1 in the original planning agreement. The terms of the planning agreement are consistent with the general terms of agreement between CSC and Hera outlined in Appendix 2. The total contributions of \$60,000 for road repair and maintenance contribution and \$32,000 for the community fund contribution listed in Appendix 2 are the same as the total contributions listed in Schedule 4 of the planning agreement.	COMPLIANCE				
S2.15	Road Maintenance Contribution	By 30 September 2015, and annually thereafter until the cessation of transport operations, the Proponent shall make annual contributions of \$20,000 to BSC for the maintenance of the unsalvaged sections of Hymnysdale-Hermidale Road.	1. Council accounts database extracts: 13/07/2015 - \$10,000 14/06/2018 - \$62,500 14/01/2019 - \$22,500 13/10/2017 - \$43,500	1. Interview L. Richards. The road related payments made to Council consist of: \$62,500 - Hera's contribution to the Hermidale-Hymnysdale sealing road project in 2018 \$22,500 - Maintenance grading of unsalvaged Hermidale-Hymnysdale Road (2017/18 annual contribution) \$43,500 - Maintenance grading of unsalvaged Hermidale-Hymnysdale Road (2015/16 & 2016/17 annual contributions) \$10,000 - Maintenance grading of unsalvaged Hermidale-Hymnysdale Road (2013/14 & 2014/17 annual contributions once grading was completed)	1. The Hymnysdale - Hermidale Road is sealed for its entire length the Auditor travelled to the site via the concentrate transport route.	Payments have been made to BSC during the audit period totalling \$158,000 for road maintenance.	COMPLIANCE				
S3.1	Noise Criteria	The Proponent shall ensure that the noise generated by the project does not exceed the criteria in Table 2 at any residence on privately-owned land or on more than 25 per cent of any privately-owned land. Table 2: Noise Criteria dB(A) Receptors: All residential receptors Day: (LAeq15-min) - 35 Evening/Night: (LAeq15-min) - 35 Night: (LAeq15-min) - 35 (LA1min) - 45 Note: Noise generated by the project is to be measured in accordance with the relevant requirements and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy. However, these criteria do not apply if the Proponent has an agreement with the relevant council to exceed the criteria.	1. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 18 May 2018 to 15 May 2017, dated 14 August 2017. 2. Hera Mine Annual Review Project Approval 10_0192 Mining Lease 1686 Mining Lease 1746, For the Period 18 May 2017 to 15 May 2018, dated 14 August 2018. 3. Hera Mine Annual Review Project Approval 10_0193 Mining Lease 1686 Mining Lease 1746, For the Period 18 May 2019 to 15 May 2019, dated 14 August 2019.			No noise exceedances were detected over the 2018/19 reporting period. No noise exceedances were detected over the 2017/18 reporting period. No noise exceedances were detected over the 2016/17 reporting period.	COMPLIANCE				

S3.2	Operating Conditions	The Proponent shall: (a) implement best practice noise management to minimise the construction, operational and traffic noise of the project.	1. Complaints Register (http://noiselevels.com/projects/here-ymag/consents/register) 2. Here Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017, dated 14 August 2017. 3. Here Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018, dated 16 August 2018. 4. Here Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019, dated 14 August 2019.	1. Interview T Cox Maintenance Supervisor: Here manage maintenance requests through the Promis system. Routine maintenance program is managed using a manual spreadsheet based system.	2. The Auditor did not identify any maintenance issues during the site inspection. All equipment sighted appeared to be operational and appropriately maintained.	Two noise complaints were received over the Audit Period relating noise from the same complainant, one via the EPA. The complaints were investigated by Here and responses provided to the Complainant. No noise exceedances were detected over the Audit Period.	COMPLIANCE			
		(b) maintain the effectiveness of any noise suppression equipment on site at all times and ensure defective equipment is not used operationally and fully repaired, and				An effective maintenance system has been developed and implemented.		COMPLIANCE		
		(c) minimise the noise impacts of the project during meteorological conditions when the noise limits in this approval do not apply.	1. Complaints Register (http://noiselevels.com/projects/here-ymag/consents/register) 2. Here Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017, dated 14 August 2017. 3. Here Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018, dated 16 August 2018. 4. Here Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019, dated 14 August 2019.			Two noise complaints were received over the Audit Period relating noise from the same complainant, one via the EPA. The complaints were investigated by Here and responses provided to the complainant. No noise exceedances were detected over the Audit Period.		COMPLIANCE		
S3.3	Noise Management Plan	The Proponent shall prepare and implement a Noise Management Plan for the project to the satisfaction of the Secretary. The plan must: (a) be prepared in consultation with the EPA, and submitted to the Secretary for approval within six months of this approval.	1. YTC Resources Ltd, Environmental Management Plan Noise Management, Revision 5, dated 19 August 2013. 2. Draft Noise Management Plan Version 1.0 / Revision 1, dated 24/11/2017. 3. Email from DPE (S Sheworth) to Here (J Thompson) titled "YTC: Here Noise Management Plan", dated 25 June 2018. The email provided three (three) comments on the contents of the plan. 4. Letter from DPE (H Read) to YTC Resources (S Haines) titled "Here Project (MP ID: 0191) Management Plan Approvals", dated 28 August 2012. The letter provided DPE approval for the Blast Management Plan, the Noise Management Plan and the Air Quality and Greenhouse gas Management Plans. NOTE this approval predates the current version of the Noise Management Plan.	2 Thompson: Please note, the approval letter is dated the 28/08/12. The Document Control table on the first page of the Noise Management Plan that a review of the document was completed in 2013 and no changes were made. Therefore, the 2013 version is the same as the 2012 version and has been approved by DPE. Unfortunately I am unable to locate the correspondence documentation between EPA and Here in 2012. However, so this was approved by DPE this correspondence must have been provided to DPE at the time of approval.		A noise management plan has been prepared, the version on the Here website is the 2013 update. No correspondence was available to verify that this plan was approved by DPE or that the EPA was consulted during preparation of the Plan. Finding NOT VERIFIED . NOTE: The Auditor assumes that the 2013 version of the NMP is the current version. Email correspondence from 2017/18 indicates that an updated to that plan was prepared and sent to DPE for review in 2017. DPE provided comment on the plan, however the plan has not been approved by DPE.	Review the 2017 version of the NMP to ensure it is up to date then consult with DPE and EPA and then seek DPE approval for the revised plan.	Consultation has been received and the NMP was submitted to DPE for approval on 14 March 2019.	Complies.	
		(b) describe the measures that would be implemented to ensure compliance with conditions 1 and 2 of this schedule, and	1. YTC Resources Ltd, Environmental Management Plan Noise Management, Revision 5, dated 19 August 2013.	2 Thompson: Four properties have been identified in the Management Plan. Refer to Figure 3. The reason only 3 monitoring locations have been identified is that R1 and R2 are monitored from the same location. This is in accordance with advice we have received from noise specialists (prior attached auditing this advice).		Section 5 of the NMP describes the measures to be implemented to ensure compliance.		COMPLIANCE		
		(c) include a monitoring program that: (i) adequately supports the noise management system on site; (ii) includes a protocol for determining exceedances of the criteria identified in Table 2; and (iii) evaluates and reports on the effectiveness of the noise management system on site.	1. YTC Resources Ltd, Environmental Management Plan Noise Management, Revision 5, dated 19 August 2013.			Section 6 of the NMP describes the monitoring that will be undertaken to assess compliance. Section 6.1.2 (Table 6) lists the noise monitoring locations at which quarterly monitoring will be undertaken. Four properties are identified.		COMPLIANCE		
S3.4	Blasting Criteria	The Proponent shall ensure that blasting on the site does not cause exceedances of the criteria in Table 3.	1. Here Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017, dated 14 August 2017. 2. Here Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018, dated 16 August 2018. 3. Here Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019, dated 14 August 2019.			868 blasts were initiated during the 2016/17 reporting year. No vibration exceedances were detected at any privately owned properties. 868 blasts were initiated during the 2017/18 reporting year. No vibration exceedances were detected at any privately owned properties.	COMPLIANCE			
S3.5	Blasting Hours	The Proponent shall only carry out above ground blasting on site between 9:00am and 5:00pm Monday to Saturday, inclusive. No above ground blasting is allowed on Sundays, public holidays or at any other time without the written approval of the Secretary.		1. Audit interview (2 Thompson): no above ground blasting has been undertaken during the Audit Period.		No above ground blasting has been undertaken during the Audit Period.	Not Triggered			
S3.6		Underground blasting may be undertaken at any time, subject to compliance with the conditions of this approval.					Noted			
S3.7	Blasting Frequency	In relation to above ground blasting, the Proponent may carry out a maximum of: (a) three blasts per day, unless an additional blast is required following a blast misfire; and (b) five blasts per week, averaged over a calendar year, for all operations on the site. This condition does not apply to blasts that generate ground vibration of 0.5 mm/s or less at any residence on privately-owned land, or blasts required to ensure the safety of the site or its workers.		1. Audit interview (2 Thompson): no above ground blasting has been undertaken during the Audit Period.		No above ground blasting has been undertaken during the Audit Period.	Not Triggered			
S3.8	Operating Conditions	During operation of the project, the Proponent shall: (a) implement best management practice to: (i) protect the safety of people and livestock in the surrounding area; (ii) protect public or private infrastructure/property in the surrounding area from any damage; and (iii) minimise the dust and fume emissions from any blasting; and (b) operate a suitable system to enable the public to get up-to-date information on the proposed blasting schedule on site, to the satisfaction of the Secretary.		1. Audit interview (2 Thompson): no damage to private property or livestock has occurred as a result of the blasting undertaken.		No damage to private property or livestock has occurred as a result of the blasting undertaken.	COMPLIANCE			
		The Proponent shall prepare and implement a Blast Management Plan for the project to the satisfaction of the Secretary.	1. YTC Resources Ltd, Environmental Management Plan Blast, Revision 4, dated 30 August 2012. 2. Blast Management Plan Version 4.0 / Revision 5, dated May 2015.			A blast management plan has been prepared and is loaded onto the Here Website.	COMPLIANCE			
		This plan must: (a) be prepared in consultation with the EPA, and submitted to the Secretary for approval within six months of this approval.	1. YTC Resources Ltd, Environmental Management Plan Blast, Revision 4, dated 30 August 2012. 2. Letter from DPE (H Read) to YTC Resources (S Haines) titled "Here Project (MP ID: 0191) Management Plan Approvals", dated 28 August 2012. The letter provided DPE approval for the Blast Management Plan, the Noise Management Plan and the Air Quality and Greenhouse gas Management Plans.			DPE approved the plan on 28 September 2012. Correspondence confirming that the EPA was consulted during preparation of the Plan was not signed during the audit.	COMPLIANCE			
S3.9	Blast Management Plan	(b) describe the blast mitigation measures that would be implemented to ensure compliance with conditions 4-8 of this schedule, and	1. YTC Resources Ltd, Environmental Management Plan Blast, Revision 4, dated 30 August 2012.			Section 5 of the BMP describes the measures to be implemented to ensure compliance.	COMPLIANCE			
		(c) include a blast monitoring program to evaluate the performance of the project.	1. YTC Resources Ltd, Environmental Management Plan Blast, Revision 4, dated 30 August 2012.			Section 5 of the BMP describes the blast monitoring program to be assessed compliance.	COMPLIANCE			
S3.10	Odour	The Proponent shall ensure that no offensive odours, as defined under the POEO Act, are emitted from the site.	1. Complaints Register (http://noiselevels.com/projects/here-ymag/consents/register)			No offensive odours at or near the site boundaries were detected by the Auditor during the site inspection.	COMPLIANCE			
S3.11	Greenhouse Gas Emissions	The Proponent shall implement all reasonable and feasible measures to minimise the release of greenhouse gas emissions from the site to the satisfaction of the Secretary.	1. YTC Resources Ltd, Environmental Management Plan Air Quality and Greenhouse Gas, Revision 3, dated 28 August 2012. 2. Air Quality and Greenhouse Gas Management Plan Version 2.0 / Revision 4, dated May 2015.			Greenhouse management strategy has been prepared for the Here operation (Section 5.8 of the AQMP).	COMPLIANCE			
S3.12	Dust	The Proponent shall ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the project do not exceed the criteria listed in Tables 4, 5 or 6 at any privately-owned land.	1. YTC Resources Ltd, Environmental Management Plan Air Quality and Greenhouse Gas, Revision 3, dated 28 August 2012. 2. Air Quality and Greenhouse Gas Management Plan Version 2.0 / Revision 4, dated May 2015. 3. Here Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017, dated 14 August 2017. 4. Here Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018, dated 16 August 2018. 5. Here Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019, dated 14 August 2019.	1. During the site inspection, the Auditor observed: -Water trucks operating on the mine access road -that application of molasses (zealant) on site access roads and roads in an around the process plant -the use of water sprays on stockpiles and transfer conveyors. -rehabilitation of formerly disturbed areas.		The Air Quality and Greenhouse Gas Management Plan is being implemented. Appropriate dust controls are being used. However dust deposition and PM10 measurements from the Audit Period showed elevated dust levels. It is likely that these exceedances were a result of the drought conditions being experienced and are not indicative of the impact of the mine operations.	Non-Compliance	It is recommended that Here consider placement of additional dust deposition gauges outside the site boundaries with an Air Quality Consultant.	Here will seek out additional Dust Deposition Gauges outside the site boundaries with an Air Quality Consultant.	31 December 2020.
		See Tables 2 - 4, including the notes on page 7 of the permit								
		The Proponent shall ensure that all point-source discharge locations on the site are designed and operated to comply with the maximum discharge concentrations applicable under the Protection of the Environment (Clean Air) Regulation 2012 and the requirements of any Environment Protection Licence issued for the project under the POEO Act.	1. Report Number R000130, Emission Testing Report Australia Metals, Nyngane, dated 24 October 2018. The report details the sampling and analysis results for the two licensed point sources. The testing confirmed compliance with all limits except Cadmium (0m-2.0 mg/m ³ - result 0.62 mg/m ³). 2. Report Number R04070, Emission Testing Report Australia Metals, Nyngane, dated 5 October 2017. The report details the sampling and analysis results for the two licensed point sources. The testing confirmed compliance with all emission limits. 3. Report Number R003726, Emission Testing Report Australia Metals, Nyngane, dated 7 March October 2017. The report details the sampling and analysis results for the two licensed point sources. The testing confirmed compliance with all emission limits.	2. Licensed air emission point sources are located that the site (the gold room stacks, EPA Sampling Points 24 and 30). The emission testing results for September 2018 found that cadmium levels exceeded the Environment (Clean Air) Regulation (2012) emission limits.			Non-Compliance	1. Ensure that any emission limit exceedances are fully investigated and reported to the EPA and DPE. This exceedance was reported to the relevant agencies on 4 April 2020. In the future, Here will ensure all exceedances are investigated and reported.	Completed.	
S3.14	Operating Conditions	The Proponent shall: (a) implement best practice air quality management on site, including all reasonable and feasible measures to minimise the off-site odour, fume and dust emissions generated by the project.		1. During the site inspection, the Auditor observed: -Water trucks operating on the mine access road -that application of molasses (zealant) on site access roads and roads in an around the process plant -the use of water sprays on stockpiles and transfer conveyors. -rehabilitation of formerly disturbed areas.		The Air Quality and Greenhouse Gas Management Plan is being implemented. Appropriate dust controls are being used. However dust deposition and PM10 measurements from the Audit Period showed elevated dust levels. It is likely that these exceedances were a result of the drought conditions being experienced and are not indicative of the impact of the mine operations.	COMPLIANCE			
		(b) minimise any visible air pollution generated by the project;	1. YTC Resources Ltd, Environmental Management Plan Air Quality and Greenhouse Gas, Revision 3, dated 28 August 2012. 2. Air Quality and Greenhouse Gas Management Plan Version 2.0 / Revision 4, dated May 2015. 3. Here Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017, dated 14 August 2017. 4. Here Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018, dated 16 August 2018. 5. Here Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019, dated 14 August 2019.	1. During the site inspection, the Auditor observed: -Water trucks operating on the mine access road -that application of molasses (zealant) on site access roads and roads in an around the process plant -the use of water sprays on stockpiles and transfer conveyors. -rehabilitation of formerly disturbed areas.		The Air Quality and Greenhouse Gas Management Plan is being implemented. Appropriate dust controls are being used. However dust deposition and PM10 measurements from the Audit Period showed elevated dust levels. It is likely that these exceedances were a result of the drought conditions being experienced and are not indicative of the impact of the mine operations.	COMPLIANCE			
		(c) minimise air quality impacts of the project during adverse meteorological conditions and extraordinary events (see noted in Tables 4-6);		1. During the site inspection, the Auditor observed: -Water trucks operating on the mine access road -that application of molasses (zealant) on site access roads and roads in an around the process plant -the use of water sprays on stockpiles and transfer conveyors. -rehabilitation of formerly disturbed areas.		The Air Quality and Greenhouse Gas Management Plan is being implemented. Appropriate dust controls are being used. However dust deposition and PM10 measurements from the Audit Period showed elevated dust levels. It is likely that these exceedances were a result of the drought conditions being experienced and are not indicative of the impact of the mine operations.	COMPLIANCE			
		(d) take all practical measures to minimise dust emissions from the tailings storage facility, to the satisfaction of the Secretary		1. During the site inspection, the Auditor observed: -Water trucks operating on the mine access road -that application of molasses (zealant) on site access roads and roads in an around the process plant -the use of water sprays on stockpiles and transfer conveyors. -rehabilitation of formerly disturbed areas.		The Air Quality and Greenhouse Gas Management Plan is being implemented. Appropriate dust controls are being used. However dust deposition and PM10 measurements from the Audit Period showed elevated dust levels. It is likely that these exceedances were a result of the drought conditions being experienced and are not indicative of the impact of the mine operations.	COMPLIANCE			
		The Proponent shall prepare and implement an Air Quality and Greenhouse Gas Management Plan for the project to the satisfaction of the Secretary.	1. YTC Resources Ltd, Environmental Management Plan Air Quality and Greenhouse Gas, Revision 3, dated 28 August 2012. 2. Air Quality and Greenhouse Gas Management Plan Version 2.0 / Revision 4, dated May 2015.			DPE approved the plan on 28 September 2012. Correspondence confirming that the EPA was consulted during preparation of the Plan was not signed during the audit.	COMPLIANCE			
		This plan must: (a) be prepared in consultation with the EPA, and be submitted to the Secretary for approval within six months of this approval.	1. Letter from DPE (H Read) to YTC Resources (S Haines) titled "Here Project (MP ID: 0191) Management Plan Approvals", dated 28 August 2012. The letter provided DPE approval for the Blast Management Plan, the Noise Management Plan and the Air Quality and Greenhouse gas Management Plans. 2. Letter from EPA (B Tawell) to RW Corkery (R Corkery) dated 10 September 2012. The letter refers to the AQMP provided for review.			DPE approved the plan on 28 September 2012. DPE approval for the 2015 plan was not signed during the audit. However as the 2012 version is loaded onto the web site, it is the Auditor's understanding that the 2012 version is the version that is being implemented.	COMPLIANCE			

S3.15	Air Quality and Greenhouse Gas Management Plan	(b) describe the measures that would be implemented to ensure compliance conditions 10-14 of this schedule;	1. YTC Resources Ltd. Environmental Management Plan Air Quality and Greenhouse Gas, Revision 3, dated 28 August 2012.		1. During the site inspection, the Auditor observed: -Water trucks operating on the mine access road -that application of roadseals (sealer) on site access roads and roads in an around the process plant; -the use of water sprays on stockpiles and transfer conveyors; -consolidation of formerly disturbed areas.	The management measures to be implemented to control air emissions are provided in Section 5 of the plan. Note that the currently approved version of the AQMP does not cover all of the current dust reporting strategies (for example the use of roadseals as a road sealer).	COMPLIANCE				
		(c) describe the proposed air quality management system;	1. YTC Resources Ltd. Environmental Management Plan Air Quality and Greenhouse Gas, Revision 3, dated 28 August 2012.			The AQMP adequately describes the air quality management system that is being implemented at the Mine.	COMPLIANCE				
		(d) include an air quality monitoring program that: (i) uses a combination of high volumes samples and dust deposition gauges to evaluate the performance of the project and (ii) includes a protocol for determining exceedances of the relevant conditions of this approval; and (e) describe the measures that would be implemented to minimise the release of greenhouse gas emissions from the site.	1. YTC Resources Ltd. Environmental Management Plan Air Quality and Greenhouse Gas, Revision 3, dated 28 August 2012. 1. Excel Spreadsheet titled "Daily Summary (22) csv". The spreadsheet contained the weather station outputs from 1 September 2016 to 9 November 2019.	No where is this approval does it state that the Gold Room Stack must be monitored only that it should be designed to ensure compliance to air quality regulations. The requirement to monitor the gold room stack is a condition of the EPL and does not relate to this approval.	1. HVAC Sampler (refer to Photo #2) and Dust Deposition Gauges 1. Met Station (refer Photo #3).	Section 6 of the plan addresses air quality monitoring. Dust deposition monitoring and HVAC sampling (including PM10 monitoring) is covered in the plan, however the monitoring of the Gold room stacks is not covered in the plan, this is a requirement of the EPL.	Non-Compliance	Review and update the 2015 version of the NMP. Then, consult with DPE and EPA and then seek DPE approval for the revised plan. Ensure that the revised plan details all monitoring and compliance assessment actions required by this Approval and the EPL.	The 2019 AQMP details all monitoring and compliance assessment actions required by the EPA and the EPL. The AQMP was prepared in consultation with the EPA and was submitted to the Secretary for approval on 14 March 2020.	Completed.	
S3.16	Meteorological Monitoring	For the life of the project, the Proponent shall ensure that there is a suitable meteorological station operating in the vicinity of the site that complies with the requirements in the Approved Methods for Sampling of Air Pollutants in New South Wales available.	1. YTC Resources Ltd. Environmental Management Plan Air Quality and Greenhouse Gas, Revision 3, dated 28 August 2012.			Greenhouse management strategy has been prepared for the Hena operation (Section 5.8 of the AQMP).	COMPLIANCE				
S3.17	Water Supply	The Proponent shall ensure that it has sufficient water for all stages of the project, and if necessary, adjust the scale of mining operations to match its available water supply, to the satisfaction of the Secretary.	1. Site Water Balance			Weather station monitoring results for the Audit Period were sighted by the Auditor. The weather station satisfies the requirements of the Approved Methods for Sampling Air Pollutants in New South Wales Guidelines.	COMPLIANCE				
S3.18		The Proponent shall ensure that all surface water discharges from the site comply with: (a) section 120 of the PSDO Act; or (b) the discharge limits (both volume and quality) set for the project in any applicable EPL.				The 2016/17 Annual review reported that two discharges from Licence Point 3 exceeded a number of water quality parameters identified in EPL 19178. The discharges occurred on 20 July 2016 and 16 December 2016 and were reported to the DPE, EPA and DPE.	Non-Compliance	Investigate the cause of any discharge from site that exceeds any discharge criterion and identify and implement appropriate mitigation strategies.	All discharges from site that exceed licence conditions are reported and investigated. Appropriate mitigating strategies are implemented to prevent recurrence.	Completed.	
S3.19	Water Discharges	The concentration of Weak Acid Dissociable (WAD) cyanide in tailings discharged from the discharge point to the tailings storage facility shall not exceed 10 mg/L.	1. Hena Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2020; dated 14 August 2017. 2. Hena Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2020; dated 14 August 2017. 3. Hena Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2020; dated 14 August 2019.			The 2017/18 Annual review reported that there were several WAD cyanide incidents during this reporting period.	Non-Compliance	Investigate the cause of any discharge from site that exceeds any discharge criterion and identify and implement appropriate mitigation strategies.	All discharges from site that exceed licence conditions are reported and investigated. Appropriate mitigating strategies are implemented to prevent recurrence.	Completed.	
S3.20		The concentration of Weak Acid Dissociable (WAD) cyanide at the discharge point to the process water dam shall not exceed 20 mg/L (20th percentile) or 30 mg/L (maximum).				The 2019 Annual Review reported that During the reporting period there were no discharges from the sediment basin and no flows recorded in the clean water by pass drain through site. There were also no flows in any creeks or drainage courses across site as a result of the extended drought. Therefore no surface water monitoring of creeks or drainage lines was able to be undertaken.	Non-Compliance	Investigate the cause of any discharge from site that exceeds any discharge criterion and identify and implement appropriate mitigation strategies.	All discharges from site that exceed licence conditions are reported and investigated. Appropriate mitigating strategies are implemented to prevent recurrence.	Completed.	
S3.21	Compensatory Water Supply	The Proponent shall provide a compensatory water supply to any owner on privately-owned land whose water supply is adversely impacted (either than an impact that is negligible) as a result of the project, in consultation with DPI Water, and to the satisfaction of the Secretary. The compensatory water supply measures must provide an alternative long-term supply of water that is equivalent in volume and quality to the loss attributed to the project. Equivalent water supply should be provided (at least on an interim basis) within 24 hours of the loss being identified, unless otherwise agreed with the landowner. If the Proponent and the affected landowner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Secretary for resolution. If the Proponent is unable to provide an alternative long-term supply of water, then the Proponent shall provide alternative compensation to the satisfaction of the Secretary.	1. Email from Hena (J Thompson) to DPI Water (T Baker) and DPE (K O'Reilly) titled "Standing water level WB18", dated 23 November 2018. The email states that Hena had commenced negotiations with a landholder in regards to a reduction in groundwater levels (at the landowner's property).			Negotiations have commenced with one impacted (groundwater) landowner.	COMPLIANCE				
S3.22		The Proponent shall ensure that the floor and walls of: (a) the leachate management pond, seepage collection pond (associated with the tailings storage facility), process water dam and raw water dam are lined to achieve a permeability of no less than 1 x 10 ⁻⁹ m/s to a depth of at least 600 millimetres of clay (or equivalent); and (b) the tailings storage facility (designed for the seepage collection ponds) is lined to achieve a permeability of no less than 1 x 10 ⁻⁹ m/s to a depth of at least 600 millimetres of clay (or equivalent). Note: An alternative permeability standard may be acceptable following completion of an appropriate risk assessment undertaken in accordance with the Environmental Guidelines - Management of Tailings Storage Facilities (VIC DPI, 2004) to the satisfaction of the EPA and the Secretary.	1. Email (and attachments) from Total Leachate Systems (S Short) to YTC Resources (G Phelan) titled "Subsident Floor Lining", dated 7 August 2017. The email provides copies of the leachate pond design and construction QHCC report.	1. Independent Environmental Audit: Hena Resources Pty Ltd, Hena Project, NUMAGEE NSW, September 2016. The report stated: "Section 4.3 (b) of the 'TSF Design 1 Construction Report (Curry, 17 June 2014) confirms that the permeability of the TSF basin floor exceeded the required value of 1.0E-9 m/s over a 600mm depth".	1. Process Water Management System (refer Photo #4).	Finding: Not Verified	The leachate management system ponds are lined with 2 mm HDPE. The QA reports associated with the construction of the ponds does not certify the permeability of the liners.	Non-Compliance	Obtain a copy of the relevant engineering report certifying the permeability of the pond liners.	Engage consultant to conduct HDPE Weld Quality Control and confirm the effectiveness of the Process Water Dam and Waste Rock Leachate Pond.	Completed.
S3.23	Design and Permeability of Seepage	The clean water diversion around the tailings storage facility shall be designed, constructed and maintained to prevent the probable maximum flood from the catchment upstream of the facility from entering the facility.	1. Letter from Hena (J Thompson) to DPE (K O'Reilly) titled "Independent Environmental Audit Aug 2013 - Sep 2016 - Action Plan Condition 23, Schedule 3 Design and Permeability of Seepage", dated 23 December 2017. The includes a plan showing the TSF diversion drain construction compliance with the requirements of this Condition. The letter also contained a survey plan that confirms the that the as built structure meets these requirements.	1. Tailings Storage Facility (Refer to Photo #5).	1. Tailings Storage Facility (Refer to Photo #5).	The permeability of the TSF satisfies the 10-8 m/s standard.	COMPLIANCE				
S3.24		The process water and raw water dams shall be maintained with a minimum freeboard sufficient to accommodate a 1 in 100-year ARI, 72-hour rainfall event without overtopping at all times.	1. Draft Water Management Plan 2016, Version 6, dated November 2018. Section 4.1.4 describes contaminated water management, including process water and refers specifically to the 100mm freeboard in the process water pond.		1. Draft Water Management Plan 2016, Version 6, dated November 2018. Section 4.1.4 describes contaminated water management, including process water and refers specifically to the 100mm freeboard in the process water pond.	A freeboard of at least 200mm is to be achieved as a minimum operational condition allowing capacity to capture the 100 year 72 hour design rainfall event (GHD, July 2016; Water Management Plan). Correspondence from DPE approving the appointment of the authors of the 2016 or 2018 plan revisions was not sighted during the Audit.	COMPLIANCE				
		The Proponent shall prepare and implement a Water Management Plan for the project to the satisfaction of the Secretary. This plan must be prepared in consultation with EPA and DPI Water.	1. Aurelia - Hena Gold WMP Water Management Plan 2016, prepared by GHD. 2. Draft Water Management Plan 2019, Version 6, dated November 2019.			A Water Management appears to have been prepared in 2013 by RW Conkey. A copy of this plan was not available at the time of the audit and no correspondence relating to that version of the plan was sighted.	COMPLIANCE				
		The plan must be prepared by suitably qualified and experienced persons whose appointment has been approved by the Secretary.	1. Independent Environmental Audit: Hena Resources Pty Ltd, Hena Project, NUMAGEE NSW, September 2016. The report stated: "A letter was received from the Hena Pty Ltd on 21st August 2012 approving the three experts (Mark Passfield, James Morrow and Wayne Russell) that contributed to the development of the site Water Management Plan (WMP), which was coordinated by external consultant RW Conkey and Co Pty Ltd."			The plan has been further revised in 2018, but has yet to be approved by DPE. Correspondence from DPE approving the plan author(s) or approving the plan was not sighted during the audit.	COMPLIANCE				
						DPE Water endorsed the appointment of three experts to prepare the original plan on 31st August 2012. Correspondence from DPE approving the appointment of the authors of the 2016 or 2018 plan revisions was not sighted during the Audit.	Non-Compliance	Request approval from DPE for the re-approval of the expert appointment for the (yet to be approved) 2019 Water Management Plan.	DPE approved the appointment of expert for the Water Management Plan on 14 March 2020.	Completed.	
						Finding: NOT VERIFIED		Ensure that the current version of the Water Management Plan is approved by DPE.	Consultation and submission of all Management Plan is on schedule and if an update is required, they will be submitted within three months of this EA.	4 July 2020.	
		and submitted to the Secretary for approval within six months of this approval, or prior to commencement of mining operations under this approval, whichever is sooner.				Correspondence verifying that the original plan was submitted to DPE / DPI was not sighted during the Audit.	Non-Compliance	Finding: NOT VERIFIED			
S3.25	Water Management Plan	In addition to the standard requirements for management plans (see Condition 3 of Schedule 5), this plan must include: (a) a Site Water Balance that includes details of: -sources of water supply; -water use on site, including any potable water use; -water management on site; -effluent water discharges, including volume, timing and release point infrastructure requirements; and -reporting procedures including comparisons of the site water balance for each calendar year; and (b) a Surface Water Management Plan, which includes: -baseline data on surface water flows and quality in waterbodies that could be affected by the project; -a detailed description of the surface water management system on site, including the: -clean water diversion system; -erosion and sediment controls; and -water storages, including the tailings storage facility, raw water or process water dams; -design objectives and performance criteria, including trigger levels for investigating any potentially adverse impacts, for the following: -the water management system; -water storages including the tailings storage facility, raw water or process water dams; and -surface water quality in waterbodies that could be affected by the project; -performance criteria for surface water quality attributes relevant to water quality impacts on biological diversity and aquatic ecological integrity, including cyanide, salinity, heavy metals, sediment load, pH, barbiturates and biological oxygen demand; -a program to monitor: -the effectiveness of the water management system; -surface water flow, quality, and impacts on water users; -potential acid rock drainage; -potential leakage or spillage from tailings, mineral concentrate or effluent pipelines; -post-closure water quality; -impacts on wildlife from exposure to cyanide or other toxic chemicals; and -a plan to respond to any exceedances of the performance criteria, and mitigate and/or offset any adverse surface water impacts of the project, including but not limited to management measures to reduce wildlife exposure to cyanide or other toxic chemicals; -reporting procedures for the results of the monitoring program; and (c) a Groundwater Management Plan, which includes: -baseline data of all groundwater levels, yield and quality in the region, and any privately-owned groundwater bores that could be affected by the project; -detailed documentation of the operation of the seepage collection and storage system associated with the tailings storage facility and associated maintenance requirements; -groundwater assessment criteria, including trigger levels for investigating any potentially adverse groundwater impacts, including but not limited to leakage from the tailings storage facility; -a program to monitor: -impacts on the groundwater supply of potentially affected landowners; -impacts on the volume of groundwater inflow into the underground workings; -regional groundwater levels and quality in all potentially affected aquifers; -potential acid rock drainage; -the effectiveness of the seepage collection and storage system and associated infrastructure in collecting and containing all seepage from the tailings storage facility and all other water storages that receive chemical or salt-laden water; -the quality of groundwater to be re-used on the site; -any post-rehabilitation seepage from the tailings storage facility; and -a plan to respond to any exceedances of the performance criteria, and mitigate and/or offset any adverse groundwater impacts of the project, including but not limited to: -procedures to minimise the potential for soil salinity, sodicity and other contaminant issues associated with the groundwater on site; and -measures to manage and mitigate any leakage from the tailings storage facility, including but not limited to that detected beyond the seepage collection and storage system.	1. Draft Water Management Plan 2016, Version 6, dated November 2018. The site water balance is provided in Section 4.5 and Appendix F of the plan.	1. Draft Water Management Plan 2019, Version 6, dated November 2019. Section 4.1 describes the surface water system. Appendix C provides the Trigger Value Action Plan and Section 6.2 describes the surface water monitoring program.		The water balance model provided in the Draft Plan (the Auditor understands that this unapproved version of the plan is currently being implemented) meets the requirements of this Condition.	COMPLIANCE				
								The required elements of the Surface Water Management Plan are contained in the Draft Water Management Plan.			
								The required elements of the Groundwater Management Plan are contained in the Draft Water Management Plan.			

S3.26	Biodiversity Offset Strategy	By 31 July 2016, the Proponent shall prepare a Biodiversity Offset Strategy for the project to the satisfaction of the Secretary.	1. Biodiversity Management Plan (incorporating the Biodiversity Offset Strategy) for the Hera Mine, prepared by RW Corkery, dated June 2016.	1. J. Thompson 10 November 2019. The Biodiversity Management Plan has not been approved.	A biodiversity management plan was prepared. The draft Biodiversity Management Plan incorporating a Biodiversity Offset Strategy was submitted to DPE by email (signed) on 15 July 2016. Subsequent delays in relation to the off-set strategy and bio banking agreements resulted in delays in finalisation of the plan.	Non-Compliance	Seek DPE Approval for the completion and finalisation of the Biodiversity Offset Strategy and the Biodiversity Offset Plan.	Consultation and submission of all Management Plans on schedule and if an update is required, they will be submitted within three months of this EA.	4 July 2020.
S3.27		The Strategy must: (a) be prepared in consultation with OEH; (b) identify the portion of the Chetopa site (WLL 3881) that would be conserved in perpetuity to offset the impacts of the project using the Biodiversity Assessment Methodology; and (c) describe the specific management measures that would be implemented on the Chetopa site to conserve and improve the biodiversity values of the site over time.	1. Letter from OEH (S Cox) to RW Corkery (M Brand) titled "Hera mine Biodiversity Management Plan". The letter from OEH provides input into the Biodiversity Offset management plan that includes the Offset Strategy. 2. Biodiversity Management Plan (incorporating the Biodiversity Offset Strategy) for the Hera Mine, prepared by RW Corkery, dated June 2016. 3. Biodiversity Management Plan (incorporating the Biodiversity Offset Strategy) for the Hera Mine, prepared by RW Corkery, dated June 2016.	1. J. Thompson 10 November 2019. The Biodiversity Management Plan has not been approved.	OEH were consulted during the preparation of the biodiversity management plan. The Biodiversity off-set area is identified in Section 4.2. Section 4.4 of the Biodiversity Management Plan (Section 4 is the Biodiversity Offset Strategy) sets out eight specific management measures a, weed and pest management. Hera has been working on the Chetopa off-set area since 2016. A substantial volume of correspondence was provided to the auditor evidencing the consultation activities undertaken.	COMPLIANCE COMPLIANCE COMPLIANCE			
S3.28	Long Term Security	Following approval, the Proponent shall implement the Biodiversity Offset Strategy to the satisfaction of the Secretary. Within 12 months of the approval of the Biodiversity Offset Strategy, the Proponent shall make suitable arrangements to conserve the off-land area identified in the Biodiversity Offset Strategy in perpetuity to the satisfaction of the Secretary.		1. J. Thompson 10 November 2019. The Biodiversity Management Plan has not been approved.		Not Triggered			
		Within 12 months of approval and prior to the commencement of vegetation clearing on the site under this approval, the Proponent shall submit a Biodiversity Management Plan for the project site to the Secretary for approval. This plan must:	1. Biodiversity Management Plan (incorporating the Biodiversity Offset Strategy) for the Hera Mine, prepared by RW Corkery, dated June 2016.	1. J. Thompson 10 November 2019. The Biodiversity Management Plan has not been approved.	A biodiversity management plan was prepared. The draft Biodiversity Management Plan incorporating a Biodiversity Offset Strategy was submitted to DPE by email (signed) on 15 July 2016. Subsequent delays in relation to the off-set strategy and bio banking agreements resulted in continuing delays in the finalisation of the plan.	Non-Compliance	Seek DPE Approval for the completion and finalisation of the Biodiversity Offset Strategy and the Biodiversity Offset Plan.	Consultation and submission of all Management Plans on schedule and if an update is required, they will be submitted within three months of this EA.	4 July 2020.
		This plan must: (a) be prepared by a suitably qualified and experienced person(s) whose appointment has been endorsed by the Secretary (b) be prepared in consultation with OEH (c) describe how the implementation of the biodiversity offset strategy would be integrated with the overall rehabilitation of the site. (d) manage the remnant vegetation and habitat on the site and in the offset areas (if and when applicable); (e) minimise the impacts on Cobor Greenhood Orchid (Cryptotylus cinctus), Lobed Blue-gums (Bottichnia lobata) and hollow-bearing trees; and (f) implement the biodiversity offset strategy (if and when applicable), including detailed performance and completion criteria.	1. Independent Environmental Audit, Hera Resources Pty Ltd, Hera Project, NMMAR/EE NSW, September 2016. The report stated: "A letter (dated 24/09/12) from the NSW Department of Planning & Infrastructure endorsing Hera's proposed list of experts as being suitably qualified and environmental non-unionists was obtained and is appended to the draft BMAP." 2. Letter from OEH (S Cox) to RW Corkery (M Brand) titled "Hera mine Biodiversity Management Plan". The letter from OEH provides input into the Biodiversity Offset management plan that includes the Offset Strategy. 3. Biodiversity Management Plan (incorporating the Biodiversity Offset Strategy) for the Hera Mine, prepared by RW Corkery, dated June 2016.		DPE approved the experts that prepared the Biodiversity Management Plan on 31 August 2012. OEH were consulted during the preparation of the biodiversity management plan. The Biodiversity off-set area is remote from the mine, therefore rehabilitation of the mine site cannot be integrated with the implementation of the Off-set strategy.	COMPLIANCE COMPLIANCE Not Triggered			
		(g) describe the short, medium, and long term measures that would be implemented to manage the remnant vegetation and habitat on the site and in the offset areas (if and when applicable); (h) minimise the impacts on Cobor Greenhood Orchid (Cryptotylus cinctus), Lobed Blue-gums (Bottichnia lobata) and hollow-bearing trees; and (i) implement the biodiversity offset strategy (if and when applicable), including detailed performance and completion criteria.	1. Biodiversity Management Plan (incorporating the Biodiversity Offset Strategy) for the Hera Mine, prepared by RW Corkery, dated June 2016.		(The Draft BMAP addresses the sub-paragraphs of this condition as follows: (i) The short, medium, and long term measures that would be implemented to manage the remnant vegetation and fauna habitat are described in sections 3.5.4.1 and 4.4 of the draft BMAP. (ii) The short, medium, and long term measures that would be implemented to minimise the impacts on Cobor Greenhood Orchid (Cryptotylus cinctus), Lobed Blue-gums (Bottichnia lobata) and hollow-bearing trees are described in sections 3.5.3 on Peak and section 4.4 Chetopa. (iii) The short, medium, and long term measures to implement the biodiversity offset strategy (if and when applicable), including detailed performance and completion criteria are referenced in section 4.5.	COMPLIANCE COMPLIANCE			
S3.29	Biodiversity Management Plan	(j) include a detailed description of the procedures to be implemented for: (i) enhancing the quality of existing vegetation and fauna habitat; (ii) restoring native vegetation and fauna habitat on the biodiversity areas and rehabilitation area through focusing on assisted natural regeneration, targeted vegetation establishment and the introduction of naturally scarce fauna habitat features (where necessary); (iii) minimising the salvage of resources within the approved disturbance area - including vegetative, soil and cultural heritage resources; - for beneficial reuse in the enhancement of the biodiversity areas or rehabilitation area; (iv) collecting and propagating seeds; (v) minimising the impacts on fauna on site, including pre-clearance surveys and minimising the potential exposure to wildlife; (vi) controlling weeds and feral pests; (vii) controlling erosion; (viii) managing grazing and application on site; (ix) controlling access; and (x) bushfire management; (k) include a reasonably-based program to monitor and report on the effectiveness of these measures, and progress against the detailed performance and completion criteria.	1. Biodiversity Management Plan (incorporating the Biodiversity Offset Strategy) for the Hera Mine, prepared by RW Corkery, dated June 2016. 2. Biodiversity Management Plan (incorporating the Biodiversity Offset Strategy) for the Hera Mine, prepared by RW Corkery, dated June 2016.		(The Draft BMAP discusses trigger levels and monitoring of the mine site in section 4.5, with detailed trigger levels in Table 8. (i) A detailed description of the procedures to be implemented for enhancing the quality of existing vegetation and fauna habitat are described in sections 3.5.4.1 and 4.4 of the draft BMAP. (ii) A detailed description of the procedures to be implemented for restoring native vegetation and fauna habitat on the biodiversity areas and rehabilitation area through focusing on assisted natural regeneration, targeted vegetation establishment and the introduction of naturally scarce fauna habitat are described in sections 3.5.4.2 (bottle trees), 3.5.3.2 (soil) and 3.5.5.4 (the cultural resources identified) of the draft BMAP. (iii) A detailed description of the procedures to be implemented for minimising the salvage of resources within the approved disturbance area including vegetative, soil and cultural heritage resources, for beneficial reuse in the enhancement of the biodiversity areas or rehabilitation area are described in sections 3.5.4.2 (bottle trees), 3.5.3.2 (soil) and 3.5.5.4 (the cultural resources identified) of the draft BMAP. (iv) A detailed description of the procedures to be implemented for collecting and propagating seeds is listed in section 3.5.5.3 of the draft BMAP. (v) A detailed description of the procedures to be implemented for minimising the impacts on fauna on site (section 3.5.3), including pre-clearance surveys and minimising the potential exposure to taking is described in sections 3.5.4.3 (TFP - 2 management procedures). (vi) A detailed description of the procedures to be implemented for sections 3.5.7 (weeds) and section 3.5.4.5 (vertebrate pest management - Appendix A). (vii) The controlling access are referred to in section 3.5.5 of the draft BMAP which in turn refers to the Water Management Plan and the MOP. Section 4.2.2.4 of the MOP describes erosion control network. (viii) A detailed description of the procedures to be implemented for managing grazing and agriculture on site is listed in section 3.5.5 of the draft BMAP. (ix) A detailed description of the procedures to be implemented for controlling access is listed in sections 3.5.5 and 3.5.8 of the draft BMAP. (x) A detailed description of the procedures to be implemented for bushfire management is listed in section 4.4.8 of the draft BMAP. A suitably-based program to monitor and report on the effectiveness of these measures, and progress against the detailed performance and completion criteria is listed in sections 5 (monitoring) and 2 (responsibilities) of the draft BMAP.	COMPLIANCE COMPLIANCE COMPLIANCE			
		(l) identify the potential risks to the successful implementation of the biodiversity offset strategy, and include a description of the contingency measures that would be implemented to mitigate against these risks; and (m) include details of who would be responsible for monitoring, reviewing and implementing the plan.	1. Biodiversity Management Plan (incorporating the Biodiversity Offset Strategy) for the Hera Mine, prepared by RW Corkery, dated June 2016. 2. Biodiversity Management Plan (incorporating the Biodiversity Offset Strategy) for the Hera Mine, prepared by RW Corkery, dated June 2016.		A Trigger Action Response Plan (TARPP) has been included in the management plan (Section 6). The TARPP identifies the risks and includes relevant measures to be implemented to mitigate against these risks.	COMPLIANCE			
S3.30	Conservation Bond	Within 6 months of the approval of the Biodiversity Offset Strategy, the Proponent shall submit an updated Biodiversity Management Plan to the Secretary for approval. Within three months of the approval of the Biodiversity Management Plan, the Proponent shall lodge a conservation bond with the Department to ensure that the Biodiversity offset is implemented in accordance with the performance and completion criteria of the Biodiversity Management Plan. The sum of the bond shall cover the full cost of implementing the Biodiversity Offset Strategy and be verified by a suitably qualified rehabilitation specialist or quantity surveyor. If the biodiversity offset is implemented to the satisfaction of the Secretary, the Secretary will release the conservation bond. If the offset strategy is not implemented to the satisfaction of the Secretary, the Secretary will call all or part of the conservation bond, and arrange for the satisfactory implementation of the biodiversity offset.	1. Biodiversity Management Plan (incorporating the Biodiversity Offset Strategy) for the Hera Mine, prepared by RW Corkery, dated June 2016.	1. J. Thompson 10 November 2019. The Biodiversity Management Plan has not been approved.	The biodiversity management plan has not yet been approved.	Not Triggered			
S3.31		The Proponent shall prepare and implement an Aboriginal Cultural Heritage Management Plan to the satisfaction of the Director-General. This plan must: (a) be prepared in consultation with OEH and the Aboriginal stakeholders (in relation to the management of Aboriginal Heritage values); (b) be submitted to the Secretary for approval within six months of this approval; and (c) describe the measures that would be implemented for: • monitoring of any surface disturbance on site for unidentified Aboriginal objects; • managing the discovery of any human remains or previously unidentified Aboriginal objects on site; and • ensuring ongoing consultation with Aboriginal stakeholders in the conservation and management of any Aboriginal cultural heritage values on site.	1. YTC Resources Ltd, Environmental Management Plan Aboriginal Cultural Heritage, Revision 1.1, dated 19 August 2012. 2. YTC Resources Ltd, Environmental Management Plan Aboriginal Cultural Heritage, Version 5.0 / Revision 5, dated 2 May 2015. 3. YTC Resources Ltd, Environmental Management Plan Aboriginal Cultural Heritage, Revision 1.1, dated 19 August 2012. Section 6 of the plan details the consultation processes undertaken during the preparation of the plan. 4. Letter from DPE to YTC Resources (S Haines) titled "Hera Project" (BMP 2012/292) Heritage Management Plan", dated 5 October 2012. The letter provided DPE approval for the Aboriginal Heritage Management Plan. 5. YTC Resources Ltd, Environmental Management Plan Aboriginal Cultural Heritage, Revision 1.1, dated 19 August 2012. Section 6 of the plan details the consultation processes undertaken during the preparation of the plan.	1. J. Thompson 10 November 2019. The Biodiversity Management Plan has not been approved. 2. J. Thompson 10 November 2019. The conservation bond has not yet been paid as the Biodiversity Management Plan has not been approved.	The biodiversity management plan has not been approved, therefore the payment of the conservation bond is not yet due.	Not Triggered			
S3.32	Heritage	(d) undertake inter-divisional design and pavement upgrades in accordance with the recommendations of the review in (a), in consultation with CSC, and to the satisfaction of CSC.				COMPLIANCE			
S3.33	Dangerous Goods	Transportation of all dangerous goods to or from the site shall be undertaken in strict accordance with Australian Code for the Transport of Dangerous Goods by Road and Rail.	1. Traffic Management Plan, Revision 3, dated 14 May 2016.			COMPLIANCE			
S3.34		Within 6 months of the date of this approval, the Proponent shall: (a) commission a suitably qualified independent expert, whose appointment has been approved by the Secretary, to undertake a design and pavement condition review for the intersection of Burringford Road and Priory Tark Road, which identifies any deficiencies in the design or pavement condition of the intersection; (b) recommend appropriate design upgrades and pavement repairs taking into consideration the type, volume and direction of traffic generated by the mine; and (c) ensure the recommended design is in accordance with the applicable AUSTRASO standards. (d) undertake inter-divisional design and pavement upgrades in accordance with the recommendations of the review in (a), in consultation with CSC, and to the satisfaction of CSC.	1. Independent Environmental Audit, Hera Resources Pty Ltd, Hera Project, NMMAR/EE NSW, September 2016. The report stated: "A suitably qualified independent expert whose appointment was approved by the Secretary (then known as the Director General), was commissioned to undertake a design and pavement condition review for the intersection of Burringford Road and Priory Tark Road. This was done within 6 months of the date of the Project Approval. A letter (dated 12/11/19) of endorsement from the Director General referring to Conditions 34 and 35 of the Project Approval was signed". 2. Intersection Assessments Nymingine and Hemisford Road (plans) prepared by Goolysy. 3. Hera Resources Purchase Order PO57681.1, dated 13 November 2015. 4. Review of Traffic Control Devices Hera Mine to Hemisford Road, prepared by Goolysy, dated May 2014. 5. Independent Environmental Audit, Hera Resources Pty Ltd, Hera Project, NMMAR/EE NSW, September 2016. The audit report stated, with respect to Condition 33.9 "A letter (dated 12/11/19) of endorsement from the Director General referring to Conditions 34 and 35 of the Project Approval was signed". 6. Letter from Hera (D Frackleton) to CSC (K Page) titled "HE Hera Resources Amendment to Consent: Haulage Route", dated 20 June 2014. The letter outlines Hera's commitment to CSC to fund the works to be undertaken in accordance with the Goolysy report.	1. J. Thompson 10 November 2019. The Biodiversity Management Plan has not been approved. 2. J. Thompson 10 November 2019. The conservation bond has not yet been paid as the Biodiversity Management Plan has not been approved.	Hera has commissioned the design of the intersection in accordance with this Condition. The works in paragraph (b) were completed by CSC on 3 January/January 2016 (audit review). Aurelia purchase order of 13 November 2015 was signed. These works were undertaken prior to this Audit Period.	COMPLIANCE COMPLIANCE Not Triggered			
S3.35	Road Lignards	Within 6 months of the date of this approval, the Proponent shall: (a) commission a suitably qualified independent expert, whose appointment has been approved by the Secretary, to undertake a review of the existing traffic control devices on Burringford Road and Priory Tark Road, which identifies any deficiencies in the design or pavement condition of the intersection; (b) recommend appropriate design upgrades and pavement repairs taking into consideration the type, volume and direction of traffic generated by the mine; and (c) ensure the recommended design is in accordance with the applicable AUSTRASO standards. (d) undertake inter-divisional design and pavement upgrades in accordance with the recommendations of the review in (a), in consultation with CSC, and to the satisfaction of CSC.	1. YTC Resources Ltd, Environmental Management Plan Aboriginal Cultural Heritage, Revision 1.1, dated 19 August 2012. Section 6 of the plan details the consultation processes undertaken during the preparation of the plan.			COMPLIANCE	This is an historical non-compliance. The works have been completed. No other action required.	PA Observation 3 - Noted.	Completed.

S3.35A		Prior to commencing the transport of concrete to the Hermitdale rail siding via Nymagee-Hermitdale Road, or an alternative date nominated by BSC and CSC (with respect to the works within the relevant local government area), the Proponent shall implement, or contribute to the cost of implementing the recommendations in the report titled Visual Review of Traffic Control Devices - Hera Mine to Hermitdale Siding prepared by Geoskye Pty Ltd and dated 7 May 2014, to the satisfaction of BSC and CSC.	1. Email from BSC (G Bourke) to Hera (S Hurren) titled "Nymagee to Hermitdale Road", dated 5 November 2014. The email refers to the receipt by Council of the Visual Road Pavement Assessment Report and committed to undertaking repairs to the road on an as needs basis. 2. Independent Environmental Audit, Hera Resources Pty Ltd, Hera Project, NMAAGEE NSW, September 2016.		The recommendations in the Geoskye report dated 7 May 2014 had not been implemented prior to commencing the transport of concrete to the Hermitdale rail siding via Nymagee-Hermitdale Road in October 2014.	Non-Compliance	This is an historical non-compliance. The works have been completed. No further action required.	PA Observation 4 - Noted.	Completed.
S3.35B		Prior to commencing the transport of concrete to the Hermitdale rail siding via Nymagee-Hermitdale Road, or at alternative date nominated by CSC, the Proponent shall upgrade the intersection of Harwood Street and Milford Street in accordance with the recommendations of the report titled Geotechnical Investigation of Harwood Street and Milford Street on Priority Park Road, Nymagee NSW, prepared by Envirowest Consulting Pty Ltd dated 23 May 2014 and the relevant AUSTROADS standards, to the satisfaction of CSC.	1. Report titled Geotechnical Investigation of Harwood Street and Milford Street on Priority Park Road, Nymagee NSW, prepared by Envirowest Consulting Pty Ltd dated 23 May 2014 2. Email from CSC (A Shepherd) to Hera (J Thompson) titled "NY Nymagee Intersection Works", dated 23 August 2016. The email confirms that the intersection works had been completed.		The works required by this Condition were completed (by Council).	COMPLIANCE			
S3.35C		Every two months during the transport of concrete to the Hermitdale rail siding via Nymagee-Hermitdale Road, the Proponent shall: (a) inspect the condition of the unsurfaced section of the transport route in consultation with BSC; and (b) grade the unsurfaced section of Nymagee-Hermitdale Road where required and as identified in the inspection carried out in accordance with condition S3.35A, to the satisfaction of BSC.	1. Records of inspection of the unsurfaced section of Nymagee - Hermitdale Road for the past three years	1. The Nymagee - Hermitdale Road is sealed for its entire length (the Auditor travelled to the site via the concrete transport route). The Nymagee - Hermitdale Road is now sealed for its entire length.	Records of inspection were sighted by the Auditor.	COMPLIANCE			
S3.36	Access Road and Intersection Construction	The Proponent shall construct the site access road for heavy vehicles, and associated intersection of this access road and Burthog Road, prior to the commencement of construction of the process plant. The intersection shall be designed and constructed to the satisfaction of CSC and in accordance with the applicable AUSTROADS standards.	1. Letter from CSC approving the design and construction of the Access Road and Intersection	1. The site access roads and intersections have been constructed. Refer to Photo 17.	Hera had constructed the site access road for heavy vehicles, and associated intersection of this access road and Burthog Road prior to the commencement of construction of the process plant (steel intervention). It was also visually verified in the July 2013 Audit that road construction had begun prior to the commencement of construction of the process plant.	COMPLIANCE			
S3.37	Monitoring of Concrete Transport	The Proponent shall: (a) keep accurate records of the (i) amount of lead and zinc concentrate transported from the site (on a monthly basis); and (b) the date and time of loaded truck movements from the site; and (c) provide the Secretary with a summary of these truck movements in the Annual Review.	1. Hera Mine Annual Review Project Approval 10, 0393 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017, dated 14 August 2017. 2. Hera Mine Annual Review Project Approval 10, 0393 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018, dated 14 August 2018. 3. Hera Mine Annual Review Project Approval 10, 0393 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019, dated 14 August 2019.	Hera keeps accurate records of the amount of lead and zinc concentrate transported from the site by calculating the net weight of each truck load. A dedicated weighbridge is located on site for this purpose. Concrete tonnage records are kept in the metadata database (MPA-CIS) on a per truck basis (signed). Monthly tonnage amounts can be calculated and are also available on Aurelia's website (signed). Hera publish the required information in the Annual Review.		COMPLIANCE			
S3.37A	Transport of Concentrate to Hermitdale Rail Siding	The Proponent shall restrict the transport of concentrate to the Hermitdale rail siding via the Nymagee-Hermitdale Road during daylight hours and limit vehicle movements (entering and leaving the site) to 4 per day, averaged over a calendar month, unless otherwise agreed by the Secretary.	1. Traffic Management Plan, Version 3.0, dated 14 May 2016. 2. Drivers Code of Conduct, Revised 2.0, dated November 2018. 3. Records of concrete transport for the past three years (monthly web reports)	Section 5.3 of the Traffic Management Plan refers to the concentrate transport limits. The Drivers Code of Conduct specifies the permitted concentrate transport times. A review of the monthly web reports confirmed compliance with the concrete load limit of 4 trucks per day average over a year.		COMPLIANCE			
S3.38	Traffic Management Plan	The Proponent shall prepare and implement a Traffic Management Plan to the satisfaction of the Secretary. The plan shall: (a) focus on traffic management along Nymagee-Hermitdale Road, Burthog Road and Priority Park Road, particularly in the vicinity of the villages of Nymagee and Hermitdale; (b) describe the measures to minimise conflicts between road users and ensure that trucks from the mine do not travel through surrounding local roads; (c) be developed in consultation with both BSC and CSC and submitted for the approval of the Secretary prior to carrying out any development on the site under this approval.	1. Traffic Management Plan, Version 3.0, dated 14 May 2016. 2. Traffic Management Plan Version 3.0, dated February 2017. 3. Letter from DPE (C Pritchard) to Hera (J Thompson) titled "Hera Gold Mine (10, 0393) Approval of Traffic Management Plan", dated 14 November 2017.	The Traffic Management Plan does not clearly address traffic management along Nymagee-Hermitdale Road, Burthog Road and Priority Park Road, particularly in the vicinity of the villages of Nymagee and Hermitdale.	Revise the Traffic Management Plan to address traffic management along Nymagee-Hermitdale Road, Burthog Road and Priority Park Road, particularly in the vicinity of the villages of Nymagee and Hermitdale.	Non-Compliance	Consultation and submission of all Management Plans is on schedule and if an update is required, they will be submitted within three months of this EA.	4 July 2020.	
S3.39	Visual	(a) implement all reasonable and feasible measures to minimise the visual impacts, and particularly the off-site lighting impacts, of the project; (b) ensure that all external lighting associated with project complies with Australian Standard AS4292 (NF) 1995 - Control of Obtrusive Effects of Outdoor Lighting, to the satisfaction of the Secretary.	1. Letter from Light Harmony (R Nixon) to Hera (S Ramsay) titled "Compliance with Control of the Obtrusive Effects of Outdoor Lightings - AS4292" dated 1 February 2017.	The reasonableness of truck drivers in relation to the minimisation of conflicts with other road users is contained in the Drivers Code of Conduct.	Hera consulted with both Councils during the preparation of the Traffic Management Plan.	COMPLIANCE			
S3.40	Final Hazard Analysis	The Proponent shall prepare a Final Hazard Analysis (FHA) for the project to the satisfaction of the Secretary, in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 8 - Guidelines for Hazard Analysis. The Proponent shall prepare and implement a Hazardous Materials Management Plan for the project to the satisfaction of the Secretary. The plan must: (a) be prepared in consultation with the relevant government agencies including CSC, RMS, EPA, DPI Water, WorkCover NSW and DPE; (b) be consistent with the International Cyanide Management Code for the Manufacture, Transport and Use of Cyanide in the Production of Gold; (c) be submitted to the Secretary for approval prior to commencing mining operations under this approval; (d) describe the measures that would be implemented to: (i) ensure sodium cyanide and other toxic chemicals are stored and handled on the site in accordance with AS/NZS 4452 - The Storage and Handling of Toxic Substances; and (ii) ensure the transportation of hazardous materials to and from the site is undertaken in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 11 - Route Selection and the Australian Code for the Transport of Dangerous Goods by Road and Rail - current version; (e) detail the emergency procedures for the Project consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1 - Emergency Planning.	1. Environmental Management Plan Hazardous Materials, Version 1.0, dated 9 April 2013. 2. Letter from DPE (R Reed) to Hera (S Hurren) titled "Hera Gold Mine (10, 0393) Hazardous Materials Management Plan", dated 1 May 2013. 1. Environmental Management Plan Hazardous Materials, Version 1.0, dated 9 April 2013. 2. Letter from DPE (R Reed) to Hera (S Hurren) titled "Hera Gold Mine (10, 0393) Hazardous Materials Management Plan", dated 1 May 2013. 1. YTC Resources Ltd, Environmental Management Plan Waste Rock, Revision 1.0, dated 15 July 2014. 2. draft Waste Rock Management Plan, Revision 2, dated 24 November 2014. 3. Independent Environmental Audit, Hera Resources Pty Ltd, Hera Project, NMAAGEE NSW, September 2016. The Audit report stated "The current Waste Rock Management Plan (WRMP) had been developed in consultation with the EPA and NSW. A letter dated 21st November 2012, was signed requesting comment from both the EPA and NSW. Letters of response from NSW dated 21/06/17 and the EPA dated 21/10/17 were signed".	Hera content this condition should be completed. The condition states that this must be prepared to the satisfaction of the Secretary. As the Secretary has approved the plan, this condition has been satisfied. The issues you have identified are separate to this condition and I would suggest a recommendation and not mandatorily the condition.	The September 2016 EIR found that a Final Hazard Analysis (FHA) had not been completed. The recommendation to complete a final hazard analysis has not been achieved. A Preliminary Hazard Analysis (PHA) was completed by RW Corkery & Co as part of the EA (Nov. 2013) (signed). Section 5.1 of the Hazardous Materials Management Plan states that "As there are no changes to the design of the Mine, the PHA is considered by Hera Resources to be sufficient to satisfy the requirement of Condition 3.40 of Project Approval whereby a Final Hazard Analysis was to be prepared". The previous audit in July 2013 noted: "As the Hazardous Materials Management Plan has been approved by the Director-General, VTC Hera is compliant with this condition." However, the 2013 audit was conducted prior to the construction and operation of the processing plant, an area where the majority of the hazardous materials are stored or used. At the time of the audit in September 2016, it was observed that there are hazardous goods (e.g. LSG Class 2.3) and processes (e.g. Melt Foundries - gold room) that were not identified in the original PHA. A Hazardous Materials Management Plan has been prepared by Hera.	Non-Compliance	Conduct a Final Hazard Analysis in accordance with Hazardous Industry Planning Advisory Paper No. 8 - Hazard Audit Guidelines.	30 September 2020.	
S3.41	Hazardous Materials Management Plan	(a) be prepared in consultation with the relevant government agencies including CSC, RMS, EPA, DPI Water, WorkCover NSW and DPE; (b) be consistent with the International Cyanide Management Code for the Manufacture, Transport and Use of Cyanide in the Production of Gold; (c) be submitted to the Secretary for approval prior to commencing mining operations under this approval; (d) describe the measures that would be implemented to: (i) ensure sodium cyanide and other toxic chemicals are stored and handled on the site in accordance with AS/NZS 4452 - The Storage and Handling of Toxic Substances; and (ii) ensure the transportation of hazardous materials to and from the site is undertaken in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 11 - Route Selection and the Australian Code for the Transport of Dangerous Goods by Road and Rail - current version; (e) detail the emergency procedures for the Project consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1 - Emergency Planning.	1. Environmental Management Plan Hazardous Materials, Version 1.0, dated 9 April 2013. 2. Letter from DPE (R Reed) to Hera (S Hurren) titled "Hera Gold Mine (10, 0393) Hazardous Materials Management Plan", dated 1 May 2013. 1. Environmental Management Plan Hazardous Materials, Version 1.0, dated 9 April 2013. 2. Letter from DPE (R Reed) to Hera (S Hurren) titled "Hera Gold Mine (10, 0393) Hazardous Materials Management Plan", dated 1 May 2013. 1. YTC Resources Ltd, Environmental Management Plan Waste Rock, Revision 1.0, dated 15 July 2014. 2. draft Waste Rock Management Plan, Revision 2, dated 24 November 2014. 3. Independent Environmental Audit, Hera Resources Pty Ltd, Hera Project, NMAAGEE NSW, September 2016. The Audit report stated "The current Waste Rock Management Plan (WRMP) had been developed in consultation with the EPA and NSW. A letter dated 21st November 2012, was signed requesting comment from both the EPA and NSW. Letters of response from NSW dated 21/06/17 and the EPA dated 21/10/17 were signed".	1. Cyanide Storage Facilities (Refer to Photo #8). 1. Waste recycling including oil and scrap steel at the workshop as well as general waste segregation/recycling in appropriately placed bins was sighted during the Audit. Refer to Photo #9. 2. Waste bins are strategically located around the site. Suitable bins are available to allow segregation of wastes. Waste storage areas are clearly signposted. Refer to Photo #10. 1. Sewage Treatment Plant and Irrigation areas.	Section 5.8 of the HEMP lists the cyanide controls to be used which are consistent with the International Cyanide Management Code for the Manufacture, Transport and Use of Cyanide in the Production of Gold (the Code). The current version of the Hazardous Materials Management Plan has been approved by DPE. The HEMP does not satisfy paragraph (d)(i) in that it does not specify measures in relation to the storing and handling of lead nitrate and toxic chemicals. The plan does not satisfy paragraph (d)(ii) in that it does not describe the route selection for the transportation of cyanide from its point of origin to the mine in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 11 - Route Selection. The 2019 HANAT MP also include the relevant requirements of AS/NZS 4452. Consultation and submission of all Management Plans is on schedule and if an update is required, they will be submitted within three months of this EA. The 2019 HANAT MP also include the relevant requirements in the Department's Hazardous Industry Planning Advisory Paper No. 1 - Emergency Planning. Consultation and submission of all Management Plans is on schedule and if an update is required, they will be submitted within three months of this EA.	Non-Compliance	Review and update the Hazardous Materials Management Plan. During preparation of the plan consult with the relevant agencies.	4 July 2020.	
S3.42	Waste	The Proponent shall: (a) minimise the waste generated by the project; (b) ensure that the waste generated by the project is appropriately stored, handled and disposed of; and (c) manage on-site sewage treatment disposal in accordance with the requirements of CSC, to the satisfaction of the Secretary. The Proponent shall prepare and implement a Waste Rock Management Plan to the satisfaction of the Secretary. The plan must: (a) be developed in consultation with the EPA and DPI Water;	1. Environmental Management Plan Hazardous Materials, Version 1.0, dated 9 April 2013. 1. Waste Disposal Records. 1. Letter from CSC to YTC Resources titled "Approval to Install / Construct a Sewage Management System", dated 18 December 2012. 12 Letter from CSC to YTC Resources titled "Approval to Install / Construct a Sewage Management System", dated 23 September 2013 3. Certificate of Completion, Fug CER500 sewage treatment system - by True Water Australia, dated 9 August 2013. 1. YTC Resources Ltd, Environmental Management Plan Waste Rock, Revision 1.0, dated 15 July 2014. 2. draft Waste Rock Management Plan, Revision 2, dated 24 November 2014. 3. Independent Environmental Audit, Hera Resources Pty Ltd, Hera Project, NMAAGEE NSW, September 2016. The Audit report stated "The current Waste Rock Management Plan (WRMP) had been developed in consultation with the EPA and NSW. A letter dated 21st November 2012, was signed requesting comment from both the EPA and NSW. Letters of response from NSW dated 21/06/17 and the EPA dated 21/10/17 were signed".	1. Waste recycling including oil and scrap steel at the workshop as well as general waste segregation/recycling in appropriately placed bins was sighted during the Audit. Refer to Photo #9. 2. Waste bins are strategically located around the site. Suitable bins are available to allow segregation of wastes. Waste storage areas are clearly signposted. Refer to Photo #10. 1. Sewage Treatment Plant and Irrigation areas.	Hera addresses waste minimisation and disposal in section 5.5 of the Hazardous Materials Management Plan (HEMP). Appropriate waste collection and storage facilities are provided. Waste records sighted demonstrate that appropriate waste disposal options are in place. Sewage treatment systems have been installed and are managed in accordance with Council requirements.	COMPLIANCE			
					The 2014 version of the plan has been approved by DPE and is the current version of the plan. A updated plan has been drafted, but not yet finalised or approved.	COMPLIANCE			
					The 2014 Waste Rock Management Plan (WRMP) was developed in consultation with the EPA and NSW.	COMPLIANCE			

55.1	Environmental Management Strategy	The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Director-General. The strategy must:	1. Environmental Management Strategy, Version 3.0, dated 12 November 2017.		An Environmental Management Strategy has been prepared.	COMPLIANCE			
		(a) be submitted to the Director-General for approval prior to the commencement of mining activities;			While the first version of the EMS was approved by DPE, the current version has not been reviewed and approved by the Department.	Non-Compliance	Ensure that the current version of the Environmental Management Strategy is approved by DPE.	Consultation and submission of all Management Plans is on schedule and if an update is required, they will be submitted within three months of this EA.	4 July 2020.
		(b) provide the strategic framework for environmental management of the project.	1. Environmental Management Strategy, Version 3.0, dated 12 November 2017.		The EMS provides a simple framework for the management of the environmental obligations associated with the Project. The framework presented in the EMS is based on ISO 14001. The framework as implemented is not sufficient to adequately manage Hera's compliance obligations under this Approval.	Non-Compliance	Implement the Environmental Management System Recommendations described in Section 7.1 of this report.	Hera will commit to implementing the EMS as described in the EA.	4 April 2021.
		(c) identify the statutory approvals that apply to the project.	1. Environmental Management Strategy, Version 3.0, dated 12 November 2017.		Section 3 of the EMS discusses the Planning Approval applicable to the mining operations.	COMPLIANCE			
		(d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project.	1. Environmental Management Strategy, Version 3.0, dated 12 November 2017.		Section 9 of the EMS describes the key roles and responsibilities.	COMPLIANCE			
55.2	Adaptive Management	(e) describe the procedures that would be implemented to: keep the local community and relevant agencies informed about the operation and environmental performance of the project; receive, handle, respond to, and record complaints; resolve any disputes that may arise during the course of the project; respond to any non-compliance; and respond to emergencies; and	1. Environmental Management Strategy, Version 3.0, dated 12 November 2017.		Section 8 of the EMS describes the complaints management and dispute resolution processes.	COMPLIANCE			
		(f) include copies of the various strategies, plans and programs that are required under the conditions of this approval once they have been approved, and a clear plan detailing all the monitoring to be carried out in relation to the project.	1. Environmental Management Strategy, Version 3.0, dated 12 November 2017.		Section 5.2 of the EMS references the management plans required by the Planning Approval.	COMPLIANCE			
		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 EPPLA Act or EPPLA Regulation.				Noted			
		(g) Where any exceedance of these criteria and/or performance measures has occurred, the Proponent shall, at the earliest opportunity:	1. Notice of PM10 exceedance and incident report - (18 July 2018) sent to DPE, DRE, EPA, CDE. 2. Notice of PM10 exceedance and incident report - (19 April 2018) sent to DPE, DRE, EPA, CDE. 3. Notice of PM10 exceedance and incident report - (30 March 2018) sent to DPE, DRE, EPA, CDE. 4. Notice of HVA5 exceedance and incident report - (25 July 2017) sent to DPE, DRE, EPA, CDE. 5. Notice of PM10 exceedance and incident report - (22 November 2016) sent to DPE, DRE, EPA, CDE. 6. Notice of Dust Deposition exceedance and incident report - (September 2019) sent to DPE, DRE, EPA, CDE. 7. Notice of Dust Deposition exceedance and incident report - (September 2019) sent to DPE, DRE, EPA, CDE. 8. Notice of Dust Deposition exceedance and incident report - (September 2019) sent to DPE, DRE, EPA, CDE. 9. Notice of WAD exceedance and incident report - (20 September 2017) sent to DPE, DRE, EPA. 10. EPA Show Cause Notice relating to cyanide contaminated water leaks, EPA Reference 1580504, dated 13 June 2019.		The Auditor has reviewed exceedance (WAD and PM10 data) for the Audit Period. The review of the correspondence provided indicates that all exceedances were reported to DPE, DRE, EPA and where required to Council.	COMPLIANCE			
		(h) 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	1. Notice of WAD exceedance and incident report - (28 September 2017) sent to DPE, DRE, EPA. The report relates to a failure to collect and analyse Wad samples (due to equipment loss in a laboratory fire) and the subsequent detection of a WAD exceedance. 2. Notice of WAD exceedance and incident report - (24, 25 and 26 April 2018) sent to DPE, DRE, EPA. The report relates to the detection of a WAD exceedance.		The Auditor has reviewed exceedance (WAD and PM10 data) for the Audit Period. The review of the correspondence provided indicates incident reports were prepared and issued to the relevant authorities.	COMPLIANCE			
55.3	Management Plans Requirements	(i) implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary.			DPE has not instructed Hera to implement and remediation strategies during the Audit Period.	Not Triggered			
		The Proponent shall ensure that the Management Plans required under this approval are prepared in accordance with any relevant guidelines, and include:			With the exception of the MCP and the TMP, current versions of the Plans that it those that were approved by DPE were prepared in 2013/13. The plans were prepared in accordance with the guidelines relevant in 2013 and reference, where applicable, baseline data.	COMPLIANCE			
		(a) a description of the relevant statutory requirements (including any relevant approval, licence or lease conditions); any relevant limits or performance measures/criteria; and the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the project or any management measures.	1. YTC Resources Ltd, Environmental Management Plan Noise Management, Revision 5, dated 19 August 2013 2. YTC Resources Ltd, Environmental Management Plan Air, Revision 4, dated 30 August 2012 3. YTC Resources Ltd, Environmental Management Plan Water Quality and Environmental Governance, Revision 3, dated 28 August 2012 4. Draft Water Management Plan 2019, Version 6, dated November 2019 5. Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hera Mine, prepared by RV Conley, dated June 2014. Note that this plan incorporates the Biodiversity Off-set Strategy 6. Environmental Management Plan Aquaculture, Materials, Version 1.0, dated 19 August 2012 7. Traffic Management Plan, Version 3.0, dated 14 May 2016 8. Environmental Management Plan Hazardous Materials, Version 1.0, dated 9 April 2013 9. YTC Resources Ltd, Environmental Management Plan Waste Rock, Revision 1.0, dated 15 July 2014 10. Mining Operations Plan for the Hera Mine PA10, 0191, dated January 2017. The MCP incorporates the Rehabilitation Management Plan. 11. Environmental Management Strategy, Version 3.0, dated 12 November 2017.		With the exception of the MCP and the TMP, current versions of the Plans that it those that were approved by DPE were prepared in 2013/13. Variations to the Project Approval have been approved during that time. Those modifications are in general not fully reflected in most of the plans.	Non-Compliance	All management plans required under this Approval (including the Environmental Management Strategy) should be thoroughly reviewed and revised to reflect changes in the approval, legislative changes and developments in environmental management standards applicable to the mining operations.	Consultation and submission of all Management Plans is on schedule and if an update is required, they will be submitted within three months of this EA.	4 July 2020.
		(c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria.			Each plan contains a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures.	COMPLIANCE			
		(d) a program to monitor and report on the impacts and environmental performance of the project and effectiveness of any management measures (see (c) above).			Each plan contains a program to monitor and report on the impacts and environmental performance of the project, and effectiveness of any management measures.	COMPLIANCE			
55.4	Annual Review	(e) a contingency plan to manage any unpredicted impacts and their consequences;			Each plan contains a contingency plan to manage any unpredicted impacts and their consequences.	COMPLIANCE			
		(f) a program to investigate and implement ways to improve the environmental performance of the project over time;			The plans in general do not provide a program to investigate and implement ways to improve the environmental performance of the project over time.	Non-Compliance	During the review and revision of each plan required under this Approval, identify a program to investigate and implement ways to improve the environmental performance of the project over time.	This will be addressed via the EMS.	4 April 2021.
		(g) a protocol for managing and reporting any incidents, complaints, non-compliance with statutory requirements, and exceedances of the impact assessment criteria and/or performance criteria; and			Each plan describes a protocol for managing and reporting any incidents, complaints, non-compliance with statutory requirements, and exceedances of the impact assessment criteria and/or performance criteria.	COMPLIANCE			
		(h) a protocol for periodic review of the plan.			Each plan describes a protocol for periodic review of the plan.	COMPLIANCE			
		(i) by the end of December each year, the Proponent shall review the environmental performance of the project to the satisfaction of the Director-General.			Letters approving each of the Annual Reviews from DPE were signed.	COMPLIANCE			
55.5	Revision of Strategies Plans and Programs	This review must:			The Annual Reviews submitted for 2016, 2017 and 2018 described the works undertaken during the respective reporting years, and a statement regarding the work proposed for the coming year, including rehabilitation works.	COMPLIANCE			
		(a) describe the works (including rehabilitation) that were carried out in the previous year, and the works that are proposed to be carried out over current year;			The Annual Reviews submitted for 2016, 2017 and 2018 included reviews of the monitoring results against the emission / performance criteria specified in the Project Approval and the Environment Protection Licence.	COMPLIANCE			
		(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 relevant statutory requirements, limits or performance measures/criteria; the monitoring results of previous years; and the relevant predictions in the EA.	1. Hera Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017, dated 14 August 2017 2. Hera Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018, dated 16 August 2018 3. Hera Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019, dated 14 August 2019 4. Letter from DPE (C78694) to Hera (17 November) titled "Hera Mine - PA 10, 0191 (MDO 4) Annual Environmental Review Report 16 May 2016 to 15 May 2017", dated 26 September 2017.		The Annual Reviews submitted for 2016, 2017 and 2018 did not clearly identify all non-compliances against both the Planning Approval and EPA, or the 2017/18 Environmental Review states "There were several WAD/Cyanide incidents during the reporting period". The non-compliances were not specifically identified, nor were there any discussion of actions taken by Hera in response to the non-compliances.	Non-Compliance	Provide full details of all non-compliances against both the Planning Approval and EPA, or the 2017/18 Environmental Review. Provide details of actions taken in relation to each non-compliance.	Noted - In the future, Hera will ensure the Annual Review provides full details of non-compliance. Hera will identify any non-compliances over the last year, and describe what actions were (or are being taken to ensure compliance).	Compliant.
		(c) identify any non-compliance over the last year, and describe what actions were (or are being taken to ensure compliance).			The Annual Reviews submitted for 2016, 2017 and 2018 identified general trends in emission / performance against the EPA.	COMPLIANCE			
		(d) identify any trends in the monitoring data over the life of the project.			Section 4 of the Annual Reviews provide an assessment of actual against predicted impacts (as per the EPA).	COMPLIANCE			
55.6	Community Consultative Committee	(e) identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential causes of any significant discrepancies; and			The Annual Reviews submitted for 2016, 2017 and 2018 identified what measures will be implemented over the next year to improve the environmental performance of the project.	COMPLIANCE			
		(f) describe what measures will be implemented over the next year to improve the environmental performance of the project.				COMPLIANCE			
		Within 3 months of:				COMPLIANCE			
		(a) the submission of an annual review under condition 5 above;				COMPLIANCE			
		(b) the submission of an incident report under condition 5 below;				COMPLIANCE			
55.7	Incident Reporting	(c) the submission of an audit report under condition 8 below; and				COMPLIANCE			
		(d) any modification to this approval.				COMPLIANCE			
		The Proponent shall review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the Director-General.				COMPLIANCE			
		New: 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.				COMPLIANCE			
		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 (Guidelines for Planning, 2007, or its latest version), and to the satisfaction of the Secretary. This CCC must be operating within six months of this approval.	1. Minutes of all CCC meetings held during the Audit Period		Quarterly meetings of the Community Consultative Committee (CCC) are hosted by Hera. Minutes of CCC meetings were signed.	COMPLIANCE			
55.8	Regular Reporting	The Proponent shall notify the Director-General and any other relevant agencies of any incident associated with the project as soon as practicable after the Proponent becomes aware of the incident. Within 7 days of the date of the incident, the Proponent shall provide the Director-General and any relevant agencies with a detailed report on the incident.				COMPLIANCE			
		The Proponent shall provide regular reporting on the environmental performance of the project on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this approval, and to the satisfaction of the Director-General.	1. http://aurelianet.com/projects/hera-nyngahajeepon		The Hera Mine website contains copies of Annual Reviews for 2016, 2017, 2018 and 2019. The website also contains copies of monthly environmental monitoring reports from March 2015 to August 2019.	COMPLIANCE			
						COMPLIANCE			
						COMPLIANCE			
						COMPLIANCE			

SS.9	Independent Environmental Audit	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: (a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary; (b) include consultation with the relevant agencies; (c) assess the environmental performance of the project and assess whether it is complying with the requirements in this approval and any relevant EPA, or Mining Lease (including any assessment, plan or program required under these approvals); (d) review the adequacy of strategies, plans or programs required under the above-mentioned approvals; and (e) recommend appropriate measures or actions to improve the environmental performance of the project, and/or any assessment, plan or program required under the above-mentioned approvals.	1. http://www.environmental.com/projects/hera-nymagpaudits 2. Independent Environmental Audit, Hera Resources Pty Ltd, Hera Project, NMAJEG NSW, September 2016.		Copies of the 2013 and 2016 Independent Environmental Audits are available on the Hera Mine Website. The site based elements of the 2016 Independent Environmental Audit were undertaken between 5 and 8 September 2016. The Audit report was finalised and issued to Hera on 13 April 2017. The audit report satisfies the requirements of this Condition.	COMPLIANCE				
SS.10		Within 6 weeks of the completion of this audit, or as otherwise agreed by the Director-General, the Proponent shall submit a copy of the audit report to the Director-General, together with its response to any recommendations contained in the audit report.	1. Email from Hera (J Thompson) to DPE submitting the 2016 IER	J Thompson: the final 2016 Audit Report was submitted to Hera on 14 March 2017 (start of the 6 week period as this was the date the audit was completed) and it was submitted to DPE on 18 Apr 2018	The previous IEA Report was submitted within 6 weeks of completion of the audit.	COMPLIANCE				
SS.11	Access to information	Prior to the commencement of construction on the site, the Proponent shall: (a) make copies of the following publicly available on its website: (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 (x) keep this information up-to-date, to the satisfaction of the Secretary.	1. http://www.environmental.com/projects/hera-nymagpa/		The documents and records required by this Condition have been uploaded to the Hera website, except for the Mining Operators Plan (note that the appendices to that plan have been uploaded).	Non-Compliance	Ensure that all required plans (including the current version of the MOP) are loaded on the corporate website. The only document missing at the time of the audit was the approved MOP. This was updated to the website on 7 Feb 2020. In the future, Hera will ensure all required documentation is uploaded to the website without delay	Completed.		
Condition Reference	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation	Hera Resources Action Plan	Hera Action Due Date
A1.1		This license authorizes the carrying out of the scheduled development work listed below at the premises listed in A2: Construction of an underground gold mine, processing plant, tailings storage facility, and ancillary infrastructure in accordance with Department of Planning project approval 15-2015.					Noted			
A1.2	Administrative Conditions	This license authorizes the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, the least activity classification and the scale of the operation. Unless otherwise further restricted by a condition of this license, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition. Scheduled Activity Fee Based Activity Scale > 100000 : 500000 T extracted, processed or stored		1. J. Thompson 20 November 2019. The mine has not exceeded the ore processing or concentrate transport limits during the audit period.		The corporate annual reports and Annual Reviews provide a summary of production data for each year. These were: 2017 Financial Year: 368,086 tonnes of ore processed, 32,308 tonnes of concentrate transported from site. 2018 Year: 407,131 tonnes of ore processed, 40,756 tonnes of concentrate transported from site. 2019 Year: 468,358 tonnes of ore processed, 31,205 tonnes of concentrate transported from site.	COMPLIANCE			
A1.3							Not Used			
A2.0		The license applies to the following premises: Hera Mine Site					Noted			
A2.1	Administrative Conditions	This license applies to all other activities carried out at the premises, including: Chemical Storage, Electricity Generation and Sewage Treatment					Noted			
A4.1	Administrative Conditions	Works and activities must be carried out in accordance with the proposal contained in the license application, except as expressly provided by a condition of this license. In this condition the reference to "the license application" includes a reference to: a) the application for any license (including former pollution control approval) which this license replaces under the Protection of the Environment Operations (Storage and Transfer) Regulation 1998, and b) the license information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this license.					Noted			
P1.1	Utilisation Areas	The following points referred to in the table (Paw Table in EPA on pg 77) are identified in this license for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.					Noted			
P1.2		The following utilisation areas referred to in the table below are identified in this license for the purposes of the monitoring and/or the setting of limits for any activities of pollutants to the utilisation area.					Noted			
P1.3		The following points referred to in the table are identified in this license for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.					Noted			
L1.1	Pollution of Waters	Except as may be expressly provided in any other condition of this license, the licensee must comply with section 122 of the Protection of the Environment Operations Act 1997.	1. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, for the Period 16 May 2016 to 15 May 2017, dated 14 August 2017 2. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, for the Period 16 May 2017 to 15 May 2018, dated 16 August 2018 3. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, for the Period 16 May 2018 to 15 May 2019, dated 14 August 2019.		The 2016/7 Annual review reported that two discharges from Licence Point 3 exceeded a number of water quality parameters identified in EPA 2017/9. The discharges occurred on 20 July 2016 and 16 December 2016 and were reported to the DPE, EPA and DRE.	Non-Compliance	Investigate the cause of any discharge from site that exceeds any discharge criteria and identify and implement appropriate mitigation strategies.	All non-compliances have been reported to the EPA and will continue to be reported. All non-compliances are investigated and solutions implemented as required.	Completed.	
L2.2	Concentration Limits	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified range.					Noted			
L2.3		To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table.					Noted			
L2.4		Water and/or Land Concentration Limits (refer to Tables in Condition L2.4)	1. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, for the Period 16 May 2016 to 15 May 2017, dated 14 August 2017 2. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, for the Period 16 May 2017 to 15 May 2018, dated 16 August 2018 3. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, for the Period 16 May 2018 to 15 May 2019, dated 14 August 2019.		1. Water monitoring results covering the Audit Period for Licensed Monitoring Points 1, 2, 3 and 4 During the 2019 reporting year on 3 occasions the cyanide destruction circuit failed and cyanide exceeding the licence limit of 120mg/l was discharged to the process water ponds. During the 2018 reporting year concentrations of weak acid dissociable (WAD) cyanide in discharges from Licence Point 1 and Licence Point 2 exceeded limits on a number of occasions. During the 2017 reporting year there were two non-compliant discharges from Point 3. Water quality concentration limit exceeded following heavy storm event. Pumps were set up to empty the sediment basin to reduce the amount of water discharged.	Non-Compliance	Review the investigations relating to the WAD Cyanide non-compliances to determine if there are systemic issues in relation to cyanide leach management in the process water system.	A review of cyanide management in the Process Plant will be conducted.	4 April 2021.	
L3.1	Waste	The licensee must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by the licensee under the Protection of the Environment Operations Act 1997. This condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the premises if it requires an environmental protection licence under the Protection of the Environment Operations Act 1997.	1. Environmental Management Plan Hazardous Materials, Version 1.5, dated 9 April 2013.		1. No evidence of off-site waste received was sighted during the Audit. 2. The mine is remote and not a practical destination for waste disposal.	1. No evidence of off-site waste received was sighted during the Audit.	COMPLIANCE			
L4.1		Noise generated at the premises must not exceed the noise limits presented in the table below. Locations: R1 to R4 in the table L4.1 are those described in the Noise and Vibration Assessment, September 2011, prepared by Spectra Acoustics Pty Ltd for the Hera Project, via Nymagpa, Environmental Assessment. NOTE: Noise generated by the project is to be measured in accordance with conditions L4.2 to L4.6 below.	1. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, for the Period 16 May 2016 to 15 May 2017, dated 14 August 2017 2. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, for the Period 16 May 2017 to 15 May 2018, dated 16 August 2018 3. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, for the Period 16 May 2018 to 15 May 2019, dated 14 August 2019.		No noise exceedances were detected over the 2016/7 reporting period. No noise exceedances were detected over the 2017/8 reporting period. No noise exceedances were detected over the 2018/9 reporting period.	COMPLIANCE				
L4.2		For the purpose of the conditions of this license: • Day is defined as the period from 7am to 6pm; and • Evening is defined as the period from 6pm to 10pm. Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 6am Sundays and Public Holidays; • LAeq(25 minutes) is defined as the continuous "A" weighted sound pressure level energy average of the noise measured over a 25 minute period; and • LAeq(1 minute) is defined as the sound pressure level exceeded for one percent of a 1 minute measurement period.					Noted			
L4.3		The noise limits set out in condition L4.1 apply under all meteorological conditions except for any one of the following: a) third speeds greater than 3 metres/second at 10 metres above ground level; or b) stability category G conditions and wind speeds greater than 2 metres/second at 10 metres above ground level.	1. Plan showing location of all Noise Monitoring Locations 2. Noise monitoring reports for the past three years				Noted			
L4.4		For the purpose of condition L4.3: a) the meteorological data to be used for determining meteorological conditions is the data recorded by the on-site meteorological weather station at the Hera project site at Nymagpa; b) temperature inversion will be assessed by use of the sigma theta process as outlined in Appendix E4 of the NSW Industrial Noise Policy (2001); c) for the purpose of determining the noise generated at the premises Class 1 or 2 noise monitoring equipment as defined by AS 8235:67.2-2004 and AS 8235:67.2-2004, or other noise monitoring equipment accepted by the EPA in writing, must be used.	1. Excel Spreadsheet titled "Daily Summary (22)car". The spreadsheet contained the weather station outputs from 9 September 2016 to 9 November 2019.		Weather station monitoring results for the Audit Period were sighted by the Auditor. The weather station satisfies the requirements of the Approved Methods for Sampling Air Pollutants in New South Wales Guidelines.	COMPLIANCE				
L4.5		For the purpose of determining the noise generated at the premises Class 1 or 2 noise monitoring equipment as defined by AS 8235:67.2-2004 and AS 8235:67.2-2004, or other noise monitoring equipment accepted by the EPA in writing, must be used.	1. Hera Gold Mine EPA attended noise monitoring (various reports covering 2017, 2018 and 2019), prepared by EMM Consultants.		The noise monitoring equipment used by Hera's consultants complies with AS 8235:67.2-2004 and AS 8235:67.2-2004 (and current EPA guidelines)	COMPLIANCE				
L4.6		To determine compliance: a) with the LAeq(25 minute) noise limits in condition L4.1, the noise monitoring equipment must be located: • within 30 metres of a dwelling (apart but not closer than 3 metres where any dwelling on the property is situated more than 30 metres from the property boundary that is closest to the premises); • approximately on the boundary where any dwelling is situated 30 metres or less from the property boundary that is closest to the premises; • within approximately 50 metres of the boundary of a National Park or a Nature Reserve; b) with the LAeq(1 minute) noise limit in condition L4.1, the noise monitoring equipment must be located within 1 metre of the dwelling facade; c) the noise monitoring equipment must be located in a position that is: i) at the noise affected point at a location where there is no dwelling at the location; or ii) at the most affected point within an area at a location prescribed by conditions L4.6(a) and (b); d) at a point other than the most affected point at a location.	1. Hera Gold Mine EPA attended noise monitoring (various reports covering 2017, 2018 and 2019), prepared by EMM Consultants.		The sampling locations and sampling procedures used by Hera's noise consultants meet the requirements of the EPA.	COMPLIANCE				
L4.7		For the purpose of determining the noise generated at the premises the modification factors in Section 4 of the NSW Industrial Noise Policy must be applied, as appropriate, to the noise levels measured by the noise monitoring equipment.					Noted			
L4.8		Blasting operations and ground vibration. The proponent must ensure that the blasting on site does not cause exceedances of the criteria in Table L3.1. Note: A tiered approach associated with any monitoring equipment used to measure this are not to be taken into account in determining whether or not the limit has been exceeded.	1. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, for the Period 16 May 2016 to 15 May 2017, dated 14 August 2017 2. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, for the Period 16 May 2017 to 15 May 2018, dated 16 August 2018 3. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, for the Period 16 May 2018 to 15 May 2019, dated 14 August 2019.		868 Blasts were initiated during the 2016/7 reporting year. No vibration exceedances were detected at any privately owned properties. 868 Blasts were initiated during the 2017/8 reporting year. No vibration exceedances were detected at any privately owned properties. 738 Blasts were initiated during the 2018/9 reporting year. No vibration exceedances were detected at any privately owned properties.	COMPLIANCE				

M4.1	Weather Monitoring	The meteorological weather station must be maintained so as to be capable of continuously monitoring the parameters specified in the condition below:	1. Excel Spreadsheet titled "Daily Summary (22)ca". The spreadsheet contained the weather station outputs from 9 September 2016 to 9 November 2019. 2. Excel spreadsheet titled "Daily Summary (22)ca". The spreadsheet contained the weather station outputs from 9 September 2016 to 9 November 2019.		Weather station monitoring results for the Audit Period were signed by the Auditor.	COMPLIANCE			
M4.2		For monitoring point 43 the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 5. The licensee must use the sampling method, units of measure, averaging period and sample at the frequency, specified apposite in the other columns.	1. Excel Spreadsheet titled "Daily Summary (22)ca". The spreadsheet contained the weather station outputs from 9 September 2016 to 9 November 2019.		Weather station calibration reports were signed by the Auditor.	COMPLIANCE			
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 the monitoring system and the actions taken to address the complaints.	1. Complaints Register (internal version) in excel format - The Register contains full details of all complaints received.		A detailed complaints register is maintained. Note that summary version that does not identify complainant details is located on the complainant website.	COMPLIANCE			
M5.2	Complaints	The record must include details of the following: 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.	1. Complaints Register (internal version) in excel format - The Register contains full details of all complaints received.		a) The register includes the date and time of the complaint. b) The method by which the complaint was made is recorded e.g. email, telephone, in person. c) The personal details of the complainant such as full name, address and phone number are recorded if provided by the complainant. d) The nature of the complaint is recorded. e) "Corrective Action" column records the action taken by the licensee in relation to the complaint. Additional columns record the name and position of the person responsible for the corrective actions as well as the date of the corrective action. Follow-up contact is recorded in the "comments" column. f) All complaints signed (except the text call made as part of the July 2013 compliance audit) have required corrective actions.	COMPLIANCE			
M5.3		The record of a complaint must be kept for at least 4 years after the complaint was made.	1. Complaints Register (internal version) in excel format - The Register contains full details of all complaints received.		The records of complaints date back to 2013.	COMPLIANCE			
M5.4		The record must be provided to any authorised officer of the EPA who asks to see them.				Noted			
M6.1	Telephone Complaints	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.			1. The telephone complaints line was operational at the time of the audit.	COMPLIANCE			
M6.2	Line	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the complainant can be contacted.	http://www.minefields.com.au/News/Company		1. The telephone complaint line number is listed at the site gate and on the site website. 2. Mine site signage provides details of the complaints telephone number. Refer to Photo #12.	COMPLIANCE			
M6.3		The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the complainant can be contacted.				Noted			
M7.1		The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. A Statement of Compliance; 2. A Monitoring and Complaints Summary; 3. A Statement of Compliance - Licence Conditions; 4. A Statement of Compliance - Load based fee; 5. A Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan; 6. A Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. A Statement of Compliance - Environmental Management Systems and Practices.	1. EPA Public Register https://open.epa.nsw.gov.au/epnregister/Details.aspx?id=201718&periodid=4501&searchrange=licenseid&searchcomplaintsdate=01/01/2016		Annual Returns have been sent to the EPA for each year covered by the Audit Period.	COMPLIANCE			
M7.2		An Annual Return must be prepared in respect of each reporting period, except as provided in the below conditions.	1. EPA Public Register https://open.epa.nsw.gov.au/epnregister/Details.aspx?id=201718&periodid=4501&searchrange=licenseid&searchcomplaintsdate=01/01/2016		Annual Returns have been sent to the EPA for each year covered by the Audit Period.	COMPLIANCE			
M7.3	Annual Returns	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.				Noted			
M7.4		Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of a licence - the date when notice in writing of the revocation is given.				Noted			
M7.5		The Annual Return for the reporting period must be supplied to the EPA by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the "due date").	1. EPA Public Register https://open.epa.nsw.gov.au/epnregister/Details.aspx?id=201718&periodid=4501&searchrange=licenseid&searchcomplaintsdate=01/01/2016		The 2016/7 Annual Return was received by the EPA on 27 May 2019 (61 days after the end of the reporting period). The 2017/8 and 2018/9 Annual Returns were received within 60 days of the end of the reporting periods.	Non-Compliance	Ensure that the Annual Returns are received by the EPA within the 60 day period required by the EPA.	During the audit period, one Annual Return was submitted one day late. Future Annual Returns will be submitted by eConnect EPA or registered post slips recorded and within 60 days of reporting period ending.	Completed.
M7.6		The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	1. 2016 Annual Return 2. 2017 Annual Return 3. 2018 Annual Return.		Copies of the annual returns are kept on file at Hera.	COMPLIANCE			
M7.7		Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.			The Annual Returns are prepared by the Environment Manager and signed by an appropriate officer of the company.	COMPLIANCE			
M7.8		Notifications of Environmental Harm must be made by telephoning the Environment Line service on 131 555.	1. Incident Report to EPA dated 4 January 2017. 2. Email from EPA (Customer Feedback line) to Hera (J Thompson) titled "14-Jan-2017 Customer Feedback for Call 0216-2017", dated 22 November 2016. The email acknowledges the telephone report to the Pollution Line. 3. Email from Hera (J Thompson) to the EPA (Dr Skokke) titled "Environmental Incident - 26 October 2016", dated 22 November 2016. The email refers to the telephone report to the Pollution Line.		A review of incidents over the audit period by the Auditor confirmed that relevant incidents have been reported to the EPA Pollution Line. Written reports have subsequently been provided to the EPA.	COMPLIANCE			
M7.9	Notification of Environmental Harm	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred. Note: The licensee or its employees must notify 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.	1. Incident Report to EPA dated 4 January 2017. 2. Email from EPA (Customer Feedback line) to Hera (J Thompson) titled "14-Jan-2017 Customer Feedback for Call 0216-2017", dated 22 November 2016. The email acknowledges the telephone report to the Pollution Line. 3. Email from Hera (J Thompson) to the EPA (Dr Skokke) titled "Environmental Incident - 26 October 2016", dated 22 November 2016. The email refers to the telephone report to the Pollution Line.		A review of incidents over the audit period by the Auditor confirmed that relevant incidents have been reported to the EPA Pollution Line. Written reports have subsequently been provided to the EPA. Notifications (incident reports) were provided to the EPA on: - 4 January 2017 (incident 18 December 2016) sediment laden discharge during storm event from Point 3. The incident was reported on 4 January 2017. The delay in reporting related to the time required for off-site sample analysis.	Non-Compliance	Hera has submitted the required incident reports to the EPA, however due to delays, mostly associated with lab testing, the 7 day reporting requirement has not been met. It is recommended that Hera request a modification to this EPA condition to modify the 7 day written report requirement to provide sufficient time for lab analysis to be completed.	The EPA will be amended to reflect Schedule 5, Condition 7 of the PA.	4 April 2021.
M8.1	Written Report	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicle or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.			No requests for reports have been received from the EPA in relation to mobile plant.	Not Triggered			
M8.2		The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.			No requests for reports have been received from the EPA in relation to mobile plant.	Not Triggered			
M8.3		The request may require a report which includes any or any of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of any pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (if when the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainant; f) details of any resource taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.			No requests for reports have been received from the EPA during the Audit Period.	Not Triggered			
M8.4	Fauna Injury or death	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified.	1. Incident Report issued to the EPA in relation to a dead goat and a dead kangaroo found in the TSP, dated 17 September 2017.		The EPA was advised following the death of a kangaroo in the TSP in 2017.	COMPLIANCE			
M8.5		The licensee must provide written details of the notification with respect of the above working to the EPA within 7 days of the date which the incident occurred.				COMPLIANCE			
M8.6	Copy of Licence	A copy of this licence must be kept at the premises to which the licence applies.			Electronic copy of the licence is maintained by Hera.	COMPLIANCE			
M8.7		The licensee must be provided to any authorised officer of the EPA who asks to see it.				Noted			
M8.8		The licensee must be available for inspection by any employee or agent of the licensee working at the premises.			Electronic copy of the licence is maintained by Hera and a copy of the licence has been uploaded to the company website.	COMPLIANCE			
M9.1	Signage	Each monitoring and discharge point must be marked by a sign that indicates the EPA point identification number.			1. The Auditor inspected all monitoring points. All licensed points were appropriately sign posted. (Refer to Photo #13).	COMPLIANCE			
M10.1		The licensee must construct the proposed contaminated storage pond consistent with the presentation provided to the EPA and dated 26 August 2016, to meet the proposed design capacity for a contaminated structure of 2 in 100, 72 hour storm event.	1. Letter from Hera (J Thompson) to EPA titled "Environment Protection Licence 20179 - 8 Special Conditions, E2 Construction of Proposed Contaminated Storage Pond", dated 9 June 2017. The letter confirms to the EPA that the contaminated storage pond construction has been completed and included details of the works (including design specifications) completed. 2. Letter from GHD (Dr Scott) to Hera (J Thompson) titled "Hera Mine Sediment Basin Response to EPA" dated 19 May 2016. The letter details the pond design specifications.		2. Inspection of the surface water management system, including the contaminated water storage pond.	COMPLIANCE			
M10.2		The proposed storage pond referred to in Condition E1.1 must be lined to meet the EPA's permeability requirement of 1 x 10 ⁻¹⁰ m/s or less with a compacted clay liner of at least 500 mm in thickness (or alternatively geomembrane liner of equivalent). Where the proposed liner will not meet the required permeability or thickness of at least 500 mm, and the natural geology of the site in conjunction with compacted clay liner is considered sufficient in meeting this requirement, an appropriately qualified person must be engaged to provide sufficient evidence in support of this to demonstrate the construction will meet the requirements outlined above and be adequate to prevent pollution of groundwater.	1. Letter from Hera (J Thompson) to EPA titled "Environment Protection Licence 20179 - 8 Special Conditions, E2 Construction of Proposed Contaminated Storage Pond", dated 9 June 2017. The letter confirms to the EPA that the contaminated storage pond construction has been completed and included details of the works (including design specifications) completed. 2. Letter from GHD (Dr Scott) to Hera (J Thompson) titled "Hera Mine Sediment Basin Response to EPA" dated 19 May 2016. The letter details the pond design specifications.		3. Inspection of the surface water management system, including the contaminated water storage pond.	COMPLIANCE			
M10.3	Construction of Contaminated Storage Pond	The licensee must complete the works required by Conditions E1.1 and E1.2 by 30 June 2017 and notify the EPA in writing upon completion of the works.	1. Letter from Hera (J Thompson) to EPA titled "Environment Protection Licence 20179 - 8 Special Conditions, E2 Construction of Proposed Contaminated Storage Pond", dated 9 June 2017. The letter confirms to the EPA that the contaminated storage pond construction has been completed and included details of the works (including design specifications) completed. 2. Letter from GHD (Dr Scott) to Hera (J Thompson) titled "Hera Mine Sediment Basin Response to EPA" dated 19 May 2016. The letter details the pond design specifications.		3. Inspection of the surface water management system, including the contaminated water storage pond.	COMPLIANCE			
M10.4		The licensee must submit a report completed by an appropriately qualified person to certify that the contaminated storage pond has been constructed to meet the design specifications referred to in Conditions E1.1 and E1.2. The report must be submitted to the EPA by 21 August 2017.	1. Letter from Hera (J Thompson) to EPA titled "Environment Protection Licence 20179 - 8 Special Conditions, E2 Construction of Proposed Contaminated Storage Pond", dated 9 June 2017. The letter confirms to the EPA that the contaminated storage pond construction has been completed and included details of the works (including design specifications) completed. 2. Letter from GHD (Dr Scott) to Hera (J Thompson) titled "Hera Mine Sediment Basin Response to EPA" dated 19 May 2016. The letter details the pond design specifications.		3. Inspection of the surface water management system, including the contaminated water storage pond.	COMPLIANCE			

	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation	Hera Resources Action Plan
1 (a)	Notice to Landholders	Within a period of three months from the date of grant/renewal of this lease or within such further time as the Minister may allow, the lease holder must serve on each landholder of the land a notice in writing indicating that this lease has been granted/renewed and whether the lease includes the surface. An adequate plan and description of the lease area must accompany the notice.	1. Independent Environmental Audit, Hera Resources Pty Ltd, Hera Project, NUMAGEE NSW, September 2016.		The 2016 Audit noted that the nearest residential premises is over 2 km from the site and therefore this Condition is not triggered.	Not Triggered			
1 (b)		If there are ten or more landholders affected, the lease holder may serve the notice by publication in a newspaper circulating in the region where the lease area is situated. The notice must indicate that this lease has been granted/renewed, state whether the lease includes the surface and must contain an adequate plan and description of the lease area.	1. Independent Environmental Audit, Hera Resources Pty Ltd, Hera Project, NUMAGEE NSW, September 2016.		The 2016 Audit noted that the nearest residential premises is over 2 km from the site and therefore this Condition is not triggered.	Not Triggered			
2(a)		The lease holder must implement all practicable measures to prevent and/or minimise any harm to the environment that may result from the construction, operation or rehabilitation of any activities under this lease.	1. EPA Show Cause Notice relating to cyanide contaminated water leaks, EPA Reference 1508054, dated 13 June 2019. 2. EPA Clean-up Notice 157818.		As a result of two (self reported by Hera) leaks of contaminated water, the EPA issue a Clean Up Notice and subsequently in response to that assessment that these incidents evidenced potential or actual Material Harm and were therefore potential breaches of Sections 64, 12 and 142A of the POEO Act.	Non-Compliance	The clean-up actions relating to the incidents have been completed - there are no further actions required.	Completed	
2(b)	Environmental Harm	For the purposes of this condition: (a) environment means components of the earth, including: (i) land, air and water, and (ii) any layer of the atmosphere, and (c) any organic or inorganic matter and any living organism, and (d) human-made or modified structures and areas, and includes interacting natural ecosystems that include components referred to in paragraphs (A)(i)-(C). (b) harm to the environment includes any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above, includes any act or omission that results in pollution, contributes to the extinction or degradation of any threatened species, populations or ecological communities and their habitats and causes impacts to places, objects and features of significance to Aboriginal people.					Noted		
3(a)		Mining operations must not be carried out otherwise than in accordance with a Mining Operations Plan (MOP) which has been approved by the Director-General.	1. Mining Operations Plan for the Hera Mine PA10, 0191, dated January 2017. 2. Letter from the DPE (to Hera (J Simpson)), titled "Application for a Mining Operations Plan (MOP) for Mining Lease (ML) 1686, ML1746, Mining Act 1992, Hera Resources Pty Ltd of DPI approving the MOP", dated 27 February 2017.		The MOP has been prepared and approved by DPE.	COMPLIANCE			
3(b)		The MOP must: (a) identify areas that will be disturbed by mining operations; (b) detail the staging of specific mining operations; (c) identify how the mine will be managed to allow mine closure;	1. Mining Operations Plan for the Hera Mine PA10, 0191, dated January 2017. 1. Mining Operations Plan for the Hera Mine PA10, 0191, dated January 2017.		Section 2.2 (Asset Register) describes the mine in terms of "Domains". Each of the Domains describe the areas of the site that are likely to be disturbed and therefore would be subject to rehabilitation in the future. Section 2 of the MOP describes the proposed mining activities and includes descriptions of the exploration, construction and mining phases of the project. Section 2.3.9 of the MOP describes the progressive rehabilitation and closure of the site.	COMPLIANCE COMPLIANCE COMPLIANCE			
3(c)	Mining Operations Plan	(c) identify how mining operations will be carried out in order to prevent and/or minimise harm to the environment; (d) reflect the conditions of approval under: - the Environmental Planning and Assessment Act 1979 - the Protection of the Environment Operations Act 1997 - any other approvals relevant to the development including the conditions of this lease; and - have regard to any relevant guidelines adopted by the Director-General. The leaseholder may apply to the Director-General to amend an approved MOP at any time.	1. Mining Operations Plan for the Hera Mine PA10, 0191, dated January 2017. 1. Mining Operations Plan for the Hera Mine PA10, 0191, dated January 2017.		Section 3 of the MOP describes the environmental risks associated with the project and Section 3.2 describes how these risks will be mitigated. The MOP is consistent with the Planning Approval and this Mining Lease.	COMPLIANCE			
3(d)		It is not a breach of this condition if: (i) the operations constituting the breach were necessary to comply with a lawful order or direction given under the Mining Act 1992, the Environmental Planning and Assessment Act 1979, Protection of the Environment Operations Act 1997, Coal Mine Health and Safety Act 2004 or Coal Mine Health and Safety Act 2000 and Mine Health and Safety Regulation 2007 (ii) Coal Mine Health and Safety Regulation 2006 or the Occupational Health and Safety Act 2000; and (iii) the Director-General had been notified in writing of the terms of the order or direction prior to the operations constituting the breach being carried out.				Noted			
3(e)		A MOP ceases to have effect 7 years after date of approval or other such period as identified by the Director-General.				Not Triggered			
4(a)		The lease holder must lodge Environmental Management Reports (EMR) with the Director-General annually or at times otherwise directed by the Director-General.	1. Hera Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017, dated 14 August 2017. 2. Hera Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018, dated 16 August 2018. 3. Hera Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019, dated 14 August 2019.		The Annual Reviews (prescribed in the Planning Approval) are accepted as fulfilling the requirements of this Condition for the preparation of Annual Environmental Management Reports (AEMR). Annual Reports have been prepared and submitted each year covered by the Audit Period.	COMPLIANCE			
4(b)	Environmental Management Report	(a) the EMR must: (i) report against compliance with the MOP; (ii) report on progress in respect of rehabilitation completion criteria;	1. Hera Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017, dated 14 August 2017. 2. Hera Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018, dated 16 August 2018. 3. Hera Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019, dated 14 August 2019.		All Annual Reviews refer back to statements made in the MOP and state if they were in accordance with MOP and if not, why not.	COMPLIANCE			
4(c)		(b) report on the extent of compliance with regulatory requirements; and (c) have regard to any relevant guidelines adopted by the Director-General.	1. Hera Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017, dated 14 August 2017. 2. Hera Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018, dated 16 August 2018. 3. Hera Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019, dated 14 August 2019.		The progress of rehabilitation against the plans in the MOP are reported in each of the Annual Reviews. See for example Section 6 of the 2018/19 MR.	COMPLIANCE			
5(a)	Environmental Incident Report	(a) the lease holder must report any environmental incidents. The report must: (i) be prepared according to any relevant Departmental guidelines; (ii) be submitted within 24 hours of the environmental incident occurring	1. Notice of PM10 exceedance and incident report - (18 July 2018) sent to DPE, DRE, EPA, CSC. 2. Notice of PM10 exceedance and incident report - (19 April 2018) sent to DPE, DRE, EPA, CSC. 3. Notice of PM10 exceedance and incident report - (30 March 2018) sent to DPE, DRE, EPA, CSC. 4. Notice of PM10 exceedance and incident report - (25 July 2017) sent to DPE, DRE, EPA, CSC. 5. Notice of PM10 exceedance and incident report - (22 November 2016) sent to DPE, DRE, EPA, CSC. 6. Notice of Dust Deposition exceedance and incident report - (September 2019) sent to DPE, DRE, EPA, CSC. 7. Notice of Dust Deposition exceedance and incident report - (September 2019) sent to DPE, DRE, EPA, CSC. 8. Notice of Dust Deposition exceedance and incident report - (September 2019) sent to DPE, DRE, EPA, CSC. 9. Notice of WAD exceedance and incident report - (20 September 2017) sent to DPE, DRE, EPA.		The Auditor has reviewed the reported environmental incidents and found exceedances (WAD and PM10 dust) for the Audit Period. The review of the correspondence provided indicates that all exceedances were reported to DPE, DRE, EPA and where required to Council.	COMPLIANCE			
5(b)		For the purposes of this condition, environmental incident includes: (a) any incident causing or threatening material harm to the environment (b) any breach of Conditions 1 to 9 and 11 to 24. (c) any breach of environmental protection legislation; or (d) a serious complaint from landholders or the public.				Noted			
5(c)		For the purposes of this condition, harm to the environment is material if: (i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or (ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000, where loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.				Noted			
6	Additional Environmental Report	Additional environmental reports may be required from time to time as directed in writing by the Director-General and must be lodged as instructed.		J Thompson: no reports have been required by DRE over the Audit Period.	DRE did not request any reports over the Audit Period.	Not Triggered			
7	Rehabilitation	Any disturbance as a result of activities under this lease must be rehabilitated to the satisfaction of the Director-General.	1. Mining Operations Plan for the Hera Mine PA10, 0191, dated January 2017. 2. Letter from the DPE (to Hera (J Simpson)), titled "Application for a Mining Operations Plan (MOP) for Mining Lease (ML) 1686, ML1746, Mining Act 1992, Hera Resources Pty Ltd of DPI approving the MOP", dated 27 February 2017.		The MOP (and therefore the Rehabilitation Management Plan) has been reviewed and approved by DPE. Progressive rehabilitation has commenced on the mine site.	COMPLIANCE			
8	Not Used	Not Used				Not Used			
9	Working Requirement	The lease holder must: (a) ensure that at least 52 competent people are efficiently employed in relation to the mining process or mining operations on the lease area (b) expend on operations carried out in the course of prospecting or mining the lease area, an amount of not less than \$650,000.00 per annum whilst the lease is in force. The Minister may at any time or times, by instrument in writing served on the lease holder, increase or decrease the expenditure required or the number of people to be employed	1. Aurelia Metals Limited 2017 Annual Report 2. Aurelia Metals Limited 2018 Annual Report		The Annual (Board) Reports published by Aurelia Resources confirm that the annual expenditure at the mine is in excess of \$650,000 per annum.	COMPLIANCE			
10(a)	Blasting	Current Version: The lease holder must ensure that the ground vibration peak particle velocity generated by any blasting within the lease area does not exceed 10 micrometres and does not exceed 5 micrometres in more than 5% of the total number of blasts over a period of 12 months at any dwelling or occupied premises, as the case may be, unless determined otherwise by the Department of Environment, Climate Change and Water.	1. Hera Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017, dated 14 August 2017. 2. Hera Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018, dated 16 August 2018. 3. Hera Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019, dated 14 August 2019.		868 blasts were initiated during the 2016/17 reporting year. No vibration exceedances were detected at any privately owned properties. 868 blasts were initiated during the 2017/18 reporting year. No vibration exceedances were detected at any privately owned properties.	COMPLIANCE			
10(b)		The lease holder must ensure that the blast overpressure noise level generated by any blasting within the lease area does not exceed 120 dB (blast) and does not exceed 115 dB (blast) in more than 5% of the total number of blasts over a period of 12 months, at any dwelling or occupied premises, as the case may be, unless determined otherwise by the Department of Environment, Climate Change and Water.	1. Hera Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017, dated 14 August 2017. 2. Hera Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018, dated 16 August 2018. 3. Hera Mine Annual Review Project Approval ID: 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019, dated 14 August 2019.		738 blasts were initiated during the 2018/19 reporting year. No vibration exceedances were detected at any privately owned properties. 868 blasts were initiated during the 2017/18 reporting year. No vibration exceedances were detected at any privately owned properties.	COMPLIANCE			

11	Safety	Operations must be carried out in a manner that ensures the safety of persons or stock in the vicinity of the operations. All shafts, shafts and excavations must be appropriately protected, to the satisfaction of the Director-General, to ensure that access to them by persons and stock is restricted. Abandoned shafts and excavations opened up or used by the lease holder must be notified in writing to the Department and filled in or otherwise rendered safe to a standard acceptable to the Director-General.	1. Incident Register	1. Audit interview (J Thompson): no damage to private property or livestock has occurred as a result of the blasting undertaken.	No damage to private property or livestock has occurred as a result of the blasting undertaken.	COMPLIANCE		
12	Prevention of soil erosion and pollution	Prospecting operations must be carried out in a manner that does not cause or aggravate air pollution, water (including groundwater) pollution, soil contamination or erosion, unless otherwise authorised by a relevant approval, and in accordance with an accredited Mining Operations Plan	1. Aurelia - Hera Gold WMP Water Management Plan 2018, prepared by GHD. 2. Draft Water Management Plan 2018, Version 6, dated November 2018.	1. No areas of soil erosion were observed during the Audit.	A surface water management plan has been prepared and implemented at the Mine. There was no evidence of erosion problems observed by the auditor.	COMPLIANCE		
13	Transmission Lines (etc)	Operations must not interfere with or impair the safety or efficiency of any transmission line, communication line, pipeline or any other utility on the lease area without the prior written approval of the Director-General and subject to any conditions stipulated.	1. Incident Register	1. Interview J Thompson, 19 November 2019. No requests have been received requesting repairs be made to any public infrastructure.	No instances of damage to public infrastructure have been identified for the Audit Period.	Not Triggered		
14(a)	Roads and Tracks	The lease holder must pay to the relevant roads authority in control of the road or track the reasonable costs incurred by the roads authority in making good any damage to roads or tracks caused by operations carried out under this lease less any amount paid or payable from the Mine Subsidence Compensation Fund	1. Council accounts database extracts: 31/7/2015 - \$10,000 1/4/2016 - \$65,000 18/1/2018 - \$22,000 15/10/2017 - \$43,500	1. Interview L. Richards. The road related payments made to Council consist of: \$82,500 - Hera's contribution to the Hermsdale-Nymagee sealing road project in 2018 \$22,000 - Maintenance grading of unsalted Hermsdale-Nymagee Road (2017/18 annual contribution) \$43,500 - Maintenance grading of unsalted Hermsdale-Nymagee Road (2015/16 & 2016/17 annual contributions) \$10,000 - Maintenance grading of unsalted Hermsdale-Nymagee Road (2015/16 & 2016/17 annual contributions once grading was completed).	1. The Nymagee - Hermsdale Road is sealed for its entire length. The Auditor travelled to the site via the concrete transport route.	COMPLIANCE		
14(b)		During wet weather the use of any road or track must be restricted so as to prevent damage to the road or track.	1. Aurelia - Hera Gold WMP Water Management Plan 2018, prepared by GHD. 2. Draft Water Management Plan 2018, Version 6, dated November 2018.	1. Interview L. Richards, 19 November 2019. Where required tracks around the site are closed during wet weather.	Drought conditions experienced over the Audit Period have resulted in no erosion issues being experienced.	COMPLIANCE		
14(c)		Existing access tracks should be used for all operations where reasonably practicable. New access tracks must be kept to a minimum and be positioned in order to minimise damage to the land, watercourses or vegetation.				Noted		
14(d)		Temporary access tracks must be rehabilitated and revegetated to the satisfaction of the Director-General as soon as reasonably practicable after they are no longer required under this lease.	1. Mining Operations Plan for the Hera Mine PALD, 0131, dated January 2017. 2. Letter from the DPE (to Hera (J Thompson), dated "Application for a Mining Operations Plan (MOP) for Mining Lease (ML) 1686, ML1746, Mining Act 1992, Hera Resources Pty Ltd of DPE approving the MOP", dated 27 February 2017.		The MOP (and therefore the Rehabilitation Management Plan) has been reviewed and approved by DPE. Progressive rehabilitation has commenced on the mine site.	COMPLIANCE		
15(a)	Trace and Vegetation	The lease holder must not fell trees, strip bark or cut timber on any land subject of this lease without the consent of the landholder who is entitled to the use of the timber.		1. Interview L. Richards, 19 November 2019. No works have been reported on any neighbouring properties.	No works have been undertaken on neighbouring properties during the Audit Period.	Not Triggered		
15(b)		The lease holder must correct Fences NSW and obtain any required permit, licence or approval before taking timber from any Crown land within the lease area.		1. J Thompson: No timber has been taken from lease areas.	No timber has been taken from lease areas.	Not Triggered		
16		Not Used		1. J Thompson: No timber has been taken from lease areas.		Not Used		
17(a)	Resource Recovery	Notwithstanding any description of mining methods and their sequence or of proposed resource recovery contained within the Mining Operations Plan, if at any time the Director-General is of the opinion that requests about the lease entitles the lease holder to mine and which are economically recoverable at the time are not being recovered from the lease area, so that any such resource which is being recovered is not being recovered to the extent which should be economically possible or which for environmental reasons are necessary to be recovered, notice in writing to the lease holder may be given requiring the holder to recover such resource.	1. Notices from DPE relating to any aspect of the mining operations			Noted		
17(b)		The notice shall specify the minerals to be recovered and the extent to which they are to be recovered, or the objectives in regard to resource recovery, but shall not specify the processes the lease holder shall use to achieve the specified recovery.	1. Notices from DPE relating to any aspect of the mining operations			Noted		
17(c)		The lease holder must, when requested by the Director-General, provide such information as the Director-General may request about the recovery of the mineral resources of the leased area.		1. J Thompson: DPE has not served any notices relating to the mining operations requiring the provision of a report.	DPE has not served any notices on or required any reports from Hera over the Audit Period.	Not Triggered		
18	Indemnity	The lease holder must indemnify and keep indemnified the Crown from and against all actions, suits, claims and demands of whatsoever nature and all costs, charges and expenses which may be brought against the lease holder or which the lease holder may incur in respect of any accident or injury to any person or property which may arise out of the construction, maintenance or working of any workings now existing or to be made by the lease holder within the lease area or in connection with any of the operations notwithstanding that all other conditions of this lease shall in all respects have been observed by the lease holder or that any such accident or injury shall arise from any act or thing which the lease holder may be licensed or compelled to do.	Noted			Noted		
19(a)	Security	This authorisation is subject to a condition that the holder of the authorisation is required to provide and maintain a security deposit to secure funding for the fulfilment of obligations of all or any kind under the authorisation, including obligations of all or any kind under the authorisation that may arise in the future.	Noted			Noted		
19(b)		The amount of the security deposit to be provided has been assessed by the Director-General of the Department of Trade and Investment, Regional Infrastructure and Services as \$2,475,000.00.	1. Deed of Security Bond (Weespac) for the sum of \$2,933,000 in favour of the Department of Industry, Skills, and Regional Development		The required bond has been established.	COMPLIANCE		
19(c)		The security deposit is to be provided by way of a cash deposit (with no endorsement to any interest therein) or in such other form as may be approved by the Director-General (or their delegate).	1. Deed of Security Bond (Weespac) for the sum of \$2,933,000 in favour of the Department of Industry, Skills, and Regional Development		The required bond has been established.	COMPLIANCE		
20		Not Used				Not Used		
21		Not Used				Not Used		
22(a)		Notwithstanding any Mining Operations Plan, the lease holder must not mine within any part of the lease area which is within the notification area of the proposed savings storage area without the prior written approval of the Minister and subject to any conditions stipulated.			1. No evidence of mining outside of the lease area was observed by the Auditor.	COMPLIANCE		
22(b)		Where the lease holder desires to mine within the notification area he or she must: (i) at least twelve (12) months before mining is to commence or such lesser time as the Minister may permit, notify the Minister of the desire to do so. A plan of the mining system to be implemented must accompany the notice, and (ii) provide such information as the Minister may direct.	1. Correspondence requesting approval to mine within the notification area.			Noted		
22(c)	Prescribed Dam	The Minister must, not, except in the circumstances set out in sub-paragraph (b), grant approval unless sub-paragraph (i) of this paragraph has been complied with. This sub-paragraph is complied with if: (i) the Dams Safety Committee as constituted by Section 7 of the Dams Safety Act 1978 and the owner of the dam have been notified in writing of the desire to mine referred to in paragraph (b); (ii) the notifications referred to in clause (i) are accompanied by a description or plan of the area to be mined; (iii) the Director-General has complied with any reasonable request made by the Dams Safety Committee or the owner of the dam for further information in connection with the mining proposal; (iv) the Dams Safety Committee has made its recommendations concerning the mining proposal or has informed the Minister in writing that it does not propose to make any such recommendations; and (v) where the Dams Safety Committee has made its recommendations the approval is in terms that are in accordance with those recommendations; or where the Minister does not accept those recommendations or any of them - in accordance with a determination under sub-paragraph (i) of this paragraph. (vi) Where the Minister does not accept the recommendations of the Dams Safety Committee or where the Dams Safety Committee has failed to make any recommendations and has not informed the Minister in writing that it does not propose to make any recommendations, the approval shall be in terms that are, in relation to matters dealing with the safety of the dam, as determined by agreement between the Minister and the Minister administering the Dams Safety Act 1978; or in the event of failure to reach such agreement - as determined by the Panel.	Noted			Noted		
22(d)		The Minister, on notice from the Dams Safety Committee, may at any time or times: (i) cancel any approval given where a notice pursuant to Section 18 of the Dams Safety Act 1978 is given; (ii) suspend for a period of time, alter, omit from or add to any approval given or conditions imposed.				Noted		
23	Suspension of Mining Operations	The holder of a mining lease may not suspend mining operations in the mining area other than in accordance with the consent of the Minister.	Not Triggered			Noted		
24	Cooperation Agreement	The lease holder must make every reasonable attempt, and be able to demonstrate their attempts, to enter into a cooperation agreement with the holder(s) of any overlapping title(s). The cooperation agreement should address but not be limited to issues such as: • access arrangements • operational interaction procedures • dispute resolution • information exchange • well location • timing of drilling • potential resource extraction conflicts and • rehabilitation issues.			There are no overlapping mining titles related to this Project.	Not Triggered		