

BARNETT & MAY

CMOC Northparkes Mine

2021 Independent Environmental Audit

Prepared for
CMOC Mining Pty Ltd.

Client representative
Michael Thomas

Date
15 July 2021

Rev 0



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Prepared by — K. Holmes		Date 15 July 2021
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Revision History

Rev No.	Description	Prepared by	Reviewed by	Authorised by	Date
A	Draft for client Review	K. Holmes	T Wilkins	K. Holmes	4/6/2021
0	Final	K. Holmes	T Wilkins	K. Holmes	15/7/2021
1					
2					

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1. Introduction

The CMOC-Northparkes Mine is a copper and gold mine located 27 kilometres north-west of Parkes, in the Central West of New South Wales, Australia. The mine is owned and operated by CMOC Mining Pty Ltd, a joint venture between China Molybdenum Co. Ltd and the Sumitomo Group.

The purpose of the audit, that was undertaken in accordance with the **Barnett and May's** proposal (dated 1 March 2021), was to determine if the compliance obligations contained in the Project Approval (11_0060) Schedule 6, Conditions 9 and 10, which state:

C9 - "By the (sic) March 2015, and every 3 years thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the development.

(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 relevant requirements in this approval and any relevant EPL(s) (including any assessment, plan or program required under these approvals);

(d) review the adequacy of strategies, plans or programs required under the abovementioned approval or licences; and

(e) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or Program required un these consents.

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

C9 – Within 3 Months of commissioning this audit, or as otherwise agreed by the *Secretary*, the *Proponent* must submit a copy of the audit report to the *Secretary*, together with its response to any recommendations contained in the Audit Report.

The Audit was commissioned on 26 April 2021 following approval of the audit team by DPIE. The site inspection was undertaken by Ken Holmes (Accredited Lead Auditor) of Barnett & May in April 2021. The audit covered the period from 1 July 2018 to 30 June 2021 (the Audit Period).

1.1 Limitations of this Report

In preparing this Independent Environmental Audit Report, Barnett and May has assessed the activities appropriate and necessary to evaluate the compliance status against the conditions contained in the Auditee's Project Approval. Barnett and May has addressed the general technical matters which might reasonably be considered to be relevant to such an assessment.

The findings of this Independent Environmental Audit are based on observations of the site, interviews with personnel nominated by the Auditee and review of the documentation provided by the Auditee. Barnett and May has relied on the accuracy and completeness of the documentation and other information provided by the Auditee.

Barnett and May can only advise based on the information provided to them and therefore cannot dismiss the possibility that compliance or environmental performance issues, other than those presented in the report existed at the time of this Audit.

The audit findings presented in this report are professional opinions based solely upon Barnett and May's visual observations of the site, and upon Barnett and May's interpretation of the documentation reviewed, interviews and conversations with personnel nominated by the Auditee, as referenced in this report. These conclusions are intended exclusively for the purposes stated herein, at the site listed, and for the project indicated. Opinions presented in this report apply to the site's conditions and features as they existed at the time of Barnett and May's site visit in April 2021, and those reasonably foreseeable. They necessarily cannot apply to conditions and features which Barnett and May is unaware of and has not had the opportunity to evaluate. This report does not, and does not purport to, give legal advice

on the actual or potential environmental liabilities of any individual or organisation.

1.2 The CMOC-Northparkes Mine.

The Northparkes Mine Project Approval (11_0060) was granted on 16 July 2014 under Section 75J of the NSW EP&A Act) by the NSW Minister for Planning and Infrastructure and has been modified five times, the most recent modification granted on 30 August 2019 for the temporary haul road. Mining on the site commenced (under a former approval) in 1997.

At the time of the audit, two areas of underground mining were producing copper / gold ore. No open cut operations are currently operating, however recovery of previously mined ore from the previous open cut operations is occurring. The mined ore is processed on site to produce a high-grade copper concentrate which is then transported by road train to the Goonumbla rail siding approximately 13 kilometres from the mine. The containers are then placed onto a train and transported to Port Kembla. The concentrate is then shipped to customers primarily in China, Japan and India.

The production of ore concentrates results in the production of tailings which are stored (permanently) in a series of Tailings Storage Facilities (TSFs).


In addition to the mine, Northparkes owns over 10,000 Ha of land, with approximately 6,500 Ha being commercially farmed.

2. Definitions

Acronyms	Description
ACHMP	Aboriginal Cultural Heritage Management Plan
AER	Annual Environmental Review
AHIP	Aboriginal Heritage Impact Permit
AEMR	Annual Environmental Management Review
AR	Annual Review
AQMP	Air Quality Management Plan
BMP	Biodiversity Management Plan
BOS	Biodiversity Off-set Strategy
CC	Construction Certificate
CCC	Community Consultative Committee
CMOC	China Molybdenum Co. Ltd
DPE	Department of Planning and Environment (former planning department name)
DPI	(former) Department of Primary Industries
DPIE	Department of Planning, Industry and Environment.
EFS	Environment and Farms Superintendent
EMS	Environmental Management Strategy
EPA	NSW Environment Protection Authority
EP&A Act	NSW Environmental Planning and Assessment Act
EPBC	Environmental Protection and Biodiversity Conservation Act
EPL	Environmental Protection License
GMP	Groundwater Management Plan
IEA	Independent Environmental Audit
MOP	Mining Operations Plan
NOW	NSW Office of Water
NMP	Noise Management Plan

Acronyms	Description
NPM	Northparkes Mine
OC	Occupation Certificate
OEH	NSW Office of Environment and Heritage
OEMP	Operational Environmental Management Plan
PA	Project Approval
PSC	Parkes Shire Council
PIRMP	Pollution Incident Response Management Plan
RAP	Registered Aboriginal Group
REF	Review of Environmental Factors
RMP	Rehabilitation Management Plan
RMSS	Risk Management and Safety System
SWAF	Surface Water Assessment Forms
SWB	Site Water Balance
SWMP	Surface Water Management Plan
SWVR	Surface Water Validation Report
TEOM	Tapered Element Oscillating Microbalance (Samplers)
TMP	Traffic Management Plan
TSF	Tailing Storage Facility
WMP	Water Management Plan

3. Auditor Certification

Independent Audit Certification Form	
Development Name	CMOC-Northparkes Mine
Application Number	11_0060
Description of Development	Copper Mine
Development Address	McClintocks Lane, Goonumbla, NSW
Proponent	CMOC Mining Pty Ltd
Operator Address	CMOC-Northparkes Mines PO Box 995, Parkes NSW 2870 Australia
Title of Audit	CMOC Northparkes Mine 2021 Independent Environmental Audit
<p><i>I certify that I have undertaken the independent audit and prepared the contents of the attached independent audit report and to the best of my knowledge:</i></p> <ul style="list-style-type: none"> <i>The audit has been undertaken in accordance with relevant approval condition(s) and in general accordance with the auditing standard AS/NZS ISO 19011:2011 and in general conformance with the DPE's Independent Audit Post Approval Requirements (June 2018).</i> <i>The findings of the audit are reported truthfully, accurately and completely;</i> <i>I have exercised due diligence and professional judgement in conducting the audit;</i> <i>I have acted professionally, in an unbiased manner and did not allow undue influence to limit or over-ride objectivity in conducting the audit;</i> <i>I am not related to any owner or operator of the development as an employer, business partner, employee, sharing a common employer, having a contractual arrangement outside the audit, spouse, partner, sibling, parent, or child;</i> <i>I do not have any pecuniary interest in the audited development, including where there is a reasonable likelihood or expectation of financial gain or loss to me or to a person to whom I am closely related (i.e. immediate family);</i> <i>Neither I nor my employer have provided consultancy services for the audited development that were subject to this audit except as otherwise declared to the lead regulator prior to the audit; and</i> <i>I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from fair payment) from any owner or operator of the development, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.</i> <p>Note.</p> <p><i>a) The Independent Audit is an 'environmental audit' for the purposes of section 122B (2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000.</i></p> <p><i>b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or \$22,000, or both).</i></p>	
Signature	
Name of Lead/Principal Auditor	Ken Holmes
Address	4 Baeckea Place, Frenchs Forest, NSW
Email Address	ken@baeckea.com.au
Auditor Certification (if relevant)	Exemplar Global 14065
Date	15 July 2021

3.1 Audit Details

Audit Title:	CMOC Northparkes Mine 2021 Independent Environmental Audit
Site:	Northparkes Mine, Parkes, New South Wales
Client Contact:	Michael Thomas
Position:	Environmental Advisor
Client:	CMOC Mining Pty Ltd
Client Address:	CMOC-Northparkes Mines PO Box 995 Parkes NSW 2870 Australia
Client Phone Number	02 6861 3000
Client Email:	Michael.thomas@au.cmoc.com
Audit Team:	Ken Holmes (Certified Lead Auditor)
Auditor's Telephone:	0438 046 261
Auditor's Email:	ken@baeckea.com.au
Date of Site Visit	28 April 2021
Site Visit Completion Date	29 April 2021
Audit Scope:	<p>The audit was undertaken as per the brief outlined in the Barnett and May proposal (dated 1 March 2021). As such, the audit provides an assessment of the compliance of the project with the conditions of the following approvals:</p> <ul style="list-style-type: none"> • Northparkes Mine Step Change Project Approval 11_0060 (consolidated approval) • Environmental Protection Licence (EPL) No. 4784 • Mining Leases 1247, 1367, 1641 and 1743. <p>The scope of this Independent Environmental Audit complies with the requirements of the New South Wales Department of Planning, Industry and Environment (DPIE) Independent Audit Post Approval Guidelines May 2020.</p>

4. Audit process

4.1 Audit Guidelines

This audit report has also been prepared in accordance with the 'Independent Audit Guideline, May 2020 (Audit Guidelines) (DP&E, 2020). [Table 1](#) lists key requirements from the Audit Guidelines, the relevant Section of the Guidelines which references the requirement and indicates where each is addressed in this report.

Table 1 - Post Approval Audit Guidelines

Section	Independent Audit Report Requirements	Addressed
4.1	Version Control	
	1) the application number of the project;	Section 3
	2) each version or revision number of the report;	Page iii
	3) the date on which the report was prepared and issued to the Department; and	Page iii
	4) the title and name of the person who certified the Independent Audit Report.	Section 3.1
4.2	Contents	
4.2.1	Introduction – a brief overview of the audit including:	
	1) background of the project;	Section 1.2
	2) the audit team (including qualifications and experience);	Section 3.1
	3) the objectives of the audit;	Section 1
	4) the audit scope; and	Section 3.1
	5) the temporal period covered by the audit.	Section 1
4.2.2	Audit Methodology	
	1) documentation from the Planning Secretary agreeing to the auditor and any technical specialist(s);	Appendix C
	2) how the audit scope was developed;	Section 5
	3) a summary of the audit process adopted to determine the compliance status and assess if documents are adequate;	Section 4
	4) site personnel interviewed including their name and position title (and including if access was not granted or possible with any required personnel and why);	Section 4.5.3
	5) details of site inspections undertaken (including any areas where access was not granted or possible and why);	Section 4.5.2
	6) a summary of the consultation undertaken; and	Section 5
	7) meanings of compliance status descriptors used, as set out in this document.	Section 4.6
4.2.3	Audit Findings	
	1) a list of the approvals and documents audited;	Appendix A
	2) a summary of the assessment of compliance i.e. comparison between the total number of compliance requirements and any non-compliances identified during the reporting period. Graphics can be used to summarise project performance in relation to compliance requirements;	Section 6.1
	3) a summary of any notices, orders, penalty notices or prosecutions issued in relation to the consent during the audit period;	Section 7.3

Section	Independent Audit Report Requirements	Addressed
	4) exception reporting of all non-compliances identified during the audit period. Details must include the relevant consent condition, the condition reference number, a unique non-compliance identification number, details of the non-compliance and the auditor's recommended actions that are proposed to be taken or have been taken to address the non-compliance;	Section 6.2
	5) a brief discussion or table of the status of actions arising from previous audits and the progress or outcomes of each action. Details must include the source of the action, reference (condition number), action proposed, proposed completion date, the status (date completed, if relevant) and the action complete.	Section 7.6
	6) a brief discussion of whether the Environmental Management Plans, Sub-plans and compliance documents are adequate, implemented and whether there are any opportunities for improvement;	Section 7.5
	7) a discussion of other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance;	Section 7.9
	8) documentation of any feedback received as a result of consultation undertaken with the Department, and other agencies or stakeholders including the community and Community Consultative Committee for the audit and the outcomes of this consultation;	Section 5
	9) a summary of complaints, and the adequacy of the response to, and management of complaints;	Section 7.2
	10) details of any incidents (including any enforcement action by any agency) and the adequacy of the response to, and management of such incidents;	Section 7.1
	11) an assessment of the compliance between actual and predicted impacts documented in environmental impact assessment, including an assessment of the physical extent of the development in comparison with the approved boundary and any potential off-site impacts of the development required under the Environmental Planning and Assessment Act 1979;	Section 7.8
	12) evidence collected through site inspections undertaken during the audit;	Appendix A
	13) evidence to support compliance assessment provided by the personnel interviewed during the audit;	Appendix A
	14) a brief discussion of any continual environmental management improvement opportunities identified as part of the audit; and	Section 6.2
	15) key strengths of the development's environmental management and performance identified by the auditor.	Section 7.4
4.2.4	Recommendations and opportunities for Improvement	Section 6.2
4.2.5	<p>Appendices</p> <p>1) a completed Independent Audit Table with all relevant conditions of consent, identifying each requirement, compliance status</p>	Appendix A

Section	Independent Audit Report Requirements	Addressed
	assessed, documenting verified evidence and providing recommendations for any non-compliance that is identified;	
	2) a copy of documentation from the Planning Secretary agreeing to the auditor and any technical specialist(s);	Appendix C
	3) documentation detailing consultation with the Department, and other agencies or stakeholders including the community and Community Consultative Committee;	Appendix D
	4) completed and signed Independent Audit Declaration Form(s);	Section 3
	5) any reports prepared by the agreed technical specialist(s), as required; and	Appendix F
	6) site inspection photographs.	Appendix B

Note 1: Compliance against the requirements of the Environment Protection Licence (EPL) has been undertaken in this Audit as the scope of the Independent Environmental Audit in the Conditions of Approval relevant to this development specifically includes the EPL.

4.2 Overview

The audit process and methodology are summarised in this section, and comprised the following key undertakings:

- Preliminary planning activities
- Review of information and preparation of a compliance register (audit protocol / checklist)
- Site inspection and interviews:
 - Opening meeting
 - Site inspection
 - Review of relevant records
 - Review of additional information provided after the site inspection
- Preparation of this audit report.

4.3 Preliminary activities

Off-site planning for the site audit comprised:

- Initial discussions with client representative, to organise the site inspection and access to audit documentation
- Prepare the audit compliance checklist.
- Completion of a project specific Risk Assessment
- Review of online information
- Submission of a preliminary document / record request
- Consultation with relevant agencies.

4.3.1 Approval of audit teams

CMOC - Northparkes Mines sought the Secretary's endorsement for the audit team to undertake this Independent Environmental Audit. The Secretary approved the appointment of the Auditor (Ken Holmes) on 12 March 2021 (Appendix C):

4.3.2 Consultation with Agencies

The Auditor consulted with the following agencies during the audit planning stage:

- Department of Planning, Industry and Environment (DPIE);
- DPIE Resources Regulator (DRE);
- NSW Environment Protection Authority (EPA);
- Parkes Shire Council (PSC)
- Community Consultative Committee (CCC)

Emails were initially sent (via Email) to each of the above agencies advising them of the audit and the scope of the audit and inviting them to provide comments/requirements or specific environmental issues they required the audit to target. Where required (where no response was provided by the nominated stakeholder organisation, a follow up email was sent to repeat the invitation to provide input into the audit. Details of the responses from each group / organisation is provided in Section 5.

4.4 Information Review and Compliance Register

Prior to the site inspection the Auditor prepared a detailed audit checklist (spreadsheet) that was used to assess and track compliance. This spreadsheet formed the basis of the compliance register presented in Appendix A of this report.

4.5 Site audit

The site inspection component of the audit was undertaken on 28 and 29 April 2021.

4.5.1 Opening Meeting

Following site inductions, the opening meeting was held on-site. It was attended by the following personnel:

- Hubert Lehman (Managing Director)
- Michael Thomas (Environmental Advisor)
- Jacques Labuschagne (Finance Director)
- Jianjun Tian (Deputy Managing Director)
- Stacey Kelly (Manager - People, Safety and Environment)
- Kirk McGinnes (Manager – Asset Management)
- Angus Wyllie (Manager – Technical Services)
- Rob Cunningham (Manager – Operations)
- Ken Holmes (Lead Auditor) – Barnett and May.

Introductions were made, and the purpose and scope of the audit was outlined. An explanation of the audit process was communicated. That is, a site inspection, site interviews and detailed review of records in order to identify compliance with the approval conditions relevant to the current operations at the site.

4.5.2 Site Inspections

An initial tour of the site was undertaken by the Auditor. Subsequent detailed inspections of specific areas of the operation were subsequently undertaken. The site inspection included observation of:

- Site access and security;
- Ore concentration plant;
- Ore Stockpiles and conveyer system;
- Waste storage areas;
- Fuel and dangerous goods storage areas;
- Surface refuelling areas;
- Equipment maintenance area;
- Equipment Laydown areas;
- Rehabilitation areas;
- Bioremediation pad;
- Weather Station;
- Process Water Dam;

- Control Room (surface);
- Dust control infrastructure;
- Tailings Storage Facilities; and
- Surface water management infrastructure.

Note that the Auditor did not inspect any underground facilities. The Auditor was provided access to all areas of the site.

4.5.3 Site Interviews

Audit interviews comprised of a series of meetings with:

- Hubert Lehman (Managing Director)
- Michael Thomas (Environmental Advisor)
- Chris Higgins (Superintendent Environment and Farms)
- Stacie Martin (Regulatory Compliance Specialist)
- Nathan Welsh (Maintenance Improvement Superintendent)
- Nathaniel Dixon (Fixed Plant Maintenance Superintendent)
- Brett Williams (Mobile Equipment Maintenance Senior Planner)
- Sarah Webster (Life of Mine Planning and Studies Leader)
- Dylan Morgan (Technical Superintendent)
- Stacey Kelly (Manager - People, Safety and Environment)
- Matt Burkitt (Farm Specialist)
- Andrew Wotton (Commercial Superintendent)

4.5.4 Document review

Compliance related documents that were not available prior to, and during site discussions of, the audit, were requested to be provided following the audit. The Auditee's personnel assisted with the provision of documentation following the audit, through secure file transfer mechanisms. The key documents reviewed during this audit are listed in the Compliance Registers against specific conditions.

4.6 Reporting

The compliance register was completed using notes and observations recorded during the site inspection / interviews and review of appropriate documentation. The completed compliance register is presented in **Appendix B**. A summary of the non-compliances identified during this audit are provided in Table 5. The audit criteria used to determine compliance for this audit is defined in Table 2.

Table 2 - Compliance Assessment Matrix

Assessment	Criteria
Compliance	<p>Compliance</p> <p>The site complies with the requirements of applicable pre-operational Consent Conditions.</p> <p>A judgment made by an auditor that the activities undertaken, and the results achieved fulfil the specified requirements of the audit criteria. While further improvements may still be possible, the minimum requirements are being met.</p>
Non-Compliance	<p>Non-Compliance</p> <p>Clear evidence has been collected to demonstrate the requirement has not been complied with and is within the scope of the audit.</p> <p>Site displays little or no evidence of compliance with the requirements of the regulatory documentation.</p> <p>Note: Where the auditor has not been able to collect enough verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit. In the absence of enough verification, the auditor may in some instances be able to verify by other means (visual inspection, personal communication, etc.) that a requirement has been met. In such a situation, the requirement should still be assessed as not verified. As the condition cannot be verified it is treated as a non-compliance.</p>
Not Triggered	<p>Not Applicable / Not Triggered</p> <p>The respective condition / requirement was not activated within the scope of the audit.</p>
Noted	<p>A statement or fact, where no assessment of compliance is required.</p>

Risk levels for each non-compliance identified have been assessed in accordance with Table 2.

Table 3 - Risk Assessment Matrix

Risk Level	Description
High	Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence.
Medium	Non-compliance with: <ul style="list-style-type: none"> • potential for serious environmental consequences, but is unlikely to occur; or • potential for moderate environmental consequences but is likely to occur.
Low	Non-compliance with: <ul style="list-style-type: none"> • potential for moderate environmental consequences, but is unlikely to occur; or • potential for low environmental consequences but is likely to occur.
Administrative non-compliance	Only to be applied where the non-compliance does not result in any risk of environmental harm (e.g. submitting a report to government later than required under approval conditions).

5. Stakeholder Consultation

Table 4 provides a summary of the Stakeholder Consultation undertaken by the Auditor.

Table 4 - Summary of Stakeholder Inputs

Department	Contact	Stakeholder Comments	Auditor Response
NSW Department of Planning, Industry and Environment	Katrina O’Rielly Team Leader Compliance	<p>The Department would like areas such as below looked at:</p> <ul style="list-style-type: none"> • Compliance with management plans generally; • Air quality such as dust management; • Water management on site including management of erosion/sediment and sediment basins; • Rehabilitation progress; and • Complaints register and community consultation. 	Refer to the detailed compliance assessment table in Appendix 1.
Parkes Council	Ben Howard	No response was received from Council.	
NSW EPA	Joshua Loxley	No response was received from the EPA.	
DPIE Resources Regulator (DRE)	Jenny Ehmsen	<p>Thank you for your email dated 31 March 2021 requesting consultation on the independent audit to be undertaken of the Northparkes Mine which is covered by the mining titles listed below.</p> <p>The Resources Regulator requires that the following issues be addressed in independent environmental audits undertaken in accordance with a planning consent condition.</p> <ul style="list-style-type: none"> • Review relevant mining leases and exploration licences as agreed with Resources Regulator. 	<p>Relevant mining leases and licences are in place.</p> <p>An assessment of compliance against the conditions of those leases is provided in Appendix 1.</p> <p>An approved MOP is in place.</p> <p>A high-level review of the MOP has been undertaken and found that the document meets the general requirements of the Approval.</p>

Department	Contact	Stakeholder Comments	Auditor Response
		<ul style="list-style-type: none"> • Undertake an assessment of compliance against the conditions of title related to environmental management. • Verify that there is a current Mining Operations Plan (MOP) in place, and it has been approved by the Regulator – review compliance against any conditions of approval of the MOP. • Undertake a critical review of the MOP, including an assessment of its compatibility with the description of operations contained in the planning approval. In particular: <ul style="list-style-type: none"> • Review the rehabilitation strategy as outlined in the MOP to determine if it is consistent with the Project Approval in terms of progressive rehabilitation schedule; and proposed final land use(s). • Review the rehabilitation objectives and completion criteria as outlined in the MOP to determine if they have been developed in accordance with the proposed final land use(s) as outlined in the Project Approval. <p>Review the development and implementation of any rehabilitation monitoring programs to assess performance against the nominated objectives and completion criteria – verified by reviewing monitoring reports and rehabilitation inspection records.</p> <ul style="list-style-type: none"> • Determine if a rehabilitation care and maintenance program has been developed and implemented based on the outcomes of monitoring program – verified by reviewing Annual Rehabilitation Programs or similar documentation. 	<p>Rehabilitation of the site will occur at the end of mine life. Post mine land use is addressed in the MOP and rehabilitation objectives established.</p> <p>A rehabilitation care and maintenance program has not yet been developed.</p> <p>The mining operations are being undertaken in accordance with the intent of the MOP.</p>

Department	Contact	Stakeholder Comments	Auditor Response
		<ul style="list-style-type: none"> • Confirm that mining operations are being conducted in accordance with the approved MOP (production, mining sequence etc.), including within the designated MOP approval boundary – to be verified by site plans and site inspection. • Confirm that rehabilitation progress is consistent with the approved MOP as verified by site plans and a site inspection. This should include an evaluation against rehabilitation targets and whether the final landform is being developed in accordance with conceptual final landform in the Project Approval. • Based on a visual inspection, determine if there are any rehabilitation areas that appear to have failed or that have incurred an issue that may result in a delay in achieving the successful rehabilitation outcomes. <p>In addition to the above, the audit should note observations where rehabilitation procedures, practices and outcomes represent best industry practice.</p> <p>It would be appreciated if a copy of the final audit report could be sent to the Regulator at nswresourcesregulator@service-now.com upon completion of the audit.</p>	
Community Consultative Committee	David Johnson (Independent Chair)	Thanks for your email. I have been chairing the Northparkes Mine CCC for most of the last two years and am not aware of any issues that would warrant bringing to your attention, or that you would not be aware of from your routine inquiries. My impression is that the environmental management of the Northparkes operation is	Noted

Department	Contact	Stakeholder Comments	Auditor Response
		generally of a high standard and this is reflected in the scarcity of community complaints and good relations which exist between the mine and the community.	

6. Statutory Compliance and Recommendations

Compliance with the Conditions of Consent and the Environment Protection Licence has been reviewed by assessing compliance against the various documentation related to project approval, as listed in section 2.2 of this report. The Compliance Register presented in Appendix A provides a detailed review of the compliance status of the site, including recommendations to address non-conformances.

6.1 Summary of Compliance Status

A summary of compliance with pre-operations statutory requirements is provided in Table 5 - Summary of Statutory Compliance. The number of conditions include sub-clauses within each approval document.

Table 5 - Summary of Statutory Compliance

Approval/ Licence	No. of Conditions	Compliant	Non- Compliant	Noted	n/or Not Triggered
PA 11_0060	171	129	17	18	7
EPL 4784	69	53	1	4	11
Mining Leases	14	8	1	2	5

6.2 Non-Compliances and other recommendations

Non-compliances identified during the site inspection, interviews and document reviews are recorded in detail in the Compliance Registers in **Appendix A** and are summarised in Table 6. Recommendations for improvements (Observations) are presented in Table 7. Recommendations have been made to address all identified Non-Compliances and Observations.

Table 6 - Statutory Non-Compliances

No.	Condition	Observation	Recommendation	Risk Level
Project Approval 11_0060				
Sch 2 Cond 8	Within 12 months of the date of this approval, or as otherwise agreed by the Secretary, the Proponent shall surrender the existing project approval PA06_0026 and development consent DA11092 in accordance with Section 104A of the EP&A Act. This requirement does not extend to the surrender of the Forbes Water Pipeline Development Consent DA2009/0057.	<p>The 2018 IEA verified that all consents other than PA06_0026 had been surrendered.</p> <p>Consent PA06_0026 and DA DA11092 were surrendered on 20 June 2018. It is noted that the surrender of the consents occurred after the 12-month period specified in this Condition.</p>	Northparkes request that this condition be removed during from the consent during the next Modification of Development Consent	Administrative non-compliance
Sch 3 Cond 5	<p>The Proponent shall prepare and implement a Noise Management Plan for the project to the satisfaction of the Secretary. The plan must:</p> <p>(d) include a monitoring program that:</p> <ul style="list-style-type: none"> evaluates and reports on: <ul style="list-style-type: none"> the effectiveness of the noise management system; compliance against the noise criteria in this approval; and compliance against the noise operating conditions; includes a program to calibrate and validate the real-time noise monitoring results with the attended monitoring results over time (so the real-time noise monitoring program can be used 	<p>Section 8 of the Noise Management Plan details the noise monitoring program.</p> <p>No information relating to calibration or validation of noise monitoring results is contained in the plan.</p> <p>Section 6.5 defines what constitutes a noise incident and the reporting requirements.</p>	Revise the Noise Management Plan to include the description (see Environmental Advisor Explanation in Column 5) of the operation of the unattended Noise Monitoring Program as a source of validation data.	Administrative non-compliance

No.	Condition	Observation	Recommendation	Risk Level
	<p>as a better indicator of compliance with the noise criteria in this approval and trigger for further attended monitoring); and</p> <ul style="list-style-type: none"> defines what constitutes a noise incident and includes a protocol for identifying and notifying the Department and relevant stakeholders of any noise incidents. 			
Sch 3 Cond 21	Unless an EPL authorises otherwise, the Proponent shall comply with Section 120 of the POEO Act.	<p>On 15 April 2019 slurry from the Secondary Crusher discharged into Goonumbla Creek. The creek was dry at the time of the incident and the slurry was successfully removed. No water pollution occurred as a result of this incident. Note however, that the EPA issued an official caution as a result of the incident.</p> <p>The incident investigation undertaken by Northparkes identified operator error as the cause and implemented further training in materials management.</p>	The incident has been investigated and appropriate action taken. No further action required.	Medium
Sch 3 Cond 23 c (i)	<p>The Proponent shall prepare and implement a Water Management Plan. This plan must include a:</p> <p>(i) Site Water Balance that:</p> <ul style="list-style-type: none"> includes details of: <ul style="list-style-type: none"> sources and security of water supply, including contingency planning for future reporting periods; water use and management on site; reporting procedures, including the preparation of a site water balance for each calendar year; describes the measures that would be implemented to minimise clean water use on site; 	<p>Section 5.1 of the Water Management Plan provides an overview of the Site Water Balance.</p> <p>Section 5.1 does not contain detail regarding contingency planning or reporting procedures.</p>	Review and revise Section 5.2 of the Water Management Plan to include all requirements of Schedule 3 Condition 23(c) (i).	Administrative non-compliance
Sch 3 Cond 23 c (ii)	<p>(ii) Surface Water Management Plan, that includes:</p> <ul style="list-style-type: none"> detailed baseline data on water flows and quality in the waterbodies that could be affected by the project; a detailed description of the water 	<p>The SWMP/WMP does not include:</p> <ul style="list-style-type: none"> detailed baseline data on water flows and quality in the waterbodies that could be affected by the project (section 6 of the SWMP contains some baseline data on water quality (pH, electrical conductivity, total suspended solids and copper), but there is no 	Review and revise Surface Water Management Plan to include all requirements of Schedule 3 Condition 23(c) (ii).	Administrative non-compliance

No.	Condition	Observation	Recommendation	Risk Level
	<p>management system on site;</p> <ul style="list-style-type: none"> • detailed plans, including design objectives and performance criteria, for the: <ul style="list-style-type: none"> - tailings storage facilities; - final voids (see the Rehabilitation Objectives in Table 8); • detailed performance criteria for the following, including trigger levels for investigating any potentially adverse impacts associated with the project: <ul style="list-style-type: none"> - the water management systems (clean, dirty and contaminated); - downstream surface water quality; - downstream flooding impacts; and - stream and riparian vegetation health for Bogan River, Tenandra Creek, Goonumbla Creek and Cookopie Creek; • a program to monitor and report on: <ul style="list-style-type: none"> - the effectiveness of the water management systems (clean, dirty and contaminated); - surface water flows and quality, stream and riparian vegetation health in the watercourses that could be affected by the project; and - downstream flooding impacts; • reporting procedures for the results of the monitoring program; and • a plan to respond to any exceedances of the performance criteria, and mitigate any adverse surface water impacts of the project; 	<p>data on water flows);</p> <ul style="list-style-type: none"> • detailed plans, including design objectives and performance criteria, for the: <ul style="list-style-type: none"> - tailings storage facilities; - final voids; • detailed performance criteria, other than trigger levels, for: <ul style="list-style-type: none"> - the water management systems (clean dirty and contaminated); <ul style="list-style-type: none"> - downstream surface water quality; - downstream flooding impacts; and - stream and riparian vegetation health for Bogan River, Tenandra Creek, Goonumbla Creek and Cookopie Creek; • a program to monitor and report on downstream flooding impacts. 		
Sch 3 Cond 23 c (iii)	<p>iii) Groundwater Management Plan, that includes:</p> <ul style="list-style-type: none"> • detailed baseline data on groundwater levels, yield and quality in the region and privately-owned groundwater bores that could be affected by the project; • groundwater assessment criteria, including 	<p>The GWMP/WMP does not include:</p> <ul style="list-style-type: none"> - detailed baseline data on groundwater levels, yield and quality in the region and privately-owned groundwater bores that could be affected by the project (section 6 of the GWMP provides some baseline data regarding pH, TDS, and spatial and temporal variations in water quality across the Northparkes site near the ore bodies); - a program to monitor and report on groundwater inflows to the sub-level 	Review and revise Section 5.2 of the Groundwater Management Plan to include all requirements of Schedule 3 Condition 23(c) (iii).	Administrative non-compliance

No.	Condition	Observation	Recommendation	Risk Level
	<p>trigger levels for investigating any potentially adverse groundwater impacts;</p> <ul style="list-style-type: none"> • a program to monitor and report on: <ul style="list-style-type: none"> - groundwater inflows to the block cave, sub-level cave and opencut mining operations; - the seepage/leachate from water storages, emplacement and final voids; - background changes in groundwater yield/quality against mine-induced changes; - impacts of the project on: <ul style="list-style-type: none"> - regional and local (including alluvial) aquifers; - groundwater supply of potentially affected landowners; and - riparian vegetation; - a program to validate the groundwater model for the project, and comparison of monitoring results with modelled predictions; and • a plan to respond to any exceedances of the groundwater assessment criteria. 	<p>cave mining operations;</p> <ul style="list-style-type: none"> - a program to monitor and report on background changes in groundwater yield/quality against mine-induced changes; - a program to validate the groundwater model for the project, and comparison of monitoring results with modelled predictions. 		
Sch 3 Cond 41 (a)	<p>The Proponent shall prepare and implement a Rehabilitation Management Plan for the project to the satisfaction of NSW Trade & Investment. This plan must:</p> <p>(a) be prepared in consultation with the Department, DPIE - Water, BCD, Council and the CCC;</p>	<p>NOW and DPIE were consulted during the preparation of the original version of the Rehabilitation Management Plan.</p> <p>Not Verified – no evidence was available to confirm that Council, BCD or the CCC were given the opportunity to review Rehabilitation Management Plan.</p> <p>Auditor's Note - Integration of the Rehabilitation Management Plan into the MOP is a significant change and should trigger consultation with the relevant stakeholders.</p>	<p>Ensure that during the preparation of the combined MOP / Rehabilitation Management Plan that the relevant stakeholders are consulted.</p>	Administrative non-compliance
Sch 3 Cond 41 (b)	<p>The Proponent shall prepare and implement a Rehabilitation Management Plan for the project to the satisfaction of NSW Trade & Investment. This plan must:</p> <p>b) be submitted to NSW Trade & Investment for approval by 30 June 2014, unless the Secretary agrees otherwise;</p>	<p>Northparkes has prepared and implemented and Rehabilitation Management Plan.</p> <p>Northparkes are in the process of integrating the Rehabilitation Management Plan into the Mining Operations Plan.</p> <p>Not Verified – no evidence was available to confirm that NSW Trade & investment approved the Rehabilitation Management Plan.</p>	<p>Ensure that the revised Rehabilitation Management Plan / Mining Operations Plan is approved by relevant government Agency.</p>	Administrative non-compliance

No.	Condition	Observation	Recommendation	Risk Level
Sch 3 Cond 41 (c)	The Proponent shall prepare and implement a Rehabilitation Management Plan for the project to the satisfaction of NSW Trade & Investment. This plan must: (c) be prepared in accordance with any relevant NSW Trade & Investment guideline;	DPIE considered that the plan did not appear to meet the requirements of the relevant NSW Trade and Investment Guidelines.	Ensure that the combined Rehabilitation Management Plan / Mining Operations Plan meets the requirements of the relevant Guidelines.	Administrative non-compliance
Sch 3 Cond 41 (d)	The Proponent shall prepare and implement a Rehabilitation Management Plan for the project to the satisfaction of NSW Trade & Investment. This plan must: (d) describe how the rehabilitation of the site would be integrated with the implementation of the biodiversity offset strategies;	The current version of the Rehabilitation Management Plan does not describe how the rehabilitation of the site would be integrated with the implementation of the biodiversity offset strategies.	Ensure that the integrated MOP / Rehabilitation Management Plan describes how the rehabilitation of the site would be integrated with the implementation of the biodiversity offset strategies.	Administrative non-compliance
Sch 3 Cond 41 (g)	The Proponent shall prepare and implement a Rehabilitation Management Plan for the project to the satisfaction of NSW Trade & Investment. This plan must: (g) include interim rehabilitation where necessary to minimise the area exposed for dust generation;	While Table 5 of the Rehabilitation Management Plan notes the requirement, where possible, to implement interim rehabilitation, no details / strategy for interim rehabilitation is described.	Ensure that the integrated MOP / Rehabilitation Management Plan describes the interim rehabilitation strategy being or proposed to be implemented.	Administrative non-compliance
Sch 6 Cond 1 (e)	The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Secretary. This strategy must: (e) describe the procedures that would be implemented to: <ul style="list-style-type: none"> keep the local community and relevant agencies informed about the operation and environmental performance of the mine; receive, handle, respond to, and record complaints; resolve any disputes that may arise; respond to any non-compliance; 	<p>The EMS provides a high-level overview of stakeholder communications and references to the Stakeholder Communications Management Plan.</p> <p>The Stakeholder Communications Management Plan contains a description of the Complaint Management process and processes for communications with regulators.</p> <p>Details of the dispute resolution process were not found in either the Stakeholder Communications Plan or the Environmental Management Strategy.</p> <p>The EMS contains a description of the Incident Management System. It is noted that reference to the RMSS (the system under which incidents are managed) is not described,</p>	<p>Review the Environmental Management Strategy / Stakeholder Communications Management Plan to include details of the stakeholder dispute resolution process.</p> <p>Revise the Incident Management Section of the EMS to include relevant details regarding the use of the RMSS.</p>	Administrative non-compliance

No.	Condition	Observation	Recommendation	Risk Level
	respond to emergencies; and			
Sch 6 Cond 3 (a)	The Proponent shall ensure that the management plans required under this approval are prepared in accordance with any relevant guidelines, and include: (a) detailed baseline data;	All plans contain relevant detailed baseline data except for the Noise Management Plan and Air Quality Management Plan.	Revise the Air Quality and Noise Management Plans to include detailed baseline data.	Administrative non-compliance
Sch 6 Cond 3 (g)	The Proponent shall ensure that the management plans required under this approval are prepared in accordance with any relevant guidelines, and include: (g) a protocol for managing and reporting any: <ul style="list-style-type: none"> incidents; complaints; non-compliances with statutory requirements; and exceedances of the impact assessment criteria and/or performance criteria; and 	Three of the plans (Environmental Management Strategy, Heritage Management Plan and Blast Management Plan) contained appropriate references to the Incident Management Process to be implemented. Two of the Plans (Traffic Management Plan and Heritage Management Plan) contained details of the complaint management procedure. Two of the plans (Environmental Management Strategy and Blast Management Plan) described the non-compliance management procedure.	Review and revise all plans to ensure that they contain consistent descriptions of the: <ul style="list-style-type: none"> Complaint Management Incident Management; and Non-compliance Management.	Administrative non-compliance
Sch 6 Cond 4 (b)	By the end of March each year, or as otherwise agreed by the Secretary, the Proponent shall review the environmental performance of the project to the satisfaction of the Secretary. This review must: (b) include a comprehensive review of the monitoring results and complaints records of the project over the previous calendar year, which includes a comparison of these results against the [sic] <ul style="list-style-type: none"> the relevant statutory requirements, limits or performance measures/criteria; the monitoring results of previous years; and the relevant predictions in the EA; 	Section 6 of the Annual Reviews present the environmental monitoring summaries (and interpretations) for the reporting period. The assessment of performance against the individual environmental parameters includes a discussion of trends in the monitoring data and performance against trigger values (including statutory compliance criteria), however these sections do not specifically provide a comparison of actual against predicted impacts. Section 9.4 presents details of complaints received for the reporting period.	In future Annual Reviews ensure that for each category of impact presented in the EA, that an assessment of actual impacts against predicted impacts are reported.	Administrative non-compliance
Sch 6 Cond 4	By the end of March each year, or as otherwise agreed by the Secretary, the Proponent shall review the environmental performance of the	The Annual Reviews do not specifically provide a comparison of actual against predicted impacts	In future Annual Reviews ensure that for each category of impact presented in the	Administrative non-

No.	Condition	Observation	Recommendation	Risk Level
(e)	project to the satisfaction of the Secretary. This review must: (e) identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;		EA, that an assessment of actual impacts against predicted impacts are reported.	compliance
Sch 6 Cond 10 (2)	The Proponent shall: (a) make the following information publicly available on its website: <ul style="list-style-type: none"> approved strategies, plans or programs required under the conditions of this approval; 	Copies of all approved plans and strategies are provided on the website (under Environmental Management Plans, Programs and Reports) with the exception of the Rehabilitation Management Plan.	Upload a copy of the current Rehabilitation Management Plan onto the Northparkes website.	Administrative non-compliance
ENVIRONMENTAL PROTECTION LICENCE 4784				
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	On 15 April 2019 slurry from the Secondary Crusher discharged into Goonumbla Creek. The creek was dry at the time of the incident and the slurry was successfully removed. No water pollution occurred as a result of this incident. Note however, that the EPA issued an official caution as a result of the incident. The incident investigation undertaken by Northparkes identified operator error as the cause and implemented further training in materials management.	The incident has been investigated and appropriate action taken. No further action required.	Medium
MINING LEASES 1247, 1367, 1641 and 1743.				
5	The lease holder must provide environmental incident notifications and reports to the Secretary no later than seven (7) days after those environmental incident notifications and reports are provided to the relevant authorities under the Protection of the Environment Operations Act 1997.	A written incident report was provided to the EPA on 14 April (two days after the initial notification), however a report was not provided to the Resource Regulator.	Ensure that the Resources Regulator is notified of any reportable environmental incident in accordance with Mining Lease Condition 5.	Administrative non-compliance

Table 7 – Observations (Recommendations for Improvement)

No.	Condition	Observation	Recommendation	Risk Level
Project Approval 11_0060				
Sch 3 Cond 25	The Proponent shall implement the biodiversity offset strategies summarised in Table 7 below, shown conceptually in Figures 1, 2 and 3 of Appendix 7 and detailed in the table at Appendix 7, to the satisfaction of the Secretary.	<p>The revegetation of the Limestone National Forest Off-set area is detailed in Limestone National Forest Offset Area Revegetation Plan. The offset area was transferred back to DPI in 2009.</p> <p>The last monitoring was undertaken in 2020 by DnA Environmental in the Limestone National Forest Offset. DnA found that some of the performance indicators had not been met and concluded that the drought conditions experienced during most of the audit period has impacted revegetation.</p> <p>Northparkes are reviewing the findings of the 2020 DnA monitoring report and at the time of this IEA were considering what actions are necessary to take as this land is no longer under Northparkes Control.</p> <p>Observation: The Annual Reviews do not provide any information on the status of the Limestone National Forest Offset.</p>	Under the Biodiversity section of the Annual Reviews include a section on the monitoring and status of the Limestone National Forest Off-set area.	Administrative Improvement
Sch 3 Cond 34	The Proponent shall design the site access road crossing over Goonumbla Creek in consultation with DPIE - Water and to the satisfaction of Council.	<p>The McClintocks Lane site access road works including the road crossing over Goonumbla Creek was approved by Parkes Shire Council on 29 April 2015 (CC 201466).</p> <p>Not verified – NPM was unable to provide evidence of consultation with the then NSW Office of Water (now DPI Water) regarding the design of the site access road crossing over Goonumbla Creek.</p> <p>This is an historic non-compliance and was not triggered in this Audit period.</p>	Request that this condition removed during next Modification of Development Consent.	Administrative Improvement

No.	Condition	Observation	Recommendation	Risk Level
Sch 6 Cond 5	<p>The Proponent shall review and, if necessary, revise the strategies, plans, and programs required under this approval to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted to the Secretary for approval.</p> <p>Within 3 months of:</p> <p>(a) the submission of an annual review under condition 4 above</p>	<p>Regular reviews of all management plans have been undertaken. Details of the review triggers are listed in each management plan revision table.</p> <p>Observation 1 – the revision table of the Environmental Management Strategy does not record the revision dates.</p> <p>Observation 2 – the Groundwater Management Plan version number is incorrect.</p> <p>Observation 3 – the Surface Water Management Plan version number is incorrect.</p>	<p>Update the revision table of the Environmental Management Strategy with the relevant revision dates.</p> <p>Update the Groundwater Management Plan and Surface Water Management Plan version numbers.</p>	Administrative Improvement

7. Independent Audit Post Approval Requirements

This audit focused on the compliance requirements established by the Conditions of Approval. While the scope of the audit, as specified in the Conditions of Consent do not refer specifically to the DPIE Independent Audit Post Approval Requirements (DPIE, May 2020), for completeness the Audit has, where possible, assessed the environmental performance of the project. This section of the report covers the specific requirements contained in the DPIE Guidelines.

7.1 Summary of Environmental Incidents

Northparkes operates a digital risk management system, Risk Management and Safety System (RMSS). All incidents are recorded and actioned through that system. Incident management procedures are described in Section 7 of the Environmental Management Strategy (EMS). An incident is defined (in the EMS) as a set of circumstances that causes or threatens to cause material harm to the environment, and/or breaches or exceeds the limits or performance measures/criteria in the Project Approval. Reportable Incidents are reported in accordance with Condition 6, Schedule 7 of the Project Approval, and are reported annually in section 13 of the Annual Review.

A print out from the RMSS of recorded incidents was provided to the Auditor. Seventy-nine incidents and near misses were recorded for the audit period and are summarised in Table 8 - Summary of Incidents. No reportable incidents were recorded in 2018 or 2020. One reportable incident (April 15, slurry spill into Goonumbla Creek bed) in 2019.

Table 8 - Summary of Incidents

Date	Type	Location	Description	DPIE Report ¹
31/10/18	Incident (actual)	Underground - Other	Environmental Exceedance of Management Plan	
11/12/18	Incident (near miss)	Roadways and Operating Areas	Loaded fuel truck lost traction in upper decline.	
15/11/18	Incident (near miss)	Northparkes (Business Compliance)	Elevated PM10 readings at offsite monitoring locations	
04/12/18	Incident (near miss)	Northparkes (Business Compliance)	Depositional dust exceeding internal trigger value	
31/01/19	Incident (near miss)	Northparkes (Business Compliance)	PM10 dust exceeding project approval criteria	
31/12/18	Incident (near miss)	Northparkes (Business Compliance)	PM10 dust exceeding project approval criteria	
07/01/19	Incident (near miss)	Northparkes (Business Compliance)	Depositional dust results exceeding internal trigger value	
04/02/19	Incident (actual)	Northparkes (Business Compliance)	The Noise monitor at Hubberstone is not recording correctly.	
02/01/19	Incident (actual)	Northparkes (Business Compliance)	PM10 monitoring unit at Hubberstone not working due to power outage	
05/04/19	Incident (actual)	Tailings - Other Assets	Rosedale TSF 200L oil spill - QBirt	
15/04/19	Incident (actual)	Surface Secondary Crushers	Sump slurry bogged and deposited over bund in Goonumbla Creek causeway	Yes
07/05/19	Incident (near miss)	Site Wide	While performing prestart hydraulic line failed.	
20/05/19	Incident (near miss)	Maintenance Workshop and Office	Diesel tank rusted through causing minor spillage	
30/04/19	Incident (near miss)	Northparkes (Business Compliance)	Elevated TSP dust readings April 2019	
30/04/19	Incident (near miss)	Northparkes (Business Compliance)	Elevated PM10 dust readings April 2019	
30/04/19	Incident (near miss)	Northparkes (Business Compliance)	Elevated Depositional Dust results for March 2019	
01/04/19	Incident (near miss)	Northparkes (Business Compliance)	Elevated PM10 readings March 2019	

Date	Type	Location	Description	DPIE Report ¹
		Compliance)		
01/04/19	Incident (near miss)	Northparkes (Business Compliance)	Elevated TSP results at offsite monitoring locations March 2019	
02/04/19	Incident (actual)	E26 Lift 2 - Crusher	Hole in tamshot pod	
08/04/19	Damage	E26 Lift 2 - Crusher	Pierced tamshot pod	
10/02/19	Incident (actual)	E26 Workshop - 9800	IT fork pierced tamshot pod.	
14/06/19	Incident (actual)	Tailings - TSF Rosedale	Diesel spill from service truck	
19/07/19	Hazard	Underground - Other	Isolation Officer onboarding gaps	
26/07/19	Hazard	Site Wide	Flow Dri bulkies not in the required storage bunded area	
12/08/19	Incident (actual)	Other Shires	Driving to work and hit a kangaroo	
29/08/19	Incident (actual)	Underground - Other	Small flame on back of IT104	
08/09/19	Incident (actual)	Site Wide	Failure of mine hose and spigot clamp	
15/09/19	Incident (actual)	Site Wide	A discharge spigot has blown off again along the eastern wall	
05/10/19	Incident (actual)	Tailings - Lines 1, 2, 3	Failed spigot on western tails line.	
03/11/19	Incident (actual)	Return Air Ways (RAW)	Possible damage to refuge chamber seal	
08/11/19	Incident (actual)	Waste Oil and Grease Storage	Battery acid in IBC spilt on ground and splashed back onto personnel	
10/11/19	Incident (actual)	Underground - Other	Smashed drivers slide window SC001	
08/11/19	Incident (actual)	Waste Oil and Grease Storage	Oily water separator overflow from tank - resulted in spil outside bund	
29/11/19	Incident (actual)	Ore Stockpiles	Dust from mobile crusher at W4	
02/12/19	Incident (actual)	E26 Lift 1 - North	Production loss - 78 Hours	
18/12/19	Incident (actual)	Flotation	Oil spill	
20/12/19	Incident (actual)	Environmental Monitoring	The PM10 unit at Hillview is not recording data correctly.	
25/01/20	Incident (actual)	Flotation	Slurry escaped floatation bund during commissioning	
02/02/20	Incident (actual)	Flotation	Overflow of flotation bund during power outage	
04/02/20	Incident (near miss)	Surface Conveyor Systems	Bunding removed along CV006	
05/02/20	Incident (actual)	Grinding 1	Slurry outside bund when splitting bogged line	
05/02/20	Incident (near miss)	EL5800 - Drilling Equipment	Hydraulic oil leak on AMWD Rig 3	
12/02/20	Incident (actual)	Roadways and Operating Areas	Oil spill discovered on sealed road Rosedale office building.	
12/02/20	Incident (actual)	Roadways and Operating Areas	Bunding and drainage along Goonumbla Creek inadequate	
03/03/20	Incident (actual)	Environmental Monitoring	No power supply to TSP unit at Milpose	
06/03/20	Incident (actual)	E26 Workshop - 9800	Oil Spill Bay 3 9800 Workshop	
06/03/20	Incident (actual)	Environmental Monitoring	PM10 units at all 3 neighbouring farms	
17/03/20	Hazard	Hydrocarbon Storage	Oil pods in unbunded area	
29/03/20	Incident (actual)	Roadways and Operating Areas	Oil leaking from decommissioned IT	

Date	Type	Location	Description	DPIE Report ¹
21/04/20	Incident (actual)	Process Water Dam (PWD)	Slump in middle wall of the Process water dam	
28/04/20	Hazard	Retention Ponds	Bank erosion at Eastern Surge Dam	
28/04/20	Hazard	Hydrocarbon Storage	Multiple oil pods outside of bunded area	
01/05/20	Damage	E48 Extraction Level Access (ELA)	Damaged transmission hose	
05/05/20	Damage	E26 Lift 2	damaged to transmission oil pan / screen on LHD22	
04/05/20	Incident (actual)	Flotation	ML06 waste grease drum tipped over in containment bund.	
07/06/20	Hazard	Site Wide	Newly procured inch hose clamps do not seal properly	
13/06/20	Hazard	Process Water Dam (PWD)	Groundwater bore submersible pump failed	
15/06/20	Incident (actual)	E48 Extraction Level Access (ELA)	Small fire on commando 120 secondary breaking rig	
17/06/20	Incident (actual)	Environmental Monitoring	The TSP dust monitor at Hubberstone Farm kept tripping out the power	
15/06/20	Incident (actual)	Tailings Storage Facilities	Erosion in the flood water channel from Rosedale to Caloola south.	
12/08/20	Incident (actual)	Grinding 2	Blown hydraulic hose on LD107	
15/08/20	Hazard	Retention Ponds	Hydrocarbon on surface of Western surge dam	
04/09/20	Damage	Environmental Monitoring	The TSP unit at Hubberstone is on a lean.	
06/10/20	Hazard	Tailings - TSF Estcourt	Gully erosion on E27 waste bund	
07/10/20	Incident (actual)	Flotation	Slurry from ML06 flowed outside of bund.	
31/08/20	Report Only	Environmental Monitoring	Elevated TSP dust results recorded on 31 August 2020 at Milpose	
21/10/20	Incident (actual)	Reagents	A spill pallet was found to be leaking onto concrete area	
04/11/20	Incident (actual)	Environmental Monitoring	TSP dust unit lost power	
10/11/20	Incident (actual)	Surface Conveyor Systems	Blown hose on EWP resulting in an oil spill	
11/11/20	Hazard	Site Wide	Erosion down ramp of E26 soil dump	
22/11/20	Hazard	Contractor Storage Yards (PJLJTE)	Inadequate housekeeping and waste segregation	
11/12/20	Hazard	E26 Workshop - 9800	Spill Kits Not Replenished	
11/01/21	Incident (actual)	E26 Lift 1	Hole in fuel tank of LV290	
20/01/21	Hazard	Tailings - TSF Estcourt	Seepage on west wall of Estcourt	
01/02/21	Hazard	Waste Oil and Grease Storage	Batteries inappropriately stored at the hydrocarbon area	
11/02/21	Hazard	Goonumbla Siding	Dust off road way and hardstand at Goonumbla siding	
23/02/21	Incident (actual)	Tailings - TSF Estcourt	Oil leak from MAAS water cart on haul road	
01/03/21	Hazard	ROM - Stockpiles	Dust generation at stockpile ROM pad	

7.2 Summary of Complaints

A complaints register is located on the company website and a separate (for internal use) register is maintained that contains details of complaints received. One complaint was recorded over the Audit Period that was related to a traffic incident. It is noted that a number of calls from neighbours were received during the audit period relating to elevated noise levels experienced from the newly commissioned ventilation shaft and associated infrastructure. The Auditor understands that the neighbours were asked whether they wanted their enquiries recorded as formal complaints. No resident requested that their noise notification be recorded as a complaint.

Table 9 provides a summary of complaints recorded by the mine management over the Audit Period.

Table 9 - Summary of Complaints

Date	Category	Details and Northparkes' Response
19 December June 2019	Traffic	<p>A local farmer and his daughter were moving sheep along McClintocks lane on horseback. They allegedly had the appropriate signs to warn drivers. They also advised that they regularly conduct these activities.</p> <p>A vehicle travelled past the daughter at speed and caused her and the horse she was riding to be sprayed with rock. It was alleged that this vehicle was regularly observed driving erratically and at high speeds.</p> <p>An investigation confirmed that the driver was a NPM employee. Details of the incident was referred to the HR department at the mine for action.</p>

7.3 Summary of Notices

The following notices, orders, penalty notices or prosecutions were issued to Northparkes during the audit period:

- Official Caution issued by the EPA on 13 June 2019 in relation to the spill of slurry material into Goonumbla Creek.
- Letter from the Resources Regulator titled “Northparkes Mines Targeted Assessment Program – Soils and Materials Management”, dated 18 December 2020. The letter noted that an issue related to general inert waste being incorporated into the waste rock dump E26 had been identified.

7.4 Project Environmental Management System

Northparkes operates in accordance with the Environmental Management Strategy. The Environmental Management Strategy that was prepared as a requirement of the Planning Approval describes the environmental management approach implemented at the Mine. The EMS, as documented, conforms to the requirements of ISO 14001 and is certified against that International Standard. The level of compliance identified in this audit indicates the system is being implemented.

7.5 Implementation of the Operational Environmental Management Plan and Sub-plans

The Conditions of Approval required the preparation and implementation of the management plans and program listed in Table 10. During the document review phase of the project the contents of each of the plans were reviewed. Table 10 summarises the findings of that review. In general, the Plans and Programs adequately identified the relevant project risks and proposed appropriate risk management controls. Note that recommendations for improvement of management plans are provided in the subsection following Table 10.

Table 10 - Management Plan Compliance Summary

Management Plan requirements under Schedule 3, 4, 5, and 6.	Environmental Management Strategy	Noise Management Plan	Air Quality Management Plan	Water Management Plan	Traffic Management Plan	Rehabilitation Management Plan	Blast Management Plan	Biodiversity Management Plan	Heritage Management Plan
Schedule 6 Condition 11									
Latest version uploaded to website	√	√	√	√	√	×	√	√	√
Schedule 6 Condition 3									
Detailed baseline data	-	×	×	√	n.a.	n.a.	n.a.	√	n.a.
Statutory requirements	√	√	√	√	×	√	√	√	√
Performance measures / criteria / action trigger levels	-	√	√	√	√	√	√	√	√
Management measures / controls	√	√	√	√	√	√	√	√	√
Monitoring and reporting	√	√	√	√	√	√	√	√	√
Contingency planning	√	√	√	√	√	√	√	√	√
Environmental performance improvement	√	√	√	√	√	√	√	√	√
Incident management	√	×	×	×	×	×	√	×	√
Complaints management	×	×	×	×	√	×	×	×	√
Non-compliance management	√	×	×	×	×	×	√	×	×
Reporting exceedance of impact assessment or performance criteria.	√	√	√	√	√	√	√	√	√
Schedule 6 Condition 5									
Periodic review and revision	√	√	√	√	√	√	√	√	√
Review and revision following Annual Review	√	√	√	√	√	√	√	√	√
Review and revision following Incidents	NT	NT	NT	NT	√	NT	NT	NT	NT
Review and revision following IEAs	√	√	√	√	√	√	√	√	√
Review and revision following modification to the Approval	√	√	√	√	√	√	√	√	√

Notes to Table 10 - Management Plan Compliance Summary:

√ = Complies

× = Does not comply (for details refer to compliance table in Appendix 1)

- = Not applicable

NT = not triggered during this Audit Period

7.5.1 Overview

The EMS and each management plan required by the Planning Approval have been reviewed. A consistent deficiency across most of the plans is lack of detail regarding complaint, incident, and non-conformance management procedures. This deficiency was also found during the 2018 Independent Environmental Audit. Specific deficiencies of each plan are discussed below.

7.5.2 Environmental Management Strategy

The review of the EMS found several non-compliances with the Approval. For example:

- Section 6.3 of the EMS (and each sub-plan) is required to contain a description of the complaint management process. For information on complaints management, reference is made to the Stakeholder Consultation Management Plan (PLN 0040). However no further details are provided. It is noted that the Stakeholder Consultation Management Plan was not found on the mine website. Section 6.5.1 of the Stakeholder Consultation Management Plan describes the complaints management system. No reference is made to the recording of complaints in the complaints register or the location of that register.
- Section 4 of the EMS describes the general responsibilities of mine personnel. Schedule 6, Condition 1 of the Approval requires that the EMS “describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the mine”. No detail or reference to where that information can be found was provided in the Plan.
- Section 6.3.3 of the EMS describes the management of documents and records. The review triggers contained in Schedule 6, Condition 5 have not been included in that section. No reference is made no maintaining the current versions of each plan on the website.

Recommendation: Review the Environmental Management Strategy (and any referenced plans) to ensure that all aspects required by Schedule 6, Conditions 1, 3, 5 and 11 are complied with. Ensure that all internal references (for example within Table 2 on page 19 are correct).

7.5.3 Noise Management Plan

There were no exceedances of environmental noise criteria recorded during the audit period and the Auditor has found that the management of environmental noise issues at the mine is appropriate. The review of the Noise Management Plan however found the following deficiencies:

- Section 2.1 of the Noise Management Plan provides a high-level overview of the baseline noise levels at the mine. However, Schedule 6 Condition 3 requires that each management plan includes detailed baseline data. As a minimum, reference should be made to the relevant background noise levels determined during the preparation of the original Environmental Assessments.
- A complaints management procedure /process has not been included in the plan.
- An incident management procedure / process has not been included in the plan.
- Section 6.5 of the plan describes reporting requirements for non-compliances but does not provide information on the review or investigation procedures to be implemented.

Recommendation: Review the Noise Management Plan to ensure that all aspects required by Schedule 6, Conditions 3 are complied with.

7.5.4 Air Quality Management Plan

The review of the Air Quality Management Plan however found the following deficiencies:

- Section 2.1 of the Air Quality Management Plan provides a very high-level overview of the baseline at the mine. However, Schedule 6 Condition 3 requires that each management plan includes detailed baseline data.
- A complaints management procedure /process has not been included in the plan.
- An incident management procedure / process has not been included in the plan.
- Section 6.5 of the plan describes reporting requirements for non-compliances but does not provide information on the review or investigation procedures to be implemented.

Recommendation: Review the Air Quality Management Plan to ensure that all aspects required by Schedule 6, Conditions 3 are complied with.

7.5.5 Water Management Plan

The review of the Water Management Plan however found the following deficiencies:

- Complaint reporting is covered in Section 6.4. However, no complaints management procedure /process has not been included in the plan.
- Incident reporting is covered in Section 6.1; however, no incident management procedure / process has not been included in the plan.
- The review or investigation procedures required should non-compliances be detected has not been included in the plan.

Recommendation: Review the Water Management Plan to ensure that all aspects required by Schedule 6, Conditions 3 are complied with.

7.5.6 Traffic Management Plan

The review of the Traffic Management Plan however found the following deficiencies:

- Statutory requirements have not been included in the Plan.
- Incident reporting is not covered in the plan.
- The review or investigation procedures required should non-compliances be detected has not been included in the plan.

Recommendation: Review the Traffic Management Plan to ensure that all aspects required by Schedule 6, Conditions 3 are complied with.

7.5.7 Rehabilitation Management Plan

The review of the Rehabilitation Management Plan however found the following deficiencies:

- A copy of the Plan was not available on the mine website. The auditee reported that they are currently consulting DPIE regarding combining the requirements of the Rehabilitation Management Plan with the MOP.
- A complaints management procedure /process has not been included in the plan.
- An incident management procedure / process has not been included in the plan.

- A non-compliance management procedure / process has not been included in the plan.

Recommendation: Review the Rehabilitation Management Plan to ensure that all aspects required by Schedule 6, Conditions 3 and 11 are complied with.

7.5.8 Blast Management Plan

The review of the Blast Management Plan however found the following deficiencies:

- A complaints management procedure /process has not been included in the plan.

Recommendation: Review the Blast Management Plan to ensure that all aspects required by Schedule 6, Conditions 3 are complied with.

7.5.9 Biodiversity (Off-Set) Management Plan

The review of the Biodiversity Management Plan however found the following deficiencies:

- A complaints management procedure /process has not been included in the plan.
- An incident management procedure / process has not been included in the plan.
- A non-compliance management procedure / process has not been included in the plan.

Recommendation: Review the Biodiversity Management Plan to ensure that all aspects required by Schedule 6, Conditions 3 are complied with.

7.5.10 Heritage Management Plan

The review of the Heritage Management Plan however found the following deficiencies:

- A non-compliance management procedure / process has not been included in the plan.

Recommendation: Review the Heritage Management Plan to ensure that all aspects required by Schedule 6, Conditions 3 are complied with.

7.6 Status of Previous IEA Findings

The previous audit was completed on 30 June 2018. Table 11 lists the status of implementation of the audit recommendations associated with the Approval, relevant licenses and permits identified during the 2018 Audit.

Table 11 - Status of 2018 Audit Findings

Condition	Detail	2018 Audit Assessment / Recommendation	Northparkes Response	Status
Project Approval 11_0060				
Sch 2 Cond 1	Obligation to minimise harm to the Environment. In addition to meeting the specific performance criteria established under this approval, the Proponent shall implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation or rehabilitation of the project.	Compliant – Observation1: This condition requires NPM to regularly consider measures that are or may be required to prevent and/or minimise any material harm to the environment. Measures which may not have been regarded as feasible in the past (e.g. due to excessive cost, or uncertain reliability) may become feasible in the future due to improvements in technology. For example, NPM could consider installing monitoring equipment (e.g. dust monitors) with a real-time alert system to enable NPM to rapidly respond to recorded air quality exceedances.	Observation 1: Management have noted this recommendation. No specific action was required by the recommendation.	Closed
Sch 2 – Cond 4	Terms of Approval The Proponent shall comply with any reasonable requirement/s of the Secretary arising from the Department’s assessment of: (a) any strategies, plans, programs, reviews, audits, reports or correspondence that are submitted by the Proponent in accordance with this approval; and (b) the implementation of any actions or measures contained in these documents.	Compliant: Observation No. 2 – NPM could consider maintaining a register of regulatory authority requests and NPM’s response and close out of those requests. For example, the Task Calendar (refer to condition 2 of this Schedule) could include tasks arising from DPE requests.	Observation 2: All regulatory actions are logged in the case management system and checked off as completed.	Closed
		Compliant Observation No. 3 – NPM could consider expanding the Task Calendar with additional information (e.g. additional tabs in the spreadsheet) to cross-reference scheduled tasks to the underlying regulatory requirement. For example, the monthly dates	Observation 3. NPM has developed a management plan commitments schedule that is reviewed and updated following review of management plans.	Closed

Condition	Detail	2018 Audit Assessment / Recommendation	Northparkes Response	Status
		for Depositional Dust Monitoring could be cross-referenced to the Noise Management Plan under		
Sch 2 – Cond 8	Surrender of Consents Within 12 months of the date of this approval, or as otherwise agreed by the Secretary, the Proponent shall surrender the existing project approval PA06_0026 and development consent DA11092 in accordance with Section 104A of the EP&A Act. This requirement does not extend to the surrender of the Forbes Water Pipeline Development Consent DA2009/0057.	Administrative non-compliance – Project Approval PA06_0026 was surrendered on 30 April 2018. NPM did not obtain the Secretary's agreement beyond 31 July 2015 to surrender Project Approval PA06_0026.	The approvals were surrendered in 2018.	Closed
Sch 2 – Cond 13	The Applicant shall ensure that all plant and equipment used at the site is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Compliant Observation No. 4 – The 2017 AEMR indicates there were significant periods of no apparent monitoring data for PM10 (section 6.3.2.1) and TSP (section 6.3.2.2) at the various monitoring locations. The longest period with no apparent monitoring data was from about 2 July 2017 to about 10 October 2017 for PM10 at 'Hillview'. NPM should implement suitable preventative measures to help avoid any significant periods of no monitoring data in the future.	During the audit, a review of environmental monitoring and routine inspection data indicated that regular checks of monitoring equipment was undertaken over the audit period and that reliability of dust monitoring stations has been addressed. It is noted that routine inspections did identify equipment failures that were subsequently rectified.	Closed
Sch 3 Cond 1	Noise Criteria The Proponent shall ensure that the noise generated by the project does not exceed the criteria in Table 1 at any residence on privately-owned land.	Compliant Observation No. 5 – In referring to "the project" (as distinct from the mine) this condition also applies to the Goonumbla Rail Siding. NPM's Noise Environmental Management Plan could be updated to refer to the Goonumbla Rail Siding and if required, implement a suitable noise monitoring program at the closest residences on privately-owned land around the Rail Siding.	Section 2, 'SCOPE', of management plan details that the document refers to all activities undertaken by Northparkes including mining and exploration activities, processing of copper / gold ore resources, project development, maintenance activities, mine closure, logistics, associated service and support functions, bore fields, farming operations and products. Copper concentrate/Goonumbla sighting is addressed through both logistics and products.	Closed

Condition	Detail	2018 Audit Assessment / Recommendation	Northparkes Response	Status
		Compliant Observation No. 6 – It became evident during this May 2018 audit that it was difficult for NPM environmental personnel to interrogate the ‘NED’ incident reporting system. NPM could consider reviewing access	Observation no. 6 – the NED system has been superseded. This recommendation is therefore no longer relevant. During this IEA interrogation of the risk management system was demonstrated to the auditor.	Closed
Schedule 3 Condition 2	Construction Noise The Proponent shall only carry out the construction works associated with the upgrade of McClintocks Lane, the construction of the McClintocks Lane access road and the upgrade of the intersection of McClintocks Lane and Bogan Road during the day.	Compliant Observation No. 7 – Section 4.17(b)(xi) of the environmental management plan (P1700224-PLN-0032-2 dated 29 April 2015) allows the Service Provider to perform Services outside the permitted hours in sub-paragraph (i) with NPM’s written approval. Although there is no evidence to suggest that sub-paragraph (xi) was used in this construction project, NPM should consider the wording of similar sub-paragraphs in environmental management plans for future construction projects to ensure any requests for performing Services outside pre-defined hours will comply with any limits on hours that are specified in a Project Approval condition.	Northparkes considered this observation and will look to implement where appropriate for specific construction activities in the future.	Closed
Sch 3 Cond 4	Noise Operating Conditions The Proponent shall: (a) implement best management practice to minimise the construction, operational and road noise of the project; (b) operate a comprehensive noise management system that uses a combination of predictive meteorological forecasting and real-time noise monitoring data to guide the day to day planning, and the implementation of both proactive and reactive noise mitigation measures to ensure compliance with the relevant conditions of this approval; (c) minimise the noise impacts of the project during meteorological conditions when the noise limits in this approval do not apply (see Appendix 5);	Compliant Observation No. 8 – NPM could consider linking or consolidating the ‘Environment Monitoring and Measuring Schedule’ and the ‘Copy of Task Calendar’ to create a single source of information regarding environmental monitoring requirements.	Task calendar is no longer used and environmental monitoring requirements are addressed in ‘Environmental Monitoring and Measuring Schedule’.	Closed
		Observation No. 9 – NPM could consider automating the email/SMS weather assessment alert thereby eliminating the risk of an alert not being sent out due to unavailability of relevant personnel.	This process relies on human and environmental interpretation and cannot be automated effectively.	Closed

Condition	Detail	2018 Audit Assessment / Recommendation	Northparkes Response	Status
	and (d) carry out regular monitoring to determine whether the project is complying with the relevant conditions of this approval, to the satisfaction of the Secretary.			
Sch 3 Cond 5	Noise Management Plan The Proponent shall prepare and implement a Noise Management Plan for the project to the satisfaction of the Secretary.	Compliant Observation No. 10 – The reference in section 6 of the NMP to noise control/mitigation “strategies” should instead refer to noise control/mitigation “measures”. Observation No. 11 – The next revision of the NMP should standardise the definition of what constitutes a ‘noise incident’ as variously referred to in sections 5.5, 7.3.1 and 8. Only section 7.3.1 refers to “repeat readings”. Observation No. 12 – The next revision of the NMP could consolidate the overlapping content in sections 5.5, 7.3.1 and 8 regarding reporting of incidents. Observation No. 13 – The next revision of the NMP should refer to the NSW Noise Policy for Industry, which replaced the NSW Industrial Noise Policy (2000) in October 2017	All observations have been addressed in the current version of the Noise Management Plan.	Closed
Sch 3 Cond 7	Blasting Hours The Proponent shall only carry out blasting on site between 9 am and 5 pm Monday to Saturday inclusive. No blasting is allowed on Sundays, public holidays, or at any other time without the written approval of the Secretary.	Compliant Observation No. 14 – To cover the possibility that the DPE may interpret this condition as applying to both surface and underground blasting, NPM should consider obtaining written approval from the DPE Secretary to carry out underground blasting without limitation as to hours and days.	This condition has been modified to refer to surface blasting.	Closed
Sch 3 Cond 7	Blasting Operating Conditions The Proponent shall: (b) operate a suitable system to enable the public to get up- to-date information on the proposed blasting	Compliant Observation No. 15 – NPM could revise its website to include a statement that there will be no surface blasting on site during the current MOP. If and when surface blasting resumes, the NPM website could	Blasting has not recommenced. Northparkes have noted this recommendation.	Open

Condition	Detail	2018 Audit Assessment / Recommendation	Northparkes Response	Status
	schedule on site,	include proposed blasting schedules.		
Sch 3 Cond 13	<p>Blast Management Plan</p> <p>The Proponent shall prepare and implement a Blast Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <p>a) be prepared in consultation with the EPA, and submitted to the Secretary for approval prior to conducting any blasting on site;</p> <p>b) describe the measures that would be implemented to ensure compliance with the blast criteria and operating conditions of this approval;</p> <p>c) propose and justify any alternative ground vibration limits for public infrastructure in the vicinity of the site (if relevant); and</p> <p>d) include a monitoring program for evaluating and reporting on compliance with the blasting criteria and operating conditions of this approval.</p>	<p>Compliant</p> <p>Observation No. 16 – Although paragraph (a) of this condition does not require a written record of consultation, NPM should consider obtaining a written record of consultation with the EPA in future substantive revisions of the BMP and annexing a copy of the written record to the revised version.</p>	No evidence was available to confirm that the EPA had been consulted during the preparation of the Blast Management Plan.	Open
		<p>Compliant</p> <p>Observation No. 17 – Table 2 in section 4.2 of the BMP is missing the 0% allowable exceedance in for “all public infrastructure” as printed in condition 6 of this Schedule.</p>	This recommendation now refers to Table 1 and has been corrected.	Closed
		<p>Compliant</p> <p>Observation No. 18 – Notwithstanding the scope of the BMP being limited to open cut mining activities, the third paragraph in section 4.1 of the BMP refers to underground blasts.</p>	While Schedule 3 Condition 7 applies only to surface blasting, the plan applies to both surface and subsurface blasting	Closed.
Sch 3 Cond 14	<p>Air Quality</p> <p>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 cause exceedances of the criteria listed in Tables 3, 4 and 5 at any residence on privately-owned land.</p>	<p>Compliant</p> <p>Observation No. 19 – Notwithstanding the private agreement in place with the owners of “Avondale”, the wording of the condition does not refer to ‘occupied’ residence (compare with the wording in condition 15 of this Schedule). NPM could request the DPE to amend the wording of this condition to refer to ‘occupied’ residence.</p>	Northparkes have requested this change to be part of MOD 6.	Closed
		Compliant	The latest version of the plan has been	Closed

Condition	Detail	2018 Audit Assessment / Recommendation	Northparkes Response	Status
		Observation No. 20 – During the on-site component of this May 2018 audit it was stated that the AQMP inaccurately describes the PM10 and TSP monitors. NPM should rectify this inaccuracy in the next revision of the AQMP.	updated to accurately describe the location of the monitoring stations.	
		Compliant Observation No. 21 – NPM could review the locations of the depositional dust gauges to better reflect particulate matter emissions generated by the Project and avoid the influence of agricultural activities on surrounding land.	Northparkes have undertaken a detailed review of the depositional dust monitoring program and have sent proposed changes to the EPA for review.	Closed
Sch 3 Condition 17	Air Quality – Air Quality Management Plan The Proponent shall prepare and implement an Air Quality Management Plan for the project to the satisfaction of the Secretary.	Compliant Observation No. 22 – The Revision Summary page of the AQMP includes version no. 15 prepared in April 2018, but the document header and next review date have not been updated.	The plan has been reviewed and the formatting issues corrected.	Closed
Sch 3 Condition 19	Water Supply The Proponent shall ensure that it has sufficient water for all stages of the project, and if necessary, adjust the scale of operations on site to match its available water supply.	Compliant Observation No. 23 – The water balances reported in the AEMRs were observed to be unclear or incomplete. For example, Table 24 in the 2017 AEMR does not balance, and data is absent. Section 3.8 of the 2015 AEMR refers to a total water use of 6684 ML, but Table 10 indicates a total water use of 6521 ML. NPM should review water supply and demand calculations and the presentation of the results of those calculations in future AEMRs.	Northparkes has noted this recommendation.	Closed
		Compliant Observation No. 24 – Section 7.1.1 of the 2017 AEMR states: “In accordance with the Approval, CMOC maintains a Surface Water Balance (SWB) for effective management of water resources. The SWB details water use, water demand and water management, as	This recommendation has not been addressed in the Annual Reviews covering the audit period. Currently states ‘Water Balance’. Northparkes will look to make this change when preparing the next Annual Return.	Open

Condition	Detail	2018 Audit Assessment / Recommendation	Northparkes Response	Status
		well as the sources and security of water supply, including contingency for future reporting periods. The SWB will be revised in 2018 in order to better reflect modifications to the mine plan." NPM should consider revising this statement to instead refer to the Site Water Balance		
Sch 3 Condition 22	<p>The Proponent shall comply with the performance measures in Table 6 to the satisfaction of the Secretary.</p> <ul style="list-style-type: none"> - Chemical and hydrocarbon products to be stored in bunded areas in accordance with the relevant Australian Standards. 	Not Verified Observation No. 25 – At the time of the audit, an IBC of Sodium Hypochlorite was observed to have been unloaded in a non-bunded area in the stores area. NPM should review procedures for temporary storage of hazardous materials.	At the time of this IEA all chemicals and hydrocarbons sighted were stored in appropriately bunded areas. Those storage facilities satisfied the general requirements of AS1940.	Closed
		Not Verified Observation No. 26 – NPM should consider storing waste oil presently stored in open IBCs in waste metal area for underground waste in the covered dedicated hydrocarbon storage shed to avoid contamination with rainwater and centralise storage of all hydrocarbon waste.	At the time of this IEA all chemicals and hydrocarbons sighted were stored in appropriately bunded areas. Those storage facilities satisfied the general requirements of AS1940.	Closed
Sch 3 Condition 23	<p>The Proponent shall prepare and implement a Water Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with DPI Water and the EPA, by suitably qualified and experienced persons whose appointment has been approved by the Secretary;</p> <p>(b) be submitted to the Secretary for approval prior by 30 June 2014;</p> <p>(c) in addition to the standard requirements for management plans (see Condition 3 of schedule 6), this plan must include a:</p> <p>(i) Site Water Balance that:</p> <ul style="list-style-type: none"> • includes details of: 	Non-compliance The Site Water Balance does not include: <ul style="list-style-type: none"> • contingency planning for future reporting periods; • reporting procedures, including the preparation of a site water balance for each calendar year. 	The site water balance (Section 5.1 of the Water Management Plan) does not contain contingency planning or reporting procedures. Water Management Plan is currently under third party review. Northparkes will ensure the management plan contains the required information of this condition.	Open
		Non-compliance The SWMP/WMP does not include: <ul style="list-style-type: none"> • detailed baseline data on water flows and quality in the waterbodies that could be affected by the project (section 7 of the SWMP contains some baseline data on water quality (pH, electrical conductivity, total 	The Surface Water Management Plan does not include the details specified in the Condition. Surface Water Management Plan is currently under third party review. Northparkes will ensure the management plan contains the required information of	Open

Condition	Detail	2018 Audit Assessment / Recommendation	Northparkes Response	Status
	<ul style="list-style-type: none"> - sources and security of water supply, including contingency planning for future reporting periods; - water use and management on site; - reporting procedures, including the preparation of a site water balance for each calendar year; • describes the measures that would be implemented to minimise clean water use on site; (ii) Surface Water Management Plan, that includes: <ul style="list-style-type: none"> • detailed baseline data on water flows and quality in the waterbodies that could be affected by the project; • a detailed description of the water management system on site; • detailed plans, including design objectives and performance criteria, for the: <ul style="list-style-type: none"> - tailings storage facilities; - final voids (see the Rehabilitation Objectives in Table 8); • detailed performance criteria for the following, including trigger levels for investigating any potentially adverse impacts associated with the project: <ul style="list-style-type: none"> - the water management systems (clean, dirty and contaminated); - downstream surface water quality; - downstream flooding impacts; and - stream and riparian vegetation health for Bogan River, Tenandra Creek, Goonumbla Creek and Cookopie Creek; • a program to monitor and report on: <ul style="list-style-type: none"> - the effectiveness of the water management systems (clean, dirty and contaminated); - surface water flows and quality, stream and riparian vegetation health in the watercourses that could be affected by the project; and - downstream flooding impacts; • reporting procedures for the results of the monitoring program; and 	<p>suspended solids and copper), but there is no data on water flows);</p> <ul style="list-style-type: none"> • detailed plans, including design objectives and performance criteria, for the: <ul style="list-style-type: none"> - tailings storage facilities; - final voids; • detailed performance criteria, other than trigger levels, for: <ul style="list-style-type: none"> - the water management systems (clean dirty and contaminated); - downstream surface water quality; - downstream flooding impacts; and - stream and riparian vegetation health for Bogan River, Tenandra Creek, Goonumbla Creek and Cookopie Creek; • a program to monitor and report on downstream flooding impacts. 	this condition.	
		<p>Non-compliance</p> <p>The GWMP/WMP does not include:</p> <ul style="list-style-type: none"> - detailed baseline data on groundwater levels, yield and quality in the region and privately-owned groundwater bores that could be affected by the project (section 6 of the GWMP provides some baseline data regarding pH, TDS, and spatial and temporal variations in water quality across the Northparkes site near the ore bodies); - a program to monitor and report on groundwater inflows to the sub-level cave mining operations; - a program to monitor and report on background changes in groundwater yield/quality against mine-induced changes; - a program to validate the groundwater model for the project, and comparison of monitoring results with modelled predictions. 	<p>The Groundwater Management Plan does not include the details specified in the Condition. Groundwater Management Plan is currently under third party review. Northparkes will ensure the management plan contains the required information of this condition.</p>	Open
		<p>Observation No. 27 – Section 3.1 of the WMP notes: “Comments regarding previous submissions and</p>	<p>Stakeholder comments are now provided in Appendix A.</p>	Closed

Condition	Detail	2018 Audit Assessment / Recommendation	Northparkes Response	Status
	<ul style="list-style-type: none"> • a plan to respond to any exceedances of the performance criteria, and mitigate any adverse surface water impacts of the project; <p>(iii) Groundwater Management Plan, that includes:</p> <ul style="list-style-type: none"> • detailed baseline data on groundwater levels, yield and quality in the region and privately- owned groundwater bores that could be affected by the project; • groundwater assessment criteria, including trigger levels for investigating any potentially adverse groundwater impacts; • a program to monitor and report on: <ul style="list-style-type: none"> - groundwater inflows to the block cave, sub-level cave and opencut mining operations; - the seepage/leachate from water storages, emplacement and final voids; - background changes in groundwater yield/quality against mine-induced changes;- impacts of the project on: - regional and local (including alluvial) aquifers; - groundwater supply of potentially affected landowners; and - riparian vegetation; - a program to validate the groundwater model for the project, and comparison of monitoring results with modelled predictions; and • a plan to respond to any exceedances of the groundwater assessment criteria. 	<p>reviews of the WMP can be found in the archived versions of previously approved WMP.” To facilitate access to previously made comments from regulators, in the next revision of the WMP NPM could either insert hyperlinks to relevant previous versions of the WMP or add an Appendix to the WMP which contains all historical comments from regulators.</p>		
		Observation No. 28 – The published (NPM website) version of the WMP is does not include the Site Water Balance (Appendix E). NPM should ensure the published version includes all Appendices in the formally approved version of the WMP.	The site water balance has been included as Section 5.1 of the report and was available on the website.	Closed
		Observation No. 29 – NPM consider replacing Figures 3-5 (Section 6) of the WMP with Figure 5-1 of the GHD Site Water Balance report to better reflect the site water balance (i.e. with approximate volumes included). Table 5-1 of the same report could be described in the WMP as the template to be used in the AEMR for reporting of the annual site water balance.	Water Management Plan is currently under third party review. Northparkes will ensure the management plan contains the required information of this condition.	Open
		Observation No. 30 – The SWMP refers to surface water baseline data being contained in the Northparkes Step Change Project (Umwelt, 2013) Appendix 11. NPM could include the more detailed baseline data in an Appendix to the SWMP.	Surface Water Management Plan is currently under third party review. Northparkes will ensure the management plan contains the required information of this condition.	Open
		Observation No. 31 – The GWMP should be revised to include NPM’s sub-level cave mining operations, for consistency with the June 2015 modification of the Project Approval.	Stated in Section 1.2, ‘Overview’, of the GWMP	Closed
		Observation No. 32 – The GWMP refers to more information regarding groundwater background data being contained in the Northparkes Step Change Project (Umwelt, 2013) Appendix 10. NPM could include the detailed background data in an Appendix to the GWMP.	Groundwater Management Plan is currently under third party review. Northparkes will ensure the management plan contains the required information of this condition.	Closed
		Observation No. 3 – Overlapping content exists in the WMP, SWMP and GWMP. NPM could consider whether the WMP should be revised to become a	Northparkes has elected to maintain separate Surface Water and Groundwater	Closed.

Condition	Detail	2018 Audit Assessment / Recommendation	Northparkes Response	Status
		single integrated document which includes Site Water Balance, Surface Water and Groundwater chapters.	Management Plans	
		Observation No. 34 – NPM should amend the header in the GWMP to use the Doc ID no. 3-9795 noted on the first page.	The Groundwater Management Plan document number is now PLN-0057.	Closed
		Observation No. 35 – Section 7 of the September 2016 SRK report includes various preliminary recommendations. NPM could track its progress towards adopting any or all of these recommendations.	These recommendations were reviewed and adopted where appropriate.	Closed
Sch 3 Condition 23	The Proponent shall actively manage and maintain the populations of Pine Donkey Orchid located to the north of the project area (near Adavale Lane) and near the E48 subsidence zone.	Compliant Observation No. 36 – References in the Species Management Plan to the Threatened Species Conservation Act 1995 should be reviewed and updated to instead refer to the current Biodiversity Conservation Act 2016.	Regulatory references in the current version of the Biodiversity Management Plan have been updated.	Closed
Sch 3 Condition 27	By the 30 June 2015, unless the Secretary agrees otherwise, the Proponent shall make suitable arrangements to protect the Kokoda Biodiversity Offset in perpetuity in consultation with OEH and to the satisfaction of the Secretary	Non-compliance A Conservation Agreement between the Minister administering the National Parks and Wildlife Act 1974 (NSW) and CMOC Mining Services Pty Limited for the Kokoda Biodiversity Offset Site was signed by both parties and became effective on execution by the Minister's delegate (refer to clause 17 of the Agreement) on 9 February 2018. This delay in executing the Conservation Agreement had not been agreed to by the Secretary of the DPE.	The Kokoda Voluntary Conservation Agreement was executed in February 2018.	Closed
Sch 3 Condition 28	By 30 June 2015, unless otherwise agreed by the Secretary, the Proponent shall lodge a Conservation Bond with the Department to ensure that the biodiversity offset strategies are implemented in accordance with the performance and completion criteria of the Biodiversity Management Plan.	Non-compliance By letter of 3 September 2015, the DPE advised NPM: "The Department notes that although payment of the bond was required by 30 June 2015, it did not receive your letter requesting an extension until 2 July 2015. The Department regards this as non-compliance with the condition and has referred the matter to the compliance team for investigation."	Noted.	Closed
		Observation No. 37 – The administrative non-compliance with this condition was caused by the	Northparkes has noted this recommendation.	Closed

Condition	Detail	2018 Audit Assessment / Recommendation	Northparkes Response	Status
		DPE's late receipt of NPM's original extension request. NPM could consider reviewing due dates for the submission of future requests to the DPE to ensure a request is submitted at least a couple of business days before the due date, to allow sufficient time for the request to be recorded as 'received'.		
Sch 3 Condition 29	<p>The Proponent shall prepare and implement a Biodiversity Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with BCD, and submitted to the Secretary for approval prior to the commencement of any development on site;</p> <p>(b) describe the short, medium, and long term measures that would be implemented to:</p> <ul style="list-style-type: none"> • manage the remnant vegetation and fauna habitat on the biodiversity offset sites; • restore the derived native grassland component of the Grey Box Grassy Woodland EEC community within the Kokoda Biodiversity Offset to woodland community; • implement the biodiversity offset strategies; and • integrate the implementation of the biodiversity offset strategies to the greatest extent practicable with the rehabilitation of the site (where relevant); <p>(c) include a detailed description of the measures that would be implemented for:</p> <ul style="list-style-type: none"> • enhancing the quality of existing vegetation and fauna habitat in the biodiversity offset areas, including the derived native grassland component of the Grey Box Grassy Woodland EEC community within the Kokoda Biodiversity Offset; • creating native vegetation and fauna habitat in the biodiversity offset areas and rehabilitation area through focusing on assisted natural regeneration, targeted vegetation establishment and the introduction of naturally scarce fauna habitat features (where necessary); • managing and maintaining the populations of Pine Donkey Orchid located to the north of the project area 	Non-compliance In relation to paragraph (g) of this condition, the BOMP does not specify who is responsible for reviewing the BOMP.	Section 4 (Responsibilities) states that the PSE Manager is responsible for 3 yearly reviews of the Plan	Closed.
		<p>Observation No. 38 – The published (NPM website) version of the BOMP does not include the relevant documents in Appendices:</p> <p>1 (Limestone National Forest Offset Area Revegetation Plan),</p> <p>2 (Vegetation Management Plan (for the Estcourt Offset area)),</p> <p>3 (Species Management Plan for the Pine Donkey Orchid), and</p> <p>5 (Bush Fire Management Plan for the Kokoda Biodiversity Offset Site). NPM should ensure the published version of the BOMP includes these documents in Appendices 1, 2, 3 and 5.</p>	All required plans are located on the Northparkes website.	Closed
		Observation No. 39 – The next review date for the Biodiversity Offset Management Plan should be brought forward from 31 December 2019 (in the header of the BOMP) to not later than 24 November 2019, for consistency with the three-year review period in section 6.2 of the BOMP.	The plan was reviewed in June 2020 and the next scheduled review has been set for June 2021.	Closed
		Observation No. 40 – References in the Biodiversity Offset Management Plan to the Threatened Species Conservation Act 1995 should be reviewed and updated to instead refer to the current Biodiversity Conservation Act 2016.	All references to the Threatened Species act 1995 have been removed and replaced with the Biodiversity Conservation Act 2016.	Closed

Condition	Detail	2018 Audit Assessment / Recommendation	Northparkes Response	Status
	<p>(near Adavale Lane) and near the E48 subsidence zone (refer to Appendix 6);</p> <ul style="list-style-type: none"> • collecting and propagating seed; • managing any potential conflicts between the proposed enhancement works in the biodiversity offset areas and any Aboriginal heritage values (both cultural and archaeological) in these areas; • managing salinity; • controlling weeds and feral pests; • controlling erosion; • managing grazing and agriculture on site; • controlling access; and • bushfire management; <p>(e) include a seasonally based program to monitor and report on the effectiveness of these measures, and progress against the detailed performance and completion criteria;</p> <p>(f) identify the potential risks to the successful implementation of the biodiversity offsets, and include a description of the contingency measures that would be implemented to mitigate against these risks; and</p> <p>(g) include details of who would be responsible for monitoring, reviewing, and implementing the plan.</p>			
Sch 3 Condition 31	<p>Heritage</p> <p>The Proponent shall prepare and implement a Heritage Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary;</p>	<p>Compliant</p> <p>Observation No. 41 – Section 10.5 of the HMP could be revised to specify conditions (e.g. procedures relating to non-urgent and urgent access) under which Aboriginal stakeholders can access heritage items on site.</p>	Detail updated in CHMP under Section 11.4, 'Curation of Heritage Objects'.	Closed
Sch 3 Condition 32	<p>Transport</p> <p>The Proponent shall use its best endeavours to ensure that as much mine-related traffic as possible, particularly heavy vehicles, uses the Newell Highway</p>	<p>Compliant</p> <p>Observation No. 42 – NPM could send periodic emails to contractors (e.g. JR Richards and Western Freight Management) regarding use of the Newell Highway and Bogan Road, or include this requirement in</p>	NPM deem this measure is not necessary, as the only approved B-double access to site is via the Newell Highway and Bogan Road.	Closed

Condition	Detail	2018 Audit Assessment / Recommendation	Northparkes Response	Status
	and Bogan Road to get to and from the mine.	contract documents.		
		Observation No. 43 – NPM’s website could be revised to include the relevant driving directions material in the “Map and Information on Access to Site”.	NPM deem this measure is not necessary, as the only approved B-double access to site is via the Newell Highway and Bogan Road.	Closed
Sch 3 Condition 36	<p>Lighting</p> <p>The Proponent shall:</p> <p>(a) implement best management practice to minimise the visual and off-site lighting impacts of the project;</p> <p>(b) ensure no fixed outdoor lights shine above the horizontal;</p> <p>(c) ensure no in-pit mobile lighting rigs shine above the pit wall and other mobile lighting rigs do not shine above the horizontal;</p> <p>(d) ensure that all external lighting associated with the project complies with Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting or its latest version;</p>	<p>Compliant</p> <p>Observation No. 44 – NPM could consider engaging a suitably qualified consultant to prepare a report on NPM’s compliance with this condition. NPM could retain the consultant’s report and a record of any action taken in response to the report, as evidence of compliance with this condition.</p>	NPM deem their current controls (including periodic inspections and Zero Harm Operations Walks) as sufficient to mitigate this risk of adverse lighting impacts. The Auditor notes that no complaints have been received relating to adverse lighting impacts.	Closed
Sch 3 Condition 37	<p>Bushfire Management</p> <p>The Proponent shall:</p> <p>(a) ensure that the project is suitably equipped to respond to any fires on site; and</p> <p>(b) assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site.</p>	<p>Compliant</p> <p>Observation No. 45 – The scope of NPM’s Bush Fire Management Plan for the Kokoda Biodiversity Offset Site (version no. 0 of 14 July 2016, Doc ID no. 3-8924) could be revised and expanded to include the mining leases and the Goonumbla Rail Siding.</p>	The scope of the current plan meets the intent of the Approval.	Closed
		Observation No. 46 – NPM could consider whether the Emergency Response Plan (Doc ID no. 3-8619) (not sighted) could be adapted to meet the requirements of this condition for general fire-fighting responses.	Separate bushfire management plan created to address risk and clearly identify appropriate control.	Closed
Sch 3 Condition 38	<p>Waste Management</p> <p>The Proponent shall:</p>	<p>Compliant</p> <p>Observation No. 47 – NPM could consider revising Table 16 in section 6.7.2 of future AEMRs to show ‘year on year’ trends in waste ‘per unit tonne of</p>	Northparkes have considered this believe it to provide little value. Various construction and development activities are regularly undertaken and do not accurately reflect the	Closed

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	(a) implement all reasonable and feasible measures to minimise the waste (including waste rock) generated by the project;	concentrate production', which could assist readers to understand the operation's waste management performance notwithstanding variations in total ore milled/concentrate production.	waste output during nominal conditions.	
	(b) ensure that the waste generated by the project is appropriately stored, handled and disposed of; and	Observation No. 48 – NPM could update the baseline year (2011) and non-mineral waste reduction target year (2015) in section 8 of the current version of the Non-Mineral Waste Management Plan.	This has been considered and will be reviewed further when business waste targets are introduced.	Closed
	(c) monitor and report on effectiveness of the waste minimisation and management measures in the Annual Review.			
Sch 3 Condition 41	Rehabilitation Management Plan The Proponent shall prepare and implement a Rehabilitation Management Plan for the project to the satisfaction of NSW Trade & Investment. This plan must: (g) include interim rehabilitation where necessary to minimise the area exposed for dust generation; (h) include a program to monitor, independently audit and report on the effectiveness of the measures, and progress against the detailed performance and completion criteria; and	Non-compliance The RMP does not comply with paragraphs (g) and (h) of this condition as follows: (g) The RMP does not specifically refer to 'interim rehabilitation' even though some of NPM's activities (such as the planting of barley on TSF2) could in substance be regarded as interim rehabilitation to minimise the area exposed for dust generation. (h) The RMP does not define a program for independent audits. In relation to the other paragraphs of this condition:	While Table 5 of the Rehabilitation Management Plan notes the requirement, where possible, to implement interim rehabilitation, no details / strategy for interim rehabilitation is described. The RMP does not define a program for independent audits.	Open
		Observation No. 49 – NPM could engage in written consultation with the DPE, DPI Water, OEH, Council and CCC in the next substantive revision of the RMP and include a record of consultation in the RMP.	No evidence was available during the current IEA that further consultation had been undertaken with Stakeholders.	Open
		Observation No. 50 NPM could improve certainty and accountability in the scheduling of rehabilitation programs by including criteria in the RMP regarding when a defined disturbance area (e.g. a TSF) which has not been used for a defined period becomes ready for 'interim (i.e. temporary) rehabilitation' and/or 'final rehabilitation'.	The rehabilitation schedule is described in the MOP.	Closed
		Observation No. 51 – NPM should correct the 'Error!' messages in the List of Figures, Section 4.1, Section 7 and Table 9 of the RMP	The plan has been edited.	Closed

Condition	Detail	2018 Audit Assessment / Recommendation	Northparkes Response	Status
Sch 5 Condition 3	Notification of Landholders/Tenants As soon as practicable after obtaining monitoring results showing: (a) an exceedance of any relevant criteria in schedule 3, the Proponent shall notify affected landowners in writing of the exceedance, and provide regular monitoring results to each affected landowner until the project is again complying with the relevant criteria.	Compliant Observation No. 52 – NPM could revise the Water Management Plan to include the requirements in paragraph (a) of this condition, if specified exceedances occur in the future against relevant water quality criteria.	This Condition apply to potential direct impacts on landowners. It is the Auditor's opinion that this condition was not triggered during the last audit period.	Closed
Sch 6 Condition 1	Environmental Management Strategy The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Secretary.	Observation No. 53 – NPM should revise the current version of its Environmental Management Strategy (EMS) at the earliest opportunity and review the correct application of document control.	The correct version of the EMS was available on the Northparkes website.	Closed
Sch 3 Condition 28	Management Plan Requirements The Proponent shall ensure that the management plans required under this approval are prepared in accordance with any relevant guidelines,	Non-compliance The Environmental Management Plans do not comply with paragraphs (a), (e) and (f) of this condition as follows: (a) The Plans generally do not include detailed baseline data. (e) Not all of the Plans include a contingency plan (or any reference to a contingency plan) to manage any unpredicted impacts and their consequences (however section 6.4 of the BOMP includes "Potential Risks and Corrective Actions"). (f) Not all of the Plans include information relating to programs to investigate and implement ways to improve the environmental performance of the project over time (however section 11 of the Air Quality Management Plan includes a reference to environmental performance, and section 13 of the Water Management Plan includes a reference to environmental performance).	The current version of the plans satisfy paragraphs (e) and (f), but not all plans contain detailed baseline data.	Open
Sch 6 Condition 5	Within 3 months of: (a) the submission of an annual review under condition 4 above;	Non-compliance The Groundwater Management Plan (version no. 2 of 3 October 2016, Doc ID no. 3-9795) is not within its required review period (review date was 10 October	The Groundwater Management Plan has been reviewed. The latest version was reviewed in June 2020.	Closed

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	(b) the submission of an incident report under condition 7 below; (c) the submission of an audit under condition 9 below; or (d) any modification to the conditions of this approval (unless the conditions require otherwise), the Proponent shall review and, if necessary, revise the strategies, plans, and programs required under this approval	2017). Observation No. 54 – NPM could develop a procedure and establish formal processes in relation to paragraph (b) of this condition under which the submission of an incident report under Schedule 6, Condition 7 of the Project Approval would trigger a reminder to relevant personnel to review all environmental strategies, plans and program within 3 months.	Northparkes has updated the environmental incident investigation form to consider the review of all environmental strategies, plans and program post incident.	Closed
Sch 6 Condition 6	Community Consultative Committee The Proponent shall operate a Community Consultative Committee (CCC) for the project to the satisfaction of the Secretary. This CCC must be operated in general accordance with the Guidelines for Establishing and Operating Community Consultative Committees for Mining Projects (Department of Planning 2007, or its latest version).	Compliant Observation No. 55 – In accordance with section 4.2 of the CCC Guidelines, NPM could arrange with the Independent Chair to introduce a standing 'Declaration of pecuniary (i.e. monetary) or other interests' item in the agenda of future CCC meetings	'Declaration of Precautionary or Other Interest' added as an agenda item	Closed
Sch 6 Condition 9	Access to Information The Proponent shall (a) make the following information publicly available on its website: <ul style="list-style-type: none">any independent environmental audit, and the Proponent's response to the recommendations in any audit.	Non-compliance As at this May 2018 audit, NPM's website contains the information required by this condition with the following exception: Although the 30 March 2015 audit report is on NPM's website, there is no NPM response to the recommendations in Table 6 of that audit report.	Northparkes response to the 2018 IEA compliance recommendations is available on the website.	Closed
Environment Protection Licence 4784				
A2.1	The licence applies to the following premises: ML 1247.	Compliant This condition limits the scope of the EPL to ML 1247. A literal interpretation of this condition is potentially problematic because section 120 of the POEO Act would apply to the other mining leases. The EPL was first issued on 13 October 2000. It appears this condition has inadvertently not been updated with successive revisions of the EPL. Observation No. 56 – NPM could request the EPA to update this condition to refer to all mining leases and applicable lots.	Northparkes have committed to this amendment to their EPL when that license is next revised. Not that this should be addressed prior to the planned addition of Tailings Storage Facilities to the development.	Open
A3.1	Works and activities must be carried out in accordance	Observation No. 57 – NPM could make enquiries with	Northparkes reported that they had made	Closed

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	<p>with the proposal contained in the licence application, except as expressly provided by a condition of this licence.</p> <p>In this condition the reference to "the licence application" includes a reference to:</p> <ul style="list-style-type: none"> a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence. 	the EPA regarding whether it is possible to obtain copies of the licence application documents made by a previous owner of the Project.	the recommended request.	
O1.1	<p>Licensed activities must be carried out in a competent manner. This includes:</p> <ul style="list-style-type: none"> a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity. 	<p>Non-compliant</p> <p>During the audit period two incidents were reported to the EPA (see Auditor's Note to EPL condition L1.1):</p> <ol style="list-style-type: none"> 1. Overflow of sediment pond SP4. 2. Overflow of Eastern Surge Dam. 	Northparkes have implemented all recommendations made in relation to this non-compliance.	Closed
O2.1	<p>All plant and equipment installed at the premises or used in connection with the licensed activity:</p> <ul style="list-style-type: none"> a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner. 	<p>Non-compliant</p> <p>Refer to non-compliance comments for condition O1.1.</p>	Northparkes have implemented all recommendations made in relation to this non-compliance.	Closed
O3.1	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	<p>Non-compliant</p> <p>During the audit period four 'dust' incidents were reported to the EPA.</p>	No recommendation was made in relation to this non-compliance. Note that no dust exceedances attributable to the mining operations were recorded during the current audit period.	Closed
		Observation No. 58 – NPM could consider making an Environment Team controlled water truck/cart available for dust suppression on site as an alternative to the Projects Team controlled water truck, which may not always be available as and when needed.	<p>Northparkes reviewed this recommendation has deemed that the proposed action was not necessary under the current operations.</p> <p>During this IEA the Auditor observed that dust management practices were controlling dust emissions.</p>	Closed
		Observation No. 59 – NPM could consider developing a	Northparkes reported that concentrate is	Closed

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		documented procedure around use of the external concentrate stockpile (e.g. if and when to cover with tarpaulin under certain weather conditions). The external concentrate stockpile has been located next to the concentrate shed since at least 2006.	only periodically stored outside the concentrate shed to aid drying. NPM has sufficient controls in place to manage potential fugitive dust emissions.	
		Observation No. 60 – NPM should formally evaluate the ongoing implementation and effectiveness of dust control strategies/measures, including the strategies identified in NPM’s Memorandum of 13 November 2015 and letter of 23 June 2016, and the control measures defined in section 6 of the Air Quality Management Plan.	Northparkes air quality monitoring results during the reporting period have shown no exceedance of air quality criteria at any privately owned residence. During this IEA adequate procedures were in place to manage dust generated at site.	Closed
		Observation No. 61 – If identified as being able to reduce fugitive dust, NPM could consider installing sprinklers along the sealed road alongside the concentrate shed to the concentrate stockpile.	Northparkes consider that this recommendation is not practical or necessary due to the limited use of the outside stockpile area.	Closed.
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	Non-compliant Identification of the person who collected the sample was not recorded on the field sheet and not recorded in places in the electronic copy.	Field sheets and analysis reported reviewed during this IEA identified the personnel responsible for sampling.	Closed
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	Non-compliant It is considered that the current groundwater sampling method employed by NPM is not obtaining a representative sample.	NPM’s groundwater sampling method outlined in the GMP continues to satisfy this condition. NPM maintains that the groundwater monitoring during the reporting period incorporated representative samples.	Closed
M2.2	Refer to Table in Condition M2.2 (reproduced in Appendix A).	Non-compliant It is considered that the current groundwater sampling method employed by NPM is not obtaining a representative sample. The sampling method described in section 5.3 of NPM’s “Work Instruction – Water Monitoring” (version 3) does not describe any requirement for purging of the well prior to sampling. The current method described of “repeat sampling bore and recording samples for a minimum 3	NPM’s groundwater sampling method outlined in the GMP satisfies this condition. NPM maintains that the groundwater monitoring during the reporting period incorporated representative samples.	Closed

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		times, once the results are showing continuity, take another sample from the bore" is not considered to be in accordance with Australian Standards.		
		Observation No. 62 – NPM should ensure groundwater sampling is conducted in accordance with the appropriate standard and all documentation describing the method is consistent. NPM's Management Plan – Tailings Storage Facility (version no. 12 of 20 July 2016, Doc ID no. 3-9268) and Groundwater Management Plan (see below) describe methods which differ from the Work Instruction – Water Monitoring (see above).		Closed
		Observation No. 63 – NPM uses Excel spreadsheets to record and retain environmental monitoring results. These spreadsheets are not in 'read only' form, which makes the spreadsheets potentially open to inadvertent or deliberate deletion or overriding. NPM could consider alternatives to Excel spreadsheets (e.g., cloud-based software or a commercially available relational database) to enhance data integrity and assist in preventing data loss.	Northparkes have implemented software database 'EnviroSys' to manage all environmental data.	Closed
M4.2	<p>The complaint record must include details of the following:</p> <ul style="list-style-type: none"> a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken. 	<p>Compliant</p> <p>Observation No. 64 – NPM could consider whether the incident numbers recorded in the Complaints Register could be hyperlinked to the original corresponding complaint record.</p>	Northparkes existing complaints management system meets the requirements of this licence condition.	Closed
M5.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows	<p>Compliant</p> <p>Observation No. 65 – NPM could consider making the complaints line telephone number directly available to</p>	Northparkes committed to including details of the complaints line in the Source Newsletter. Complaints line was provided in	Closed

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	how to make a complaint.	the general public by non-electronic means (for example, the White Pages, in the printed version of the 'Source' Community newsletter, or by a printed notice outside the main entry to the Site) to enable members of the public without computer knowledge or access to readily locate this contact number.	July 2018 Source Newsletter (bottom page 1). No complaints have been received since 2018.	
R1.1	<p>The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:</p> <ol style="list-style-type: none"> 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. <p>At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.</p>	<p>Compliant</p> <p>Observation No. 66 – NPM should ensure the NPM 'NED' incident numbers for any reported non-compliance continue to be recorded in Section C of future Annual Returns to assist tracking and close-out of incidents. NPM's 2016-2017 Annual Return included a record of NPM incident numbers for the incidents referred to in the comments for condition O1.1 but the previous 2014-2015 and 2015-2016 Annual Returns did not contain references to NPM incident numbers.</p>	<p>Recommendation did not occur for reportable event, 'Slurry Spill', in 2018/19 Annual Return. Northparkes recognize the benefit of recording the internal incident number for tracking purposes when a number of incidents have occurred during a reportable period. Northparkes operate a high level Environment Management System, recording 1 reportable incident in the past 3 years and do not see the value of the recommendation. When multiple reportable incidents of the same nature occur, Northparkes may consider the recommendation.</p>	Closed
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or 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').	<p>Non-compliance</p> <p>NPM did not submit (i.e. supply) the Annual Returns (listed above) prepared during the audit period to the EPA via eConnect EPA or by registered post.</p>	All annual returns were submitted in accordance with this licence condition during this audit period.	Closed
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	<p>Compliant</p> <p>Observation No. 67 – NPM could consider making a hard copy of the current version of the EPL (along with the Project Approval and Mining Leases) available for inspection by personnel in some suitable centralised work areas (if any) where computer or internet access is not readily available. If this occurs, NPM should consider identifying the location of these hard copies in a register to allow these to be withdrawn and replaced with updated copies as required.</p>	<p>Northparkes have noted the following in their response to the 2018 IEA:</p> <p>Copies of all relevant Licences and the Approval are made available at the People Safety and Environmental (PSE) Department office.</p>	Closed

Condition	Detail	2018 Audit Assessment / Recommendation	Northparkes Response	Status
U1.1	A comprehensive review is to be conducted by an appropriately qualified and experience person into all aspects of the surface water/stormwater management on the Northparkes mine site.	<p>Compliant</p> <p>Observation No. 68 – The May 2018 GHD report does not refer to EPL condition U1.1 and the described ‘scope of work’ (in section 1.3 of the GHD report) does not clearly match the issues listed in paragraphs a. to d. of this condition. NPM should ensure that future external reports prepared in response to an EPL condition:</p> <ul style="list-style-type: none"> • identify the condition which is the source of the report; • describe the scope of work consistent with the wording of the condition; and • where particular guidance material is not relevant to the report, include a statement to that effect. 	Northparkes has noted this recommendation.	Closed
U1.3	The review of the Surface water management plan and report as referred to above must be completed no later than the COB 30 March 2018 and submitted to the Dubbo EPA office.	<p>Non-compliance</p> <p>GHD’s report (Revision 2, Final) was completed on 3 May 2018 and was submitted by NPM to the Dubbo EPA office on 4 May 2018.</p> <p>By letter of 26 February 2018 NPM requested the EPA to extend the timeframe for compliance with EPL condition U1.3 to COB 31 May 2018. The EPA did not respond with written acceptance of NPM’s request.</p>	Northparkes has noted this recommendation.	Closed
U2.2	The review of the Dust management plan and report as referred to above must be completed no later than the COB 28 February 2018 and submitted to the Dubbo EPA office.	<p>Non-compliance</p> <p>The Pacific Environment report (dated 29 March 2018) was submitted by NPM to the Dubbo EPA office on 29 March 2018.</p> <p>By letter of 26 February 2018 NPM (the same letter as referred to in condition U3.1), NPM requested the EPA to extend the timeframe for compliance with EPL condition U2.2 to COB 29 March 2018. The EPA did not respond with written acceptance of NPM’s request</p>	Northparkes has noted this recommendation.	Closed
Mining Lease 1247				
2 (b)	The MOP must identify the post mining land use and set out a detailed rehabilitation strategy which: (i) identifies areas that will be disturbed;	<p>Compliant</p> <p>Observation No. 69 – To better align with paragraph b) of this condition, section 4.3 of the MOP could be</p>	Northparkes have not implemented this in the current MOP but will reconsider this during MOP/Rehab MP reform.	Open

Condition	Detail	2018 Audit Assessment / Recommendation	Northparkes Response	Status
	(ii) details the staging of specific mining operations, mining purposes and prospecting; (iii) identifies how the mine will be managed and rehabilitated to achieve the post mining land use; (iv) identifies how mining operations, mining purposes and prospecting will be carried out in order to prevent and or minimise harm to the environment; and (v) reflects the conditions of approval under: <ul style="list-style-type: none"> the Environmental Planning and Assessment Act 1979; the Protection of the Environment Operations Act 1997; and any other approvals relevant to the development including the conditions of this mining lease. 	renamed from 'Rehabilitation Objectives' to 'Rehabilitation Strategy' and revised to incorporate: <ul style="list-style-type: none"> the 'tree planting and rehabilitation' section on page 81; and the strategies (short-, medium- and long-term management measures) in section 5 of NPM's Rehabilitation Management Plan. 		
5	The lease holder must provide environmental incident notifications and reports to the Secretary no later than seven (7) days after those environmental incident notifications and reports are provided to the relevant authorities under the Protection of the Environment Operations Act 1997.	Compliant Observation No. 70 – NPM's Pollution Incident Response Management Plan (version 7) could be updated to add the Secretary of the DPE (DRG) as a notifiable regulatory authority (in Table 1, page 5).	The current version of the PRIMP (Table 3) lists the Resource Regulator as a notifiable authority.	Closed
Mining Lease 1367				
6	The lease holder must optimise recovery of the minerals that are the subject of this mining lease to the extent economically feasible.	Compliant Observation No. 71 – Silver is not authorised to be mined under ML 1367. NPM could consider requesting the DPE (DRG) to revise ML 1367 to include silver, for consistency with other NPM mining leases.	Northparkes has enquired into getting the ML updated to include the mining of silver. The Departments application form has been unavailable for a number of months during a review period and Northparkes will be notified as the form comes available.	Open
Mining Lease 1641				
8	The lease holder must make every reasonable attempt, and be able to demonstrate its 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: <ul style="list-style-type: none"> access arrangements operational interaction procedures dispute resolution information exchange well location 	Compliant Observation No. 72 – NPM should review the legal status of the Occupation Permit (No. HD48307). As defined in condition 1 of the Occupation Permit, "Northparkes Mines" does not include any future owner of the Project.	NPM has submitted an application for a new Occupation Permit which will be issued to the appropriate company title.	Closed

Condition	Detail	2018 Audit Assessment / Recommendation	Northparkes Response	Status
	<ul style="list-style-type: none"> • timing of drilling • potential resource extraction conflicts; and • rehabilitation issues. 			
9	The lease holder must ensure that mining operations which will utilize methods which are likely to cause interference with Parkes Radio Telescope during its operational hours are conducted in co-operation and consent with the CSIRO.	Compliant Observation No. 73 – NPM could consider contacting the CSIRO Parkes Radio Telescope facility and perhaps arrange a formal meeting (i.e. recorded in writing) if required to confirm existing and proposed mining methods are not of concern to that facility.	Northparkes has considered this recommendation but decided that no action would be taken.	Closed

7.7 Specialist Auditor Reports

No specialist auditor reports were prepared as part of this audit.

7.8 Operational Environmental Impacts

The assessment of actual impacts against those predicted in the EAs for each of the Modifications (as provided on the DPIE website) is provided in Table 12.

Table 12 - Predicted vs Actual Impacts

Category	Predicted Impact	Actual Impacts to Date
Modification 1		
Subsidence	No change in existing /surface development / impact areas	All subsidence impacts are contained within the approved subsidence areas.
Water Resources	No change in existing / approved surface water / underground impact areas	All surface impacts are contained within the approved mining areas.
Visual	No change existing / approved impact areas	All surface impacts are contained within the approved mining areas.
Land Resources	No change existing / approved impact areas	All surface impacts are contained within the approved mining areas.
Flora and Fauna	No change existing / approved impact areas	All surface impacts are contained within the approved mining areas.
Hazards and Risks	No change underground mining techniques	Noted
Workforce	No change workforce	Noted
Modification 2		
General	No additional impacts predicted	Noted
Modification 3		
Agricultural	All surface disturbance is within approved areas	All subsidence impacts are contained within the approved subsidence areas.
Air Quality	All surface disturbance is within approved surface disturbance areas. No change in stockpile, TSF or processing relative to the approved Northparkes operations.	Air quality monitoring results indicate that no significant air quality impacts were recorded (that were attributable to the mining and related operations)
Noise and Blasting	No change to surface operations. Blasting practices are consistent with current approved operations	All noise / blast monitoring verified that no noise non-compliances were recorded
Biodiversity	All surface disturbance is within approved areas	All surface impacts are contained within the approved mining areas.
Water Resources	All surface disturbance is within approved surface disturbance areas and captured within approved water management system	All surface impacts are contained within the approved mining areas.
Heritage	All surface disturbance is within approved areas	All surface impacts are contained within the approved mining areas.
Visual	All surface disturbance is within approved areas. No change in surface infrastructure	All surface impacts are contained within the approved mining areas.

Category	Predicted Impact	Actual Impacts to Date
Traffic and Amenity	No change to staff or production methods	All surface impacts are contained within the approved mining areas.
Rehabilitation	All surface disturbance is within approved areas	No additional land impacts have been identified related to Modification 3. All surface impacts are contained within the approved mining areas.
Modification 4		
Agricultural	Additional disturbance if 1400 m ² will no significantly change the agricultural impacts	All surface impacts are contained within the approved mining areas.
Air Quality	No significant change in air quality impacts	Air quality monitoring results indicate that no significant air quality impacts were recorded (that were attributable to the mining and related operations)
Noise and Blasting	Impacts on all private receivers will continue to comply with noise limits	All noise monitoring verified that no noise non compliances were recorded.
Biodiversity	1400 m ² of Grey Box tall grassy woodland will be disturbed	All surface impacts are contained within the approved mining areas.
Water Resources	No material changes to water infrastructure or impacts	All surface impacts are contained within the approved mining areas.
Heritage	No additional heritage impacts	All surface impacts are contained within the approved mining areas.
Visual	No increase in footprint of plant areas	All surface impacts are contained within the approved mining areas.
Traffic and Amenity	No change in staff or production	All surface impacts are contained within the approved mining areas.
Rehabilitation	No change in rehabilitation objectives or final land uses	All surface impacts are contained within the approved mining areas.
Modification 5		
Road and Traffic	Temporary impacts on roads and intersections associated with the temporary transport route	No permanent impacts on roads to the site were identified
Traffic Noise	Road traffic noise will comply with RNP noise limits	No traffic noise complaints were received.
Operational Noise	Impacts on all private receivers will continue to comply with noise limits	No noise complaints receive relating to the site operations. All noise monitoring verified that no noise non compliances were recorded.
Air quality	Negligible dust impacts from secondary crusher operations would occur	Air quality monitoring results indicate that no significant air quality impacts were recorded (that were attributable to the mining and related operations)
Visual	No permanent additional visual impacts	No additional visual impacts from permanent infrastructure have been identified.
Biodiversity	No additional land clearing required for Mod 5.	No additional land impacts have been identified related to Modification 5. All surface impacts are contained within the approved mining areas.
Rehabilitation	No additional land clearing required for Mod 5.	No additional land impacts have been identified related to Modification 5. All surface impacts are contained within the approved mining areas.

Compliance Table

Appendix A

PLANNING APPROVAL 11_0060

Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
SCHEDULE 2 ADMINISTRATIVE CONDITIONS								
Sch 1 Cond 1	OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT	In addition to meeting the specific performance criteria established under this approval, the Proponent shall implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation or rehabilitation of the project.				The Auditor considers that as of May 2020, NPM has implemented 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. The Northparkes Mines operates an ISO 14000 compliant Environmental Management System Standard.	Complies	
Sch 2 Cond 2	TERMS OF CONSENT	The Proponent must carry out the project: (a) generally in accordance with the EA and the statement of commitments; and (b) in accordance with the conditions of this approval.				The Auditor considers that as at May 2020, Northparkes Mine is carrying out the Project generally in accordance with the Environmental Assessment and the statement of commitments, and in accordance with the conditions of the Project Approval, subject to the non-compliance findings in this audit report. NPM has developed suitable Management Plans and procedures to assist it in carrying out the Project in accordance with this condition.	Complies	
Sch 2 Cond 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 consent shall prevail to the extent of any inconsistency.					Noted	
Sch 2 Cond 4		The Proponent shall comply with any reasonable requirements of the Director-General arising from the Department's assessment of: <ul style="list-style-type: none"> any strategies, plans, programs, reviews, audits, or correspondence that are submitted in accordance with this approval; and the implementation of any actions or measures contained in these documents. 					Noted	
Sch 2 Cond 5	Mining Operations	The Proponent may carry out mining operations on the site until 31 December 2032.					Noted	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Sch 2 Cond 6	Ore Processing	The Proponent shall not process more than 8.5 million tonnes of ore on site in any calendar year.	2018_12_NPM Sitewide Reconciliation Report 2019_12_NPM Sitewide Reconciliation Report 2020_12_NPM Sitewide Reconciliation Report 2021_03_NPM Sitewide Reconciliation Report			Ore processed for the 2018 calendar Year – 6.484 million tonnes. Ore processed for the 2019 calendar Year – 6.422 million tonnes. Ore processed for the 2020 calendar Year – 6.494 million tonnes. Ore processed for the first quarter of 2021- 1.482 million tonnes.	Compliance	
Sch 2 Cond 7	Ore Concentrate Transport	The Proponent shall ensure that all ore concentrate produced on site is transported to the Goonumbla Rail Siding via truck haulage on Bogan Road.	2018_12_NPM Sitewide Reconciliation Report 2019_12_NPM Sitewide Reconciliation Report 2020_12_NPM Sitewide Reconciliation Report 2021_03_NPM Sitewide Reconciliation Report Spreadsheet titled “Train Consignments 2019” Spreadsheet titled “Train Consignments 2020” Spreadsheet titled “Train Consignments 2021”	Environmental Advisor - All concentrate was transported to the Goonumbla rail siding via truck haulage on the Bogan Road during the period, except for the period during construction of the inland railway. As part of MOD5, Conditions 32A, 32B, 34A and 34B of schedule 3 approve the temporary haulage of concentrate to the Parkes Logistics Terminal.		A review of the train consignment against the concentrate production records for the audit period verified that all ore concentrate produced on site was transported to the Goonumbla Rail Siding via truck haulage on Bogan Road	Compliance	
Sch 2 Cond 8	Surrender of Consents	Within 12 months of the date of this approval, or as otherwise agreed by the Secretary, the Proponent shall surrender the existing project approval PA06_0026 and development consent DA11092 in accordance with Section 104A of the EP&A Act. This requirement does not extend to the surrender of the Forbes Water Pipeline Development Consent DA2009/0057.	2018 Independent Environmental Audit Letter from DPI (B Lashbrook) to Northparkes (C Dingle) titled “Owner’s consent for development: Surrender of Consent” dated 20 June 2018 confirming surrender of Consent PA-6_0026 and DA11092.			The 2018 IEA verified that all consents other than PA06_0026 had been surrendered. Consent PA06_0026 and DA DA11092 were surrendered on 20 June 2018. It is noted that the surrender of the consents occurred after the 12-month period specified in this Condition.	Non-Compliance	Northparkes request that this condition removed during next Modification of Development Consent.
Sch 2 Cond 9		Prior to the surrender of these consents, the conditions of this approval (including any notes) shall prevail to the extent of any inconsistency with the conditions of these consents.					Noted	
Sch 2 Cond 10	STRUCTURAL ADEQUACY	The Proponent shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structure, are constructed in accordance with the relevant requirements of the BCA; <i>Notes:</i> <i>Under Part 4A of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works.</i> <i>Part 8 of the EP&A Regulation sets out the requirements for the certification of the</i>	Northparkes Mine Secondary Crush, MHS & Overland Conveyor Detailed Design Close Out Report, prepared by GHD, dated September 2020.	Environment Advisor – During the audit period the secondary crushing circuit consisting of 2 buildings (crusher and screen) and a number of conveyors were constructed.		GHD certified the design and compliance crusher and conveyer system.	Compliance	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		<i>project.</i>						
Sch 2 Cond 11	DEMOLITION	The Applicant 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.		Environment and Community Superintendent – No structures were demolished during the audit period.		No structures were demolished during the audit period.	Not Triggered	
Sch 2 Cond 12	Protection of Public Infrastructure	Unless the Proponent and the applicable authority agree otherwise, the Proponent shall: a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the project; and b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the project. Note: This condition does not apply to any damage to public infrastructure subject to compensation payable under the Mine Subsidence Compensation Act 1961, or to damage to roads caused as a result of general road usage.	Complaints Register	Environment and Community Superintendent – No impacts on public infrastructure occurred during the audit period.		Northparkes was not aware of any public infrastructure being damaged by the project during the audit period; and there has been no relocation of public infrastructure during the audit period.	Compliance	
Sch 2 Cond 13	Operation of Plant and Equipment	The Applicant shall ensure that all plant and equipment used at the site is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.		Maintenance Improvement Superintendent – Northparkes uses SAP to track maintenance works across the mine both on the surface and underground.	During the site inspection all areas inspected were appropriately organised and maintained. No evidence of improper equipment operations or maintenance were observed.	The Northparkes Mine operates an SAP based maintenance system that monitors and manages scheduled and unscheduled maintenance.	Compliance	
Sch 2 Cond 14	STAGED SUBMISSION OF STRATEGIES, PLANS OR PROGRAMS	With the approval of the Director-General, the Proponent may submit any strategies, plans or programs required by this approval on a progressive basis.					Noted	
SCHEDULE 3 ENVIRONMENTAL PERFORMANCE CONDITIONS								
Sch 3 Cond 1	NOISE Noise Criteria	The Proponent shall ensure that the noise generated by the project does not exceed the criteria in Table 1 at any residence on privately-owned land. Table 1: Noise impact assessment criteria Table 1: On all privately owned land Day LA _{eq(15min)} 35 dB(A) Evening LA _{eq(15min)} 35 dB(A) Night LA _{eq(15min)} 35 dB(A) Night LA _{1(1min)} 45 dB(A)	Noise Monitoring Assessment Northparkes Mine Quarter 1, 2021, prepared by Muller Acoustic Consulting. Noise Monitoring Assessment Northparkes Mine Quarter 4, 2020, prepared by Muller Acoustic Consulting. Noise Monitoring Assessment Northparkes Mine Quarter 3, 2020, prepared by Muller Acoustic Consulting. Noise Monitoring Assessment Northparkes Mine Quarter 2, 2020, prepared by Muller Acoustic Consulting.	Environmental Advisor- There have been no exceedances of the noise impact assessment criteria during the audit period.		No noise exceedances were reported during the audit period.	Compliance	
Sch 3 Cond 2	Construction Noise	The Proponent shall only carry out the construction works associated with the upgrade of McClintocks Lane, the construction of the McClintocks Lane access road and the upgrade of the intersection of McClintocks Lane and Bogan Road during the day.	Noise Monitoring Assessment Northparkes Mine Quarter 1, 2020, prepared by Muller Acoustic Consulting. Noise Monitoring Assessment Northparkes Mine Quarter 4, 2019, prepared by Muller Acoustic Consulting.	Environmental Advisor– works associated with the upgrade of McClintocks Lane were completed during the previous audit period.		No exceedances of the noise acquisition criteria were recorded over the audit period. Woks on McClintocks	Not Triggered	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Sch 3 Cond 2		During construction of the works referred to in condition 2 of schedule 3, the noise criteria in Table 1 do not apply to the residences located in the vicinity of the works. The Proponent shall implement all reasonable and feasible measures to minimise construction noise impacts on the residences in the vicinity of these works.	Noise Monitoring Assessment Northparkes Mine Quarter 3, 2019, prepared by Muller Acoustic Consulting. Noise Monitoring Assessment Northparkes Mine Quarter 2, 2019, prepared by Muller Acoustic Consulting. Noise Monitoring Assessment Northparkes Mine Quarter 1, 2019, prepared by Muller Acoustic Consulting.	Environmental Advisor– works associated with the upgrade of McClintocks Lane were completed during the previous audit period.		No exceedances of the noise acquisition criteria were recorded over the audit period. Woks on McClintocks	Not Triggered	
Sch 3 Cond 4	Noise Operating Conditions	The Proponent shall: a) implement best management practice to minimise the construction, operational and road noise of the project;	Noise Monitoring Assessment Northparkes Mine Quarter 4, 2018, prepared by Muller Acoustic Consulting. Noise Monitoring Assessment Northparkes Mine Quarter 3, 2018, prepared by Muller Acoustic Consulting. Noise Monitoring Assessment Northparkes Mine Quarter 2, 2019, prepared by Muller Acoustic Consulting. Northparkes Mine Annual Review 2020. Northparkes Mine Annual Review 2019. Northparkes Mine Annual Review 2018. Northparkes Mines Management Plan Environmental Noise, Version 17, dated May 2020.	Environmental Advisor– neighbours advised the mine that they could hear noise from the new vent shaft fans. Monitoring confirmed that no exceedances were occurring. Investigations were undertaken and a noise control berm installed to reduce impacts on neighbours.	During the audit inspection, the mine operations were inaudible at all locations outside of the mine boundaries visited by the Auditor.	No exceedances of the noise acquisition criteria were recorded over the audit period. The noise management program implemented is described in the Environmental Noise Management Plan. Neighbours advised that the new vent shaft fans were audible. While the noise levels were below compliance criteria, Northparkes have investigated and implemented best practice measures to further reduce noise impacts.	Compliance	
		b) operate a comprehensive noise management system that uses a combination of predictive meteorological forecasting and real-time noise monitoring data to guide the day to day planning, and the implementation of both proactive and reactive noise mitigation measures to ensure compliance with the relevant conditions of this approval;			The Auditor inspected the meteorological station and noise monitoring sites. Photograph 1 shows the meteorological station located near the main site entry.	No exceedances of the noise acquisition criteria were recorded over the audit period. A comprehensive noise monitoring and management program has been implemented.	Compliance	
		c) minimise the noise impacts of the project during meteorological conditions when the noise limits in this approval do not apply; and				No exceedances of the noise acquisition criteria were recorded over the audit period. The noise management program implemented is described in the Environmental Noise Management Plan.	Compliance	
		d) carry out regular monitoring to determine whether the project is complying with the relevant conditions of this approval, to the satisfaction of the Secretary.				Regular noise monitoring has been consistently undertaken over the audit period.	Compliance	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Sch 3 Cond 5	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 prior to the commencement of construction;	Northparkes Mines Management Plan Environmental Noise, Version 17, dated May 2020. Memo from Northparkes (C Higgins) to the DPIE (R Hawkeswood), titled "Noise Management Plan Review", dated 5 August 2020. 2017 Independent Environmental Audit			A Noise Management Plan has been prepared and implemented. The operation meet all noise emission criteria during the audit period. The original plan was issued in 2014 and minor revisions made since that this. Those changes were communicated to DPIE in 2020. The EPA was consulted during the preparation of the original plan (verified in the 2017 IEA).	Complies	
		(b) describe the measures that would be implemented to ensure compliance with the noise criteria and operating conditions in this approval;	Northparkes Mines Management Plan Environmental Noise, Version 17, dated May 2020.			Section 7 of the Noise Management Plan details the environmental noise controls implemented at the mine.	Complies	
		(c) describe the proposed noise management system in detail; and	Northparkes Mines Management Plan Environmental Noise, Version 17, dated May 2020.			The plan provides sufficient explanation of the overall noise management system as implemented at the mine.	Complies	
		(d) include a monitoring program that: <ul style="list-style-type: none"> evaluates and reports on: <ul style="list-style-type: none"> the effectiveness of the noise management system; compliance against the noise criteria in this approval; and compliance against the noise operating conditions; includes a program to calibrate and validate the real- time noise monitoring results with the attended monitoring results over time (so the real-time noise monitoring program can be used as a better indicator of compliance with the noise criteria in this approval and trigger for further attended monitoring); and defines what constitutes a noise incident and includes a protocol for identifying and notifying the Department and relevant stakeholders of any noise incidents. 	Northparkes Mines Management Plan Environmental Noise, Version 17, dated May 2020.	Environment Advisor – Northparkes operate both an attended and unattended noise monitoring program. Attended monitoring is undertaken quarterly in accordance with the conditions of development consent 11_0060. The unattended noise monitoring network has been established at 4 neighbouring receivers (same as the attended monitoring locations) to capture Northparkes offsite impacts. Northparkes have no monitoring and reporting obligations (development consent and EPL) for the unattended monitoring although the data is primarily used to validate attended monitoring results. Following attended monitoring, the consultant will request unattended noise and weather data to validate against attended results. As the real-time monitors capture all external noise sources, data is not readily available to discern the mine contribution at any one point. The real-time unattended monitors are manufacturer calibrated and reissued every 2 years. Northparkes do not see the benefit in validating real-time noise monitoring against attended monitoring results. Northparkes undertake ad hoc noise monitoring when there are significant changes to normal operation conditions.		Section 8 of the Noise Management Plan details the noise monitoring program. No information relating to calibration or validation of noise monitoring results is contained in the plan. Section 6.5 defines what constitutes a noise incident and the reporting requirements.	Non-Compliance	Revise the Noise Management Plan to include the description (see Environmental Advisor Explanation in Column 5) of the operation of the unattended Noise Monitoring Program as a source of validation data.

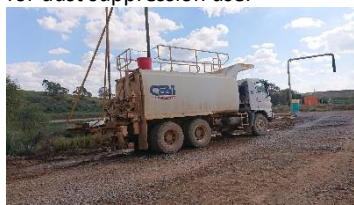
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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Sch 3 Cond 6	Blasting Criteria	The Proponent shall ensure that blasting on site does not cause exceedances of the criteria in Table 2.		Environment Advisor – no surface blasting was undertaken during the audit period.		no surface blasting was undertaken during the audit period.	Not Triggered	
Sch 3 Cond 7	Blasting Hours	The Proponent shall only carry out surface blasting on site between 9 am and 5 pm Monday to Saturday inclusive. No blasting is allowed on Sundays, public holidays, or at any other time without the written approval of the Secretary.		Environment Advisor – no surface blasting was undertaken during the audit period.		no surface blasting was undertaken during the audit period.	Not Triggered	
Sch 3 Cond 8	Blasting Frequency	The Proponent shall only carry out 1 blast per day on site. <i>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 mine or its workers.</i>					Complies	
Sch 3 Cond 9	Blasting Property Inspections	If the Proponent receives a written request from the owner of any privately-owned land within 2 kilometres of any approved open cut mining pit on site for a property inspection to establish the baseline condition of any buildings and/or structures on his/her land, or to have a previous property inspection updated, then within 2 months of receiving this request the Proponent shall: a) commission a suitably qualified, experienced and independent person, whose appointment is acceptable to both parties to: <ul style="list-style-type: none"> establish the baseline condition of any buildings and other structures on the land, or update the previous property inspection report; and identify measures that should be implemented to minimise the potential blasting impacts of the project on these buildings and/or structures; and b) give the landowner a copy of the new or updated property inspection report. If there is a dispute over the selection of the suitably qualified, experienced and independent person, or the Proponent or the landowner disagrees with the findings of the property inspection report, either party may refer the matter to the Secretary for resolution.		Environment Advisor – no surface blasting was undertaken during the audit period. No requests for property inspections have been received during the audit period.		During the audit period NPM has not received a written request under this condition.	Not Triggered	
Sch 3 Cond 10	Blasting – Property Investigations	If the owner of any privately-owned land claims that buildings and/or structures on his/her land have been damaged as a result of blasting on the site, then within 2 months of receiving this claim the Proponent shall: (a) commission a suitably qualified, experienced and independent		Environment Advisor – no surface blasting was undertaken during the audit period. No requests for property inspections have been received during the audit period.		During the audit period NPM has not received a written request under this condition.	Not Triggered	

PLANNING APPROVAL 11_0060

Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		<p>person, whose appointment is acceptable to both parties to investigate the claim; and</p> <p>(b) give the landowner a copy of the property investigation report.</p> <p>If this independent property investigation confirms the landowner's claim, and both parties agree with these findings, then the Proponent shall repair the damage to the satisfaction of the Secretary.</p> <p>If there is a dispute over the selection of the suitably qualified, experienced and independent person, or the Proponent or the landowner disagrees with the findings of the independent property investigation, then either party may refer the matter to the Secretary for resolution</p>						
Sch 3 Cond 11	Blasting – Operating Conditions	<p>The Proponent shall:</p> <p>a) implement best management practice to:</p> <ul style="list-style-type: none"> protect the safety of people and livestock in the surrounding area; protect public or private infrastructure/property in the surrounding area from any damage; and minimise the dust and fume emissions of any blasting; and <p>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.</p>		Environment Advisor – no surface blasting was undertaken during the audit period.		No surface blasting was undertaken during the audit period.	Not Triggered	
Sch 3 Cond 12		<p>Proponent shall not undertake blasting on site within 500 metres of:</p> <p>(a) any public road;</p> <p>(b) any land outside the site not owned by the Proponent, unless the Proponent has:</p> <ul style="list-style-type: none"> demonstrated to the satisfaction of the Secretary that the blasting can be carried out closer to the infrastructure or land without compromising the safety of people or livestock or damaging the infrastructure and/or other buildings and structures; and updated the Blast Management Plan to include the specific measures that would be implemented while blasting is being carried out within 500 metres of the infrastructure or land; or a written agreement with the relevant infrastructure owner or landowner to allow blasting to be carried out closer to the infrastructure or land, and the Proponent has advised the Department 		Environment Advisor – no surface blasting was undertaken during the audit period.		No surface blasting was undertaken during the audit period.	Not Triggered	

PLANNING APPROVAL 11_0060

Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation	
		in writing of the terms of this agreement							
Sch 3 Cond 13	Blasting Management Plan	Proponent shall prepare and implement a Blast Management Plan for the project to the satisfaction of the Secretary. This plan must: a) be prepared in consultation with the EPA, and submitted to the Secretary for approval prior to conducting any blasting on site;	Northparkes Mine Blast Management Plan, Version 8, dated 30 May 2020.	Environment Advisor – Following reviews of the approved management plan (2015) only minor (formatting and wording) modifications have been undertaken to the management plan to reflect updated systems (RMSS, DCS, etc). There have been no changes to technical information, monitoring programs and reporting processes. Northparkes will still make the commitment for third party review of the management plan prior to the recommencement of open cut operations. Consultation will be made with the EPA prior to submission to the Department.		A Blast Management Plan has been prepared. A review of the Plan was undertaken in August 2020.	Complies		
		b) describe the measures that would be implemented to ensure compliance with the blast criteria and operating conditions of this approval;	Northparkes Mine Blast Management Plan, Version 8, dated 30 May 2020.			The Blast Management Plan provides an appropriate framework for managing surface blasting at the mine.	Complies		
		c) propose and justify any alternative ground vibration limits for public infrastructure in the vicinity of the site (if relevant); and	Northparkes Mine Blast Management Plan, Version 8, dated 30 May 2020.			No changes to ground vibration limits.	Not Triggered		
		d) include a monitoring program for evaluating and reporting on compliance with the blasting criteria and operating conditions of this approval.	Northparkes Mine Blast Management Plan, Version 8, dated 30 May 2020.			A blast monitoring program is presented in Section 6 of the plan.	Complies		
Sch 3 Cond 14	Air Quality Impact Assessment Criteria	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 cause exceedances of the criteria listed in Tables 3, 4 and 5 at any residence on privately-owned land.	Northparkes Mine Annual Review 2020. Northparkes Mine Annual Review 2019. Northparkes Mine Annual Review 2018. Northparkes Mines Air Quality Management Plan Environmental Noise, Version 19, dated June 2020.	Environment and Community Superintendent – All air quality monitoring results were below the criteria.	At the time of the site inspection minimal levels of dust were observed. Water carts were in operation and no dust was observed leaving the boundaries of the mine. Photograph shows one of the site-based water carts taking on water for dust suppression use. 	A review of each Annual Review has indicated that no air quality related non-compliances were detected.	Complies		
		Pollutant	Av. Period	Criterion					
		Long Term Impact Assessment Criteria		Northparkes Mine Annual Review 2020. Northparkes Mine Annual Review 2019. Northparkes Mine Annual Review 2018.					
		TSP	Annual	90 ug/m³			No exceedances in these criteria attributable to the mining operations were detected during the audit period.	Complies	
		PM ₁₀	Annual	30 ug/m³				Complies	
		Short Term Impact Assessment Criteria		Northparkes Mines Air Quality Management Plan Environmental Noise, Version 19, dated June 2020.					
		PM ₁₀	24 hour	30 ug/m³				Complies	
		Long Term Criteria Deposited Dust							

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Cond.	Short Title	Condition				Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		Pollutant	Ave. Period	Max increase	Max Total Dust					Complies	
		Deposited	Year	2 g/m²/mth	4 g/m²/mth					Complies	
Sch 3 Cond 15	Air Quality Mine Owned Land	<p>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 cause exceedances of the criteria listed in Tables 3, 4 and 5 at any occupied residence on mine-owned land unless:</p> <p>a) the tenant has been notified of any health risks associated with such exceedances in accordance with the notification requirements under schedule 5 of this approval;</p> <p>b) the tenant of any land owned by the Proponent can terminate their tenancy agreement without penalty at any time, subject to giving reasonable notice;</p> <p>c) air mitigation measures such as air filters, a first flush roof water drainage system and/or air conditioning) are installed at the residence, if requested by the tenant;</p> <p>d) air quality monitoring is regularly undertaken to inform the tenant of the actual particulate emissions at the residence; and</p> <p>e) data from this monitoring is presented to the tenant in an appropriate format for a medical practitioner to assist the tenant in making informed decisions on the health risks associated with occupying the property, to the satisfaction of the Secretary.</p>					Environment Advisor – there are no occupied residences on mine owned land.		There were no occupied residences on mine-owned land during the audit period.	Not Triggered	
Sch 3 Cond 16	Air Quality Operating Conditions	<p>The Proponent shall:</p> <p>a) implement best management practice to minimise the off-site odour, fume and dust emissions of the project;</p> <p>b) implement all reasonable and feasible measures to minimise the release of</p>				<p>Northparkes Mine Annual Review 2020.</p> <p>Northparkes Mine Annual Review 2019.</p> <p>Northparkes Mine Annual Review 2018.</p> <p>Northparkes Mines Air Quality Management Plan Environmental Noise, Version 19, dated June 2020.</p> <p>Maintenance Management System.</p> <p>Complaints Register</p>	<p>Maintenance Superintendent – Northparkes operates a SAP based plant and equipment maintenance system. All contractor's equipment is covered by the SAP system.</p> <p>Plant and equipment specific maintenance requirements are prepared and loaded in the SAP system. Inspections are undertaken weekly, routine maintenance operations are monitored and managed by the SAP system.</p>	<p>During the site inspection the audit witness the operation of water carts across the operational areas. No significant visible dust was being generated at the time of this audit.</p> <p>Planting of grasses on the currently unutilized tailings storage facility was sighted.</p> <p>Photograph 3 shows the grass stabilised batter slopes of tailings storage facility.</p>	<p>The review of dust monitoring data covering the audit period did not identify any dust exceedances due to mining operations.</p> <p>The Auditor considers that the control measures specified in the Air Quality Management Plan were being implemented.</p> <p>No dust related complaints were received during the audit period.</p> <p>All plant and equipment are subject to routine checks and maintenance.</p>	Complies	
									All plant and equipment are subject to routine checks and	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		greenhouse gas emissions from the site;				maintenance.		
		c) minimise any visible off-site air pollution generated by the project;			During the site inspection the audit witness the operation of water carts across the operational areas. No significant visible dust was being generated at the time of this audit. Planting of grasses on the currently unutilized tailings storage facility was sighted.	No evidence of visible air pollution was sighted during the audit. No air quality related complaints were received during the audit period.	Complies	
		d) minimise the surface disturbance of the site;			During the site inspection all areas of the site were inspected. No clearing of vegetation in areas not being actively mines or being prepared for mining (or mining support activities were identified. Progressive revegetation works were observed on stockpiles and the tailings storage facilities. Photograph 4 shows the rehabilitation areas trailed on the surface of the completed TSF.	No unnecessary clearing of vegetation was observed during this IEA. Progressive revegetation was being undertaken.	Complies	
		e) operate an air quality management system that uses a combination of predictive meteorological forecasting and real-time air quality monitoring data to guide the day-to-day planning of mining operations and the implementation of both proactive and reactive air quality mitigation measures to ensure compliance with the relevant conditions of this approval; and				An air quality monitoring and management system as described in the Air Quality Management Plan has been implemented.	Complies	
		f) minimise the air quality impacts of the project during adverse meteorological conditions and extraordinary events (see Noted above under Table 5); to the satisfaction of the Secretary			Air quality monitoring stations Meteorological station. Photograph 5 shows one of the off-site air quality monitoring stations.	The review of dust monitoring data covering the audit period did not identify any dust exceedances due to mining operations.	Complies	
Sch 3 Cond 17	Air Quality Management Plan	The Proponent shall prepare and implement an Air Quality Management Plan for the project to the satisfaction of the Secretary. This plan must: a) be prepared in consultation with the EPA, and submitted to the Secretary for approval by 30 June 2014;	Northparkes Mines Air Quality Management Plan Environmental Noise, Version 19, dated June 2020. Memorandum from Northparkes (C Higgins) to EPA (J Loxley) titled "Air Quality Management Plan Review", dated 26 February 2021.			Northparkes has consulted with the EPA in regard to changes made to the Air Quality Management Plan since the previous formal review (2016).	Complies	
		b) describe the measures that would be implemented to	Northparkes Mines Air Quality Management Plan Environmental Noise, Version 19, dated June 2020.			Section 7 of the Air Quality Management Plan describe the control measures to be implemented to control dust and ensure compliance.	Complies	
		c) describe the air quality management system;	Northparkes Mines Air Quality Management Plan Environmental Noise, Version 19, dated June 2020.			The Air Quality Management Plan provides an appropriate description of the air quality management system.	Complies	
		d) include an air quality monitoring program that:	Northparkes Mines Air Quality Management Plan Environmental Noise,			Section 8 of the plan describes the air quality	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		<ul style="list-style-type: none"> adequately supports the air quality management system; evaluates and reports on the: <ul style="list-style-type: none"> the effectiveness of the air quality management system; compliance with the air quality criteria; compliance with the air quality operating conditions; and defines what constitutes an air quality incident and includes a protocol for identifying and notifying the Department and relevant stakeholders of any air quality incidents. 	Version 19, dated June 2020.			monitoring program. Section 10 of the plan describes the air quality incident response procedures.		
Sch 3 Cond 19	Meteorological Monitoring	<p>For the life of the project, the Proponent shall ensure that there is a meteorological station in the vicinity of the site that:</p> <p>(a) complies with the requirements in the Approved Methods for Sampling of Air Pollutants in New South Wales guideline; and</p> <p>(b) is capable of continuous real-time measurement of stability class in accordance with the NSW Industrial Noise Policy, unless a suitable alternative is approved by the Secretary following consultation with the EPA.</p>	<p>Northparkes Mines Air Quality Management Plan Environmental Noise, Version 19, dated June 2020.</p> <p>Northparkes Mine Annual Review 2020.</p> <p>Northparkes Mine Annual Review 2019.</p> <p>Northparkes Mine Annual Review 2018.</p>		<p>The meteorological station was inspected during the audit.</p> <p>Photograph 1 shows the meteorological station</p>	<p>Northparkes maintain an automatic meteorological station (model number CR800, serial number 20425) on Mining Lease No. 1367.</p> <p>Air Quality Management Plan states: <i>“The weather monitoring station Northparkes is sited as required in “Approved Methods for Sampling of Air Pollutants in New South Wales”, which complies with AS 2923 –1987 –Guide for Measurement of Horizontal Wind for Air Quality Applications. The meteorological station complies with AS 2923 – 1987 on all respects. The 10m tower located on relatively flat terrain and is at least ten times the height of obstructions, and away from those obstructions, as per Section 8.3 of AS 2923 –1987”.</i></p>	Complies	
Sch 3 Cond 19	Water Supply	<p>The Proponent shall ensure that it has sufficient water for all stages of the project, and if necessary, adjust the scale of operations on site to match its available water supply.</p>	<p>Northparkes Mine Annual Review 2020.</p> <p>Northparkes Mine Annual Review 2019.</p> <p>Northparkes Mine Annual Review 2018.</p> <p>Water Access Licenses:</p> <ul style="list-style-type: none"> 43208 43207 34955 32138 32120 32004 31969 13963 31863 31850 			<p>Table 27 in each of the Annual Returns reports on the water sources (and volumes used during each reporting period.</p> <p>A water model (GoldSim) has been developed for the mine and the model is considered in operational planning. Management review water balance predictions (Annual Return Section 7.3) annually.</p> <p>A review of the water balances reported in the Annual Review confirm that adequate water supply was available for the audit period.</p>	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Sch 3 Cond 20	Compensatory Water Supply	<p>The Proponent shall provide a compensatory water supply to any landowner of privately owned land whose water supply is adversely and directly impacted (other than an impact that is negligible) as a result of the project, in consultation with DPI Water, and to the satisfaction of the Secretary.</p> <p>The extent of adverse impact on water supply must be investigated in accordance with the procedures outlined in Condition 4 of Schedule 5. The compensatory water supply measures must provide an alternative long-term supply of water that is equivalent to the loss attributable 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.</p> <p>If the Proponent and the 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.</p> <p>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.</p>	<p>Memo from Knight Piesold Consulting (K O'Connell to Northparkes (C Higgins) titled "Northparkes Mine – Groundwater Impact Assessment Rev 1", dated 20 November 2020.</p>	<p>Environmental Advisor – No reports were received during the audit period relating to Northparkes having a current impact on groundwater. Northparkes is applying for a new groundwater supply application and during stakeholder consultation a neighbor expressed concern at what potential effect this would have on their current supply. They also referred to a bore to the East of the Bogan / McClintocks intersection and that it was such a reliable bore for 100 years that during droughts the neighbours from around the area would truck water back to their properties from that bore. The bore stopped working around the same time as Northparkes went underground (1997). It still is used in a minor capacity, but the flow rate is back to a 'trickle'. Northparkes engaged Knight Piesold to conduct a desktop groundwater impact assessment to determine the potential influence of proposed abstraction from water bores, on groundwater use on an identified neighbouring farm south east and adjacent to Northparkes.</p> <p>There are currently no Compensatory Water Supply Agreements in place.</p>		<p>Northparkes was not notified of any adverse and direct impact (other than an impact that is negligible) on the water supply to any landowner of privately owned land during the audit period.</p> <p>Knight Piesold Consulting found that highly unlikely that the relatively low abstraction at either or both of the proposed borefields at Northparkes would affect bore abstraction for domestic use and livestock watering on the private property.</p>	Not Triggered	
Sch 3 Cond 21	Water Pollution	<p>Unless an EPL authorises otherwise, the Proponent shall comply with Section 120 of the POEO Act.</p>	<p>Email from Northparkes (C Dingle) to EPA (J Loxley) and DPIE (K O'Reilly) titled "Goonumbla Creek – Environmental Incident", dated 17 April 2019.</p> <p>Northparkes Mine Annual Review 2020.</p> <p>Northparkes Mine Annual Review 2019.</p> <p>Northparkes Mine Annual Review 2018.</p>		<p>During the site inspection the audit viewed the area and noted that no impact of the incident was visible. Photograph 6 shows the location of the slurry spill. No evidence of impact was visible.</p>	<p>On 15 April 2019 slurry from the Secondary Crusher discharged into Goonumbla Creek. The creek was dry at the time of the incident and the slurry was successfully removed. No water pollution occurred as a result of this incident. Note however, that the EPA issued an official caution as a result of the incident.</p> <p>The incident investigation undertaken by Northparkes identified operator error as the cause and implemented further training in materials management.</p>	Non-Compliance	<p>The incident has been investigated and appropriate action taken. No further action required.</p>
Sch 3 Cond 22	Water Management Performance	<p>The Proponent shall comply with the performance measures in Table 6 to the satisfaction of the Secretary.</p>						

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Cond.	Short Title	Condition		Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
	Measures	Feature	Measure						
		Water Management General	Minimise the use of clean water.	Northparkes Mine Surface Water Management Plan, Version 7, dated June 2020.		<p>The clean and dirty water systems were inspected during the site audit and were found to meet the requirements of Surface Water Management Plan.</p> <p>Photograph 7 shows the process water storage. Photograph 8 shows typical water diversion drainage infrastructure.</p>	<p>Section 7.1 of the Surface Water Management Plan describes the clean water management system.</p> <p>All dirty and contaminated water, including process water is reused. Clean water from the clean water system is used is therefore minimised.</p>	Complies	
		Construction and Operation of linear infrastructure including Goonumbla Creek Crossing	<p>Design, install and maintain erosion and sediment controls generally in accordance with the series Managing Urban Stormwater: Soils and Construction including Volume 1, Volume 2A – Installation of Services and Volume 2C – Unsealed Roads Design, install and maintain the infrastructure within 40 m of watercourses generally in accordance with the Guidelines for Controlled Activities on Waterfront Land (DPI 2007), or its latest version</p> <p>Design, installation and maintenance of creek crossings generally in accordance with the Policy and Guidelines for Fish Friendly Waterway Crossings (NSW Fisheries, 2003) and Why Do Fish Need To Cross The Road? Fish Passage Requirements for Waterway Crossings (NSW Fisheries 2003), or their latest versions.</p>	Northparkes Mines Surface Water Management Plan – Surface Water Storage Facility Assessment Report, prepared by GHD, dated May 2018.		<p>At the time of this IEA runoff from all unsealed internal roads was captured by the surface water management system. No evidence of erosion of these areas was sighted. Photograph 9 shows a typical site road and associated drainage.</p>	<p>No evidence of erosion issues were sighted during the audit, and Northparkes have actioned a review of the drainage to ensure compliance.</p>	Complies	
		Clean water management system	<p>Design, install and maintain the clean water system to capture and convey the 100 year ARI flood.</p> <p>Maximise as far as reasonable and feasible the diversion of clean water around disturbed areas on site.</p>	<p>Northparkes Mine Surface Water Management Plan, Version 7, dated June 2020.</p> <p>Northparkes Mines Surface Water Management Plan – Surface Water Storage Facility Assessment Report, prepared by GHD, dated May 2018.</p>	<p>Environmental Advisor – No documentation can be provided to verify compliance with this. Northparkes identified this gap during a review of critical controls and have actioned the review of site drainage followed by upgrades where/if required. It is moderate in priority as drainage has remained effective during large rainfall events with no incidents or issues recorded.</p>	<p>The clean and dirty water systems were inspected during the site audit and were found to meet the requirements of Surface Water Management Plan. Clean water is diverted away from dirty areas.</p>	<p>Section 10 of the Surface Water Management Plan states that all existing infrastructure is located outside of the 100-year ARI flood area.</p>	Complies	
		Dirty water management system	<p>Design, install and maintain the dams generally in accordance with the series Managing Urban Stormwater: Soils and Construction – Volume 1 and Volume 2E Mines and Quarries.</p> <p>Designed to capture the 90th percentile 5-day duration rainfall event.</p>	<p>Northparkes Mine Surface Water Management Plan, Version 7, dated June 2020.</p> <p>Northparkes Mines Surface Water Management Plan – Surface Water Storage Facility Assessment Report, prepared by GHD, dated May 2018.</p>			<p>The dirty water management system includes settlement ponds. Table 11 in Section 13.1.2 of the SWMP indicates the settlement ponds were assessed against the 90th percentile 5 day duration rainfall event.</p> <p>No evidence of drainage were sighted during the audit, and</p>	Complies	

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Cond.	Short Title	Condition		Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
							Northparkes have actioned a review of the drainage to ensure compliance.		
		Contaminated water management	<p>Nil discharge from site On-site storages (including tailings dams, mine infrastructure dams, groundwater storage and treatment dams) are suitably lined to comply with a permeability standard of < 1 x 10⁻⁹ m/s in line with the NSW Environmental Guidelines for Solid Waste Landfills (EPA, 1996)</p> <p>Design, construct and maintain other aspects of the tailings dams in accordance with the standards set out in the Environmental Guidelines – Management of Tailings Storage Facilities (VIC DPI, 2006), including a requirement to maintain a minimum freeboard of 600 mm or a sufficient freeboard to accommodate a 1 in 100-year ARI, 72 hour rainfall event without overtopping at all times, whichever is greater.</p> <p>Design and construct the tailings storage facilities in accordance with the requirement of the Dam Safety Committee.</p>	<p>Northparkes Mine Surface Water Management Plan, Version 7, dated June 2020.</p> <p>Northparkes Mines Surface Water Management Plan – Surface Water Storage Facility Assessment Report, prepared by GHD, dated May 2018.</p>			<p>The dirty water management system includes settlement ponds. Table 11 in Section 13.1.2 of the SWMP indicates the settlement ponds were assessed against the 90th percentile 5 day duration rainfall event.</p> <p>No evidence of drainage were sighted during the audit, and Northparkes have actioned a review of the drainage to ensure compliance.</p>	Complies	
		Chemical and hydrocarbon storage	Chemical and hydrocarbon products to be stored in bunded areas in accordance with the relevant Australian Standards.			<p>The inspection of chemical and hydrocarbon storage facilities during this IEA found that the storage facilities satisfy the general requirements of AS1940.</p> <p>Photograph 10 shows a hydrocarbon storage facility.</p>	The storage of chemical and hydrocarbon comply with this performance criterion.	Complies	
Sch 3 Cond 23	Water Management Plan	<p>The Proponent shall prepare and implement a Water Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with DPI Water and the EPA, by suitably qualified and experienced persons whose appointment has been approved by the Secretary;</p> <p>(b) be submitted to the Secretary for approval prior by 30 June 2014;</p> <p>(c) in addition to the standard requirements for management plans (see Condition 3 of schedule 6), this plan must include a:</p>		Northparkes Mine Water Management Plan, Version 13, dated June 2020.			Appendix A of the Water Management Plan provides a summary of the comments made on the original (2015) plan by DPIE, NOW and the EPA.	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(i) Site Water Balance that: <ul style="list-style-type: none"> includes details of: <ul style="list-style-type: none"> sources and security of water supply, including contingency planning for future reporting periods; water use and management on site; reporting procedures, including the preparation of a site water balance for each calendar year; describes the measures that would be implemented to minimise clean water use on site; 	Northparkes Mine Water Management Plan, Version 13, dated June 2020.			Section 5.1 of the Water Management Plan provides an overview of the Site Water Balance. Section 5.1 does not contain detail regarding contingency planning or reporting procedures.	Non-Compliance	Review and revise Section 5.2 of the Water Management Plan to include all requirements of Schedule 3 Condition 23(c) (i).
		(ii) Surface Water Management Plan, that includes: <ul style="list-style-type: none"> detailed baseline data on water flows and quality in the waterbodies that could be affected by the project; a detailed description of the water management system on site; detailed plans, including design objectives and performance criteria, for the: <ul style="list-style-type: none"> tailings storage facilities; final voids (see the Rehabilitation Objectives in Table 8); detailed performance criteria for the following, including trigger levels for investigating any potentially adverse impacts associated with the project: <ul style="list-style-type: none"> the water management systems (clean, dirty and contaminated); downstream surface water quality; downstream flooding impacts; and stream and riparian vegetation health for Bogan River, Tenandra Creek, Goonumbla Creek and Cookopie Creek; a program to monitor and report on: <ul style="list-style-type: none"> the effectiveness of the water management systems (clean, dirty and contaminated); surface water flows and quality, stream and riparian vegetation health in the watercourses that could be affected by the project; and downstream flooding impacts; reporting procedures for the results of the monitoring program; and a plan to respond to any exceedances of the performance criteria, and mitigate any adverse surface water impacts of the project; 	Northparkes Mine Surface Water Management Plan, Version 7, dated June 2020.			The SWMP/WMP does not include: <ul style="list-style-type: none"> detailed baseline data on water flows and quality in the waterbodies that could be affected by the project (section 6 of the SWMP contains some baseline data on water quality (pH, electrical conductivity, total suspended solids and copper), but there is no data on water flows); detailed plans, including design objectives and performance criteria, for the: <ul style="list-style-type: none"> tailings storage facilities; final voids; detailed performance criteria, other than trigger levels, for: <ul style="list-style-type: none"> the water management systems (clean dirty and contaminated); downstream surface water quality; downstream flooding impacts; and stream and riparian vegetation health for Bogan River, Tenandra Creek, Goonumbla Creek and Cookopie Creek; a program to monitor and report on downstream flooding impacts. 	Non-Compliance	Review and revise Surface Water Water Management Plan to include all requirements of Schedule 3 Condition 23(c) (ii).
		(iii) Groundwater Management Plan, that includes: <ul style="list-style-type: none"> detailed baseline data on groundwater levels, yield and quality in the region and 	Northparkes Mine Groundwater Management Plan, Version 7, dated June 2020.			The GWMP/WMP does not include: <ul style="list-style-type: none"> detailed baseline data on groundwater levels, yield and 	Non-Compliance	Review and revise Section 5.2 of the Groundwater Management Plan to

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		privately- owned groundwater bores that could be affected by the project; • groundwater assessment criteria, including trigger levels for investigating any potentially adverse groundwater impacts; • a program to monitor and report on: - groundwater inflows to the block cave, sub-level cave and opencut mining operations; - the seepage/leachate from water storages, emplacement and final voids; - background changes in groundwater yield/quality against mine-induced changes; - impacts of the project on: - regional and local (including alluvial) aquifers; - groundwater supply of potentially affected landowners; and - riparian vegetation; - a program to validate the groundwater model for the project, and comparison of monitoring results with modelled predictions; and • a plan to respond to any exceedances of the groundwater assessment criteria.				quality in the region and privately-owned groundwater bores that could be affected by the project (section 6 of the GWMP provides some baseline data regarding pH, TDS, and spatial and temporal variations in water quality across the Northparkes site near the ore bodies); - a program to monitor and report on groundwater inflows to the sub-level cave mining operations; - a program to monitor and report on background changes in groundwater yield/quality against mine-induced changes; - a program to validate the groundwater model for the project, and comparison of monitoring results with modelled predictions.		include all requirements of Schedule 3 Condition 23(c) (iii).
Sch 3 Cond 24	Biodiversity Pine Donkey Orchid	The Proponent shall actively manage and maintain the populations of Pine Donkey Orchid located to the north of the project area (near Adavale Lane) and near the E48 subsidence zone.	Northparkes Mine Management Plan Pine Donkey orchid, Version 6, dated 20 May 2020.		The Auditor inspected the Pine Donkey Orchid area. The site is fenced and signposted. Photograph 11 shows the signage showing the location of the Pine Donkey Orchid Area.	A Pine Donkey Orchid management plan has been prepared and implemented. The protection measures specified in the plan have been implemented.	Complies	
Sch 3 Cond 25	Biodiversity Off-sets	The Proponent shall implement the biodiversity offset strategies summarised in Table 7 below, shown conceptually in Figures 1, 2 and 3 of Appendix 7 and detailed in the table at Appendix 7, to the satisfaction of the Secretary.						
		Limestone National Forest Off-set						
		Revegetate Land	45.1	Northparkes Limestone National Forest Offset Area Revegetation Plan, Version 1, dated 6 October 2015. Northparkes Biodiversity Management Plan, Version 7, dated 23 June 2020. Northparkes Vegetation Management Plan, Version 6, dated 18 Feb 2020. Conservation Agreement (Estcourt Off-set Area) dated February 2011. Conservation Agreement (Kokoda Off-set Area) dated 12 June 2018. 2020 NPM Rehabilitation Monitoring Report, prepared by DnA Environmental, dated February 2021. Northparkes Conservation Area Monitoring and Report Form 2012 Report. Estcourt Offset Inspection Report 2018.	Environmental Advisor - Revegetation of Limestone land swap was undertaken in 2007/2008. All management actions required by that Agreement have been completed. Monitoring of the revegetation area has been undertaken since 2008. The land was handed back to DPI and Northparkes no longer has responsibility for that area. Northparkes currently holds an occupancy permit for the land permitting it for the use as an ore conveyor, ventilation system, ancillary mining activities and related purposes.		The revegetation of the Limestone National Forest Off-set area is detailed in Limestone National Forest Offset Area Revegetation Plan. The offset area was transferred back to DPI in 2009. The last monitoring was undertaken in 2020 by DnA Environmental in the Limestone National Forest Offset. DnA found that some of the performance indicators had not been met and concluded that the drought conditions experienced	Complies

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Cond.	Short Title	Condition		Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation		
				Estcourt Offset Inspection Report 2020. Kokoda Biodiversity Off-set Area Ecological Monitoring Report – prepared by DnA Environment, dated December 2019. Kokoda Biodiversity Off-set Area Ecological Monitoring Report – prepared by DnA Environment, dated December 2018. Northparkes Mine Annual Review 2020. Northparkes Mine Annual Review 2019. Northparkes Mine Annual Review 2018.			during most of the audit period has impacted revegetation. Northparkes are reviewing the findings of the 2020 DnA monitoring report and at the time of this IEA were considering what actions are necessary to take as this land is no longer under Northparkes Control. Observation: The Annual Reviews do not provide any information on the status of the Limestone National Forest Offset.				
		Estcourt Tailing Storage Facility Off-set									
		Yellow Box Tall Grassy Woodland	3.3								
		Inland Grey Box			38.8						
		Derived Tussock Grassland	23		Environmental Advisor - Northparkes has acquired the Estcourt offset and it is secured in perpetuity under a Voluntary Conservation Agreement. Estcourt was only subject to 1 monitoring event (2020) during the period, monitoring was undertaken by DnA Environmental. The current strategy for this area is monitor natural revegetation and implement controls (for example weed / pest control) as required.	An inspection of the Estcourt Off-set area was undertaken during this IEA. The area was fenced and secure.	The Estcourt Tailings Storage Off-set is detailed in the Vegetation Management Plan. One inspection was undertaken during the audit period by DnA Environmental (2020). Two inspections by Northparkes environmental personnel were also completed. The last monitoring was undertaken in 2020 by DnA Environmental in the Estcourt Offset area. DnA found that some of the performance indicators had not been met and concluded that the draught conditions experienced during most of the audit period has impacted revegetation. The current strategy for this site is to monitor and maintain (ie no active revegetation).	Complies			
		Kokoda Biodiversity Off-set									
		Grey Box Grassy Woodland EEC	13								
		Grey Box Grassy Woodland DNG EEC	96								
		White Box Woodland EEC	2.2								
		Dwyer’s Red Gum – Grey Box – Mugga Ironbark – Black Cypress Pine Forest	150								
		Rocky Rise Shrubby Woodland	26								
		Grey Box – Ironbark Woodland	25								
		Dwyer’s Red Gum – Grey Box – Mugga Ironbark – Black Cypress Pine DNG	15								
		Dwyer’s Red Gum Creek line	9.4								
							Environmental Advisor - Northparkes has acquired the Kokoda offset and it is secured in perpetuity under a Voluntary Conservation Agreement. Kokoda was monitored annually during the audit period by DnA Environmental. Revegetation works have commenced in the Kokoda Off-set area and substantial progress has been made.		The Biodiversity Management Plan commits Northparkes to achieving the outcomes specified in Conditions 25 and 26 of Schedule 3. Plantings have commenced and progress is reported in the Annual Returns. Section 6.6.2 of the Annual Returns summarises the performance monitoring outcomes. Significant plantings were undertaken in 2020 and 2021.	Complies	

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Cond.	Short Title	Condition		Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		Woodland					Northparkes personnel undertake biannual inspections and DnA Environmental have undertaken inspections and monitoring investigations twice during the audit period. The reports provided by Northparkes indicates that the biodiversity strategies are being progressively implemented in accordance with the Biodiversity Management Plan. The planned on-going monitoring of the offset area is required to confirm development of the area against the agreed performance indicators. Northparkes continue to actively manage the revegetation and maintenance of this offset area.		
		Dwyer's Red Gum – Grey Box – Mugga Ironbark – Black Cypress Pine Woodland Low Quality	8.6						
		Mugga Ironbark Woodland	1.9						
		Farm Tracks and Dams (disturbed land)	2.5						
Sch 3 Cond 26	Biodiversity Off-sets	The Proponent shall ensure that the Kokoda Biodiversity Offset provides suitable habitats for all the threatened fauna species confirmed and identified as being present in the disturbance areas.		Northparkes Biodiversity Management Plan, Version 7, dated 23 June 2020. Kokoda Biodiversity Off-set Area Ecological Monitoring Report – prepared by DnA Environment, dated December 2019. Kokoda Biodiversity Off-set Area Ecological Monitoring Report – prepared by DnA Environment, dated December 2018.				Complies	
Sch 3 Cond 27	Security of Off-sets	By the 30 June 2015, unless the Secretary agrees otherwise, the Proponent shall make suitable arrangements to protect the Kokoda Biodiversity Offset in perpetuity in consultation with BCD and to the satisfaction of the Secretary.		Conservation Agreement (Kokoda Off-set Area) dated 12 June 2018.			The Kokoda Offset area is owned by Northparkes and has been secured by a Conservation Agreement. It is noted that the agreement was finalised in 2018 and that no agreement with the Secretary was available to verify compliance with the June 2015 timeline specified in this Condition. This is an historical non-compliance. No further action required.	Not Triggered	
Sch 3 Cond 28	Conservation Bonds	By 30 June 2015, unless otherwise agreed by the Secretary, the Proponent shall lodge a Conservation Bond with the Department to ensure that the biodiversity offset strategies are implemented in accordance with the performance and completion criteria of the Biodiversity Management Plan (refer to Condition 29 below). The sum of the bond shall be determined by: (a) calculating the full cost of implementing the biodiversity offset strategy (other than land acquisition costs); and (b) employing a suitably qualified quantity surveyor to verify the calculated costs, to the satisfaction of the Secretary. If the biodiversity offset strategies are completed generally in accordance with the completion criteria in the Biodiversity Management Plan to the satisfaction of the		Letter from DPE (M Young) to Northparkes (S Kelly) titled “Northparkes Mine (11_0060) Lodgment of Conservation Bond”, dated 13 May 2016. This letter confirms the bond of \$276,081.67 is payable by 31 May 2016. Letter from Westpac to Northparkes (M Young) titled “Executed Bank Guarantee”, dated 26 May 2016. The letter contains a copy of the executed bank guarantee. 2018 Independent Environmental Audit.			DPE approved the Conservation Bond on 13 May 2016. A bank guarantee was executed for the required amount on 26 May 2016. It is noted that an extension in time for the late finalisation of the Conservation bond was not approved by the Secretary until after the timeline specified in this Condition. This is an historical non-compliance. No further action required.	Not Triggered	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		Secretary, the Secretary will release the bond. If the biodiversity offset strategies are not completed generally in accordance with the completion criteria in the Biodiversity Management Plan, the Secretary will call in all, or part of, the conservation bond, and arrange for the satisfactory completion of the relevant works.						
Sch 3 Cond 29	Biodiversity Management Plan	The Proponent shall prepare and implement a Biodiversity Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with BCD, and submitted to the Secretary for approval prior to the commencement of any development on site;	Northparkes Biodiversity Management Plan, Version 7, dated 23 June 2020. 2018 Independent Environmental Audit.			The Biodiversity Management Plan has been prepared and implemented. Compliance with the approval and consultation requirements were verified in the 2018 IEA.	Complies	
		(b) describe the short, medium, and long term measures that would be implemented to: <ul style="list-style-type: none"> manage the remnant vegetation and fauna habitat on the biodiversity offset sites; restore the derived native grassland component of the Grey Box Grassy Woodland EEC community within the Kokoda Biodiversity Offset to woodland community; implement the biodiversity offset strategies; and integrate the implementation of the biodiversity offset strategies to the greatest extent practicable with the rehabilitation of the site (where relevant); 	Northparkes Biodiversity Management Plan, Version 7, dated 23 June 2020.			Section 9 of the Biodiversity Management Plan describe the measures to be implemented to manage remnant vegetation and restore native grasslands (section 9.7).	Complies	
		(c) include detailed performance and completion criteria for evaluating the performance of the biodiversity offset strategies, and triggering remedial action (if necessary);	Northparkes Biodiversity Management Plan, Version 7, dated 23 June 2020.			The Biodiversity Management Plan describe performance and completion criteria for the biodiversity off-set area.	Complies	
		(d) include a detailed description of the measures that would be implemented for: <ul style="list-style-type: none"> enhancing the quality of existing vegetation and fauna habitat in the biodiversity offset areas, including the derived native grassland component of the Grey Box Grassy Woodland EEC community within the Kokoda Biodiversity Offset; creating native vegetation and fauna habitat in the biodiversity offset areas and rehabilitation area through focusing on assisted natural regeneration, targeted vegetation establishment and the introduction of naturally scarce fauna habitat features (where necessary); managing and maintaining the populations of Pine Donkey Orchid located to the north of the project area (near 	Northparkes Biodiversity Management Plan, Version 7, dated 23 June 2020.			Section 9 of the Biodiversity Management Plan details the management strategies and actions to be taken to enhance the quality of the EEC communities within the Kokoda Offset Area. Appendices 1 and 2 describe the strategies and actions to be taken to create native vegetation and fauna habitat in the Limestone National Forest Offset and Estcourt Offset Areas, respectively. Appendix 3 describes the management and maintenance of Pine Donkey Orchid areas.	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		Adavale Lane) and near the E48 subsidence zone (refer to Appendix 6); <ul style="list-style-type: none"> collecting and propagating seed; managing any potential conflicts between the proposed enhancement works in the biodiversity offset areas and any Aboriginal heritage values (both cultural and archaeological) in these areas; managing salinity; controlling weeds and feral pests; controlling erosion; managing grazing and agriculture on site; controlling access; and bushfire management; 				Section 9.9 of the Biodiversity Management Plan describes seed collection. It is noted that seed propagation is not considered in the Plan. Section 9.14 briefly describes the management of heritage values within the offset areas. Section 9.12 deals with Salinity Sections 9.5 and 9.6 cover weed and pest management. Sections 9.2 and 9.10 cover management of agricultural impacts. Section 9.2 covers site access. Section 9.11 covers erosion and sediment control. Section 9.13 covers bushfire management.		
		(e) include a seasonally based program to monitor and report on the effectiveness of these measures, and progress against the detailed performance and completion criteria;	Northparkes Limestone National Forest Offset Area Revegetation Plan, Version 1, dated 6 October 2015. Northparkes Biodiversity Management Plan, Version 7, dated 23 June 2020. Northparkes Vegetation Management Plan, Version 6, dated 18 Feb 2020.			Section 8 of the Biodiversity Management Plan describes the monitoring program for the Kokoda Offset Area. Section 4 of the Limestone National Forest Offset Area Revegetation Plan describes the monitoring program for the Limestone National Forest Offset Area. Section 6.10 of the Vegetation Management Plan describes the monitoring program for the Estcourt Offset Area.	Complies	
		(f) identify the potential risks to the successful implementation of the biodiversity offsets, and include a description of the contingency measures that would be implemented to mitigate against these risks; and	Northparkes Biodiversity Management Plan, Version 7, dated 23 June 2020. Northparkes Vegetation Management Plan, Version 6, dated 18 Feb 2020.			Section 10.4 of the Biodiversity Management Plan describes the risks and contingency measures for the Kokoda Offset Area. Section 6 of the Vegetation Management Plan describes the management of hazards for the Estcourt Offset Area.	Complies	
		(g) include details of who would be responsible for monitoring, reviewing, and implementing the plan.	Northparkes Biodiversity Management Plan, Version 7, dated 23 June 2020.			Section 4 of the Biodiversity Management Plan describes the general responsibilities associated with implementation of the Plan, including monitoring and 3 yearly reviews.	Complies	
Sch 3 Cond 30	Heritage Protection of Aboriginal Sites	The Proponent shall ensure that the project does not cause any direct or indirect impact on the Aboriginal sites located outside the approved disturbance area of the project unless otherwise	Northparkes Heritage Management Plan, Version 9, dated June 2020. Northparkes Mine Annual Review 2020. Northparkes Mine Annual Review 2019.	Environmental Advisor – no land disturbance has occurred outside of approved areas. Any new land disturbance (within the approved disturbance area) is surveyed for heritage significance prior to	Heritage sites were inspected during this IEA. The areas inspected where securely fenced and signposted.	Northparkes assesses potential heritage impacts associated with land disturbance prior to ground disturbance, vegetation	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		authorised under this approval or the NP&W Act.	Northparkes Mine Annual Review 2018. Incident Register (RMSS).	any works commencing. This includes consultation with RAPs.	Photograph 12 shows fenced and signposted heritage area.	removal and earthworks commencing, through the use of a Site Disturbance Permit Procedure. No unapproved impacts on heritage sites occurred during the audit period.		
Sch 3 Cond 31	Heritage Management Plan	The Proponent shall prepare and implement a Heritage Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary;	Northparkes Heritage Management Plan, Version 9, dated June 2020. 2018 Independent Environmental Audit.			The Heritage Management Plan has been prepared and implemented. Compliance with the approval and consultation requirements were verified in the 2018 IEA.	Complies	
		(b) be prepared in consultation with BCD and the Aboriginal stakeholders (in relation to the management of Aboriginal heritage values);	Northparkes Heritage Management Plan, Version 9, dated June 2020. 2018 Independent Environmental Audit.			The Heritage Management Plan has been prepared and implemented. Compliance with the approval and consultation requirements were verified in the 2018 IEA	Complies	
		(c) be submitted to the Secretary for approval prior to construction, unless the Secretary agrees otherwise;	Northparkes Heritage Management Plan, Version 9, dated June 2020. 2018 Independent Environmental Audit.			The Heritage Management Plan has been prepared and implemented. Compliance with the approval and consultation requirements were verified in the 2018 IEA	Complies	
		(d) include a description of the measures that would be implemented for: • managing the discovery of human remains or previously unidentified heritage items on site; and • ensuring any workers on site receive suitable heritage inductions prior to carrying out any development on site, and that suitable records are kept of these inductions;	Northparkes Heritage Management Plan, Version 9, dated June 2020.		Photograph 13 shows a recovered and protected scar tree.	Section 9.3 of the Heritage Management Plan describes the procedures for managing the discovery of human remains or previously unidentified heritage items. Section 11.1 of the Heritage Management Plan describes Aboriginal Heritage Management Training.	Complies	
		(e) include the following for the management of Aboriginal Heritage: • a description of the measures that would be implemented for: - protecting, monitoring and/or managing (including any proposed archaeological investigations and/or salvage measures) the heritage items identified on site; - managing the discovery of previously unidentified Aboriginal items on site; - conserving the sites outside the surface disturbance area; - maintaining and managing reasonable access for Aboriginal stakeholders to heritage items on site; - ongoing consultation with the Aboriginal stakeholders in the conservation and management of Aboriginal cultural heritage on site; and • a strategy for the storage of any heritage	Northparkes Heritage Management Plan, Version 9, dated June 2020.			Section 11 of the Heritage Management Plan describe the management of known aboriginal heritage items are areas of cultural significance. Section 11.4 details the process for curation of heritage objects and approval process for access of relevant areas of the site by Aboriginal Stakeholders. Section 11.2 details on-going consultation with Aboriginal Stakeholders.	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		items salvaged on site, both during the project and in the long term;						
		(f) include a detailed plan for the implementation of the mitigation and management measures outlined for the heritage items identified on site including archival recording, historical research and archaeological assessment prior to any disturbance.	Northparkes Heritage Management Plan, Version 9, dated June 2020.			Sections 8, 9 and 11 include details for the implementation of the mitigation and management measures outlined for the heritage items identified on site including archival recording, historical research and archaeological assessment prior to any disturbance.	Complies	
Sch 3 Cond 32	Transport	The Proponent shall use its best endeavours to ensure that as much mine-related traffic as possible, particularly heavy vehicles, uses the Newell Highway and Bogan Road to get to and from the mine.	CMOC Northparkes Traffic Management Plan Modified Haulage Operations, prepared by Umwelt, dated September 2019.		The most direct vehicle access to the site is via Bogan Road and McClintocks Lane. The only vehicle access control point to the site is via McClintocks Lane.	Access to the site is via the Newel Highway and Bogan Road.	Complies	
Sch 3 Cond 32A	Temporary Haulage Route	The Proponent may transport copper concentrate to the Parkes National Logistics Terminal when the Goonumbla rail siding is closed for upgrade and maintenance work. Transport of the copper concentrate to the Parkes National Logistics Terminal must cease after 12 months or when the Goonumbla rail siding is re-opened, whichever occurs first, unless otherwise agreed by the Secretary.	Modification 5 Approval letter dated 13 July 2020. Letter from DPIE (S O'Donoghue) to Northparkes (S Kelly) titled "Northparkes Extension (MP11_0060) Extension of Temporary Transport Arrangements", dated 13 July 2020.	Environmental Advisor – use of the Parkes Logistics Terminal was approved under Modification 5. Temporary haulage began on 2 September 2019 and concluded on 23 September 2020. On 13 July 2020 Northparkes were approved for the continued transport of copper concentrate to the PLT until 31 December 2020 or until the Goonumbla rail siding is re-opened, whichever occurs first.	At the time of this IEA all concentrate transport from the site was via the Goonumbla Rail siding.	Goonumbla Siding has been used as the transport route for concentrate except for the period approved under Modification 5 which permitted the temporary use of the Parkes Logistics Terminal.	Complies	
Sch 3 Cond 32B		The proponent must use the haulage route shown in the Figure in Appendix 10 to transport copper concentrate to the Parkes National Logistics Terminal, unless otherwise agreed by the Secretary.					Complies	
Sch 3 Cond 33	McClintocks Lane Site Access	The Proponent shall design, construct, and maintain the site access intersection at Bogan Road and McClintocks Lane to Austroad standards and to the satisfaction of Council.	2018 Independent Environmental Audit.			This Condition was verified during the 2018 IEA: Service provider, Geolyse, prepared a Detailed Design Report dated February 2015 (reference P1700224-005) on the Access Road Upgrade to Northparkes Mines.	Complies	
Sch 3 Cond 34		The Proponent shall design the site access road crossing over Goonumbla Creek in consultation with DPIE - Water and to the satisfaction of Council.	2018 Independent Environmental Audit.			The McClintocks Lane site access road works including the road crossing over Goonumbla Creek was approved by Parkes Shire Council on 29 April 2015 (CC 201466). Not verified – NPM was unable to provide evidence of consultation with the then NSW Office of Water (now DPI Water) regarding the design of the site access road	Not Triggered	Request that this condition removed during next Modification of Development Consent.

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
						crossing over Goonumbla Creek. This is an historic non-compliance and was not triggered in this Audit period.		
Sch 3 Cond 34A	Traffic Management Plan	Prior to hauling copper concentrate to the Parkes National Logistics Terminal, the Proponent must prepare a Traffic Management Plan for the development in consultation with RMS, and Council, and to the satisfaction of the Secretary.	CMOC Northparkes Traffic Management Plan Modified Haulage Operations, prepared by Umwelt, dated September 2019. Email from RMS (A Bruem) to Northparkes (C Dingle) titled "Northparkes Mine Draft Consent Condition 43A", dated 5/09/2019. The email provides comments on the draft Traffic Management Plan. Email from Northparkes (C Dingle) to the EPA (J Loxley) titled "Northparkes Mine Draft Consent Condition 43A", dated 28/08/2019. The email invited the EPA to comment on the draft Traffic Management Plan. Email from Northparkes (C Dingle) to Council (B Howard) titled "Northparkes Mine Draft Consent Condition 43A", dated 28/08/2019. The email invited Council to comment on the draft Traffic Management Plan.			The Traffic Management Plan was prepared in 2019. Comments for the relevant stakeholders were sought in August of that year.	Complies	
		This plan must include: (a) details of the measures that would be implemented to minimise traffic safety issues and disruption to local users of the transport route;	CMOC Northparkes Traffic Management Plan Modified Haulage Operations, prepared by Umwelt, dated September 2019.			Section 3 of the Traffic Management Plan specifies the approved haulage routes. Section 4 of the Plan specified the traffic safety requirements.	Complies	
		(b) details of measures that would be implemented to minimise traffic noise, including noises with the potential to cause sleep disturbance;	CMOC Northparkes Traffic Management Plan Modified Haulage Operations, prepared by Umwelt, dated September 2019.			Section 5 of the Plan specifies the traffic noise impact controls to be implemented by drivers.	Complies	
		(c) measures to minimise potential for conflict with school buses and other motorists as far as practicable;	CMOC Northparkes Traffic Management Plan Modified Haulage Operations, prepared by Umwelt, dated September 2019.			Section 4.2 of the Traffic Management Plan details the requirements for minimisation of impacts on school bus operations.	Complies	
		(d) procedures for receiving and addressing complaints from the community about development related traffic	CMOC Northparkes Traffic Management Plan Modified Haulage Operations, prepared by Umwelt, dated September 2019.			Section 6 of the Traffic Management Plan details the community consultation and complaints management processes to be implemented.	Complies	
		(f) a driver's code of conduct that addresses: • travelling speeds; • driver fatigue; • procedures to ensure that drivers adhere to the designated transport route/s; and • procedures to ensure that drivers implement safe driving practices.	CMOC Northparkes Traffic Management Plan Modified Haulage Operations, prepared by Umwelt, dated September 2019.			Appendix 2 of the Traffic Management Plan provides a copy of the Driver Code of Conduct.	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Sch 3 Cond 34B		The proponent must implement the approved Traffic Management Plan	CMOC Northparkes Traffic Management Plan Modified Haulage Operations, prepared by Umwelt, dated September 2019. Complaints Register			No complaints were received relating to concentrate transport during the audit period.	Complies	
Sch 3 Cond 35	Visual Additional Visual Impact Mitigation	Upon receiving a written request from the owner of any residence on privately-owned land which has, or would have, significant direct views of the mining operations and infrastructure on site during the project, the Proponent shall implement additional visual impact mitigation measures (such as landscaping treatments or vegetation screens) to reduce the visibility of these mining operations and infrastructure from the residences on their properties. These mitigation measures must be reasonable and feasible and must be implemented within a reasonable timeframe. If the Proponent and the owner 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	Complaint Register	Environmental Advisor – no written requests related to visual amenity were received during the audit period.	No adverse visual impacts from surface infrastructure were observed during the audit.	No complaints relating to visual amenity were received during the audit period. No written requests related to visual amenity were received during the audit period.	Not Triggered	
Sch 3 Cond 36	Visual – Operating Conditions	The Proponent shall: (a) implement best management practice to minimise the visual and off-site lighting impacts of the project; (b) ensure no fixed outdoor lights shine above the horizontal; (c) ensure no in-pit mobile lighting rigs shine above the pit wall and other mobile lighting rigs do not shine above the horizontal; (d) ensure that all external lighting associated with the project complies with Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting or its latest version; (e) provide for the establishment of trees and shrubs and/or the construction of mounding to minimise visual and lighting impacts on the Proponent's land adjoining public roads with views of the site; (f) ensure that the visual appearance of all buildings, structures, facilities or works (including paint colours and specifications) is aimed at blending as far as possible with the surrounding landscape, to the satisfaction of the Secretary.	Compliant Register		No off-site visual amenity issues were observed during the audit. Elements of the site infrastructure are visible in the distance from the eastern section of McClintocks Lane, however no adverse impacts from lighting are likely. All site structures including buildings and elevated structures are clad in colours that blend into the surrounding landscape.	No adverse visual impacts were identified during this IEA.	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Sch 3 Cond 37	Bushfire Management	The Proponent shall: (a) ensure that the project is suitably equipped to respond to any fires on site; and (b) assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site.	Management Plan Bushfire, Version 4.01 dated 18 Feb 2020. Management Plan Kokoda Bushfire, version 3, dated 24 January 2020. Management Plan Emergency, version 5.01, dated 11 June 2020.	Environmental Advisor – Northparkes trains site personnel in emergency response procedures.	The auditor inspected the Northparkes Emergency Response Facility. Appropriate fire-fighting equipment was sighted. Photograph fourteen shows the emergency response centre and fire truck.	Northparkes has prepared and implemented an Emergency Management Plan and bushfire management plans. The plan details emergency response procedures, training requirements and equipment maintained at the mine. Site personnel are trained in emergency procedures. Appropriate firefighting infrastructure and equipment is maintained at the mine.	Complies	
Sch 3 Cond 38	Waste	The Proponent shall: (a) implement all reasonable and feasible measures to minimise the waste (including waste rock) generated by the project; (b) ensure that the waste generated by the project is appropriately stored, handled and disposed of; and (c) monitor and report on effectiveness of the waste minimisation and management measures in the Annual Review.	Management Plan Non-Mineral Waste, version 16, dated 1 November 2019. Contract for Services No. SC202013, unsigned – draft contract with Sam's Waste Management for the provision of waste management services including provision of waste bins, waste collection and disposal, documentation and record maintenance, six-monthly performance reviews, and provision of training and awareness materials. Spreadsheet titled "Scrap Steel Despatches(sic)". Record of steel sent off site for recycle in 2018. Total Waste Management Report prepared by JR Richards for the period 1 December 2019 to 31 December 2019. The report includes a summary of monthly waste collection and disposal covering each month in 2019, including waste categories and waste recycling and disposal locations. Spreadsheet titled "2019 Scrap Goods Outwards Weights". Record of metal sent off site in 2019 for recycle. Spreadsheet Report (from Sam's Waste) titled "SamsWaste NovDec 2020". The report provides a template for the recording of waste materials collected, recycled and disposed of by Sam's Waste.		During the site visit all waste storage areas at the mine were inspected. All areas were appropriately organised and maintained. Sam's Waste bins are provided at each location and allow for the segregation and storage of wastes. Photograph 15 shows a typical waste storage area.	Northparkes have prepared and implemented a Non-mineral waste management plan. Northparkes have contracted Sam's Waste (a local Parkes contractor) to manage the storage, collection and management (reuse / recycling / disposal) of waste materials. Appropriate facilities for waste segregation are provided on-site and evidence that waste materials are being segregated and appropriately managed was sighted.	Complies	
Sch 3 Cond 39	Rehabilitation Objectives	The Proponent shall rehabilitate the site to the satisfaction of NSW Trade & Investment. This rehabilitation must be generally consistent with the proposed rehabilitation strategy described in the EA (and depicted conceptually in the figures in Appendix 9) and comply with the objectives in Table 8.						
		Feature	Objective					
		Mine site (as a whole)	<ul style="list-style-type: none"> Safe, stable and non-polluting. Constructed landforms drain to the natural 	Northparkes Rehabilitation Management Plan, Version 13, dated June 2020. Northparkes Mine Annual Review 2020.		Current landforms including the tailings storage facilities have been constructed within the site surface water drainage system.	Table 2 of the Rehabilitation Management Plan reproduces the objective	Complies

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Cond.	Short Title	Condition		Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
			environment (excluding final voids and subsidence areas). • Minimise visual impact of final landforms as far as is reasonable and feasible.	Northparkes Mine Annual Review 2019. Northparkes Mine Annual Review 2018.		Photograph 5 shows the rehabilitation works undertaken on the completed TSF.	contained in this Condition. Table 6 of the Plan describes the proposed landscape and rehabilitation completion criteria. The proposed completion criteria are consistent with the rehabilitation objectives. Section 8.5 of the Annual Reviews report on rehabilitation activities completed during the reporting period. The implemented rehabilitation activities and observations made by the Auditor indicate that the works undertaken to date generally support the achievement of these objectives.		
		Agricultural Areas	• Land is returned to a condition that sustains agricultural land use to at least the original rural land capability and agricultural productivity and requires a level of management that is comparable to adjacent agricultural areas.	Northparkes Mine Annual Review 2020. Northparkes Mine Annual Review 2019. Northparkes Mine Annual Review 2018.		Agricultural land that is part of the mine is being maintained appropriately and in some cases being actively farmed.		Complies	
		Final Voids and Subsidence Zones	• Minimise the size and depth of the final voids and subsidence zones so far as is reasonable and feasible. • Minimise the drainage catchment of the final voids and subsidence zones so far as is reasonable and feasible. • Negligible high wall instability risk. • Restrict access. • Revegetate areas surrounding final voids and subsidence zones to minimise erosion. • Minimise risk of flood interaction for all flood events	Northparkes Mine Annual Review 2020. Northparkes Mine Annual Review 2019. Northparkes Mine Annual Review 2018.				Complies	
		Tailings Storage Facilities	• Any seepage from tailings storage facilities to be contained and treated on the site. • Filled and shaped to final landform levels as provided in Appendix 9. • Final landforms to be capped and revegetated to be stable, self-sustaining, free draining and consistent with surrounding rehabilitated areas.	Northparkes Mine Annual Review 2020. Northparkes Mine Annual Review 2019. Northparkes Mine Annual Review 2018.		The tailings storage facilities have been constructed within the site surface water drainage system. Temporary revegetation (Photograph 5) of TSF 1 has been undertaken.		Complies	
		Waste Rock Dumps	• Any seepage from waste rock dumps to be contained and treated on the site.	Northparkes Mine Annual Review 2020. Northparkes Mine Annual Review 2019. Northparkes Mine Annual Review 2018.		Waste rock dumps were inspected during this IEA. All waste dumps are located within the current site drainage system and any drainage would be captured by the surface drainage system.		Complies	
		Surface infrastructure	• To be decommissioned and removed, unless NSW Trade & Investment agrees otherwise.	Northparkes Mine Annual Review 2020. Northparkes Mine Annual Review 2019. Northparkes Mine Annual Review 2018.				Complies	
		Native Vegetation	Revegetation is to be sustainable for the long term, contains native vegetation communities, second generation trees and habitat for native fauna species.	Northparkes Mine Annual Review 2020. Northparkes Mine Annual Review 2019. Northparkes Mine Annual Review 2018.		Rehabilitation trails are being conducted, for example the TSF1 trail plots (reported in Section 8.4.1 of the Annual Review) and sighted by the Auditor.		Complies	

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Cond.	Short Title	Condition		Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		Community	<ul style="list-style-type: none"> • Ensure public safety. • Minimise adverse socio-economic effects associated with mine closure. 	Northparkes Mine Annual Review 2020. Northparkes Mine Annual Review 2019. Northparkes Mine Annual Review 2018.				Complies	
Sch 3 Cond 40	Rehabilitation – Progressive Rehabilitation	The Proponent shall rehabilitate the site progressively as soon as reasonably practicable following disturbance. All reasonable and feasible measures must be taken to minimise the total area exposed for dust generation at any time. Interim rehabilitation strategies shall be employed when areas prone to dust generation cannot be permanently rehabilitated.		Northparkes Mine Annual Review 2020. Northparkes Mine Annual Review 2019. Northparkes Mine Annual Review 2018. Northparkes Mine Mining Operations Plan 2020 to 2022		Progressive rehabilitation of the mine site was observed Tailing storage facility external walls.	The rehabilitation status (2020 Annual Review Section 8.5) at the end of the 2020 reporting period are in line with the 2020-2022 MOP Table 37.	Complies	
Sch 3 Cond 41	Rehabilitation Management Plan	The Proponent shall prepare and implement a Rehabilitation Management Plan for the project to the satisfaction of NSW Trade & Investment. This plan must:		Northparkes Rehabilitation Management Plan, Version 13, dated June 2020.	Environment Advisor – Northparkes are in the process of integrating the Rehabilitation Management Plan into the Mining Operations Plan.	During the site inspection the Auditor observed areas (for example the Tailings Storage Facility) where rehabilitation works were being undertaken in accordance with the Rehabilitation Management Plan.	Northparkes has prepared and implemented and Rehabilitation Management Plan.	Complies	
		(a) be prepared in consultation with the Department, DPIE - Water, BCD, Council and the CCC;		Northparkes Rehabilitation Management Plan, Version 13, dated June 2020. Letter from Northparkes (R Cunningham) to NSW Office of Water (T Baker) titled “Northparkes Mines Project Approval 11_0600”, dated 20 August 2014. The letter is a request for NOW to review the Rehabilitation Management Plan. Email from DPIE (S Withington) to Northparkes (M Priest) titled “Northparkes Mines Management Plans”, dated 1 September 2015. The attachment to the email provides comments on the Rehabilitation (and other) Management Plan.			NOW and DPIE were consulted during the preparation of the original version of the Rehabilitation Management Plan. Not Verified – no evidence was available to confirm that Council, BCD or the CCC were given the opportunity to review Rehabilitation Management Plan. Auditor’s Note - Integration of the Rehabilitation Management Plan into the MOP is a significant change and should trigger consultation with the relevant stakeholders.	Non-Compliance	Ensure that during the preparation of the combined MOP / Rehabilitation Management Plan that the relevant stakeholders are consulted.
		(b) be submitted to NSW Trade & Investment for approval by 30 June 2014, unless the Secretary agrees otherwise;		Northparkes Rehabilitation Management Plan, Version 13, dated June 2020. Letter from Northparkes (M Priest) to DPI (C McNally) titled “Northparkes Mines Project Approval 11_0600- Management Plan submission and variation to submission dates”, dated 27 November 2014. The letter requests an extension of time for the submission of the Rehabilitation Management Plan. Letter from Northparkes (M Priest) to DPI (C McNally) titled “Northparkes Mines Project Approval 11_0600- Management Plan submission and variation to submission dates”, dated 27 November 2014. The letter requests an extension of time for the submission of the Rehabilitation Management Plan as Project Approval was issued after the deadline set in the Approval and was therefore not			Northparkes has prepared and implemented and Rehabilitation Management Plan. Northparkes are in the process of integrating the Rehabilitation Management Plan into the Mining Operations Plan. Not Verified – no evidence was available to confirm that NSW Trade & investment approved the Rehabilitation Management Plan.	Non-Compliance	Ensure that the revised Rehabilitation Management Plan / Mining Operations Plan is approved by the relevant Authority.

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
			possible to meet. Letter from Northparkes (R Cunningham) to DPI (S Hardie) titled "Northparkes Mines Project Approval 11_0600", dated 20 August 2014. The letter requests an extension of time for the submission of the Rehabilitation Management Plan.					
		(c) be prepared in accordance with any relevant NSW Trade & Investment guideline;	Northparkes Rehabilitation Management Plan, Version 13, dated June 2020. Email from DPIE (S Withington) to Northparkes (M Priest) titled "Northparkes Mines Management Plans", dated 1 September 2015. The attachment to the email provides comments on the Rehabilitation (and other) Management Plan. DPIE notes that the plan did not appear to meet the requirements of the relevant NSW Trade and Investment Guidelines.			DPIE considered that the plan did not appear to meet the requirements of the relevant NSW Trade and Investment Guidelines.	Non-Compliance	Ensure that the combined Rehabilitation Management Plan / Mining Operations Plan meets the requirements of the relevant Guidelines.
		(d) describe how the rehabilitation of the site would be integrated with the implementation of the biodiversity offset strategies;	Northparkes Rehabilitation Management Plan, Version 13, dated June 2020.			The current version of the Rehabilitation Management Plan does not describe how the rehabilitation of the site would be integrated with the implementation of the biodiversity offset strategies.	Non-Compliance	Ensure that the integrated MOP / Rehabilitation Management Plan describes how the rehabilitation of the site would be integrated with the implementation of the biodiversity offset strategies.
		(e) include detailed performance and completion criteria for evaluating the performance of the rehabilitation of the site against the rehabilitation objectives in Table 8, and triggering remedial action (if necessary);	Northparkes Rehabilitation Management Plan, Version 13, dated June 2020.			Section 7 of the Rehabilitation Management Plan presents the proposed performance and closure criteria.	Complies	
		(f) describe the measures that would be implemented to ensure compliance with the relevant conditions of this approval, and address all aspects of rehabilitation including mine closure, final landform, and final land use;	Northparkes Rehabilitation Management Plan, Version 13, dated June 2020.			Section 6 of the Rehabilitation Management Plan describes the rehabilitation management measures to be implemented.	Complies	
		(g) include interim rehabilitation where necessary to minimise the area exposed for dust generation;	Northparkes Rehabilitation Management Plan, Version 13, dated June 2020.			While Table 5 of the Rehabilitation Management Plan notes the requirement, where possible, to implement interim rehabilitation, no details / strategy for interim rehabilitation is described.	Non-Compliance	Ensure that the integrated MOP / Rehabilitation Management Plan describes the interim rehabilitation strategy being or proposed to be implemented.
		(h) include a program to monitor, independently audit and report on the effectiveness of the measures, and progress against the detailed performance and completion criteria; and	Northparkes Rehabilitation Management Plan, Version 13, dated June 2020.			Section 8 of the Rehabilitation Management Plan describes the rehabilitation monitoring program.	Complies	

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		(i) build to the maximum extent practicable on the other management plans required under this approval.	Northparkes Rehabilitation Management Plan, Version 13, dated June 2020.				Noted	
Sch 5 Cond 1	Notification of Landowners	<p>Within 1 month of this approval, the Proponent shall:</p> <p>(a) notify in writing the owners of:</p> <ul style="list-style-type: none"> any privately-owned land within 2 kilometres of the approved open cut mining pit/s that they are entitled to ask for an inspection to establish the baseline condition of any buildings or structures on their land, or to have a previous property inspection report updated; any residence on privately-owned land which has, or would have, significant direct views of the mining operations and infrastructure on site during the project, that they are entitled to visual impact mitigation measures to reduce the visibility of the mining operations and infrastructure from their residence; <p>(b) notify the tenants of any mine-owned land of their rights under this approval; and</p> <p>(c) send a copy of the NSW Health fact sheet entitled "Mine Dust and You" (as may be updated from time to time) to the existing tenants of mine-owned land where the predictions in the EA identify that dust emissions generated by the project are likely to be greater than the relevant air quality criteria in schedule 3 at any time during the life of the project.</p>	2018 Independent Environmental Audit			The 2018 IEA verified compliance with this Condition.	Complies	
Sch 5 Cond 2		<p>Prior to entering into any tenancy agreement for any land owned by the Proponent that is predicted to experience exceedances of the recommended dust and/or noise criteria, the Proponent shall:</p> <p>(a) advise the prospective tenants of the potential health and amenity impacts associated with living on the land, and give them a copy of the NSW Health fact sheet entitled "Mine Dust and You" (as may be updated from time to time); and</p> <p>(b) advise the prospective tenants of the rights they would have under this approval, to the satisfaction of the Secretary.</p>		Environmental Advisor - no new tenancy agreements have been entered into during this Audit Period.		Northparkes have no tenancy agreements in place.	Not Triggered	
Sch 5 Cond 3	Notification of Landowners	<p>As soon as practicable after obtaining monitoring results showing:</p> <p>(a) an exceedance of any relevant criteria in schedule 3, the Proponent shall notify affected landowners in writing of the exceedance, and provide</p>		Environmental Advisor - no notification to landowners have been required during this audit period.		A review of environmental monitoring data covering the audit period has confirmed that no notifications under this condition have been required.	Not Triggered	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		regular monitoring results to each affected landowner until the project is again complying with the relevant criteria; and (b) an exceedance of the relevant air quality criteria in schedule 3, the Proponent shall send a copy of the NSW Health fact sheet entitled "Mine Dust and You" (as may be updated from time to time) to the affected tenants of the land (including the tenants of any mine-owned land).						
Sch 6 Cond 1	ENVIRONMENTAL MANAGEMENT Environmental Management Strategy	The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Secretary. This strategy must: (a) be submitted to the Secretary for approval by 30 June 2014;	Northparkes Mine Environmental Management Strategy, Version 13. 2018 Independent Environmental Audit	Environmental Advisor – Northparkes has established a comprehensive environmental management system that is certified as compliant with AS/NZ 14001.		An Environmental Management Strategy has been prepared and implemented. DPE Secretary's nominee approved the EMS by letter dated 19 January 2016.	Complies	
		(b) provide the strategic framework for environmental management of the mine	Northparkes Mine Environmental Management Strategy, Version 13.			The EMS provides an appropriate strategic framework for environmental management of the mine. It is an overarching document that documents the key elements of the site Environmental Management System.	Complies	
		(c) identify the statutory approvals that apply to the mine;	Northparkes Mine Environmental Management Strategy, Version 13.			Appendix D contains a summary of the statutory licences and approvals covering the operation.	Complies	
		(d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the mine;	Northparkes Mine Environmental Management Strategy, Version 13.	Environmental Advisor - the current roles and descriptions in Section 4 of the EMS provide descriptions of the personnel involved in the environmental management of the mine. Responsibilities are likely to change frequently depending on resourcing during the life of the operation. Northparkes have held ISO14001 certification since 2004.		Section 4 of the EMS provides a high-level description of environmental responsibilities at the mine.	Complies	
		(e) describe the procedures that would be implemented to: <ul style="list-style-type: none"> keep the local community and relevant agencies informed about the operation and environmental performance of the mine; receive, handle, respond to, and record complaints; resolve any disputes that may arise; respond to any non-compliance; respond to emergencies; and 	Northparkes Mine Environmental Management Strategy, Version 13. Northparkes Stakeholders Communications Management Plan, Version 5, dated 18 March 2019.			The EMS provides a high-level overview of stakeholder communications and references to the Stakeholder Communications Management Plan. The Stakeholder Communications Management Plan contains a description of the Complaint Management process and processes for communications with regulators. Details of the dispute	Non-Compliance	Review the Environmental Management Strategy / Stakeholder Communications Management Plan to include details of the stakeholder dispute resolution process. Revise the Incident Management Section of the EMS to include relevant details regarding the use of

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
						resolution process were not found in either the Stakeholder Communications Plan or the Environmental Management Strategy. The EMS contains a description of the Incident Management System. It is noted that reference to the RMSS (the system under which incidents are managed) is not described,		the RMSS.
		(f) include: <ul style="list-style-type: none"> copies of any strategies, plans and programs approved under the conditions of this approval; and a clear plan depicting all the monitoring to be carried out in relation to the project. 	Northparkes Mine Environmental Management Strategy, Version 13, not dated.			Each of the plans required under this Approval are available on the website.	Complies	
Sch 6 Cond 2	Adaptive Management	The Proponent shall assess and manage project-related risks to ensure that there are no exceedances of the criteria and/or performance measures in Schedules 3 & 4. [Auditor's Note – There is no Schedule 4; assume as reference to Schedule 5.] Any exceedance of these criteria and/or performance measures constitutes a breach of this approval and may be subject to penalty or offence provisions under the EP&A Act or EP&A Regulation. Where any exceedance of these criteria and/or performance measures has occurred, the Proponent must, at the earliest opportunity: (a) take all reasonable and feasible steps to ensure that the exceedance ceases and does not recur; (b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing those options and any preferred remediation measures or other course of action; and (c) implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary.	Incident Register (extract from the Risk Management and Safety System).		The RMSS was demonstrated to the Auditor during this IEA.	Northparkes maintains detailed compliance and incident database and retains information about environmental risks across its operations. Evidence obtained during this IEA indicates that Northparkes reports exceedances of criteria generated by the Project (including the incidents) and has implemented reasonable and feasible responses (i.e. suitable corrective and preventative actions) to those exceedances. Northparkes has received no requests from the Secretary which directed Northparkes to undertake remediation measures.	Complies	
Sch 6 Cond 3	Management Plan Requirements	The Proponent shall ensure that the management plans required under this approval are prepared in accordance with any relevant guidelines, and include: (a) detailed baseline data;	Northparkes Mine Environmental Management Strategy, Version 13, not dated. Northparkes Air Quality Management Plan, Version 19, dated 29 June 2020.			All plans contain relevant detailed baseline data except for the Noise Management Plan and Air Quality Management Plan.	Non-Compliance	Revise the Air Quality and Noise Management Plans to include detailed baseline data.
		(b) a description of: <ul style="list-style-type: none"> the relevant statutory requirements (including any relevant approval, licence or lease conditions); 	Northparkes Mine Biodiversity Management Plan, Version 7, dated 23 June 2020. Northparkes Mine Blast Management Plan,			All plans contain details of relevant statutory requirements.	Complies	Revise the Traffic Management Plan to include relevant statutory

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		<ul style="list-style-type: none"> any relevant limits or performance measures/criteria; the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the project or any management measures; 	Version 9, dated 30 May 2020. Northparkes Mine Heritage Management Plan, Version 9, dated June 2020. Northparkes Mine Environmental Noise Management Plan, Version 17, dated May 2020. Northparkes Mine Pollution Incident Response Management Plan, Version 11, dated December 2020. Northparkes Mine Traffic Management Plan, dated September 2019. Northparkes Mine Water Management Plan, Version 12, dated June 2020. Northparkes Mine Surface Water Management Plan, Version 7, dated June 2020. Northparkes Mine Groundwater Management Plan, Version 7, dated 20 June 2020.			All plans contained reference to performance measures, compliance criteria and relevant performance indicators.		requirements.
		(c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;				All plans contain a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria.	Complies	
		(d) a program to monitor and report on the: <ul style="list-style-type: none"> impacts and environmental performance of the project; effectiveness of any management measures (see c above); 				All plans contain a description of the monitoring and reporting programs required under this Approval.	Complies	
		(e) a contingency plan to manage any unpredicted impacts and their consequences;				All plans contained an appropriate contingency management plan.	Complies	
		(f) a program to investigate and implement ways to improve the environmental performance of the project over time;				All plans contained an appropriate description of the program to be implemented to improve environmental performance over time.	Complies	
		(g) a protocol for managing and reporting any: <ul style="list-style-type: none"> incidents; complaints; non-compliances with statutory requirements; and exceedances of the impact assessment criteria and/or performance criteria; and 				Three of the plans (Environmental Management Strategy, Heritage Management Plan and Blast Management Plan) contained appropriate references to the Incident Management Process to be implemented. Two of the Plans (Traffic Management Plan and Heritage Management Plan) contained details of the complaint management procedure. Two of the plans (Environmental Management Strategy and Blast Management Plan) described the non-compliance management procedure.	Non-Compliance	Review and revise all plans to ensure that they contain consistent descriptions of the: <ul style="list-style-type: none"> Complaint Management Incident Management; and Non-compliance Management.
		(h) a protocol for periodic review of the plan.				All plans contained an appropriate description of the protocol for periodic plan review.	Complies	
Sch 6 Cond 4	Annual Review	By the end of March each year, or as otherwise agreed by the Secretary, the Proponent shall review the	Northparkes Mine Annual Review 2020. Northparkes Mine Annual Review 2019.			The three Annual Reviews prepared during this audit period were published prior	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		<p>environmental performance of the project to the satisfaction of the Secretary. This review must:</p> <p>(a) describe the development that was carried out in the previous calendar year, and the development that is proposed to be carried out over the next year;</p>	Northparkes Mine Annual Review 2018.			<p>to 30 March each year. Section 6 of the Annual Reviews provide an overview of environmental performance for the reporting period. Section 4 of the Annual Reviews describe the operations undertaken during the reporting period.</p> <p>Section 4.6 describes the development work (construction) undertaken during the audit period. Section 12 describes the activities proposed for the forth coming reporting period.</p>		
		<p>(b) include a comprehensive review of the monitoring results and complaints records of the project over the previous calendar year, which includes a comparison of these results against the [sic]</p> <ul style="list-style-type: none"> the relevant statutory requirements, limits or performance measures/criteria; the monitoring results of previous years; and the relevant predictions in the EA; 	<p>Northparkes Mine Annual Review 2020.</p> <p>Northparkes Mine Annual Review 2019.</p> <p>Northparkes Mine Annual Review 2018.</p>	<p>Environmental Advisor - Section 6.3.2 describes Air Quality Performance and Section 6.4.2 Noise Quality Performance, detail reporting period performance against EA predictions.</p>		<p>Section 6 of the Annual Reviews present the environmental monitoring summaries (and interpretations) for the reporting period. The assessment of performance against the individual environmental parameters includes a discussion of trends in the monitoring data and performance against trigger values (including statutory compliance criteria), however these sections do not specifically provide a comparison of actual against predicted impacts. Section 9.4 presents details of complaints received for the reporting period.</p>	Non-Compliance	<p>In future Annual Reviews ensure that for each category of impact presented in the EA, that an assessment of actual impacts against predicted impacts are reported.</p>
		(c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;	<p>Northparkes Mine Annual Review 2020.</p> <p>Northparkes Mine Annual Review 2019.</p> <p>Northparkes Mine Annual Review 2018.</p>			<p>Non-compliances against licenses and approvals are presented in Section 1 of the Annual Reviews.</p>	Complies	
		(d) identify any trends in the monitoring data over the life of the project;	<p>Northparkes Mine Annual Review 2020.</p> <p>Northparkes Mine Annual Review 2019.</p> <p>Northparkes Mine Annual Review 2018.</p>			<p>Trends in monitoring data are discussed in Section 6 of the Annual Reviews.</p>	Complies	
		(e) identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies; and	<p>Northparkes Mine Annual Review 2020.</p> <p>Northparkes Mine Annual Review 2019.</p> <p>Northparkes Mine Annual Review 2018.</p>	<p>describes Air Quality Performance and Section 6.4.2 Noise Quality Performance, detail reporting period performance against EA predictions.</p>		<p>The Annual Reviews do not specifically provide a comparison of actual against predicted impacts</p>	Non-Compliance	<p>In future Annual Reviews ensure that for each category of impact presented in the EA, that an assessment of actual impacts against predicted impacts are reported.</p>

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(f) describe what measures will be implemented over the next year to improve the environmental performance of the project.	Northparkes Mine Annual Review 2020. Northparkes Mine Annual Review 2019. Northparkes Mine Annual Review 2018.			Proposed actions to improve environmental performance are presented in Section 6 and Section 12.	Complies	
Sch 6 Cond 5	Revision of Strategies, Plans and Programs	The Proponent shall review and, if necessary, revise the strategies, plans, and programs required under this approval to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted to the Secretary for approval. Within 3 months of:	Northparkes Mine Environmental Management Strategy, Version 13, not dated. Northparkes Air Quality Management Plan, Version 19, dated 29 June 2020. Northparkes Mine Biodiversity Management Plan, Version 7, dated 23 June 2020. Northparkes Mine Blast Management Plan, Version 9, dated 30 May 2020.	Environmental Advisor - All management plans were review and updated, if required, during the period. Those stipulated in the Development Consent were reviewed following submission of each Annual Review. Outside of these management plans, Northparkes reviews its other internal management plans periodically based on risk level. In 2020 a gap analysis of each management was undertaken, assessing the changes that have occurred from original approval by the Department to current operations. The completed gap analyses were submitted with the respective management plan to the Department for review, comment and approval. The air quality management is currently waiting for EPA comment as Northparkes are requesting refinement of its air quality monitoring program. The water management plans (WMP, SWMP, GWMP, SWB) were third party reviewed and updated, and will be submitted following the final stages of review. The Traffic management Plan was the only plan developed during the period and was prepared in consultation with the relevant agencies. Revision history is detailed on the second page of each management plan.		Regular reviews of all management plans have been undertaken. Details of the review triggers are listed in each management plan revision table. Observation 1 – the revision table of the Environmental Management Strategy does not record the revision dates. Observation 2 – the Groundwater Management Plan version number is incorrect. Observation 3 – the Surface Water Management Plan version number is incorrect.	Complies	Update the revision table of the Environmental Management Strategy with the relevant revision dates. Update the Groundwater Management Plan and Surface Water Management Plan version numbers.
		(a) the submission of an annual review under condition 4 above	Northparkes Mine Heritage Management Plan, Version 9, dated June 2020.				Complies	
		(b) the submission of an incident report under condition 7 below;	Northparkes Mine Environmental Noise Management Plan, Version 17, dated May 2020.				Complies	
		(c) the submission of an audit under condition 9 below; or	Northparkes Mine Pollution Incident Response Management Plan, Version 11, dated December 2020. Northparkes Mine Traffic Management Plan, dated September 2019. Northparkes Mine Water Management Plan, Version 12, dated June 2020. Northparkes Mine Surface Water Management Plan, Version 7, dated June 2020. Northparkes Mine Groundwater Management Plan, Version 7, dated 20 June 2020.				Complies	
Sch 6 Cond 6	Community Consultative Committee	The Proponent shall operate a Community Consultative Committee (CCC) for the project to the satisfaction of the Secretary. This CCC must be operated in general accordance with the Guidelines for Establishing and Operating Community Consultative Committees for Mining Projects (Department of Planning, 2007, or its latest version).	http://www.northparkes.com/news/reports-and-policies#community-reports			Northparkes has established and maintained a CCC. The CCC was consulted during this IEA. Minutes of the CCC meetings are provided on the website under Community Reports.	Complies	
Sch 6 Cond 7	REPORTING Incident Reporting	The Proponent shall notify, immediately, the Secretary and any other relevant agencies of any incident. Within 7 days of the date of the incident, the Proponent shall provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.	Email from Northparkes (C Dingle) to EPA (J Loxley) and DPIE (K O'Reilly) titled "Goonumbla Creek – Environmental Incident", dated 17 April 2019. Northparkes Mine Annual Review 2020. Northparkes Mine Annual Review 2019. Northparkes Mine Annual Review 2018.			Northparkes operates a digital risk management system, Risk Management and Safety System (RMSS). All incidents (covering environment and safety are recorded and actioned through that system. A review of the incidents recorded for the audit period identified one (1) reportable incident relating. That incident was appropriately investigated	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
						and reported to the DPIE and other relevant Authorities.		
Sch 6 Cond 8	Regular Reporting	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.	Northparkes Mine Annual Review 2020. Northparkes Mine Annual Review 2019. Northparkes Mine Annual Review 2018.			Environmental monitoring data, specialist environmental reports and the Annual Reviews are provided on the Northparkes' website.	Complies	
Sch 6 Cond 9	INDEPENDENT ENVIRONMENTAL AUDIT	By the 31 March 2015, and every 3 years thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project.	Independent Environmental Audit CMOC – Northparkes Mines Parkes NSW, report prepared by 3E Environmental Engineering & Energy, dated May 2018.			The 2018 IEA was commissioned in March 2015 following endorsement of the audit team by DPE.	Complies	
		This audit must: (a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;	Independent Environmental Audit CMOC – Northparkes Mines Parkes NSW, report prepared by 3E Environmental Engineering & Energy, dated May 2018.			The appointment of the Audit team was endorsed by DPE on 26 March 2018.	Complies	
		(b) include consultation with the relevant agencies;	Independent Environmental Audit CMOC – Northparkes Mines Parkes NSW, report prepared by 3E Environmental Engineering & Energy, dated May 2018.			Appendix 2 of the 2018 Audit report provides copies of consultation correspondence with the relevant agencies.	Complies	
		(c) assess the environmental performance of the project and assess whether it is complying with the requirements in this approval, and any other relevant approvals, relevant EPL/s and/or Mining Lease (including any assessment, plan or program required under these approvals);	Independent Environmental Audit CMOC – Northparkes Mines Parkes NSW, report prepared by 3E Environmental Engineering & Energy, dated May 2018.			The 2018 IEA reviewed and assessed the environmental performance of the mine and the relevant approvals.	Complies	
		(d) review the adequacy of any approved strategy, plan or program required under the abovementioned approvals; and	Independent Environmental Audit CMOC – Northparkes Mines Parkes NSW, report prepared by 3E Environmental Engineering & Energy, dated May 2018.			The 2018 IEA included the review of the approved plans, strategies and programs.	Complies	
		(e) recommend measures or actions to improve the environmental performance of the project, and/or any strategy, plan or program required under these approvals.	Independent Environmental Audit CMOC – Northparkes Mines Parkes NSW, report prepared by 3E Environmental Engineering & Energy, dated May 2018.			The 2018 IEA made a series of comprehensive recommendations.	Complies	
		Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Proponent shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.	Independent Environmental Audit CMOC – Northparkes Mines Parkes NSW, report prepared by 3E Environmental Engineering & Energy, dated May 2018.			The final 2018 IEA audit report was issued on 29 June 2018 and subsequently reissued following the completion of revisions requested by DPE.	Complies	
Sch 6 Cond 10	ACCESS TO INFORMATION	The Proponent shall: (a) make the following information publicly available on its website:	http://www.northparkes.com/news/reports-and-policies#publications			A link to the DPIE Approvals site is provided on the website under “Northparkes Extension Project”.	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		<ul style="list-style-type: none"> the EA; 				Environmental assessments for each of the modifications are available through a link to the DPIE website.		
		<ul style="list-style-type: none"> current statutory approvals for the project; 	http://www.northparkes.com/news/reports-and-policies#publications			Copies of the current Approvals and Licenses are provided on the website under Approvals, Licenses and Leases.	Complies	
		<ul style="list-style-type: none"> approved strategies, plans or programs required under the conditions of this approval; 	http://www.northparkes.com/news/reports-and-policies#publications			Copies of all approved plans and strategies are provided on the website (under Environmental Management Plans, Programs and Reports) with the exception of the Rehabilitation Management Plan.	Non-Compliance	Upload a copy of the current Rehabilitation Management Plan onto the Northparkes website.
		<ul style="list-style-type: none"> a comprehensive summary of the monitoring results of the project, which have been reported in accordance with the various plans and programs approved under the conditions of this approval; 	http://www.northparkes.com/news/reports-and-policies#publications			Summaries of environmental data are provided on the website under Environmental Monitoring.	Complies	
		<ul style="list-style-type: none"> a complaints register, which is to be updated on a monthly basis; 	http://www.northparkes.com/news/reports-and-policies#community-reports			The complaints register is provided on the website under Community Reports.	Complies	
		<ul style="list-style-type: none"> minutes of CCC meetings; 	http://www.northparkes.com/news/reports-and-policies#community-reports			Minutes of the CCC meetings are provided on the website under Community Reports.	Complies	
		<ul style="list-style-type: none"> the last five annual reviews; 	http://www.northparkes.com/news/reports-and-policies#publications			Copies the last five Annual Reports are provided on the website under Annual Environmental Management Reports.	Complies	
		<ul style="list-style-type: none"> any independent environmental audit, and the Proponent's response to the recommendations in any audit; and 	http://www.northparkes.com/news/reports-and-policies#publications	Environmental Advisor - Northparkes believe to be compliant with this condition as responses to all recent audits are displayed on the website.		Copies of the past two Independent Environmental Audits and Northparkes responses to recommendations were available on the website.	Complies	
		<ul style="list-style-type: none"> any other matter required by the Secretary; and 	http://www.northparkes.com/news/reports-and-policies#publications				Noted	
		(b) keep this information up to date, to the satisfaction of the Secretary.	http://www.northparkes.com/news/reports-and-policies#publications			The website information was up to date at the time of this IEA.	Complies	

ENVIRONMENT PROTECTION LICENCE 4784								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
A1.1	Administrative Conditions What the licence authorises and regulates	This licence authorises 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, fee-based activity classification and the scale of the operation. Mining for minerals > 5,000,000 T capacity.	Northparkes Mine Annual Review 2020. Northparkes Mine Annual Review 2019. Northparkes Mine Annual Review 2018.				Noted	
A2.1	Premises or plant to which this licence applies	The licence applies to the following premises: Bogan Road, Parkes – ML 1247.	Mining Lease 1247			The mining operations are contained within the area covered by Mining Lease 1247.	Noted	
A3.1	Information supplied to the EPA	Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to "the licence application" includes a reference to: a) the applications for any licenses (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.					Noted	
P1.1	Discharges to Air and Water and Applications to Land Location of monitoring / discharge points	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.					Noted	
P1.2		The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point. Water and Land: EPA 1 Groundwater Monitoring Point EPA 2 Groundwater Monitoring Point EPA 3 Groundwater Monitoring Point EPA 4 Groundwater Monitoring Point EPA 5 Groundwater Monitoring Point EPA 6 Groundwater Monitoring Point EPA 7 Wastewater discharge EPA 8 Wastewater discharge					Noted	

ENVIRONMENT PROTECTION LICENCE 4784								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
L1.1	Limit Conditions Pollution of Waters	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	Email from Northparkes (C Dingle) to EPA (J Loxley) and DPIE (K O'Reilly) titled "Goonumbla Creek – Environmental Incident", dated 17 April 2019. Northparkes Mine Annual Review 2020. Northparkes Mine Annual Review 2019. Northparkes Mine Annual Review 2018.		During the site inspection the audit viewed the area and noted that no impact from the incident was visible.	On 15 April 2019 slurry from the Secondary Crusher discharged into Goonumbla Creek. The creek was dry at the time of the incident and the slurry was successfully removed. No water pollution occurred as a result of this incident. Note however, that the EPA issued an official caution as a result of the incident. The incident investigation undertaken by Northparkes identified operator error as the cause and implemented further training in materials management.	Non-Compliance	The incident has been investigated and appropriate action taken. No further action required.
L2.1	Waste	The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled "Waste" and meeting the definition, if any, in the column titled "Description" in the table below. Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled "Activity" in the table below. Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled "Other Limits" in the table below. Waste: Drilling mud and cuttings that have been generated by the licensee during exploration.	Incident Register			No evidence of the acceptance of unapproved wastes from outside of the Northparkes operation was found during the audit.	Complies	
L2.2		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 licence	Incident Register			No evidence of the acceptance of wastes from outside of the Northparkes operation was found during the audit.	Complies	
O1.1	Operating Conditions Activities must be carried out in a competent manner	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and			Inspection of materials storage (including fuels and lubricants) found that the use and storage of those materials were being undertaken in an appropriate manner. Photograph 10 shows the hydrocarbon storage area and photograph 16 shows a bulk fuel storage and refueling area.	At the time of the audit the processing, handling, movement and storage of materials and other substances was being undertaken in an appropriate manner.	Complies	
		b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity	Contract for Services No. SC202013, unsigned – draft contract with Sam's Waste Management for the provision of waste management services including provision of waste bins, waste collection and disposal, documentation and		During the site visit all waste storage areas at the mine were inspected. All areas were appropriately organised and maintained. Sam's Waste bins	Northparkes have contracted Sam's Waste (a local Parkes contractor) to manage the storage, collection and management (reuse / recycling	Complies	

ENVIRONMENT PROTECTION LICENCE 4784								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
			<p>record maintenance, six-monthly performance reviews, and provision of training and awareness materials.</p> <p>Spreadsheet titled “Scrap Steel Despatches(sic)”. Record of steel sent off site for recycle in 2018.</p> <p>Total Waste Management Report prepared by JR Richards for the period 1 December 2019 to 31 December 2019. The report includes a summary of monthly waste collection and disposal covering each month in 2019, including waste categories and waste recycling and disposal locations.</p> <p>Spreadsheet titled “2019 Scrap Goods Outwards Weights”. Record of metal sent off site in 2019 for recycle.</p> <p>Spreadsheet Report (from Sam’s Waste) titled “SamsWaste NovDec 2020”. The report provides a template for the recording of waste materials collected, recycled and disposed of by Sam’s Waste.</p>		are provided at each location and allow for the segregation and storage of wastes. Photograph 15 shows an example of Sam’s Waste Bins.	/ disposal) of waste materials. Appropriate facilities for waste segregation are provided on-site and evidence that waste materials are being segregated and appropriately managed was sighted.		
O2.1	Maintenance of plant and equipment	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and		Maintenance Improvement Superintendent – Northparkes uses SAP to track maintenance works across the mine both on the surface and underground.	During the site inspection all areas inspected were appropriately organised and maintained. No evidence of improper equipment operations or maintenance were observed.	The Northparkes Mine operates an SAP based maintenance system that monitors and manages scheduled and unscheduled maintenance.	Compliance	
		b) must be operated in a proper and efficient manner.			During the site inspection all areas inspected were appropriately organised and maintained. No evidence of improper equipment operations or maintenance were observed.	No evidence of improper equipment operations or maintenance were observed during the audit.	Complies	
O3.1	Dust	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	Complaints Register		<p>During the site inspection the audit witness the operation of water carts across the operational areas.</p> <p>No significant visible dust was being generated at the time of this audit.</p> <p>Planting of grasses on the currently unutilized tailings storage facility was sighted.</p>	<p>The review of dust monitoring data covering the audit period did not identify any dust exceedances due to mining operations.</p> <p>The Auditor considers that the control measures specified in the Air Quality Management Plan were being implemented.</p> <p>No dust related complaints were received during the audit period.</p> <p>All plant and equipment are subject to routine checks and maintenance.</p>	Complies	
M1.1	Monitoring and Reporting Conditions	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.					Noted	
M1.2	Monitoring Records	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form;	Comprehensive sampling and analysis records covering the audit period for groundwater, surface water, dust, TSP, PM ₁₀ and noise monitoring were provided. The following are			Monitoring records covering the audit period were available and were accessible and legible.	Complies	

ENVIRONMENT PROTECTION LICENCE 4784											
Cond.	Short Title	Condition				Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
	M1.3	b) kept for at least 4 years after the monitoring or event to which they relate took place; and				examples of the records provided: 2021 Q1 Surface Water.pdf (field sampling sheet) 2021 Q1 Ground Water.pdf (field sampling sheet) ALS Certificate of Analysis ES2111944, dated 13 April 2021. Record of sampling and analysis including identification of person responsible for sampling, date and time of sampling, sample location and identification numbers. ALS Quality Control Report ES2111944, dated 13 April 2021. Record of QA/QC data, including identification of laboratory testing methods. Chain of Custody Form Q1, 2021 groundwater sampling, ES211944. Sampling details and COC trail for groundwater sampling undertaken. 01 Quarterly Bore Water Analysis (spreadsheet) - record of groundwater analysis for all monitoring including EPA Sampling Points for the audit period. 02 Quarterly Bore Water Depth - record of groundwater depths for all monitoring for the audit period. 03 Quarterly Bore Water Monitoring SWL - record of groundwater levels for all monitoring including EPA Sampling Points for the audit period. 02 Quarterly Surface Water Analysis for the audit period. Noise Monitoring Report March 2021 prepared by Muller Acoustic Consulting.			Monitoring results from 2005 to 2021 are available on the Northparkes website.	Complies	
		c) produced in a legible form to any authorised officer of the EPA who asks to see them.							Monitoring records covering the audit period were available and were accessible and legible.	Complies	
M1.3		The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken;							Certificates of water, noise and dust monitoring recorded sighted contained details of sampling locations and dates were sighted.	Complies	
		b) the time(s) at which the sample was collected;							Certificates of water, noise and dust monitoring recorded sighted contained details of sampling time and date were sighted.	Complies	
		c) the point at which the sample was taken; and							Certificates of water, noise and dust monitoring recorded sighted contained details of sampling locations and sample identification numbers.	Complies	
		d) the name of the person who collected the sample.							Certificates of water, noise and dust monitoring recorded sighted contained details of sampling personnel.	Complies	
M2.1	Monitoring Requirements	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:							Noted		
		Analyte	Unit	Freq.	Method						
M2.2	Water Monitoring Requirements Testing Methods	EPA Points 1, 2, 3, 4, 5, 6				Comprehensive sampling and analysis records covering the audit period for groundwater and surface water. The following are examples of the records provided: ALS Certificate of Analysis ES2111944, dated 13 April 2021. Record of sampling and analysis including identification of person responsible for sampling, date and time of sampling, sample location and identification numbers. 01 Quarterly Bore Water Analysis (spreadsheet) - record of groundwater analysis for all monitoring including EPA Sampling Points for the audit period. 02 Quarterly Bore Water Depth - record of groundwater depths for all monitoring for the	Environmental Advisor Although there are 8 points identified in the EPL, only 6 of them are required to be monitored quarterly for the parameters in M2.2. The other two locations are ‘discharge’ points and have no monitoring requirements. These ‘discharge’ points are not off-site release points and relate to the dewatering of the underground workings. All monitoring was completed successfully during the period.		Certificates of analysis confirmed annual sampling and testing for the nominated pollutants.	Complies	
		Al	mg/l	Yearly	Representative					Complies	
		As	mg/l	Yearly	Representative					Complies	
		Ba	mg/l	Yearly	Representative					Complies	
		Be	mg/l	Yearly	Representative					Complies	
		HCO ₃	mg/l	Yearly	Representative					Complies	
		Cd	mg/l	Yearly	Representative					Complies	
		Ca	mg/l	Yearly	Representative					Complies	
		Cl ⁻	mg/l	Yearly	Representative					Complies	
		Cr	mg/l	Yearly	Representative					Complies	
		Co	mg/l	Yearly	Representative					Complies	
		Cond.	uS/cm	Qtly	Representative					Complies	
		Cu	mg/l	Qrtly	Representative					Complies	
		Pb	mg/l	Yearly	Representative					Complies	
		Mg	mg/l	Yearly	Representative					Complies	

ENVIRONMENT PROTECTION LICENCE 4784											
Cond.	Short Title	Condition				Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		Mo	mg/l	Yearly	Representative	audit period. 03 Quarterly Bore Water Monitoring SWL - record of groundwater levels for all monitoring including EPA Sampling Points for the audit period. 02 Quarterly Surface Water Analysis for the audit period. Northparkes Mine Annual Review 2020. Northparkes Mine Annual Review 2019. Northparkes Mine Annual Review 2018.				Complies	
		Ni	mg/l	Yearly	Representative					Complies	
		pH	pH	Qrtly	Representative					Complies	
		K	mg/l	Yearly	Representative					Complies	
		Se	mg/l	Yearly	Representative					Complies	
		Na	mg/l	Yearly	Representative					Complies	
		Water Level	M	Qrtly	In-situ					Complies	
		SO ₄ ²⁻	mg/l	Yearly	Representative					Complies	
		TSS	mg/l	Yearly	Representative					Complies	
		Zn	mg/l	Yearly	Representative					Complies	
M3.1	Testing Methods – concentration limits	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.								Noted – Refer to Condition M2.2 above	
M4.1	Recording of Pollution Complaints	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.				Complaints Register (website) Spreadsheet “Complaints Register Master)			A complaints register is maintained and is available on the website.	Complies	
M4.2		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.				Complaints Register (website) Spreadsheet “Complaints Register Master)			A detailed complaint register that meets all of the requirements of this condition has been maintained.	Complies	
M4.3		The record of a complaint must be kept for at least 4 years after the complaint was made.				Complaints Register (website) Spreadsheet “Complaints Register Master)			A detailed complaint register that meets all of the requirements of this condition has been maintained.	Complies	
M4.4		The record must be produced to any authorised officer of the EPA who asks to see them.				Complaints Register (website) Spreadsheet “Complaints Register Master)				Noted	
M5.1	Telephone Complaints Line	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.				http://www.northparkes.com/contact			Community complaint hotline number +61 2 6861 3533 is listed on the mine website	Complies	
M5.2		The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.				http://www.northparkes.com/contact			Community complaint hotline number +61 2 6861 3533 is listed on the mine website	Complies	

ENVIRONMENT PROTECTION LICENCE 4784								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
M5.3		The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.					Noted	
R1.1	Reporting Conditions Annual Returns	<p>The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:</p> <ol style="list-style-type: none"> 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. <p>At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.</p>	https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=4784&id=4784&option=licence&searchrange=licence&range=POEO%20licence&prp=no&status=Issued			Northparkes has issued Annual Returns to the EPA in accordance with the Conditions every year covered by this audit period.	Complies	
R1.2		An Annual Return must be prepared in respect of each reporting period, except as provided below.	https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=4784&id=4784&option=licence&searchrange=licence&range=POEO%20licence&prp=no&status=Issued			Northparkes has issued Annual Returns to the EPA in accordance with the Conditions every year covered by this audit period.	Complies	
R1.3		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.				No transfer of licence has occurred during the audit period.	Not Triggered	
R1.4		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 the licence - the date from which notice revoking the licence operates.				The EPL was not surrendered during the audit period.	Not Triggered	

ENVIRONMENT PROTECTION LICENCE 4784								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
R1.5		The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or 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').	https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=4784&id=4784&option=licence&searchrange=licence&range=POEO%20licence&prp=no&status=Issued			Northparkes has issued Annual Returns to the EPA in accordance with the Conditions every year covered by this audit period.	Complies	
R1.6		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.	2018 Annual Return (signed by Director)			Copies of signed annual returns are kept by Northparkes.	Complies	
R1.7		Within the Annual Return, the Statements 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.	2018 Annual Return (signed by Director) 2020 Metropolitan Coal – Environmental Protection Licence Monitoring Summary			Copies of signed annual returns are kept by Northparkes.	Complies	
R2.1	Notification of Environmental Harm	Notifications must be made by telephoning the Environment Line service on 131 555.	Email from EPA (WMS> Admin@environment.nsw.gov.au) to Northparkes (C Dingle) confirming receipt of Pollution Line incident report. Northparkes Mine Annual Review 2020. Northparkes Mine Annual Review 2019. Northparkes Mine Annual Review 2018.			Northparkes operates a digital risk management system, Risk Management and Safety System (RMSS). All incidents (covering environment and safety) are recorded and actioned through that system. A review of the incidents recorded for the audit period identified one (1) reportable incident relating. That incident was appropriately investigated and reported to the EPA via the pollution line.	Complies	
R2.2		The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.	Email from Northparkes (C Dingle) to EPA (J Loxley) and DPIE (K O'Reilly) titled "Goonumbla Creek – Environmental Incident", dated 17 April 2019.	Environment and Community Manager – no environmental incidents that trigger the environmental harm criteria occurred during the audit period		A written incident report was provided to the EPA on 14 April (two days after the initial notification).	Complies	
R3.1	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 vehicles 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.		Environment Advisor – no requests for additional investigations or written reports were received from the EPA during the audit period.		No requested for additional investigations or written reports were received from the EPA during the audit period.	Not Triggered	
R3.2		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.		Environment Advisor – no requests for additional investigations or written reports were received from the EPA during the audit period.		No requested for additional investigations or written reports were received from the EPA during the audit period.	Not Triggered	

ENVIRONMENT PROTECTION LICENCE 4784								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
R3.3		The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every 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 (of whom 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 complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.		Environment Advisor – no requests for additional investigations or written reports were received from the EPA during the audit period.		No requested for additional investigations or written reports were received from the EPA during the audit period.	Not Triggered	
R3.4		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 in the request.					Noted	
G1.1	General Conditions Copy of Licence	A copy of this licence must be kept at the premises to which the licence applies.	http://www.northparkes.com/news/reports-and-policies#publications			A copy of the EPL is maintained on the company website.	Complies	
G1.2		The licence must be produced to any authorised officer of the EPA who asks to see it.	http://www.northparkes.com/news/reports-and-policies#publications			A copy of the EPL is maintained on the company website.	Complies	
G1.3		The licence must be available for inspection by any employee or agent of the licensee working at the premises.	http://www.northparkes.com/news/reports-and-policies#publications			A copy of the EPL is maintained on the company website.	Complies	

Mining Leases 1247 / 1367 / 1641 / 1743								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
1	Notice to Landowners	Within a period of three months from the date of renewal of this mining lease, the lease holder must serve on each landholder a notice in writing indicating that this mining lease has been renewed and whether the lease includes the surface. A plan identifying each landholder and individual land parcel subject to the lease area, and a description of the lease area must accompany the notice.				Northparkes owns all land defined in Mining Lease (ML) 1247.	Complies	
		If there are ten or more landholders, 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 mining lease has been renewed; state whether the lease includes the surface and must contain a plan and description of the lease area. If a notice is made under condition 1(b), compliance with condition 1(a) is not required.				ML 1247 was granted on 27 November 1991, transferred to Northparkes on 3 January 2014, and was renewed prior to the audit period until 26 November 2033. No renewal or transfer of ML 1247 occurred during the audit period.	Complies	
2	Rehabilitation	Any disturbance resulting from the activities carried out under this mining lease must be rehabilitated to the satisfaction of the Minister.				At the time of the audit no land covered by this mining lease was completed.	Noted	
3	Mining Operations Plan and Annual Rehabilitation Report	(a) The lease holder must comply with an approved Mining Operations Plan (MOP) in carrying out any significant surface disturbing activities, including mining operations, mining purposes and prospecting. The lease holder must apply to the Minister for approval of a MOP. An approved MOP must be in place prior to commencing any significant surface disturbing activities, including mining operations, mining purposes and prospecting.	Northparkes Mining Operations Plan 2020 to 2022, Version 1.2, dated 26 November 2020. Letter from the Resources Regulator (C Fawcett) to Northparkes (C Higgins) titled "ML 1367 (1992), ML 1641 (1992), ML 1247 (1973), ML 1743 (1992), CMOC Mining Pty Limited Approval of Mining Operations Plan and Assessment of Security Deposit", dated 15 December 2020. The letter approves the current version of the MOP.			At this time of the audit, the current version of the MOP was version 1.2, dated 26 November 2020. The MOP for the works undertaken during the audit period was approved by the Resources Regulator on 15 December 2020.	Complies	
		(b) The MOP must identify the post mining land use and set out a detailed rehabilitation strategy which: (i) identifies areas that will be disturbed; (ii) details the staging of specific mining operations, mining purposes and prospecting; (iii) identifies how the mine will be managed and rehabilitated to achieve the post mining land use; (iv) identifies how mining operations, mining purposes and prospecting will be carried out in order to prevent and or minimise harm to the environment; and (v) reflects the conditions of approval under: - the Environmental Planning and Assessment Act 1979; - the Protection of the Environment Operations Act 1997; and - any other approvals relevant to the development including the conditions of this mining lease.	Northparkes Mining Operations Plan 2020 to 2022, Version 1.2, dated 26 November 2020.			Post mining land use is described in Section 4 of the Mining Operations Plan. Section 2 of the MOP describes the areas to be disturbed by mining and associated activities, including exploration. Section 5 of the MOP describes rehabilitation planning and management. Sections 2 and 3 describe how mining operations, mining purposes and prospecting will be carried out in order to prevent and or minimise harm to the environment.	Complies	
		(c) The MOP must be prepared in accordance with the ESG3: Mining Operations Plan (MOP) Guidelines September 2013 published on the Department's website at www.resources.nsw.gov.au/environment	Northparkes Mining Operations Plan 2020 to 2022, Version 1.2, dated 26 November 2020.			The MOP was prepared to the satisfaction of the Resources Regulator. A review of the plan contents found that the MOP meets the general requirements of the relevant guidelines.	Complies	

Mining Leases 1247 / 1367 / 1641 / 1743								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(d) The lease holder may apply to the Minister to amend an approved MOP at any time.					Noted	
		(e) It is not a breach of this condition if: (i) the operations which, but for this condition 3(e) would be a breach of condition 3(a), were necessary to comply with a lawful order or direction given under the Environmental Planning and Assessment Act 1979, the Protection of the Environment Operations Act 1997, the Mine Health and Safety Act 2004 / Coal Mine Health and Safety Act 2002 and Mine Health and Safety Regulation 2007 / Coal Mine Health and Safety Regulation 2006 or the Work Health and Safety Act 2011; and (ii) the Minister had been notified in writing of the terms of the order or direction prior to the operations constituting the breach being carried out.					Noted	
		(f) The lease holder must prepare a Rehabilitation Report to the satisfaction of the Minister. The report must: (i) provide a detailed review of the progress of rehabilitation against the performance measures and criteria established in the approved MOP; (ii) be submitted annually on the grant anniversary date (or at such other times as agreed by the Minister); and (iii) be prepared in accordance with any relevant annual reporting guidelines published on the Department's website at www.resources.nsw.gov.au/environment . Note: The Rehabilitation Report replaces the Annual Environmental Management Report.	Northparkes Mine Annual Review 2020. Northparkes Mine Annual Review 2019. Northparkes Mine Annual Review 2018.			The Annual Rehabilitation Report required under this paragraph are contained in Section 8 of the Annual Reviews that specifically deal with Land Management and Rehabilitation.	Complies	
4	Non-Compliance Reporting	(a) The lease holder must notify the Department upon becoming aware of any breaches of the conditions of this mining lease or breaches of the Mining Act or Regulations;		Environmental Advisor – Northparkes is not aware of any breaches of the conditions of the mining leases during the audit period.		Northparkes is not aware of any breaches of the conditions of the mining leases during the audit period.	Not Triggered	
		(b) Notifications under condition 4(a) must be provided in the form specified on the Department's website within seven (7) days of the mining lease holder becoming aware of the breach.		Environmental Advisor – Northparkes is not aware of any breaches of the conditions of the mining leases during the audit period.		Northparkes is not aware of any breaches of the conditions of the mining leases during the audit period.	Not Triggered	
5	Environmental Incident Report	The lease holder must provide environmental incident notifications and reports to the Secretary no later than seven (7) days after those environmental incident notifications and reports are provided to the relevant authorities under the Protection of the Environment Operations Act 1997.	Email from Northparkes (C Dingle) to EPA (J Loxley) and DPIE (K O'Reilly) titled "Goonumbla Creek – Environmental Incident", dated 17 April 2019.	Environment and Community Manager – no environmental incidents that trigger the environmental harm criteria occurred during the audit period		A written incident report was provided to the EPA on 14 April (two days after the initial notification), however a report was not provided to the Resource Regulator.	Non-Compliance	Ensure that the Resources Regulator is notified of any reportable environmental incident in accordance with Mining Lease Condition 5.
6	Resource Recovery	The lease holder must optimise recovery of the minerals that are the subject of this mining lease to the extent economically feasible.					Noted	
7	Single Security	The lease holder is required to provide and maintain a security deposit to secure funding for the fulfilment of obligations of all or any kind under the mining lease, including obligations of all or any kind under the mining lease that may arise in the future. The amount of the security deposit to be provided as a single security has been assessed by the Minister at \$17,840,000.	Trade & Investment NSW - Resources and Energy Division Report for all Mining Leases. The extract confirms the provision of joint securities of \$46,149,000. Tenant Obligations Report Northparkes Mine April 2021. Report verifies that the security obligations have been met.			The required securities have been established.	Complies	

Mining Leases 1247 / 1367 / 1641 / 1743								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		leases covered by the single security include: Mining Lease No. 1247 (Act 1973) Mining Lease No. 1367 (Act 1992) Mining Lease No. 1641 (Act 1992)						
8	Cooperation Agreement	The lease holder must make every reasonable attempt, and be able to demonstrate its 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: <ul style="list-style-type: none"> • access arrangements • operational interaction procedures • dispute resolution • information exchange • well location • timing of drilling • potential resource extraction conflicts; and • rehabilitation issues. 	Mining Lease 1247 / 1367 / 1641 / 1743.			There are no overlapping and titles associated with Mining Lease 1247.	Noted	
9	Prescribed Dam	(a) Notwithstanding any Mining Operations Plan, the lease holder must not mine within any part of the lease area which is within the Northparkes Notification Area as defined around the Northparkes Tailings Dam, Northparkes Tailings Dam 2, Northparkes E27 Estcourt Tailings Dam and the proposed Rosedale Tailings Dam without the prior written approval of the Minister and subject to any conditions he may stipulate.	2018 Independent Environmental Audit		No mining activities were observed within the Northparkes Notification Area as defined around the Northparkes Tailings Dam, Northparkes Tailings Dam 2, Northparkes E27 Estcourt Tailings Dam and the Rosedale Tailings Dam	This Mining Lease Condition was verified in the 2018 IEA.	Complies	

Audit Photos

Appendix B



Photograph 1 - Meteorological Station



Photograph 2 - Water Cart



Photograph 3 - Stabilised TSF batter slopes



Photograph 5 - TSF surface rehabilitation / stabilisation



Photograph 4 - Air quality monitoring station



Photograph 6 - Site of the April 2019 slurry spill into Goonumbla Creek



Photograph 7 - Process water storage



Photograph 8 - Water management berms / channels (viewed from TSF)



Photograph 9 - Typical internal site road



Photograph 10 - Hydrocarbon storage



Photograph 11 - Pine Donkey Orchid Habitat Area



Photograph 12 - Cultural Heritage Site



Photograph 13 - Scar Tree



Photograph 14 - Emergency Response Centre



Photograph 15 Waste Storage and Recycling Bins



Photograph 16 - Fuel storage and distribution

DPIE Auditor Approval

Appendix C

Mr Chris Higgins
Environment and Farm Superintendent
Bogan Rd
Parkes New South Wales 2870

12/03/2021

Dear Mr Higgins

**Northparkes Mine Step Change Project (MP 11_0060)
Independent Environmental Audit 2021**

I refer to your request of 10 March 2021 seeking approval of Mr Ken Holmes of Barnett and May as the auditor for the upcoming Independent Environmental Audit of Northparkes Mine Step Change Project (the project), in accordance with Schedule 6, Condition 9 of the project approval MP 11_0060, as modified (the approval).

Having considered the qualifications and experience of Mr Holmes, the Secretary endorses the appointment of Mr Holmes to undertake the audit in accordance with Schedule 6, Condition 9 of the approval. This approval is conditional on Mr Holmes being independent of the project.

The audit is to be conducted in accordance with AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing and you may wish to consider the Independent Audit Guideline dated October 2015. A copy of this guideline can be located at <http://planning.nsw.gov.au/Policy-and-Legislation/Mining-and-Resources/Integrated-Mining-Policy>.

The audit report is to include the following:

1. consultation with the relevant agencies;
2. a compliance table indicating the compliance status of each condition of approval and any relevant EPL;
3. not use the term "partial compliance";
4. recommend actions in response to non-compliances;
5. review the adequacy of plans and programs required under this consent; and
6. identify opportunities for improved environmental management and performance.

Within three months of commissioning of this audit, Northparkes is to submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report and a timetable to implement the recommendations. Prior to submitting the audit report to the Secretary, it is recommended that Northparkes review the report to ensure it complies with the relevant consent condition.

Should you have any enquiries in relation to this matter, please contact me on (02) 4247 1852 or by email to Georgia.Dragicevic@planning.nsw.gov.au.

Yours sincerely

A handwritten signature in purple ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Georgia Dragicevic
Acting Team Leader Compliance
Compliance

As nominee of the Planning Secretary

Stakeholder Consultation

Appendix D

From: [Katrina O'Reilly](#)
To: [Ken Holmes](#)
Subject: North Parkes Mine - 2021 Independent Environmental Audit - Consultation Request
Date: Wednesday, 31 March 2021 1:34:14 PM

Good afternoon Ken,

Rose Anne Hawkeswood from Assessments has forwarded me your email in regards to consultation with the Department for the upcoming IEA for Northparkes Mine. The Department would like areas such as below looked at:

Compliance with management plans generally;
Air quality such as dust management;
Water management on site including management of erosion/sediment and sediment basins;
Rehabilitation progress; and
Complaints register and community consultation.

Regards
Katrina

Katrina O'Reilly
Team Leader Compliance

Energy, Industry & Compliance | Planning and Assessment
T 02 6229 7909 | M 0429 400261 | E katrina.oreilly@planning.nsw.gov.au
PO Box 5475 | Level 1 11 Farrer Place Queanbeyan NSW 2620
www.dpie.nsw.gov.au



The Department of Planning, Industry and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically

MAAG0010539

Mr Ken Holmes
Barnett & May
By email: ken@baeckea.com.au

Dear Mr Holmes

Subject: Northparkes Mine – Independent Environmental Audit

Thank you for your email dated 31 March 2021 requesting consultation on the independent audit to be undertaken of the Northparkes Mine which is covered by the mining titles listed below.

- ML1247 (1973)
- ML1367 (1992)
- ML1641 (1992)
- ML1743 (1992)

The Resources Regulator requires that the following issues be addressed in independent environmental audits undertaken in accordance with a planning consent condition.

- Review relevant mining leases and exploration licences as agreed with Resources Regulator.
- Undertake an assessment of compliance against the conditions of title related to environmental management.
- Verify that there is a current Mining Operations Plan (MOP) in place and it has been approved by the Regulator – review compliance against any conditions of approval of the MOP.
- Undertake a critical review of the MOP, including an assessment of its compatibility with the description of operations contained in the planning approval. In particular:
 - Review the rehabilitation strategy as outlined in the MOP to determine if it is consistent with the Project Approval in terms of progressive rehabilitation schedule; and proposed final land use(s).
 - Review the rehabilitation objectives and completion criteria as outlined in the MOP to determine if they have been developed in accordance with the proposed final land use(s) as outlined in the Project Approval.
- Review the development and implementation of any rehabilitation monitoring programs to assess performance against the nominated objectives and

completion criteria – verified by reviewing monitoring reports and rehabilitation inspection records.

- Determine if a rehabilitation care and maintenance program has been developed and implemented based on the outcomes of monitoring program – verified by reviewing Annual Rehabilitation Programs or similar documentation.
- Confirm that mining operations are being conducted in accordance with the approved MOP (production, mining sequence etc.), including within the designated MOP approval boundary – to be verified by site plans and site inspection.
- Confirm that rehabilitation progress is consistent with the approved MOP as verified by site plans and a site inspection. This should include an evaluation against rehabilitation targets and whether the final landform is being developed in accordance with conceptual final landform in the Project Approval.
- Based on a visual inspection, determine if there are any rehabilitation areas that appear to have failed or that have incurred an issue that may result in a delay in achieving the successful rehabilitation outcomes.

In addition to the above, the audit should note observations where rehabilitation procedures, practices and outcomes represent best industry practice.

It would be appreciated if a copy of the final audit report could be sent to the Regulator at nswresourcesregulator@service-now.com upon completion of the audit.

Yours sincerely

Jenny Ehmsen
Principal Compliance Auditor

14 April 2021

From: [David Johnson](#)
To: [Ken Holmes](#)
Cc: [Kelly Stacey](#)
Subject: Re: North Parkes Mine - 2021 Independent Environmental Audit - Consultation Request
Date: Monday, 12 April 2021 12:50:40 PM

Hi Ken,

Thanks for your email. I have been chairing the North Parkes Mine CCC for most of the last two years and am not aware of any issues that would warrant bringing to your attention, or that you would not be aware of from your routine inquiries. My impression is that the environmental management of the Northparkes operation is generally of a high standard and this is reflected in the scarcity of community complaints and good relations which exist between the mine and the community.

Happy to discuss at any time.

Regards,
David

From: **David Johnson**

email: johnsons08@iinet.net.au

phone: 0412 160 200

----- Original Message -----

From:
"Ken Holmes" <Ken@baeckea.com.au>

To:
"johnsons08@iinet.net.au" <johnsons08@iinet.net.au>
Cc:

Sent:
Mon, 29 Mar 2021 03:25:36 +0000
Subject:
North Parkes Mine - 2021 Independent Environmental Audit - Consultation Request

Good Afternoon David,

I have been commissioned to undertake the 2021 Independent Environmental Audit (IEA) of North Parkes Mine in western NSW. The IEA will be undertaken accordance with Project Approval 11_0600, that requires:

By 31 March 2015, 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. This audit must:

- a. be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Director General;;*
- b. include consultation with the relevant agencies;*

- c. *assess the environmental performance of the project and assess whether it is complying with the relevant requirements in this approval and any relevant EPL (including any assessment, plan or program required under these approvals);*
- d. *review the adequacy of strategies, plans or programs required under the abovementioned approvals; and if appropriate*
- e. *recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals.*

The Project Approval Conditions require that the auditor consults with relevant agencies, including the CCC.

I would therefore appreciate if you could provide me with any information, comments or concerns the CCC may have regarding the environmental performance of the operation (over the past three years – the audit period) and details of any specific issues you suggest that the Auditor addresses during the audit.

Please do not hesitate to contact me if you require any additional information.

Thanks and Regards,

Ken Holmes

Lead Auditor

Principal Environmental Consultant

Director

Barnett & May

P +61 (0)438 046 261

E ken@baeckea.com.au

A PO Box 365 Belrose NSW 2085