

## Cadia 2020 Independent Compliance Audit - Recommendations

Condition Number (ID)	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Cadia's Proposed Action / Action Taken / Response (as Applicable)	Proposed Action Due Date
S2. C1	<b>OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT</b> The Proponent shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction, operation, or rehabilitation of the project.	<b>Non-compliance No. 1</b> – During the audit period Cadia has not adequately implemented 'all' reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the operation of the project, specifically in relation to the minimisation of dust emissions from the surface of Tailings Storage Facilities and from ore processing activities (refer to Schedule 3, Conditions 17 and 19 in this audit report).	<b>Recommendation No. 1</b> – As defined against Project Approval Schedule 3, Conditions 17 and 19 in this audit report.	No Action Required.  Refer to findings and response for : -Schedule 3, Conditions 17 and 19	N/A
S2. C4	<b>TERMS OF APPROVAL</b> The Proponent shall comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: (a) any reports, strategies, plans, programs, reviews, audits or correspondence that are submitted in accordance with this approval; and (b) the implementation of any actions or measures contained in these documents.	Cadia was mostly compliant with any direction or request for information / action from the Department, however on two occasions Cadia could not fully demonstrate compliance with Project Approval Schedule 2, Condition 4.  <b>Non-compliance No. 2</b> – As of November 2020: •in relation to the Independent Environmental Audit in 2017, Cadia was not able to comply with the reasonable requirement of the Secretary to respond to a request regarding the 2017 Independent Environmental Audit by 25 January 2018; and  •in relation to the Official Caution of 28 February 2020 regarding the Cadiangullong Dam Water Extraction, it is acknowledged that work has commenced and technical challenges have been experienced, however, Cadia had not implemented the action to link the level sensor to the site's central process control system by 20 April 2020 as committed to by Cadia.	<b>Recommendation No. 2</b> – Cadia should ensure a system is in place to be able to comply with the timeframes of reasonable requirements of the Secretary.	Accepted. 1. Cadia is developing a reporting schedule to ensure all required reporting / responses to regulator requirements are completed on time.  2. Cadia will complete the linkages between the Cadiangullong Dam level sensor and the DCS System.	30-Jun-21

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Condition Number (ID)	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Cadia's Proposed Action / Action Taken / Response (as Applicable)	Proposed Action Due Date
S2. C14	<p><b>STAGED SUBMISSION OF STRATEGIES, PLANS OR PROGRAMS</b></p> <p>With the approval of the Secretary, the Proponent may:</p> <p>(a)submit any strategy, plan or program required by this consent on a progressive basis; and</p> <p>(b)combine any strategy, plan or program required by this consent with any similar strategy, plan or program required for the Cadia East Project.</p> <p>To ensure these strategies, plans or programs are updated on a regular basis, the Proponent may at any time submit revised strategies, plans or programs to the Secretary for approval.</p> <p>With the agreement of the Secretary, the Proponent may prepare any revised strategy, plan or program without undertaking consultation with all parties under the applicable condition of this consent.</p> <p><i>Notes:</i></p> <p>•While any strategy, plan or program may be submitted on a progressive basis, the Proponent will need to ensure that the existing operations on site are covered by suitable strategies, plans or programs at all times.</p> <p>•If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger</p>	<p>Evidence was sighted (DPIE letter dated 25/06/2020) confirming the Secretary's agreement with the consultation approach Cadia undertook in relation to the revised Rehabilitation Strategy (Revision 3, dated 12 June 2020).</p> <p><b>Non-compliance No. 3</b> – No evidence was obtained to verify that Cadia sought or obtained agreement of the Secretary during the audit period, to prepare management plan revisions without undertaking consultation with all parties under the applicable condition of this consent.</p>	<p><b>Recommendation No. 3</b> – Cadia should formalise existing processes to ensure that environmental management plan revisions are conducted in consultation with all parties under the applicable condition of this Project Approval and that any consultation undertaken be stated in each plan. Similarly, if agreement was obtained from the Secretary not to undertake consultation with all parties, then this should also be included in the plan.</p>	<p>The existing procedure for Reviewing and Updating Management Plans (710-005-EN-PRO-0024) will be reviewed and updated to include consultation with all parties as per the Project Approval.</p>	30-Apr-21
S3. C2	<p><b>NOISE</b></p> <p><b>Impact Assessment Criteria</b></p> <p>The Proponent shall ensure that the noise generated by the project does not exceed the noise impact assessment criteria in Table 2 at any residence on privately-owned land or on more than 25 per cent of any privately-owned land.</p> <p><i>[Refer to Table 2 in PA06_0295]</i></p>	<p>On all occasions during the audit period, Cadia was unable to demonstrate full compliance with criteria defined in Project Approval Schedule 3, Table 2: Noise Impact Assessment Criteria dB(A) LAeq (15min).</p> <p><b>Non-compliance No. 4</b> – During the audit period, even though mitigation was offered and completed at affected properties and no noise complaints were received, Cadia exceeded the noise impact assessment criteria defined in Project Approval Schedule 3, Table 2: Noise Impact Assessment Criteria dB(A) LAeq (15min) as follows:</p> <ul style="list-style-type: none"> <li>•on 38 occasions from August 2019 to May 2020;</li> <li>•on 21 occasions from July 2018 to June 2019;</li> <li>•on 86 occasions from July 2017 to June 2018, relating to either aircraft noise during aerial dust suppression activities (x82) or trains in the vicinity of the CVO Dewatering Facility (x4); and</li> <li>•in June 2019, relating to container handling activities contributing noise levels above the LA1,1 minute criteria during the night period at the 247 Newbridge Road monitoring location, resulting in a marginal exceedance of the Sleep Disturbance criteria.</li> </ul>	<p><b>Recommendation No. 4</b> – Where reasonable and feasible, Cadia should continue to implement additional noise abatement projects and controls to improve levels of compliance with Project Approval Schedule 3, Table 2: Noise Impact Assessment Criteria dB(A) LAeq (15min). and/or have this condition reassessed within a future Project Approval Modification.</p>	<p>Cadia accepts the recommendation and will continue to investigate and where appropriate mitigate operational noise affected properties. Updates will be provided to DPIE via the reporting of non-compliances, actions taken and provide annual updates via the Annual Review.</p>	Ongoing as required. Reported in Annual Reviews.

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S3. C5	<p><b>NOISE</b>  <b>Traffic Noise Impact Assessment Criteria</b>                      The Proponent shall take all reasonable and feasible measures to ensure that the traffic noise generated by the project does not exceed the traffic noise impact assessment criteria in Table 5.</p> <p>[Refer to Table 5 PA 06_0295]</p>	<p>No official or valid traffic related noise complaints were received by Cadia during the audit period.</p> <p><b>Non-compliance No. 5</b> – During the audit period, CVO was unable to demonstrate compliance with the required Project Approval Schedule 3, Table 5: Traffic Noise Impact Assessment Criteria dB(A) during 2019/20 on both monitoring occasions, during 2018/19 on one occasion, and during 2017/18 on one occasion.                      It is acknowledged that during the audit period, Cadia investigated, discussed mitigation options and completed several mitigation measures and initiatives with some affected landowners.                      Three properties that have not had mitigation works are a result of the landowners not proceeding with the recommended works and discussions are ongoing.</p>	<p><b>Recommendation No. 5</b> – It is acknowledged that few additional opportunities exist to reduce traffic noise generated by the project. Mitigation of traffic noise affected properties is the most favourable solution and is required when requested by affected landowners.</p>	<p>Cadia accepts the recommendation and will continue to investigate and where appropriate mitigate traffic noise affected properties. Updates will be provided to DPIE via the reporting of non-compliances and annual updates via the Annual review.</p>	<p>Ongoing as required.                      Reported in Annual Reviews.</p>
S3. C17	<p><b>AIR QUALITY</b>  <b>Impact Assessment Criteria</b>                      Except for the land in Table 1, the Proponent shall ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not cause exceedances of the criteria listed in Tables 8, 9 and 10 at any residence on privately owned land, or on more than 25% of any privately-owned land.</p> <p>[Refer to Tables 8, 9 and 10 in PA 06_0295]</p>	<p>During the audit period, Cadia was unable to demonstrate that it met the criteria defined in Table 9: Short term impact assessment criterion for particulate matter (i.e. 24 hour 50 µg/m3 limit for PM10) on all required occasions).</p> <p><b>Non-compliance No. 6</b> – During the audit period (2017-2020), Cadia exceeded the 24 hour 50 µg/m3 for PM10 limit in Project Approval Schedule 3, Table 9: Short term impact assessment criterion for particulate matter, on 15 separate occasions (i.e. these exceedances were attributed to the operation of the CVO mine and related activities).</p>	<p><b>Recommendation No. 6</b> – To comply with limits defined in Project Approval Schedule 3, Tables 8, 9 and 10, and to reduce the number and frequency of complaints from landowners, additional controls should be progressed and completed to minimise fugitive dust emissions from the surface of the TSFs and from ore processing (i.e. crushers, conveyors, ore stockpile etc). This is inclusive of completing the remaining 50% of projects defined in its 24-month dust abatement works for ore processing.</p>	<p>Cadia has formed a Dust Committee to define and prioritise the actions required for dust abatement.                      The dust emissions from the TSFs were identified as the highest priority and significant work has been completed and is ongoing to minimise this dust source.                      Mitigation from other dust sources such as the crushes and roads are currently being considered. A written update and detailed schedule for implementation will be provided to DPIE by 30/6/2021</p>	<p>30-Jun-21</p>
S3. C19	<p><b>AIR QUALITY</b>  <b>Operating Conditions</b>                      The Proponent shall:                      (a)ensure any visible air pollution generated by the project is assessed regularly, and that operations are relocated, modified, and/or stopped as far as is reasonable and feasible to minimise air quality impacts on privately-owned land;                      (b)ensure that the real-time air quality monitoring and meteorological monitoring data are assessed regularly, and that operations are relocated, modified and/or stopped as required to ensure compliance with the relevant air quality criteria; and                      (c)implement all reasonable and feasible measures to minimise off-site odour and fume emissions generated by the project, to the satisfaction of the Secretary.</p>	<p>Cadia was only partially able to demonstrate compliance with Project Approval Schedule 3, Condition 19 (a) and (b).</p> <p><b>Non-compliance No. 7</b> – During the audit, Cadia was unable to demonstrate that it diligently controls and minimises fugitive dust emissions from ore processing (i.e. crushers, conveyors, ore stockpile etc). There was minimal evidence that: a) operators are reporting excessive dust; b) dust sprays and sprinklers are being used as required to minimise dust emissions; and c) the water sprayed/applied to conveyors and transfer points is sufficient for the volume of dry ore being handled (i.e. as a means of minimising air quality impacts on privately-owned land).</p>	<p><b>Recommendation No. 7</b> – See Recommendation No. 6 against Project Approval Schedule 3, Condition 17 – Air Quality – Impact Assessment Criteria</p>	<p>This finding will be tabled in the Dust Committee and a plan will be developed to address the issues detailed in this non-compliance. A written update and detailed schedule for implementation will be provided to DPIE by 30/6/2021</p>	<p>30-Jun-21</p>

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S3. C27	<b>SOIL AND WATER</b> <b>Cadiangullong Creek Flows</b> The Proponent shall manage water releases from Cadiangullong Dam to provide: (a)flows of at least: •3.4 ML/day, for periods when inflows into the dam are more than 3.4 ML/day and the water level in the dam is at or above the lowest valve level on the multilevel offtake (ie. 773.0 metres AHD); •the volume equal to the inflow into the dam, for periods when inflows into the dam are between 0.4 and 3.4 ML/day and the water level in the dam is at or above the lowest valve level on the multi-level offtake; •0.4 ML/day, for periods when inflows into the dam are less than 0.4 ML/day and the water level in the dam is at or above the lowest valve level on the multi-level offtake; •the volume equal to the inflow into the dam, up to 0.4ML/day, for periods when the water level in the dam is below the lowest valve level on the multi-level offtake and above the level of the scour valve (i.e. 762.8 metres AHD); and •zero, when the water level in the dam is below the level of the scour valve; and (b)releases of up to 4 medium flows (of the order of 12 to 15 ML/day) per year, each for a duration of 1 to 3 days, with timing and frequency of such flows determined by hydrographs of typical medium flows,	Water inflows and outflows from Cadiangullong Dam are monitored to verify compliance with Project Approval Schedule 3, Condition 27. Results of monthly streamflow monitoring continues to be available on the Cadia website.  <b>Non-compliance No. 8</b> – On three occasions during the audit period, riparian releases/flows from Cadiangullong Dam did not comply with the criteria and water release requirements defined in Project Approval Schedule 3, Condition 27 (a).	<b>Recommendation No. 8</b> – More diligent monitoring and provision of flow data is required to be demonstrated by Cadia to ensure that minimum flows within Oaky Creek downstream are maintained at all times. This could be achieved by revising the method of measuring and determining compliance to reduce the effects of the variables that can impact on meeting this condition.	Cadia has already developed a new web-based dashboard showing real-time flow data to improve data accessibility. Cadia will also revise the method for calculating the downstream flow from a 7-day rolling to a 10-day rolling average in the next version of the Water Management Plan. This will provide operational flexibility while still meeting the intent of the PA Condition to maintain riparian habitat and river health.  The above changes will be documented in the revised Water Management Plan to be submitted to DPIE by 30/6/2021	30-Jun-21
S3. C39	<b>REHABILITATION AND BIODIVERSITY OFFSETS</b> Within 2 years of the date of this approval, the Proponent shall make suitable arrangements to provide appropriate long term security for the offset areas to the satisfaction of the Secretary.	Due to the excise of land from the Cadia East Offset Area (MOD 7), it is evident that the subsequent processes to survey, subdivide, seek approval to rezone and register the land as well as amend the BSC Local Environmental Plan (LEP) has been lengthy and is continuing.  <b>Non-compliance No. 9</b> – Notwithstanding continued efforts by Cadia to make suitable arrangements to provide long term security for the offset areas to the satisfaction of the Secretary, these arrangements had not been finalised at the date of this November 2020 audit.	<b>Recommendation No. 9</b> – Cadia should continue efforts to make suitable arrangements to provide long term security for the offset areas to the satisfaction of the Secretary.	Cadia is well advanced in establishing long term security for the offset areas including re-zoning with Blayney Shire Council. The process will be completed in the current calendar year.	31-Dec-21
S3. C47	<b>VISUAL</b> <b>CVO Dewatering Facility</b> Prior to the commencement of construction of the CVO Dewatering Facility, the Proponent shall prepare: (a)architectural plans for the facility in a manner that achieves a suitable standard of design; and (b)a Landscape Plan for the facility, including provision for vegetative screening to minimise the visual impacts on adjacent receivers, in consultation with Blayney Shire Council, and to the satisfaction of the Secretary.  Following approval, these plans must be implemented to the satisfaction of the Secretary.	It is acknowledged that Cadia has partially implemented the Landscape Plan including the replanting of trees that did not survive the drought.  <b>Non-compliance No. 10</b> – Based on a site inspection on 10th November 2020, it was evident that the provision for vegetative screening to minimise the visual impacts on adjacent receivers had not been fully implemented according to the approved Landscape Plan (Cadia Valley Operations – Sealink Concentrate Filtration & Handling Facility – Newbridge Road – Blayney Figure 2 – Proposed Landscaping Plan, 2.09.2019) for the CVO Dewatering Facility.	<b>Recommendation No. 10</b> – Cadia should fully implement the Landscape Plan for the CVO Dewatering Facility in accordance with Project Approval Schedule 3, Condition 47.	Between July and September 2020, approximately 95% of the required landscape plan was re-implemented (ie planted) following initial failure in 2016. At the time of planting in 2020, a small portion of the required area was not accessible due to civil construction works. The remaining area (along with any required replanting) will be undertaken by 30/8/2021	30-Aug-21

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S3. C49	<b>VISUAL</b> <b>Visual Amenity and Lighting</b> The Proponent shall: (a)implement all reasonable and feasible measures to mitigate visual and off site lighting impacts of the project; (b)ensure no outdoor lights shine above the horizontal; and (c)ensure that all external lighting associated with the project complies with Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting, to the satisfaction of the Secretary.	<b>Non-compliance No. 11</b> – It was evident that Cadia is implementing measures to mitigate lighting impacts, however: •in relation to paragraph (b) of this condition, Cadia were not able to ensure no outdoor lights shone above the horizontal as Cadia received 4 fugitive lighting complaints during the audit period, the nature of which, suggest this paragraph was not satisfied; and •in relation to paragraph (c) of this condition, no evidence was able to be provided at the time of this audit that all external lighting associated with the project complies with Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting	<b>Recommendation No. 11</b> – Cadia should ensure that the finalised Fugitive Lighting Management Plan is implemented.	Cadia accept the recommendation. The Cadia Fugitive Lighting Management Plan will be finalised and implemented.	31-May-21
S3. C50	<b>WASTE</b> <b>Waste Minimisation</b> The Proponent shall: (a)minimise the waste generated by the project; (b)ensure that the waste generated by the project is appropriately stored, handled and disposed of; (c)manage on-site sewage treatment and disposal in accordance with the requirements of the applicable Council; and (d)report on waste management and minimisation in the Annual Review, to the satisfaction of the Secretary.	Cadia was able to provide evidence that it is effectively managing non mineralised waste generated by the Project, by proactively identifying recycling opportunities and ensuring non mineralised waste (and waste rock) is appropriately stored, handled and disposed of.  <b>Non-compliance No. 12</b> – In relation to paragraph (b) of this condition, tailings generated by the Project was not appropriately stored with a slump of the southern wall of the NTSF (9th March 2018) constructed to store and hold the tailings.	<b>Recommendation No. 12</b> – It is recommended that Cadia appropriately stores the tailings produced by the Project by ensuring the structural integrity of the walls of the tailings dams.	Significant investigation has been undertaken following the partial wall failure in March 2018. TSF embankment construction designs have been revised and have been submitted for approval to DPIE via Modification 14. Mod 14 is expected to be approved by mid 2021.	Pending approval of Modification 14, no further action required.

## Cadia 2020 Independent Compliance Audit - Observations

Condition Number (ID)	Compliance Requirement	Independent Audit Observation / Opportunity for Improvement	Cadia's Proposed Action or reason to not implement measures / changes	Proposed Action Due Date (if applicable)
S2. C6	<b>LIMITS ON APPROVAL</b> The Proponent shall not process more than 32 million tonnes of ore from the project in a calendar year.	<b>Observation No. 1</b> – To enable consistency in business reporting and avoidance of errors, Cadia could request that this condition be based on a fiscal year rather than a calendar year in future approval modifications.	Finding accepted. The Cadia Management Team (Senior Leadership Team) will need to determine if this recommendation meets the needs of the business.  Should the recommendation be approved to proceed, Cadia will liaise with DPIE when draft consent conditions are issued following the determination of Mod 14.	28-Apr-21
		<b>Observation No. 2</b> – Cadia could ensure that the calendar year processed ore is reported in the AEMRs (omitted from 2019/20 AEMR).	Accepted. Will be included in the next Annual Review / AEMR and on an ongoing basis.	31-Oct-21
		<b>Observation No. 3</b> – This condition is currently assigned to the environment department personnel in CHESS. Cadia could consider assigning accountability to the Ore Processing Manager.	Cadia accept the finding. Action to be assigned to the Ore Processing Manager	15-Mar-21
		<b>Observation No. 4</b> – Cadia could review recommendations of the "Metallurgical Accounting Data Validation" report (MIPAC, 2014) and ensure close-out. Cadia could also consider undertaking an update of this assessment.	Will review action close out with Metallurgical Superintendent.	30-Jun-21
S2. C8	<b>SURRENDER OF CONSENTS</b> Within 12 months of the date of this approval, or as otherwise agreed by the Secretary, the Proponent shall surrender all existing development consents for the project in accordance with sections 75YA and 104A of the EP&A Act, to the satisfaction of the Secretary.  <i>Note: This approval will apply to all components of the Cadia Valley Operations from the date of approval. The existing management and monitoring plans/strategies/programs/protocols for the project will continue to apply until the approval of the comparable plan/strategy/program under this approval</i>	<b>Observation No. 5</b> – On the basis the Secretary is satisfied that this historical condition has been complied with, Cadia could consider requesting this condition be removed in future approval modifications.	Accepted. Cadia will make a request to DPI&E to remove the condition relating to surrendering all existing development consents when draft consent conditions are issued following the determination of Mod 14.	28-Apr-21
S2. C10	<b>DEMOLITION</b> The Proponent shall ensure that all demolition work is carried out in accordance with AS 2601-2001: The Demolition of Structures, or its latest version.	<b>Observation No. 6</b> – The Newcrest Operational Risk Management (NORM) spreadsheet provided (Excel spreadsheet "17-76 DRAW Blayney old plant decommissioning") for the demolition risk assessment did not identify AS 2601 as a reference. In addition, Project Approval compliance was not identified as a risk category and based on attendance records, approvals personnel were not in attendance for the risk assessment workshop. Cadia should include consideration of approvals/legal risks in future demolition projects where relevant.  <b>Observation No. 7</b> – It was stated that the demolition contract was managed by Newcrest's Melbourne based commercial group. Cadia should ensure a system is in place to record consideration of AS 2601-2001: <i>The Demolition of Structures</i> obligations under this Project Approval condition, in future demolition projects.	Accepted. Internal processes and procedures will be reviewed and updated to ensure that all project approval requirements are incorporated into contracts, risk assessments and project design.	31-May-21
S2. C14	<b>STAGED SUBMISSION OF STRATEGIES, PLANS OR PROGRAMS</b> With the approval of the Secretary, the Proponent may: (a) submit any strategy, plan or program required by this consent on a progressive basis; and (b) combine any strategy, plan or program required by this consent with any similar strategy, plan or program required for the Cadia East Project. To ensure these strategies, plans or programs are updated on a regular basis, the Proponent may at any time submit revised strategies, plans or programs to the Secretary for approval.	<b>Observation No. 8</b> – Cadia could consider renaming the following plans: • "Cadia Environmental Strategy" to "Cadia Environmental Management Strategy" to be consistent with the Project Approval condition; • the "Cadia Air Quality Program" to the "Cadia Air Quality Monitoring Program" to be consistent with the Project Approval condition; and • the "Aboriginal Heritage Management Plan" to "Aboriginal Cultural Heritage Management Plan" to be consistent with the Project Approval condition.	Cadia accepts the observation. These documents are periodically reviewed and updated. Future updates will ensure correct nomenclature is used.	31-Dec-22

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	<p>Secretary for approval. With the agreement of the Secretary, the Proponent may prepare any revised strategy, plan or program without undertaking consultation with all parties under the applicable condition of this consent.</p> <p><i>Notes:</i>  <i>•While any strategy, plan or program may be submitted on a progressive basis, the Proponent will need to ensure that the existing operations on site are covered by suitable strategies, plans or programs at all times.</i>  <i>•If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program</i></p>	<p><b>Observation No. 9</b> – Table 12-3 in each of the three AEMRs (during the audit period) should read “Aboriginal Cultural Heritage Management Plan”.</p> <p><b>Observation No. 10</b> – A number of management plans state that the plan will be “assessed annually following the AEMR process as to whether a formal review is required” (e.g. Section 9.1 of the Water Management Plan). Cadia should expand this to include within 3 months of an incident report, audit under condition 7 or modifications in accordance with Project Approval Schedule 5, Condition 3. Any of these conditions trigger a (mandatory) review of the Strategies, Plans and Programs. Based on the review, a decision is then made whether a revision. needs to be undertaken. In addition, Project Approval Schedule 5, Condition 3 should be included in the relevant Strategies, Plans and Programs (e.g. Table 1-1 of the Water Management Plan).</p>	<p>Cadia accepts this observation. Future AEMRs will ensure correct nomenclature is used.</p> <p>Cadia accepts this observation. Standardised wording for when a document review is triggered will be aligned with the Project Approval. Amendments will be included with reviews required under Observation No. 8.</p>	<p>30-Oct-21</p> <p>31-Dec-22</p>
S3. C8	<p><b>NOISE</b>  <b>Continuous Improvement</b>  The Proponent shall:  (a)implement all reasonable and feasible best practice noise mitigation measures;  (b)investigate ways to reduce the noise generated by the project, including off site road (particularly on Forest Road, Orchard Road and Woodville Road during the night and early morning periods) and rail noise and maximum noise levels which may result in sleep disturbance; and  (c)report on these investigations and the implementation and effectiveness of these measures in the Annual Review, to the satisfaction of the Secretary.</p>	<p><b>Observation No. 11</b> – For some specific examples, Cadia is incorrectly defining statutory non-compliances in their AEMR as “non-conformances” (e.g. Section 6.4.4 of the 2019/2020 AEMR relating to noise monitoring exceedances).</p>	<p>Accepted. Will be included in the next Annual Review / AEMR and on an ongoing basis.</p>	<p>31-Oct-21</p>
S3. C10	<p><b>BLASTING AND VIBRATION</b>  <b>Blasting Impact Assessment Criteria</b>  The Proponent shall ensure that blasting at the project does not exceed the criteria in Table 7.   <i>[Refer to Table 7 in PA 02_0295]</i></p>	<p><b>Observation No. 12</b> – Cadia is encouraged to revise and reissue its existing agreement with Ecotech, as the current agreement was stated as not being valid in late 2020 (i.e. it was issued to Ecotech in July 2018 for a 12 month period).</p>	<p>Cadia accepts this observation. A new agreement with Ecotech will be established.</p>	<p>31-Dec-21</p>
S3. C12	<p><b>BLASTING AND VIBRATION</b>  <b>Public Notice</b>  During mining operations on site, the Proponent shall:  (a)notify the landowner/occupier of any residence within 2 kilometres of blasting operations who registers an interest in being notified about the blasting schedule at the mine, or any other landowner nominated by the Secretary;  (b)operate a Blasting Hotline, or alternate system agreed to by the Secretary, to enable the public to get up-to-date information on the blasting schedule at the project;  (c)publish an up-to-date blasting schedule on its website (for open pit and major underground blasting operations); and  (d)advertise the blasting hotline number and website information in the mine's regular newsletter, to the satisfaction of the Secretary.</p>	<p><b>Observation No. 13</b> – In conjunction with its Production Managers, Cadia could review the blasting schedule that is advertised on the Cadia website, as it may no longer reflect actual practice in 2020.</p>	<p>Accepted - Cadia to review and update the blasting schedule that is advertised on the Cadia Valley Operations website to ensure that information is current.</p>	<p>01-Mar-21</p>
		<p><b>Observation No. 14</b> – Cadia does not maintain a “blasting hotline”, only a “complaints hotline”. The next update of the Project Approval should not refer to a Blasting Hotline.</p>	<p>Accepted. Cadia to seek permission from DPI&amp;E to remove the reference of the “blasting hotline” in S3, Condition 12 (b) when draft consent conditions are issued following the determination of Mod 14.</p>	<p>28-Apr-21</p>
S3. C14	<p><b>BLASTING AND VIBRATION</b>  <b>Property Inspections</b>  If the Proponent receives a written request for a structural property inspection from any such landowner, the Proponent shall:  (a)within 2 months of receiving this request commission a suitably qualified, experienced and independent person, whose appointment has been approved by the Secretary, to inspect the condition of any building or structure on the land (prior to blasting taking place within 2 kilometres of the property, if possible), and recommend measures to mitigate any potential blasting impacts; and  (b)give the landowner a copy of the property inspection report.</p>	<p><b>Observation No. 15</b> – Cadia could potentially investigate and verify if any additional baseline structural inspections need to be completed of the landowner residences (i.e. located within a 2 km radius of existing and future blast zones) that potentially could be impacted in the future (i.e. given that the last opportunity was in 2010).</p>	<p>Action accepted - Cadia will investigate and verify if any additional baseline structural inspections need to be completed.</p>	<p>31-Dec-21</p>

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Condition Number (ID)	Compliance Requirement	Independent Audit Observation / Opportunity for Improvement	Cadia's Proposed Action or reason to not implement measures / changes	Proposed Action Due Date (if applicable)
S3. C17	<b>AIR QUALITY</b> <b>Impact Assessment Criteria</b> Except for the land in Table 1, the Proponent shall ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not cause exceedances of the criteria listed in Tables 8, 9 and 10 at any residence on privately owned land, or on more than 25% of any privately-owned land.	<b>Observation No. 16</b> – Cadia's TSP concentrations are inferred from the PM10 monitoring data, by assuming that 40% of the TSP is PM10. This data and assumption are derived from the Hunter Valley coal region and may not be applicable to a base metals operation in central west NSW. This could be reviewed and potentially reassessed by a specialist air consultant.	Observation to be considered in future reviews of the Air Quality Monitoring Program	31-Dec-22
		<b>Observation No. 17</b> – Cadia could request confirmation of the data retention processes and data back-up periods retained by Advitech and request that Cadia data is provided by the consultant to Cadia annually.	Cadia accepts this observation and will seek confirmation and implement annual data provision if required.	31-Dec-21
		<b>Observation No. 18</b> – Cadia could investigate why TSP data at the control site remains high, as defined in recent monthly Air Quality Monitoring Assessment reports issued by Advitech.	Not Accepted. Dust deposition results are considered in line with predominant wind directions are independently assessed.	N/A
		<b>Observation No. 19</b> – Ideally, the reason for not including high/erroneous dust deposition data in the annual averages (i.e. as prepared by Todoski) would be expected to be included as a one-page appendix in the back of the consultant's report.	Cadia accepts this observation and will ensure future reports include, where appropriate, high/erroneous dust deposition data as an Appendix in the consultant's report.	31-Dec-21
		<b>Observation No. 20</b> – Cadia is encouraged to include four duplicate QA/QC samples within its dust deposition monitoring program (i.e. one duplicate sample every quarter at one nominated dust deposition site that typically records higher readings).	Cadia accepts this observation and will install a duplicate sample in line with Observation No. 21.	31-Dec-22
		<b>Observation No. 21</b> – Cadia is encouraged to investigate and redesign the design of its dust deposition poles/gauges to reduce the contribution of organic matter from birds.	Cadia accepts this observation. Cadia will investigate, and where appropriate, redesign the Dust Deposition Gauges to minimise contribution of organic matter from birds.	31-Dec-22
S3. C27	<b>SOIL AND WATER</b> <b>Cadiangullong Creek Flows</b> The Proponent shall manage water releases from Cadiangullong Dam to provide: (a) flows of at least: • 3.4 ML/day, for periods when inflows into the dam are more than 3.4 ML/day and the water level in the dam is at or above the lowest valve level on the multilevel offtake (ie. 773.0 metres AHD); • the volume equal to the inflow into the dam, for periods when inflows into the dam are between 0.4 and 3.4 ML/day and the water level in the dam is at or above the lowest valve level on the multi-level offtake; • 0.4 ML/day, for periods when inflows into the dam are less than 0.4 ML/day and the water level in the dam is at or above the lowest valve level on the multi-level offtake; • the volume equal to the inflow into the dam, up to 0.4ML/day, for periods when the water level in the dam is below the lowest valve level on the multi-level offtake and above the level of the scour valve (i.e. 762.8 metres AHD); and • zero, when the water level in the dam is below the level of the scour valve; and (b) releases of up to 4 medium flows (of the order of 12 to 15 ML/day) per year, each for a duration of 1 to 3 days, with timing and frequency of such flows determined by hydrographs of typical medium flows, to the satisfaction of, and unless otherwise approved by, DPIE Water.	<b>Observation No. 22</b> – In its 2017/18 AEMR (i.e. Section 11.3 – Notifications) Cadia did not include and report the three non-compliances from December 2017, September 2018 and November 2018 relating to minimum flows required to be maintained at the Oaky Creek gauging station.	Accepted, no action required.	N/A



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Condition Number (ID)	Compliance Requirement	Independent Audit Observation / Opportunity for Improvement	Cadia's Proposed Action or reason to not implement measures / changes	Proposed Action Due Date (if applicable)
S3. C28	<b>SOIL AND WATER</b> The Proponent shall not extract any water from Cadiangullong Dam when the volume in the dam drops to 10 percent or less of its total capacity (i.e. 778.8 metres AHD), unless otherwise approved by DPIE Water. Flow releases (see condition 27 above) shall be continued during any such period, except when the level of water in the dam drops below the level of the dam's scour valve (i.e. 762.8 metres AHD).	<b>Observation No. 23</b> – For due diligence, records relating to the physical isolation of the Cadiangullong Dam valve should be retained by CVO Environment Department personnel. This would potentially involve requesting and receiving a written verification that the valve is located, supported by a photo of the locked valve from SAOC (and potentially the key lock). In addition, Cadia could confirm which employee retains the key lock and where the lock should reside.	Accept - Cadia will develop a procedure for the Environment Department to physically lock licensed extraction points that are out of use for compliance purposes.	30-Jun-21
		<b>Observation No. 24</b> – Cadia could consider ensuring the Cadiangullong Dam level sensor (when connected to the control centre) is alarmed at an appropriate level above the regulatory level enabled with automatic notification.	Accept - Cadia commits to linking the Cadiangullong Dam level to the central control system (DCS) and developing alarm triggers corresponding to the TARP levels for Cadiangullong Dam in the Cadia Water Management Plan.	30-Jun-21
S3. C31	<b>SOIL AND WATER</b> The Site Water Balance must: (a)include details of: •sources and security of water supply; •water use on site; •water management on site; •any off-site water transfers; •reporting procedures; and (b)investigate and implement all reasonable and feasible measures to minimise water use by the project.	<b>Observation No. 25</b> – Whilst it is acknowledged that Cadia's November 2019 Water Management Plan is of high quality, considerable differences in content and structure exist between this plan and for example, the May 2019 Cadia Dust Management Plan. Cadia would benefit by increasing the consistency in structure and content across its environmental management plans (i.e. inclusive of defining all existing environmental controls and potentially, planned future controls). If future controls are unsuitable to be defined within individual environmental management plans, then formal annual Environmental Improvement Plans could be developed, disseminated to operational departments and implemented (i.e. defining how improvements will be formally implemented and potentially administered within CHES).	Cadia accepts this observation. A program will be put in place to align environmental management plans consistency in structure and content. Cadia will investigate the potential for future controls to be addressed in Environmental Improvement Plans, and if appropriate will seek to implement EIPs.	31-Dec-22
S3. C32	<b>SOIL AND WATER</b> The Erosion and Sediment Control Plan must: (a)be consistent with the requirements of Managing Urban Stormwater: Soils and Construction, Volume 1, 4th Edition, 2004 (Landcom); (b)identify activities that could cause soil erosion and generate sediment; (c)describe measures to minimise soil erosion and the potential for the transport of sediment to downstream waters; (d)describe the location, function, and capacity of erosion and sediment control structures; and (e)describe what measures would be implemented to maintain the structures over time.	<b>Observation No. 26</b> – Whilst Cadia's November 2019 Water Management Plan references the NSW Government's guidelines for Managing Urban Stormwater: Soils and Construction, Volume 1, 4th Edition, 2004 (Landcom), Cadia has not defined how its Erosion and Sediment Control Plan aligns with requirements defined in the 2004 NSW Government Guidelines (i.e. as a table in the plan).	Cadia will expand on the commentary in the Water Management Plan to describe how the Erosion and Sediment Control Plan aligns with Landcom 2004	30-Dec-21
S3. C33	<b>SOIL AND WATER</b> The Surface Water Monitoring Program must include: (a)detailed baseline data, based on sound statistical analysis, to benchmark the pre-mining natural variation in surface water flows and quality in creeks and other waterbodies that could potentially be affected by the project; (b)surface water and stream health impact assessment criteria; (c)a program to monitor and assess: •impacts on surface water flows and quality;	<b>Observation No. 27</b> – CVO's Environmental Monitoring Manual describes monitoring and sampling requirements inclusive of surface water and groundwater. This Manual was last revised and issued in 2016 and requires review and updating in the next 12 months to ensure it reflects leading practice and standardised industry practices in surface and groundwater monitoring (e.g. June 2018 Queensland DES Monitoring and Sampling Manual).	Cadia accepts this observation. Cadia intends for the Environmental Monitoring Manual to be re-developed by aspect. A Surface Water Monitoring Manual and Groundwater Monitoring Manual will be developed and reviewed as part of this re-development.	31-Dec-21

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Condition Number (ID)	Compliance Requirement	Independent Audit Observation / Opportunity for Improvement	Cadia's Proposed Action or reason to not implement measures / changes	Proposed Action Due Date (if applicable)
	<p>impacts on surface water flows and quality;</p> <ul style="list-style-type: none"> <li>•impacts on water users;</li> <li>•stream health conditions in Swallow Creek, Cadiangullong Creek, Rodds Creek, Flyers Creek and Diggers Creek, including riparian vegetation;</li> <li>•potential acid rock drainage;</li> <li>•potential leakage or spillage from tailings, mineral concentrate and effluent pipelines;</li> <li>(d)a program for the ongoing verification and refinement of the surface water model; and</li> <li>(e)reporting procedures for the results of the monitoring program and model verification.</li> </ul>	<p><b>Observation No. 28</b> – To improve CVO's existing quality control program, the number of monthly QA/QC samples collected for surface and groundwater monitoring would be expected to be 5 8% of the total number of samples collected (i.e. comprising blank, duplicate and potentially spiked samples).</p>	Accept - Cadia will review its quality control procedures based on relevant guidelines and define a proportion of QAQC samples to be routinely collected in the site Water Management Plan.	30-Jun-21
		<p><b>Observation No. 29</b> – CVO is encouraged to schedule and complete an environmental monitoring audit to ensure that:</p> <p>a) environmental monitoring is conducted against leading and standardised industry practice prior to the final reissue of CVO's 2016 Environmental Monitoring Manual; and</p> <p>b) to ensure that monitoring personnel are suitably trained and competent.</p>	<p>Cadia will conduct an internal review of water quality monitoring procedures in accordance with relevant guidelines and any identified improvement actions documented in the next version of the Environmental Monitoring Manual.</p> <p>Cadia commits to internally providing adequate training to monitoring personnel and verifying competency in the field.</p>	31-May-21
		<p><b>Observation No. 30</b> – QC samples, including blank and duplicate samples must not be identifiable/disclosed to the ALS laboratory (i.e. these samples must be submitted as blind samples to ALS).</p>	Cadia will review its sample naming convention and database system to develop a system whereby QAQC samples are not identifiable to an external laboratory.	30-Jun-21
		<p><b>Observation No. 31</b> – Section 9 of Cadia's November 2019 Water Management Plan currently lists a range of reports relating to water management, but would be expected to more effectively describe requirements applicable to Project Approval Schedule 3, Condition 33 (e) relating to reporting procedures for the results of the monitoring program and model verification</p>	Cadia will review Section 9 of the Water management Plan and link the reporting requirements with the specific requirements from PA06_0295 Schedule 3. Any changes will be made to the next version of the WMP	30-Jun-21
		<p><b>Observation No. 32</b> – Relevant sections of Cadia's November 2019 Water Management Plan will require review and updating to describe the additional water management practices and containment structures in progress at the CVO Dewatering Facility.</p>	Cadia will incorporate the design changes to the Cadia Dewatering Facility water management in the next revision of the Water Management Plan	30-Jun-21
S3. C34	<p><b>SOIL AND WATER</b></p> <p>The Groundwater Monitoring Program must include:</p> <p>(a)detailed baseline data, based on sound statistical analysis, to benchmark the pre-mining natural variation in groundwater levels, yield and quality (including privately-owned bores within the maximum predicted 1 metre groundwater drawdown contour, as indicated on the plans in Appendix 5);</p> <p>(b)groundwater impact assessment criteria (including for monitoring bores and privately-owned bores);</p> <p>(c)a program to monitor:</p> <ul style="list-style-type: none"> <li>•impacts on the groundwater supply of potentially affected landowners;</li> <li>•impacts on springs and groundwater dependent ecosystems;</li> <li>•the volume of groundwater seeping into open pit and underground mine workings;</li> <li>•regional groundwater levels and quality in all potentially affected aquifers;</li> <li>•potential acid rock drainage;</li> <li>•the hydraulic gradient and groundwater quality around the base of the Cadia Hill pit;</li> <li>(d)a program for the ongoing verification and refinement of the groundwater</li> </ul>	<p><b>Observation No. 33</b> – As required by Project Approval Schedule 3, Condition 34 (c), Cadia's November 2019 Water Management Plan could more effectively define and include details of the operation's monitoring program to assess the potential for acid rock drainage (i.e. acknowledging that it is based on the monitoring of water quality within the NLD and SLD leachate dams).</p>	Cadia will expand on commentary relating to assessment of the Potential for AMD and make reference to the Waste Rock (incorporating Acid and Metalliferous Drainage) Management Plan where relevant	30-Jun-21
S3. C36	<p><b>REHABILITATION AND BIODIVERSITY OFFSETS</b></p> <p>Rehabilitation</p> <p>By the end of 2010, the Proponent shall prepare a Rehabilitation Strategy for the project to the satisfaction of the Secretary. This strategy must:</p> <p>(a)be prepared by a team of suitably qualified and experienced experts whose appointment has been endorsed by the Secretary;</p> <p>(b)be prepared in consultation with relevant stakeholders, including the RR, DRG, BCD, DPIE Water, Councils and the CCC;</p> <p>(c)investigate options for the future use of disturbed areas including voids upon the completion of mining;</p> <p>(d)describe and justify the proposed rehabilitation strategy for the site, including the post-mining landform and use;</p>	<p><b>Observation No. 34</b> – Cadia could consider requesting the Secretary to correct the text colour of Project Approval Schedule 3, Condition 36 (e) in any future modification of the Project Approval, as this condition was not changed as part of Modification 13 as shown.</p>	Accepted. Cadia will make a request to DPI&E to correct the colour text for modification updates in PA06_0295 when draft consent conditions are issued following the determination of Mod 14.	28-Apr-21
		<p><b>Observation No. 35</b> – Notwithstanding the above DPIE consultation agreement, there is no evidence that Cadia consulted with the CCC in the review of the Rehabilitation Strategy as per the commitment stated in Section 11.2 of the strategy (in addition, the summary of comments received in Table 11-1 appears to be from previous revisions/original version of the strategy). Cadia should review this aspect of the strategy.</p>	Refer to commitment from Non Compliance 3 / recommendation 3.	N/A

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Condition Number (ID)	Compliance Requirement	Independent Audit Observation / Opportunity for Improvement	Cadia's Proposed Action or reason to not implement measures / changes	Proposed Action Due Date (if applicable)
	<p>(e)define the rehabilitation objectives for the site, as well as the proposed completion criteria for this rehabilitation; and</p> <p>(f)be prepared in accordance with any relevant RR guideline.</p> <p><i>Note: The strategy should build on the concept strategy depicted in Appendix 6.</i></p>	<p><b>Observation No. 36</b> – Cadia could consider requesting the Secretary to revise Project Approval Schedule 3, Condition 36 (b) in any future modification to the Project Approval in consideration of the Resource Regulator's response in that they will not comment on revisions of the Rehabilitation Strategy.</p>	<p>Accepted. Cadia to request DPI&amp;E to remove RR regarding consultation on changes or updates to the Rehabilitation Strategy as they do not comment on this plan. This is to be requested when the draft consent conditions are issued following the determination of Mod 14.</p>	28-Apr-21
		<p><b>Observation No. 37</b> – In future revisions of the Rehabilitation Strategy, Cadia should consider amending the review of strategy requirements (Section 11.1) of the Rehabilitation Strategy to refer to the requirement of Project Approval Schedule 5, Condition 3.</p>	<p>Accepted. The next revision of the Rehabilitation Strategy will include review requirements as per Schedule 5, Condition 3.</p>	31-Dec-22
		<p><b>Observation No. 38</b> – Notwithstanding the absence of relevant RR guidelines for preparation of the Rehabilitation Strategy, Cadia should consider ensuring that figures in the strategy are consistent with the latest ESG3 Mining Operations Plan (MOP) Guidelines (see Rehabilitation Phases Table 8, section 11.4 and example Plans 3A - 3E).</p>	<p>Accepted. Cadia will review figures to ensure consistency with the guidelines.</p>	31-Dec-22
		<p><b>Observation No. 39</b> – In future revisions of the Rehabilitation Strategy, Cadia should include the note of this condition (Note: The strategy should build on the concept strategy depicted in Appendix 6) in Table 4-1 of the strategy.</p>	<p>Accepted. Full condition, including notes will be included in future revision of the Strategy</p>	31-Dec-22
<b>S3. C37</b>	<p><b>REHABILITATION AND BIODIVERSITY OFFSETS</b></p> <p>The Proponent shall:</p> <p>(a)carry out rehabilitation progressively, that is, as soon as reasonably practicable following disturbance; and</p> <p>(b)achieve the rehabilitation objectives in the Rehabilitation Strategy (see condition 36), to the satisfaction of the RR.</p>	<p><b>Observation No. 40</b> – As per Project Approval Schedule 5, Condition 3(d), plans should be reviewed and if necessary revised within 3 months of a modification. The LMBP should be revised in light of the April 2017 modification (new Cadia Warehouse) (e.g. section 2.4 and Figure 2.2).</p>	<p>Refer to commitment arising from Non Compliance 3 / Recommendation 3</p>	N/A
		<p><b>Observation No. 41</b> – Cadia could improve its internal recording of rehabilitation management outcomes. Other than the annual rehabilitation monitoring report undertaken by DnA Environmental and appended to the AEMR each year, Cadia was unable to produce records of internal rehabilitation management records such as routine inspections/monitoring, corrective actions, or action plans with timelines etc.</p>	<p>Accepted, Cadia to implement internal tracking document.</p>	30-Apr-21
		<p><b>Observation No. 42</b> – Cadia could revise Figure 8-4 of the 2019/20 AEMR to ensure all monitoring sites are included (e.g. North Dump 02-03), and consider reporting the percentage of closure criteria met for the reporting year.</p>	<p>Accepted, the legend from the graph was inadvertently removed during import into the AEMR / Annual Review. This will be corrected in future Annual Reviews</p>	31-Oct-21
		<p><b>Observation No. 43</b> – Cadia could include a table in section 1.7 of the LBMP indicating where in the plan each Project Approval condition is described.</p>	<p>The Observation will be considered during the current review of the LBMP and document templates..</p>	09-May-21
		<p><b>Observation No. 44</b> – Cadia could consider improving the graphical spatial representation of the rehabilitation progression (as suggested in the 2017 IEA) by substituting Figure 8-1 (Mine Disturbed Rehabilitation) of future AEMRs with plans similar to Plan 3A of the approved MOP. However, the colour coding of rehabilitation progression should be consistent with the latest ESG3 Mining Operations Plan (MOP) Guidelines (see Rehabilitation Phases Table 8, section 11.4 and example Plans 3A - 3E).</p>	<p>Accept. Where the required content of figures aligns between the MOP (guidelines) and Annual Review (guidelines) they will be consistent where possible.</p>	31-Oct-21
		<p><b>Observation No. 45</b> – To improve clarity of all relevant project approval area plans/figures (including MOP, management and AEMRs plans and figures), Cadia should consider including a single line on the plan/figure and similarly in the legend identifying the project's approved surface development/disturbance area boundary.</p>	<p>Accepted, Cadia will include a single line for disturbance in future plans.</p>	31/12/21
		<p><b>Observation No. 46</b> – Cadia could consider replying to the RR's letter of 13/08/2020 with a response to the observations and recommendations of the TAP and thereby ensure the RR is satisfied.</p>	<p>Accepted. Cadia will provide a written response to the RR TAP.</p>	30-May-21

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S3. C38	<b>REHABILITATION AND BIODIVERSITY OFFSETS</b> <b>Biodiversity Offsets</b> The Proponent shall: (a) implement the biodiversity offset strategy as described in the EA, and summarised in Table 14 (and shown conceptually in Appendix 6); and (b) investigate ways to salvage and beneficially use resources (including timber, fauna habitat, seed and soil resources) in areas subject to subsidence as far as is reasonable and feasible, in consultation with the BCD, to the satisfaction of the Secretary.  <i>[Refer to Table 14 in PA 06_0295]</i>	<b>Observation No. 47</b> – In relation to the biodiversity offset strategy shown conceptually in Appendix 6 (Figure 6.1 of the Project Approval): •the Figure differs from Figure 3 Existing CVO Rehabilitation and Woodland Enhancement Concept (NEC-14-81 75W Mod-101D) of the EA. Figure 6.1 is (possibly an earlier draft) version NEC-14-81 75W Mod-101A. Cadia should confirm the correct version is included in the Project Approval; •the Figure does not show the East Cadia Subsidence as a waterbody, unlike the MOP; and •the Figure could be included in the body of the Land and Biodiversity Management Plan rather than in the appendix (as MOD 7 EA).	Accepted. Cadia commits to updating the figure Appendix 6 of the PA to reflect correct final landforms and offsets including displaying the Cadia East subsidence zone as a water body.	28-Apr-21
		<b>Observation No. 48</b> – There was no evidence of formal tracking of the work being undertaken in the offset areas. Cadia could consider preparing an internal report structure that regularly tracks the actions and timing of the Management Aspects for the offset areas as listed in Section 9.9 of the Land and Biodiversity Management Plan.	Accepted, Cadia to establish and implement an internal tracking process and document of rehabilitation works undertaken.	30-Apr-21
S3. C39	<b>REHABILITATION AND BIODIVERSITY OFFSETS</b> Within 2 years of the date of this approval, the Proponent shall make suitable arrangements to provide appropriate long term security for the offset areas to the satisfaction of the Secretary.	<b>Observation No. 49</b> – The BRR offset area shown in the approved management plans (e.g. Figures 9.2 and 9.3, pp 81-82 of the approved LBMP) is not consistent with the approved BRR offset area as shown in Appendix 6 (Figure 6.3) of the project approval.	Accepted, Cadia to review and update plans to ensure consistency.	30-Jun-21
		<b>Observation No. 50</b> – Cadia should ensure the Black Rock Range – Cadia East Offset cadastral boundary (Lot 21 DP 1204782) is correctly reflected in all relevant approvals, plans, strategies and agreements as per the surveyed plan (Carpenter, Ref: 10086B dated 12th November 2009).	Accepted, Cadia to review and update plans to ensure consistency.	30-Jun-21
S3. C40A	<b>REHABILITATION AND BIODIVERSITY OFFSETS</b> <b>Retirement of Credits</b> Within two years of commencing construction of the MOD 13 Southern Tailings Storage Facility buttressing, unless the Secretary agrees otherwise, the Proponent must retire biodiversity credits of a number and class identified in Tables 14.1 and 14.2 below. The retirement of credits must be carried out in accordance with the Biodiversity Offsets Scheme of the Biodiversity Conservation Act 2016, to the satisfaction of the Biodiversity Conservation Trust.  <i>[Refer to table 14.1 in PA06_0295]</i>	<b>Observation No. 51</b> – With regard to commencing construction of the MOD 13 Southern Tailings Storage Facility buttressing, Cadia could consider notifying the Secretary of the date of commencement so that the start of this condition's timeframe (i.e. within two years) is clear and Cadia will be able to ensure future compliance.	Accepted. Cadia commits to notify DPI&E of the commencement of construction of Mod 13 STSF buttressing.	08-Mar-21
S3. C41	<b>REHABILITATION AND BIODIVERSITY OFFSETS</b> <b>Land and Biodiversity Management Plan</b> The Proponent shall prepare and implement a Land and Biodiversity Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with BCD, DPIE Water, RR and the Councils, and be submitted to the Secretary within 18 months of the date of this approval; (b) include: (i) the rehabilitation objectives for the site and offset areas; (ii) a description of the short, medium, and long term measures that would be implemented to: •rehabilitate the site in accordance with the Rehabilitation Strategy (see condition 36); •implement the offset strategy; and •manage the remnant vegetation and habitat on the site and in the offset areas; (iii) detailed performance and completion criteria for the site rehabilitation and implementation of the offset strategy; (iv) a detailed description of the measures that would be implemented over the next 3 years, including the procedures to be implemented for: •progressively rehabilitating disturbed areas;	<b>Observation No. 52</b> – Cadia could consider standardising the Document History and Status to ensure the correct plan is being referred to when approved. The DPIE has approved Revision 3 of a plan dated 15/5/2017. However, the current plan shows a Date Issued of 20/1/2017 with a printed date of 15 May 2017.	Accepted. This will be completed in line with Observation No. 25.	31-Dec-22
		<b>Observation No. 53</b> – Cadia could consider referencing all of the relevant approval conditions as listed in section 1.7 of the LBMP to the relevant section in the plan where the condition is addressed.	The Observation will be considered during the current review of the LBMP and document templates..	09-May-21
		<b>Observation No. 54</b> – Cadia should ensure the figures of the Cadia East Offset areas are consistent with the Project Approval (Appendix 6).	Accepted, Cadia to review and update plans to ensure consistency.	30-Jun-21

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	<ul style="list-style-type: none"> <li>•implementing revegetation and regeneration within the disturbance areas and offset areas, including establishment of canopy, sub-canopy (if relevant), understorey and ground strata;</li> <li>•investigating ways to salvage and beneficially use resources in areas subject to subsidence (including timber, fauna habitat, seed and soil resources);</li> <li>•protecting vegetation and soil outside the disturbance areas;</li> <li>•rehabilitating creeks and drainage lines on the site (both inside and outside the disturbance areas);</li> <li>•managing potential acid forming material (including ensuring effective isolation of potential acid forming material in rock dumps);</li> <li>•managing salinity;</li> <li>•conserving and reusing topsoil;</li> <li>•undertaking pre-clearance surveys;</li> <li>•managing impacts on terrestrial and aquatic fauna (including a Squirrel Glider conservation strategy);</li> <li>•landscaping the site to minimise visual impacts;</li> <li>•collecting and propagating seed for rehabilitation works;</li> <li>•salvaging and reusing material from the site for habitat enhancement;</li> <li>•controlling weeds and feral pests, including terrestrial and aquatic species;</li> <li>•managing grazing and agriculture on site;</li> <li>•controlling access;</li> <li>•bushfire management;</li> <li>•managing and minimising any potential adverse impacts associated with the final voids; and</li> <li>•managing and minimising any adverse socio-economic effects associated with mine closure;</li> <li>(v)a program to monitor the effectiveness of these measures, and progress against the performance and completion criteria;</li> <li>(vi)a description of the potential risks to successful rehabilitation and/or revegetation, and a description of the contingency measures that would be implemented to mitigate these risks;</li> <li>(vii)details of who would be responsible for monitoring, reviewing, and implementing the plan; and</li> <li>(viii)a Threatened Species Management Protocol, which outlines management strategies to protect any threatened flora and fauna species during construction,</li> </ul>	<p><b>Observation No. 55</b> – Cadia could consider reporting the key findings (only) of the annual waste rock dump cover monitoring (e.g. graph of yearly net percolation rate compared to baseline model) and include any relevant recommendations adopted in the "Actions for the next reporting period" section of the AEMR</p>	Accepted - Cadia to include in future Annual Reviews / AEMR's	31-Oct-21
		<p><b>Observation No. 56</b> – To determine whether any proposed disturbance is within the approved project disturbance footprint, Table 2 of the of the Environmental Impact Permit (710-005-EN-PRO-0006) procedure states that reference should be made to Figure 2 4d from the Cadia East Environmental Assessment. The figure is replicated in Appendix A of the procedure. The Auditor considers the scale of this figure (Project General Arrangement) too large to determine the permitted disturbance footprint. Cadia could consider providing the disturbance area electronically on a GIS. In addition, the procedure requires the assessor to consult previous project environmental assessments to retrieve information such as the location of heritage and environmentally sensitive areas. Cadia could consider including this information in a GIS as well.</p>	Accept. Procedure 710-005-EN-PRO-0006 will be updated to require the checking of the current approved disturbance footprint and heritage sites on the Cadia GIS System.	15-Apr-21
S3. C42	<p><b>ABORIGINAL HERITAGE</b>  <b>Aboriginal Cultural Heritage Management Plan</b>  The Proponent shall prepare and implement an Aboriginal Cultural Heritage Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <p>(a)be prepared in consultation with BCD and the Aboriginal community, and be submitted to the Secretary for approval within 6 months of the date of this approval;</p> <p>(b)include a:</p> <ul style="list-style-type: none"> <li>•detailed salvage program and management plan for Aboriginal sites and potential archaeological deposits within the project disturbance area;</li> <li>•detailed description of the measures that would be implemented to protect and monitor Aboriginal sites outside the project disturbance area;</li> <li>•description of the measures that would be implemented if any new Aboriginal objects or skeletal remains are discovered during the project; and</li> <li>•protocol for the ongoing consultation and involvement of the Aboriginal communities in the conservation and management of Aboriginal cultural heritage on the site.</li> </ul>	<p><b>Observation No. 57</b> – The current ACHM shows two version dates; Version 2 – 5/09/2010 Page i and Version 2 – 4/07/2012 Page 2.</p> <p><b>Observation No. 58</b> – It is recommended that the ACHM be updated after any new ACHA is undertaken. The ACHA can be referenced in the ACHM and any new sites (if any) and findings can be recorded in the ACHM. This removes the requirement, and possibility of omissions, to search through modification documentation for ACHA findings (e.g. when assessing Environmental Impact Permits).</p>	<p>Accepted, ACHMP) will be reviewed and updated.</p> <p>Trigger (AHCA) for requiring an update will be incorporated into the next review of the ACHMP</p>	31-Dec-22

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Condition Number (ID)	Compliance Requirement	Independent Audit Observation / Opportunity for Improvement	Cadia's Proposed Action or reason to not implement measures / changes	Proposed Action Due Date (if applicable)
S3. C43	<b>HISTORICAL HERITAGE</b> <b>Historical Heritage Management Plan</b> The Proponent shall prepare and implement a Historical Heritage Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with the Heritage NSW and be submitted to the Secretary for approval within 6 months of the date of this approval; (b) include: • compilation of archival recording, excavation and/or salvage of heritage items within the project disturbance area, including the Wire Gully Gold Workings and the Little Cadia Copper Mine; • a detailed conservation management strategy for heritage items outside the project disturbance area but within the vicinity of the site, including a: o description of the measures that would be implemented to protect heritage items from disturbance, including disturbance from blasting activities; o program to monitor the effects of blasting on relevant heritage items; and o an Interpretation Plan for the Cadia Village.  <i>Note: The Little Cadia Copper Mine is outside the zone of subsidence for the Cadia East mine but within its zone of influence, and therefore may potentially be subject to impact. It is proposed to conserve the site in-situ, if possible.</i>	<b>Observation No. 59</b> – The document history and status show the currently approved version of the HHMP as Rev.1 dated issue 15/6/2020. However, the DPIE approval refers to a HHMP, Revision 1 dated 29 May 2020. Cadia should ensure that the DPIE approval dates are consistent with the final plan.	Observation accepted. Future revisions will identify the correct approval dates in line with Observation No. 25.	31-Dec-22
		<b>Observation No. 60</b> – Cadia could consider ensuring reports, provided to regulators and for public publishing on the Cadia website, are reviewed by multiple reviewers for quality control. Section 6.7.2.1 of the 17/18 and 18/19 both refer to the 2017/18 inspection report undertaken by Mott McDonald.	Not Accepted. These documents are currently reviewed by multiple people. Further care will be taken in the quality of the reviews prior to accepting reports.	Ongoing
S3. C44	<b>TRANSPORT</b> <b>Road Construction</b> The Proponent shall: (a) realign the affected sections of Cadia Road, and reconstruct the Cadia Road / Woodville Road intersection, at least 6 months before causing any subsidence of the affected roads; and (b) construct the CVO Dewatering Facility site intersection on Newbridge Road, prior to the commencement of construction of the facility, to the satisfaction of the applicable Council.	<b>Observation No. 61</b> – Schedule 3, Condition 44(b) applies to construction of the CVO Dewatering Facility site intersection on Newbridge Road, which has been constructed to the satisfaction of Blayney Shire Council. Cadia could consider requesting paragraph (b) of this condition be removed in a future modification of the Project Approval, as paragraph (b) is now redundant.	Accepted. Cadia to request DPI&E to remove item Schedule 3, Condition 44b. This is to be requested when the draft consent conditions are issued following the determination of Mod 14.	28-Apr-21
S3. C45	<b>TRANSPORT</b> <b>Road Haulage</b> The Proponent shall transport all concentrate: (a) to the Blayney Dewatering Facility and CVO Dewatering Facility by pipeline; and (b) from the Blayney Dewatering Facility and CVO Dewatering Facility by rail. If during the life of the project pipeline or rail services are not available to transport the concentrate the Proponent may apply to the Secretary for permission to temporarily use truck facilities until such time as pipeline or rail services are returned to normal service.	<b>Observation No. 62</b> – Considering the Blayney Dewatering Facility is now demolished, references to it in this condition are now redundant. Cadia could consider requesting that references to the Blayney Dewatering Facility in this condition be removed in a future modification of the Project Approval.	Accepted. Cadia will make a request to DPI&E for the reference to the BDWF to be removed when draft Mod 14 conditions are received.	28-Apr-21
S3. C46	<b>TRANSPORT</b> <b>Road Haulage</b> The Proponent shall ensure that all traffic accessing the Blayney Dewatering Facility does so via Marshalls Lane and Gerty Street. Hill Street shall not be used except with the written permission of Blayney Shire Council.	<b>Observation No. 63</b> – This condition applies to traffic route restrictions to and from the (now demolished) old Blayney Dewatering Facility. If Hill Street is not intended to be used in the future, Cadia could consider requesting that this potentially redundant condition be removed in a future modification of the Project Approval.	Accepted. Cadia to seek permission from DPI&E that this condition is removed when Mod 14 draft conditions are available.	28-Apr-21
S3. C49	<b>VISUAL</b> <b>Visual Amenity and Lighting</b> The Proponent shall: (a) implement all reasonable and feasible measures to mitigate visual and off site lighting impacts of the project; (b) ensure no outdoor lights shine above the horizontal; and	<b>Observation No. 64</b> – Cadia could update the Risk Register (710-000-RI-REG-0001) to include lighting risks at the CVO Dewatering Facility.	Complete. Risk Register line EAI-396 includes Fugitive lighting risks from the Cadia Dewatering Facility. Fugitive Lighting Management Plan also updated to include risk.	Complete

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Condition Number (ID)	Compliance Requirement	Independent Audit Observation / Opportunity for Improvement	Cadia's Proposed Action or reason to not implement measures / changes	Proposed Action Due Date (if applicable)
	(b)ensure no outdoor lights shine above the horizontal, and (c)ensure that all external lighting associated with the project complies with Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting, to the satisfaction of the Secretary.	<b>Observation No. 65</b> – Cadia could consider including lighting (e.g. working at night on the southern waste dump) as an Initiating Trigger in Table 2 of the Environmental Impact Permit (Procedure) 710-005-EN-PRO-0006.	Accept. Procedure 710-005-EN-PRO-0006 will be updated as stated in the observation	15-Apr-21
<b>S3. C50</b>	<b>WASTE</b> <b>Waste Minimisation</b> The Proponent shall: (a)minimise the waste generated by the project; (b)ensure that the waste generated by the project is appropriately stored, handled and disposed of; (c)manage on-site sewage treatment and disposal in accordance with the requirements of the applicable Council; and (d)report on waste management and minimisation in the Annual Review, to the satisfaction of the Secretary.	Observation No. 66 – The general condition (colour coding, labelling etc.) of waste bins was observed to be poor/faded. Cadia could consider requesting the waste contractor to recondition all waste containers (both for external and internal use containers).	Accepted. Remondis directed to update bin condition in line with observation.	30-Jun-21
		<b>Observation No. 67</b> – In the next revision of the Non-Mineral Waste Management Plan, Cadia could update Table 1 to include all paragraphs of this condition (i.e. the current plan includes paragraph (b) only).	Accepted. Future revision of the NMWMP will include the full condition.	31-Dec-22
		<b>Observation No. 68</b> – Cadia could consider reviewing the Total Waste Management Contract (TWMC) to include Schedule 3 Condition 50 (a) as a KPI, and report on waste minimisation outcomes and initiatives in the AEMR.	Accepted, TWMC to be reviewed mid 2021 so will add to this recommendation for discussion with Contract Manager	30-Jun-21
		<b>Observation No. 69</b> – The % recycling value KPI is omitted from the TWMC (shown as TBA) and shown as 55% in the waste contractors monthly reports (e.g. Figure 11 Site Recycling % – YTD of April 2020 report). The AEMRs for the audit period report it as 65%. Cadia should ensure this recycling benchmark is clear and consistent across all plans, contracts and reporting documents.	Accepted. The NMWP will be updated to reflect how the KPIs are calculated.	31-Dec-22
		<b>Observation No. 70</b> – Cadia could review and where necessary update the Non-Mineral Waste Management Plan to: •assign single responsibility for waste contractor liaison and accountability for achieving KPIs. It was stated that the Fixed Plant and Maintenance Department Manager has recently been assigned this role. The Areas of Responsibility table in section 13 of the plan currently assigns responsibility of liaison with stakeholders (including contractors, however not verified if the waste contractor is included) to four departments; and •ensure obligations from the TWMC are captured in the plan (including the 22 KPIs).	Cadia will consider this observation when the TWMC is next reviewed.	31-Dec-22
		<b>Observation No. 71</b> – Cadia could consider undertaking an audit to ensure compliant waste tracking is undertaken and waste receivers are compliant with legal requirements.	Accept, Cadia will schedule a series of 'waste tracking audits' of high risk waste streams as per the NMWP.	30-Jun-21
		<b>Observation No. 72</b> – At the time of this audit, full IBCs containing oils were observed (temporarily) stored on an unbunded concrete pad area beside the CVO Waste Storage Facility. The area appeared to drain to an internal stormwater drain. It was stated that the drainage system had an inline oil interceptor, however, these are not designed to capture large losses. Cadia should ensure all hydrocarbons are stored (including temporary storage) in banded areas.	Complete. At the time of the audit, wastes were being progressively moved in to an upgraded waste transfer facility. The area will continue to be included in Cadia Environmental Inspection program.	N/A

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Condition Number (ID)	Compliance Requirement	Independent Audit Observation / Opportunity for Improvement	Cadia's Proposed Action or reason to not implement measures / changes	Proposed Action Due Date (if applicable)
		<p><b>Observation No. 73</b> – Paragraph (a) of this condition requires Cadia to “minimise the waste generated by the project”. Cadia effectively manages non-mineral waste generated with specific targets for recycling (65%) and reducing waste to landfill (by 5% each year) i.e. the downstream side, once the waste is generated. Cadia could consider reviewing its waste strategy to ensure effort is expended on the “upstream” side of the non-mineral waste in order to minimise that waste being generated in the first place. This may be through elimination, substitution etc. and integrating waste minimisation into procurement contracts for supplies as well as major projects. Cadia could consider reporting this information (in the AEMR) as a simple stacked bar chart showing total waste generated (recycling plus landfill) each year and resulting trends (of all three KPIs, i.e. percentage recycled, percentage waste to landfill and total waste generated).</p>	Accepted. Cadia will consider revising its reporting of waste data in future AEMRs. Cadia will investigate opportunities for improvement to reduce waste in consideration of procurement and supply.	30-Jun-22
		<p><b>Observation No. 74</b> – Cadia should ensure the ore processing area OSSMS is being maintained and operated in accordance with the recommendations of the Cadia Valley Operations Report on Sewage Treatment Plan – Performance Review (April 2008).</p>	Accepted, will review with Maintenance Manager (via the Cadia Obligations Register)	30-Jun-21
S5. C1	<p><b>ENVIRONMENTAL MANAGEMENT</b>  <b>Environmental Management Strategy</b>  The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Secretary. The strategy must:</p> <ul style="list-style-type: none"> <li>(a) be submitted to the Secretary for approval within 6 months of the date of this approval;</li> <li>(b) provide the strategic framework for environmental management of the project;</li> <li>(c) identify the statutory approvals that apply to the project;</li> <li>(d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;</li> <li>(e) describe the procedures that would be implemented to: <ul style="list-style-type: none"> <li>• keep the local community and relevant agencies informed about the operation and environmental performance of the project;</li> <li>• receive, handle, respond to, and record complaints;</li> <li>• resolve any disputes that may arise during the course of the project;</li> <li>• respond to any non-compliance; and</li> <li>• respond to emergencies;</li> </ul> </li> <li>(f) include: <ul style="list-style-type: none"> <li>• copies of the various strategies, plans and programs that are required under the conditions of this approval once they have been approved; and</li> <li>• a clear plan depicting all the monitoring to be carried out in relation to the project.</li> </ul> </li> </ul>	<p><b>Observation No. 75</b> – Cadia would be expected to improve the document control applied to its environmental management plans (i.e. primarily relating to the approval of these plans and defined approval dates).</p>	Accepted. Will be completed in line with Observation No. 25.	31-Dec-22



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Condition Number (ID)	Compliance Requirement	Independent Audit Observation / Opportunity for Improvement	Cadia's Proposed Action or reason to not implement measures / changes	Proposed Action Due Date (if applicable)
S5. C2	<b>ENVIRONMENTAL MANAGEMENT</b> <b>Annual Review</b> By the end of 2010, and annually thereafter, the Proponent shall review the environmental performance of the project to the satisfaction of the Secretary. This review must: (a) describe the works that were carried out in the past year, and the works that are proposed to be carried out over the next year; (b) include a comprehensive review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the: • the relevant statutory requirements, limits or performance measures/ criteria; • the monitoring results of previous years; and • the relevant predictions in the EA and previous EAs; (c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance; (d) identify any trends in the monitoring data over the life of the project; (e) identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies; and (f) describe what measures will be implemented over the next year to improve the environmental performance of the project.	<b>Observation No. 76</b> – Cadia's AEMR template could include a table in the front of the template that clearly defines and lists how each issued AEMR complies with the requirements of Project Approval Schedule 5, Condition 2 (a) to (f).	Accepted. Cadia will consider summarising the various sections in the AEMR into a succinct table to address Schedule 5, Condition 2 (a) to (f)	31-Dec-21
		<b>Observation No. 77</b> – In relation to the improving the environmental performance of the project, Cadia could consider: • ensuring relevant findings, recommendations or any critical information contained in environmental assessments are extracted and presented in a readily accessible and easy to understand format to all relevant personnel; and • in the case of the location of aboriginal relics, Cadia could consider an updated GIS, with locations marked, that is accessible and workable by personnel in all relevant project departments.	Accepted. Relevant established procedures will be reviewed and updated to address the findings.	30-Jun-21
S5. C3	<b>ENVIRONMENTAL MANAGEMENT</b> <b>Revision of Strategies, Plans and Programs</b> Within 3 months of: (a) an annual review under condition 2 above; (b) an incident report under condition 5 below; (c) an audit under condition 7 below; or (d) any modification of this approval, the Proponent shall review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the Secretary  <i>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the project.</i>	<b>Observation No. 78</b> – CVO could request removal of Project Approval Schedule 5, Condition 3 (d) relating to the revision of CVO Strategies, Plans and Programs within 3 months of any modification to the Project Approval, given that for example, three Project Approval modifications occurred in a 12-month period in March 2018, April 2018 and September 2018. The requirement to revise these documents at intervals less than annually is impractical.	Accepted. Cadia to seek permission from DPI&E to remove reference to 3 (d) once Mod 14 draft conditions are received.	28-Apr-21
		<b>Observation No. 79</b> – The Amendments Table provided in the current Cadia Water Management Plan should be standardised across all of Cadia's Environmental Management Plans and Monitoring Plans (as this process demonstrates compliance with Project Approval Schedule 5, Condition 3 (b) and (c)), for those plans that are required to be approved by the regulator).	Accepted. Will be completed in line with Observation No. 25.	31-Dec-22
		<b>Observation No. 80</b> – The AEMRs state that a review of the strategies, plans and programs is undertaken as part of the Annual Review process in accordance with Project Approval Schedule 5, Condition 3(c). However, any review should be undertaken as per Project Approval Schedule 5, Condition 3(a). The review (and revision if necessary) of the documents is required to be completed within 3 months of the annual review based on actions, improvements, changes etc. identified in the AEMR. Cadia should identify any required changes and revise the relevant document (include revision date) as required by this condition.	Accepted. Document revisions will reflect Schedule 5, Condition 3 as per Observation No. 10 and recorded in future AEMRs appropriately.	31-Dec-22

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S5. C4	<p><b>ENVIRONMENTAL MANAGEMENT</b>  <b>Community Consultative Committee</b>            Within 6 months of the date of this approval, the Proponent shall establish Community Consultative Committee (CCC) for the project to the satisfaction of the Secretary. This CCC must be established and 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).</p> <p><i>Notes:</i>            •The CCC is an advisory committee. The Department and other relevant agencies are responsible for ensuring that the Proponent complies with this approval. In accordance with the Guideline, the Committee should comprise an independent chair and appropriate representation from the Proponent, affected councils and the general community.            •In establishing the CCC, the Department will accept the continued representation from existing CCC members, however the Proponent should ensure that adequate representation is achieved for landowners within the area surrounding the Cadia East underground mine.</p>	<p><b>Observation No. 81</b> – The next issue of the Project Approval could reference the revised January 2019 version of the Guideline for Establishing and Operating Community Consultative Committees for Mining Projects (i.e. not the 2007 version).</p>	<p>Accepted. Cadia to seek permission from DPI&amp;E to request a change to the reference of the current guideline for CCC.</p>	<p>28-Apr-21</p>
S5. C5	<p><b>COMPLIANCE</b>  <b>Incident Notification</b>            The Proponent must immediately notify the Department and any other relevant agencies immediately after it becomes aware of an incident. The notification must be in writing and identify the development (including the development application number and name) and set out the location and nature of the incident.</p>	<p><b>Observation No. 82</b> – Cadia's February 2020 procedure titled "Reporting of Environmental Exceedances and Incidents" incorrectly utilises "non-conformances" throughout the procedure (i.e. a failure to meet an internal requirement) instead of referring to "non-compliance" (i.e. a failure to meet a statutory or external obligation). These are the correct and standard definitions utilised in Cadia's Project Approval and in the ISO14001:2015 Standard.</p>	<p>Accepted. Procedure 710-005-EN-PRO-0018 will be updated as suggested.</p>	<p>25-Mar-21</p>