

**Integra Underground
Post Approval Review**



Document: Integra Underground Environmental Management Strategy

Revision: Version 4, September 2020

Reviewed: Sarah Clibborn on 10 September 2020

<i>Integra Underground Environmental Management Strategy, Condition 1, Schedule 5</i>	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
If the Secretary requires, the Proponent must prepare an Environmental Management Strategy for the project to the satisfaction of the Secretary. This strategy must:				
(a) be submitted to the Secretary for approval;	Yes	This review .	Nil.	
(b) provide the strategic framework for the environmental management of the project;	Yes	Sections 1.2 and 1.3 outline the strategic framework.	Nil.	
(c) identify the statutory approvals that apply to the project;	Yes	Table 3.1 in Section 3.5 lists all relevant approvals for the project. Some updates made here in regard to Mining Leases and Water Access Licences.	Nil.	
(d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;	Yes	Table 4.1 in Section 4.1 outlines key personnel and their roles and responsibilities with regard to environmental management.	Nil.	
(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 project; 	Yes	Section 1.4 states that the approved EMS is made available on the Integra Underground website. Section 4.5.2 External Communication – states that consultation with relevant stakeholders is ongoing. Also details the combined Community Consultative Committee with Mt Owen Glendell Operations (referred to in this section as Mt Owen Complex). Section 5.2 External Reporting – lists all documentation publicly available via the Integra Underground website.	Change wording from “Mt Owen Complex” to Mt Owen Glendell Operations as per previous changes in document.	Changes made in Table 3-1, Section 4.5.2
<ul style="list-style-type: none"> receive, handle, respond to, and record complaints; 	Yes	Section 4.5.3 Community Complaints Management – details ways in which complaints can be made and the complaints handling and recording procedure.	Nil.	
<ul style="list-style-type: none"> resolve any disputes that may arise during the course of the project; 	Yes	Section 4.5.4 Dispute Resolution – details dispute resolution procedure.	Nil.	

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<ul style="list-style-type: none"> respond to any non-compliance; and 	Yes	<p>Sections 6.2 and 6.4 outline procedures for identifying and responding to non-compliances and environmental incidents.</p> <p>The DA compliance table (Table 7.1) identifies Section 4 as containing this information.</p>	Update Table 7.1 accordingly.	Current reference is Section 6.4. Added reference to Section 6.2.
<ul style="list-style-type: none"> respond to emergencies; and 	Yes	<p>Section 4.4.2 – Emergency Preparedness and Response – outlines emergency response procedure.</p>	Nil.	
<p>(f) include:</p> <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 required to be carried out under the conditions of this approval. 	Yes	<p>Section 6.1 lists plans and strategies and provides a link to their location on the Integra Underground website.</p> <p>Figure 3 depicts all environmental monitoring locations.</p>	Nil.	
General Comments			Action Required	Company Response
Other Agency Comments			Action Required	Company Response