

INDEPENDENT ENVIRONMENTAL AUDIT

**Aeris Resources
Constellation Project
2026**

Client Representative: William Olson

Audit Date: 15 Jun 2026

Report Date: 7 July 2026

Revision: 0



Document Control

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1.ACRONYMS

AQGGMP	Air Quality and Greenhouse Gas Management Plan
BSC	Bogan Shire Council
CCC	Community Consultative Committee
DCCEEW	Department of Climate Change, Energy, Environment and Water
CPHR	Conservation Programs, Heritage and Regulation branch (DCCEEW)
DPHI	Department of Planning, Housing and Industries
EIS	Environmental Impact Statement
EMS	Environmental Management Strategy
EPA	Environment Protection Authority
EPL	Environment Protection Licence
IAPAR	Independent Audit Post Approval Requirements
IEA	Independent Environmental Audit
ML	Mining Lease
NMP	Noise and Vibration Management Plan
NSW RR	New South Wales Resources Regulator
RFI	Request for Information
SSD	State Significant Development
TfNSW	Transport for New South Wales
WMP	Water Management Plan

2. EXECUTIVE SUMMARY

Aeris Resources engaged Enviraud to undertake the initial Independent Environmental Audit (IEA) of construction phase of the newly approved Constellation mine project, located approximately 7km northwest of Girilambone township and 55km northwest of Nyngan in Bogan Shire Council in central New South Wales.

Aeris owns the Tritton Resources Pty Ltd that operates various copper mines in the area – Tritton underground copper mine, Murrawombie open cut mine, the Avoca Tank project and now the Constellation project. An underground and open cut mines are approved under the State Significant Development approval SSD-41579871. The green field project is in early construction phase. Condition D5 in the instrument of consent requires an IEA to be undertaken. As per the NSW Department of Planning Independent Audit Post Approval Requirements (IAPAR), the initial construction audit must occur within 4-12 weeks of commencement of construction and further audits are required at intervals of no more than 26 weeks, or as otherwise agreed or directed by the Planning Secretary.

As the project is in early construction phase, only the conditions of the Development Consent SSD-41579871 formed the criteria for this audit. The Environmental Protection Licence EPL 4501 (Murrawombie Copper Mine) is soon to be amended to include the Constellation project and a new Mining Lease (ML) will be issued which shall apply for future audits.

The audit comprised of review of documentation, consultation with relevant agencies, a site inspection on 15 June 2026, interview with site personnel and reporting of findings in the audit report (this report). The audit was undertaken as per process outlined in Enviraud proposal dated 20 April 2026 and carried out in accordance with IAPAR 2026 and ISO19011:2018 Guidelines for auditing management systems. Environmental performance of the project was reviewed for compliance with applicable SSD consent conditions and matters raised in the stakeholder consultation with agencies.

Aeris cooperated throughout the audit including in responding to the initial Request for Information (RFI) and in the planning and execution of site inspection. As this was the initial construction audit, the extent of works witnessed was predominantly the laying of pipes for conveyance of water from Murrawombie mine to the Constellation project area along the road corridor. Construction of works for the future haul road along existing Okeh Road commenced on 5 May 2026. The Constellation mine site was not accessible at the time of this audit, and the auditor was advised that the site was still under the control of the exploration licensee.

Aeris demonstrated a good level of compliance. Positive measures that demonstrated compliance with requirements included:

- Management of documentation in progress
- Record keeping of site plant and equipment by the engaged contractor
- The construction footprint was within approved limits and kept neat and managed well
- Heritage items were managed as required
- Incident reporting and non-compliance reporting were undertaken as required.

3. AUDITOR CERTIFICATION

The below audit report declaration is signed by the approved lead auditor, as per template provided in IAPAR Appendix E.

Independent Audit Report Declaration Form – Lead Auditor
Project Name – Aeris Constellation Project
Application Number – SSD-41579871
Project Address – 1890 Okeh Road, Girilambone NSW 2831
Proponent – Aeris Resources Limited
Title of Audit – Initial Construction Phase Independent Environmental Audit
Date – 07 July 2026
I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge: - the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019); - the findings of the audit are reported truthfully, accurately and completely; - I have exercised due diligence and professional judgement in conducting the audit; - I have acted professionally, objectively and in an unbiased manner; - I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child; - I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child; - neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and - I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so. Notes: - Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)
Name of Auditor – Dr Avanish Panikkar
Signature – 
Qualification – Exemplar Global Master Auditor C-357016/ Principal 113142 CEnvP 1472, PhD, MEngSc, BTech Hons
Company - ENVIRAUD
Company Address – 14 Avium Dr, Caddens NSW 2747

4. INTRODUCTION

4.1 Purpose of this report

Aeris Resources engaged Enviraud to undertake the initial Independent Environmental Audit (IEA) of construction phase of the newly approved Constellation mine project. This report details the audit scope, methods employed in undertaking this audit, presents the audit findings and provides any corrective actions and recommendations based on the findings, that when implemented, will facilitate improved compliance with relevant approval requirements.

4.2 Project Background

Aeris owns the Tritton Resources Pty Ltd that operates various copper mines in the area (Bogan Shire Council LGA) – Tritton underground copper mine, Murrawombie open cut mine, the Avoca Tank project and now the Constellation project. The development, comprising an open cut mine and underground operations approved under the State Significant Development approval SSD-41579871, is located approximately 7km northwest of Girilambone township and 55km northwest of Nyngan in central New South Wales. The green field project will be developed across two rural freehold properties (Lot 4 of DP751341, Lot 9 of DP751321 and Lot 10 of DP751321) with approximately 170ha surface footprint and is in early construction phase at the time of this audit. Works along the proposed haul road is in progress along existing Okeh Road. The proposed mine area is within exploration leases EL6126, EL8987 and EL8084 held by Tritton Resources Pty Ltd.

4.3 Scope of Audit

Condition D5 in the instrument of consent requires an IEA to be undertaken.

D5. Independent environmental audits of the development must be conducted and carried out in accordance with the *Independent Audit Post Approval Requirements* published on the Department's website.

As per the NSW Department of Planning Independent Audit Post Approval Requirements (IAPAR, March 2026), the initial construction IEA must be conducted within 4-12 weeks of commencement and further construction phase audits are required at intervals of no more than 26 weeks, or as otherwise agreed or directed by the Planning Secretary.

As the project is in early construction phase, only the conditions of the Development Consent SSD-41579871 formed the criteria for this audit. The Environmental Protection Licence EPL 4501 (Murrawombie Copper Mine) is soon to be amended to include the Constellation project, and a new Mining Lease (ML) will be issued – both which shall apply for future audits.

4.3.1 Audit Period

The official commencement of construction, as per sighted evidence and reporting, is 5 May 2026. As per section 2.1 of IAPAR 2026, the audit period commences on 5 May 2026 and ends on 15 June 2026 (day of site inspection). It is noted that the Development Consent was issued on 24 Dec 2025 and from this timeline, relevant documentation was prepared by Aeris.

4.4 Audit Team

The audit team proposed for this audit comprised:

- Dr Avanish Panikkar, CEnvP, Lead Auditor
- Sai Meghna, Support Auditor

Both the proposed persons had signed the Independence Declaration Form (as per the template provided in IAPAR Appendix A).

Approval for lead auditor was provided by DPHI via letter dated 19 May 2026 (see Appendix A of this report).

4.5 Limitations

This report has been prepared by Enviraud for Aeris Resources Limited upon engagement to act as its Independent Environmental Auditor. The content of this report may only be used and relied upon by Aeris for the purpose agreed between Aeris and Enviraud as set out in sections 4.1 and 4.3 of this report. Thus, Enviraud disclaims any responsibility to any person/entity other than Aeris arising in connection with this report. Any implied warranties and conditions to the extent legally permissible are excluded.

Work undertaken by Enviraud in connection with this report are limited to those specifically detailed in this report and are as per scope declared in this report. It may contain professional opinion of experienced environmental consultants and does not imply specialist legal advice. Findings, conclusions and any recommendations stated in this report are based on information obtained from documentation review, discussions and site observations.

Enviraud has prepared this report based on information provided by Aeris personnel and others (including Government entities as consulted), which information has not been independently verified or fact-checked beyond the agreed scope of works. Enviraud does not accept liability in connection with such unverified information, including errors or omissions caused by errors or omissions in the obtained information.

5. AUDIT METHODOLOGY

As per the scope detailed in section 4.3 of this report, the IEA reviewed compliance with all conditions, as applicable, in the SSD consent:

- Part A – Administrative Conditions
- Part B – Environmental Management Conditions
- Part C – Specific Environmental Conditions and
- Part D – Reporting and Compliance Conditions
- Appendices 6 and 7

The audit was undertaken generally in accordance with the IAPAR 2026 and adopted an approach consistent with AS/NZS ISO 19011:2019 Guidelines for auditing management systems. The audit was structured as:

- Audit preliminaries
- Site visit and audit interviews
- Review and reporting

In particular, the audit considered the following:

- The key principles of auditing including the requirement of auditors to conduct themselves in an ethical manner, report truthfully and accurately, be diligent and have the appropriate competency to conduct the audit, be independent, and apply an evidence-based approach to conducting the audit.
- The audit objectives, scope and criteria were based on the SSD Development Consent SSD-41579871 (the requirements). The scope of the audit was limited to compliance with the conditions therein, the environmental performance of the development, and the adequacy of strategies, plans or programs under the approval.
- An appropriate audit team was proposed that possess skills and experience in environmental auditing to ensure that an adequate assessment of compliance with the requirements could be made.
- Relevant documentation was reviewed prior to the audit to make an initial determination of conformity of the system to the requirements, and to prepare an audit checklist containing appropriate questions to address during the site audit.
- Audit opening and closing meetings were conducted with the auditee to explain the format of the audit upfront and to highlight preliminary audit findings at the conclusion of the site audit.
- An inspection of the site was conducted on 15 June 2026 within the accessible areas of the project footprint area and specifically at select locations to verify relevant compliance aspects of the audit.
- During the site inspection, audit interviews were conducted with personnel involved in the project and additional documentary evidence was discussed.
- Verifiable evidence was collected and recorded throughout the audit and evaluated against the requirements to determine compliance status. All evidence was recorded on the Compliance Tables (refer Appendix C) and photographic evidence are shown in Appendix D.
- A complete and accurate report was prepared and distributed to provide a record of the audit and its findings.

As per the DPHI auditor approval letter (refer Appendix A):

- The Lead Auditor must attend the site inspection.
- The audit is to be conducted in accordance with the Independent Audit Post Approval Requirements (2020 or as updated).
- Auditor may wish to have regard to AS/NZS ISO19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing.

5.1 Document Review

Documentation was requested via RFI-1. Provided information was reviewed prior to site inspection and noted within the audit compliance table (audit checklist). Further information was sought from Aeris via RFI-2, which was provided promptly. William Olson and Cordelia Smart assisted with access to requested information during the audit process, via email or secure file transfer system. Documentation reviewed are noted in the Compliance Tables (refer Appendix C).

Generally, the documentation included, among others:

- Environmental Impact Statement
- Environmental Management Strategy
- Management Plans, protocols, programs and strategies
- Agency consultation records
- Records of uploading documentation to the Major Projects portal
- Records of approvals
- Monitoring data, as relevant to project stage etc.

5.2 Consultation

The following agencies were consulted at the commencement of audit:

- Aboriginal Council / NTSCORP
- Bogan Shire Council (BSC)
- Conservation Programs, Heritage and Regulation (CHPR branch of DCCEEW)
- Department of Planning, Housing and Infrastructure (DPHI)
- Heritage NSW
- NSW Environmental Protection Authority (EPA)
- NSW Resource Regulator (NSW RR)
- Transport for NSW (TfNSW)
- WaterNSW (DCCEEW)

A letter was sent to agencies advising of the upcoming audit, Auditor details and requesting comments/input on the project performance as relevant. A sample letter is included in Appendix B of this report. Written comments as received and Auditor responses are included in Table 1.

Table 1 – Agency Consultation Responses

Agency	Comments Received	Audit Response
Aboriginal Council / NTSCORP		
	Dear Avanish, Thank you for your email. I have passed your correspondence on to directors of the Ngemba, Ngiyampaa, Wangaaypuwan, Wayilwan Aboriginal Corporation RNTBC. Kind regards, Aleisha Birch Law Graduate 	As no further response was received, no action is required in this audit.
Bogan Shire Council		
26 May 2026	RE: AERIS RESOURCES CONSTELLATION PROJECT – Independent Environmental Audit. Thank you for the opportunity to provide comment on Aeris Resources – Constellation Project -Independent Environmental Audit. Aeris Resources has maintained open communication with Bogan Shire Council since the commencement of the Constellation Project and Council is not aware of any instances of non-compliance. Accordingly, Council does not identify any additional matters requiring specific focus or further investigation as part of the Independent Environmental Audit at this time. Should you require any additional information, please do not hesitate to contact me during office hours, Monday to Thursday (02) 6835 9000 or via email cathy.black@bogan.nsw.gov.au.	Noted, no further review or action is required in this audit.
CHPR		
	(no responses received)	n/a
Department of Planning, Housing and Infrastructure		

26 May 2026	Hi Avnish Thank you for consulting the NSW Department of Planning, Housing and Infrastructure on the upcoming IEA for Constellation Project. In addition to the consent requirements, please review the management of land, including management of biodiversity, including vegetation clearance, erosion and sediment, amenity, including noise, air quality and visual, transport and parking, community consultation and complaints management. Please check that the development is being constructed within the development footprint, including any vegetation clearance and stockpiling. Please ensure all relevant stakeholders, as identified in the consent are consulted during the course of the audit. Thank you kindly, Georgia	Limited activities are in progress at the time of the audit for land clearing, easements and other civil works. During documentation review, site inspection and audit interviews, matters including land management, biodiversity management and vegetation clearance, installation of ERSED, visual and other amenity matters such as potential generation and impact of noise, dust, parking, traffic etc were discussed. No issues were noted at this early phase of works. Community consultation is progressing via community events and CCC. No complaints were received during the audit term.
Heritage NSW		
	Your request has been updated. To add additional comments, reply to this email. Hello Avnish, Thank you for your referral seeking comment from Heritage NSW on the scope for the Independent Environmental Audit for your project. Please consider as a part of your audit scope any conditions relating to heritage within the Conditions of Consent for the project and any approved Management Plans. In addition, please confirm that any required updates to the AHIMS register, including Aboriginal Site Impact Recording forms, have been completed. It is recommended that the Department of Planning Housing and Infrastructure Compliance Team be contacted via compliance@planning.nsw.gov.au to determine if there is any non-compliance with Conditions of Consent for the project. If you have any questions regarding these comments, please contact heritagemailbox@environment.nsw.gov.au. Kind regards,	Heritage related conditions of consent were reviewed as part of the IEA including the Heritage Management Plan. Updates to the AHIMS register is being undertaken pending specialist advice awaited at the time of this audit. Scar tree salvage and protection measures being implemented were sighted. DPHI was consulted separately (see above) in this audit and no non-compliance noted.
NSW EPA		
21 May 2026	<i>Following the EPA's restructure, can you please send your request through info@epa.nsw.gov.au so it can go to the appropriate area and be assigned to the relevant staff member.</i>	The request was forwarded to EPA's generic email address, no further response was received.
NSW Resources Regulator		

2 June 2026	Dear Dr Panikkar, Thank you for your email dated 26 May 2026 (our reference: AREQ0075243) requesting consultation on the independent audit to be undertaken of the Constellation project. A mining lease application (MLA659) was lodged with NSW Resources but has not yet been determined. Given there is currently no mining lease applicable to the Constellation project, the NSW Resources Regulator has no requirements for this audit. Sincerely Jenny Ehmsen Principal Compliance Auditor NSW Resources Regulator	The status of the mining lease was discussed in the audit and confirmed as pending progress. No further action relevant in this audit.
Transport for NSW – Development Services (West)		
27 May 2026	Hi Avnish, Thank you for the email below inviting TfNSW to comment on the scope of an Independent Environmental Audit for Constellation Mine project. TfNSW understands that the mine is not yet operational. Accordingly, TfNSW suggests that the Independent Environmental Audit scope consider: • Compliance with Instrument of Consent transport-related conditions. Note, see attached a Traffic Management Plan that TfNSW endorsed on 12/03/2026. • Commitments made within the Environmental Impact Statement (EIS). Please note, the consent requires two (2) separate intersection upgrades along the Mitchell Highway (HW7), a classified (State) road, for which TfNSW will act as the roads authority and will require the developer to enter into a Works Authorisation Deed (WAD). TfNSW are yet to receive the WAD initiation request but will work with the proponent when engaged. If you have any questions about the above, please contact me. Kylie-Anne Pont Team Leader, Development Services (West) Transport Planning	Conditions of the Development Consent were reviewed in detail in this audit. Traffic Management Strategy as provided and updated version were reviewed against relevant conditions. Commitments made in the EIS were also part of the audit review undertaken. The status of WAD was discussed in the site discussion and no further progress noted due to works being in early construction phase.
Water Group (DCCEEW)		
	(no responses received)	n/a

5.3 Site Audit and Inspection

A site inspection and audit meeting was conducted on 15 June 2026.

5.3.1 Audit Meeting

Upon receiving the lead auditor endorsement from DPHI, the IEA engagement commenced with a project inception meeting on 8 May 2026. At this meeting, overall project scope, resourcing, audit planning, documentation review requirements and reporting requirements were discussed. A Request for Information (RFI-1) was prepared based on audit criteria and issued to Aeris thereafter. Aeris provided the requested information promptly and this enabled documentation review phase of the audit.

The audit site inspection day commenced with a formal Opening Meeting at the Murrawombie mine site office. At the opening meeting, the audit objectives, scope and methodology on the day were confirmed.

The Audit Opening Meeting was attended by:

- William Olson, Environmental Superintendent, Aeris Resources – Tritton Operations
- Cordelia Smart, Senior Environmental Advisor, Aeris Resources – Tritton Operations
- Avanish Panikkar, Lead Auditor, Enviraud

Upon completion of audit interviews and site inspection, an Audit Closing Meeting was conducted, attended by the same personnel as per the Opening Meeting. The lead auditor discussed the preliminary audit findings, further requirements for documentation (subsequently requested as RFI-2) and reporting timeline was confirmed at the Closing Meeting.

5.3.2 Audit Interviews

The audit included discussion with the below personnel, following the relevant audit criteria / conditions of consent:

- William Olson, Environmental Superintendent, Aeris Resources – Tritton Operations
- Cordelia Smart, Senior Environmental Advisor, Aeris Resources – Tritton Operations
- Robert Pelkey, Site Manager, Neill Earthmoving - Contractor

5.3.3 Site Inspection

Weather condition on the site audit day was predominantly sunny and calm with mild temperatures around 15-18°C. Occasional slight breeze was present.

The site inspection was conducted by lead auditor Avanish Panikkar, accompanied by Aeris representatives William Olson and Cordelia Smart. The inspection included a general site drive over along approximately 18km road corridor along Okeh Road from the Murrawombie mine office site (where site meetings were held) up to the front of Okeh property. Location of the future Constellation mine site was inaccessible due to staging of works (the area was under the Exploration License holders and under inspections and not yet open for access). The auditor was advised that no construction works had commenced at the future mine site and will commence (outside the audit period) as per the construction activities project program (dated 27 May 2026) sighted in the audit.

Where possible, the following aspects and areas of interest were inspected:

- Water pipe laying works along the haul road corridor along existing Okeh Road
- Vegetative tree barrier (visual amenity) at one property
- Hollow bearing trees identified and protected
- Salvaged scarred tree locations and storage
- Construction contractor site office

Statements made by personnel interviewed were verified by documentation and visual observations. Photographs from site visit are included in Appendix D of this report. Observations are included in the audit checklist (Appendix C).

5.4 Reporting

This report presents the findings of the initial construction phase IEA at the Constellation project as per condition D5 of the Development Consent.

The assessment criteria used to determine compliance, as per IAPAR 2026, is outlined in table below. Risk assessing of compliance status is not included. It is noted that the IAPAR allows making observations or notes for each criterion only limited to these compliance status descriptors.

Table 2- Compliance Status Descriptors

Status	Description
Compliant	The Lead Auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the audit period.
Non-Compliant	The Lead Auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the audit period.
Not Triggered	A requirement has an activation or timing trigger that has not been met during the audit period (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

6. AUDIT FINDINGS

6.1 Overall Environmental Performance

The overall environmental performance of Aeris Resources in the Constellation project as reviewed in this audit was reviewed by assessing compliance against the conditions within the Development Consent SSD-41579871. Compliance tables provided in Appendix C of this report provide details of the review undertaken including findings. A summary is provided in below sections of this report.

During the site inspection visit, it was noted that the works along the proposed haul road corridor along the existing Okeh Road were progressing well, with laying of water conveyance pipes being undertaken. As the audit was undertaken at the completion of the sixth week of construction, other surface works were not available to witness. There were no non-compliances or observations noted from site inspection.

The works are being delivered by Neill Earthmoving contractor. Documentation and site office conditions as sighted indicated good environmental management being implemented.

Given this is the initial construction phase IEA undertaken at the completion of the sixth week of development, and as per stakeholder consultation undertaken in this audit, good overall environmental performance and documentation management are noted.

6.1.1 Statements of Commitment in the EIS

A general review of the commitments per assessment presented in the EIS was undertaken, assisted by Chapter 7 of the EIS. The commitments are being addressed in various management plans prepared and approved for the Constellation Project. These were reviewed in audit discussions and site inspection observations in this audit.

6.2 Adequacy of Plan/Programs

The following Management Plans and relevant documentation were reviewed in this audit, as required by the Development Consent conditions:

- Environmental Management Strategy v1.1 – Condition B1
- Air Quality and Greenhouse Gas Management Plan v1.1 – Condition C2
- Out of Hours Work Protocol – Condition C6
- Water Management Plan v0.2 – Condition C22
- Biodiversity and Land Management Plan v0.2 – Condition C27 and
- Traffic Management Plan v1.2 – Condition C35
- Rehabilitation Strategy v0.1 – Condition C48
- Workforce Accommodation Strategy – Condition C61

These plans were sighted including evidence of review and approval by the Department and evidence for required consultations with agencies. Additionally, Aeris provided the below plans specifically prepared for the Constellation project, or combined with other operations in the region:

- Heritage Management Plan, v0
- Natural Hazards Management Plan v1.1

- Noise and Vibration Management Plan v1.2
- Waste Management Plan v0.1
- Constellation Project Construction Management Plan v1

The below documentation was also supplied to address or regarding various conditions of consent:

- Planning Agreement with Bogan Shire Council
- Road Use Agreement with Bogan Shire Council
- Modification Report submitted to DPHI

As noted throughout the compliance tables in Appendix C of this report, on an audit perspective, the documentation has been prepared as required by relevant conditions of consent.

6.3 Previous Audit Findings

As this is the initial construction phase audit, no previous audit findings apply.

6.4 Technical Specialist Reports

There were no technical specialists involved in this audit.

6.5 Status of Complaints, Notices and Incidents

There were no complaints or notices relevant to this audit period.

An incident had been reported following established procedures as per Condition 3 of Part D of the Development Consent, involving harm to an Aboriginal artefact.

6.6 Audit Findings Summary

Due to the early stage of development, several conditions of consent have not been triggered at the time of this audit. These have been identified as such in the compliance table, Appendix C of this report.

One non-compliance is noted against two conditions (Development Consent, Part A condition 8 and Schedule C condition 6) relating to Out of Hours works, that had been identified and reported promptly as per requirement in condition 1 of Part D of the Development Consent.

Some opportunities for improvement are noted in section 7 of this report.

A summary of compliance status in this audit is given in table below. The number of conditions includes sub-clauses within each approval condition (audit criteria).

Table 3 – Audit findings summary

Consent / Approval	Compliant	Non-compliant	Not Triggered	Total number
SSD- Part A	7	1	9	18
SSD- Part B	8	0	4	12
SSD- Part C	30	1	30	61
SSD- Part D	6	0	3	9

7. RECOMMENDATIONS

The below corrective actions and recommendations are noted in the compliance table in Appendix C.

7.1 Corrective Actions

Corrective Action ID	Non-Compliance ID	Consent Reference	Corrective Action
CA-1	NC-1	A-8 C-6	Ensure adequate explanation of protocol (OOHW) is provided to all employees, operators and contractor staff.

7.2 Recommendations

The below opportunities for improvement are noted.

7.2.1 Opportunities for Improvement

1. SSD Development Consent Part A condition 18 – Construction Management Plan refers to initial construction phase IEA however not subsequent construction phase IEAs as required by the DPHI IAPAR 2026. This could cause omissions or confusion during a subsequent IEA if required. Recommended to update section 10.7.3 of the CMP to address this.
2. Construction Management Plan refers to development consent requirements, however reference to the CMP is not evident in the contractor's induction and pre-start documentation as sighted in this audit. While this is not specifically in non-compliance to any conditions of consent, will assist in ensuring that all employees, contractors and subcontractors are instructed to comply with the conditions of consent.

8. APPENDICES

APPENDIX A - AUDITOR APPROVAL BY DPHI

Department of Planning, Housing and Infrastructure

Reference: SSD-41579871-PA-13

Mr William Olson
Environmental Superintendent
TRITTON RESOURCES PTY LTD
19/05/2026

Sent via the Major Projects Portal only

Subject: Constellation Project - Independent Environmental Auditor May 2026

Dear Mr Olson

I refer to your request of 4 May 2026, seeking the agreement of the Planning Secretary of the Department of Planning, Housing and Infrastructure ("the Department") of the suitability of the auditor's qualifications, experience and independence to undertake an independent audit of the Constellation Project ("the development"), in accordance with Schedule 2, Condition D5 of the State significant development consent SSD 41579871 ("the consent").

Having considered the qualifications and experience of Mr Avanish Panikkar of Enviraud, as nominee of the Planning Secretary, I endorse the appointment of Mr Panikkar, in accordance with Condition D5 of the consent. This approval is conditional on Mr Panikkar being independent of the development and maintaining Exemplar Global certification. The Department reserves the right to request an alternate auditor or audit team for future audits.

Please note, the Lead Auditor must attend the site inspection/s.

Please ensure this correspondence is appended to the Audit Report.

The audit is to be conducted in accordance with the Independent Audit Post Approval Requirements (NSW Planning, 2020 or as updated). A copy of this guideline can be located at <https://www.planning.nsw.gov.au/sites/default/files/2023-02/independent-audit-par-202005.pdf>. Auditor may wish to have regard to AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing.

Audit Report, including the response to any recommendations contained in the audit report and a timetable to implement the recommendations is to be submitted to the Planning Secretary, with the Audit Report.

Failure to meet these requirements will require revision and resubmission of the Audit Report.

Department of Planning, Housing and Infrastructure

Should you have any enquiries in relation to this matter, please contact Georgia Dragicevic, Senior Compliance Officer, on 4247 1852 or by email to Georgia.Dragicevic@planning.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "K O'Reilly", enclosed in a thin black rectangular border.

Katrina O'Reilly
Team Leader - Compliance
Compliance

As nominee of the Planning Secretary

APPENDIX B – AGENCY CONSULTATION



ENVIRAUD

Letter

Stakeholder Consultation

Aeris Resources Constellation Project IEA

21 May 2026

Katrina O'Reilly
Team Leader - Compliance
Department of Planning, Housing and Infrastructure
Via email: katrina.oreilly@planning.nsw.gov.au

AERIS RESOURCES CONSTELLATION PROJECT – Independent Environmental Audit-Stakeholder Consultation

Dear Katrina

Enviraud has been engaged by Aeris Resources Ltd to undertake an Independent Environmental Audit (IEA) of the new greenfield mine - the "Constellation Project" located on Okeh Road, Hermidale NSW 2831, in accordance with the below Development Consent:

- SSD-41579871

Aeris Resources has auditable obligations under the Development Consent. The scope of the IEA is to:

- Assess the environmental performance of the project
- Assess compliance with the requirements in the consent or other (including any assessment, plan or program required under these approvals)
- Review the adequacy of strategies, plans or programs required under the consents, and
- Recommend appropriate measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under the consents, if required.

I have been endorsed by DPHI to lead this audit. I am writing to you to invite comments from DPHI Compliance, regarding these obligations and specifically on the progress of works and on the performance of Tritton Resources Pty Ltd on the Constellation Project. I note the project is in early construction phase.

It would be appreciated if you could provide your comments under the following areas:

- Compliance with requirements
- Progress to meeting requirements
- Details of incidents of non-compliance
- Adequacy of actions taken
- Adequacy of requirements
- Any other areas to focus on during the IEA.

The site visit, and the end of audit period, is planned to be 15 June 2026, weather permitting. Therefore, please send in your responses by 12 June 2026 at the latest. I am available for a phone call or a short teleconference in the week of 9 June 2026 if required – please let me know.

All correspondence in relation to this matter should be directed to the undersigned as per the audit guidelines.

Regards
Dr Avanish Panikkar, CEnvP, Certified Master Auditor
Principal – ENVIRAUD

APPENDIX C – COMPLIANCE TABLES

SSD-4157891 Part A - Administrative Conditions

Condition of Consent	Requirement	Evidence Collected	Independent Audit Finding	Recommendation	Compliance Status	Unique ID Noncompliance
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT						
A1	A1. In addition to meeting the specific performance measures and criteria established under this consent, all reasonable and feasible measures to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from preliminary works, construction, operation, or any other part of the development, including rehabilitation required under this consent.	Site observations and documentation reviewed in this audit	Based on site observations, audit discussions and documentation reviewed, and as per stakeholder consultation comments, in this early days of the project, all reasonable and feasible measures to prevent or minimise any material harm to the environment are being taken.		Compliant	
TERMS OF CONSENT		Site observations and documentation reviewed in this audit				
A2	A2. The development must only be carried out:				Compliant	
	(a) in compliance with the conditions of this consent;		Except for a non-compliance related to Out of Hours work notified as required, conditions of this consent are generally met.			
	(b) in accordance with all written directions of the Planning Secretary;		There were no specific written directions received in this audit period.			
	(c) generally in accordance with the EIS; and		Section 5.4 of the EIS summarises key strategies adopted to avoid, minimise or offset the impacts of the project. Eg the haul road works are within the existing Okeh Road corridor footprint, bi-directional water pipeline between Constellation project mine site and existing Murrawombie mine is being installed within the existing road corridor, consultation with stakeholders is evident etc. Biodiversity offset mechanisms are in place as noted against relevant conditions in this audit. Required documentation such as strategy/plans/protocols are developed. Environmental requirements from the EIS are listed with action plan in the sighted documentation.			
	(d) generally in accordance with the development layout plans in Appendix 2.		Project is progressing, noting the timeframe of this audit, as per the development layout plans in Appendix 2. At the time of this audit, surface works of the haul road and laying of water conveyance pipe along Okeh Road was in progress.			
A3	A3. Consistent with the requirements in this consent, the Planning Secretary may make written directions in relation to:				Compliant	
	(a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; and		Evidence of consultation with the department is noted as letters from DPHI indicating review and written directions issued to Aeris, as included in the sighted management plan/strategy or protocol. Any written directions are addressed in the final version of such document that have been approved subsequently.			
	(b) the implementation of any actions or measures contained in any such document referred to in condition A3(a).		Works are in early stage of development - actions and measures contained in the management plans/strategy and protocol are being implemented as per site observations, site discussions and sighted documentation.			

A4	A4. The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and the EIS. In the event of an inconsistency, ambiguity or conflict between any of the EIS, the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	EIS for Constellation Project by aarc environmental solutions, signed off by a REAP on 27 Jun 2024.	Noted, no ambiguity or inconsistency is noted.	Compliant
LIMITS OF CONSENT				
Mining Operations				
A5	A5. Mining operations may be carried out for 10 years following commencement of mining operations.	Development Consent documentation and high level construction program	This condition is not yet applicable at the time of this audit.	not triggered
Notes:				
• Under this consent, the applicant is required to decommission and rehabilitate the site and carry out other requirements in relation to mining operations. Consequently, this consent will continue to apply in all respects other than to permit the carrying out of mining operations until the rehabilitation of the site and other requirements have been carried out to the required standard.				
• Mining operations and rehabilitation are also regulated under the Mining Act 1992.				
Extraction and transport				
A6	A6. A maximum of 1 million tonnes of ore may be extracted and transported from the site in any calendar year.	Development Consent documentation and high level construction program	This condition is not yet applicable at the time of this audit.	not triggered
A7	A7. Heavy vehicle haulage movements to and from the site must not exceed 82 movements per day, unless otherwise agreed by the Planning Secretary.	Development Consent documentation and high level construction program	This condition is not yet applicable at the time of this audit.	not triggered
Development hours				
A8	A8. The development may only be undertaken during the hours set out in Table 1.			
Table 1: Development hours				
Activity		Permissible hours		
Mine site				
Construction and preliminary works		24 hours per day, seven days a week		
Operation				
Rehabilitation				
Infrastructure corridor				
Construction		• 7 am to 6 pm Monday to Friday • 8 am to 6 pm Saturday • At no time on Sundays or public holidays Unless otherwise agreed by the Planning Secretary in accordance with condition C8		
Operation, including light vehicle movements		24 hours per day, seven days a week		
Operation, including heavy vehicle ore haulage on public roads		Day and evening, unless otherwise agreed by the Planning Secretary		
All development				
Delivery or dispatch of materials as requested by Police or other public authorities		At any time, subject to notification to the Department within 24 hours after commencement of activity		
Emergency work to avoid the loss of lives, property or to prevent environmental harm				
Delivery of oversized plant or structures		At any time		
IDENTIFICATION OF APPROVED DISTURBANCE AREA				
A9	A9. Within three months of commencement of development under this consent, or other timeframe agreed by the Planning Secretary, a survey plan (or spatial files in a format agreed by the Planning Secretary) of the boundaries of the approved disturbance areas must be provided to the Department.	Modification-1 Report for Constellation Project, May 2026	Development commenced 5 May - three month time requirement is not yet triggered. A modification application to the Development Consent is pending approval to update infrastructure layout which may change disturbance footprint.	not triggered

NOTIFICATION OF COMMENCEMENT				
A10	A10. The Department must be notified, in writing, of the date of commencement of each of the following phases of the development:	Letter to Director - Resource Assessments at DPHI, dated 21 April 2026	The letter notification sighted provides written notification with details of commencement of development and construction dates (5 May 2026).	Compliant
	(a) commencement of development under the consent;	Major projects portal communication record also sighted in this audit.	The letter notes that further notifications for subsequent phases will be provided.	
	(b) commencement of construction under the consent;	Letter from DPHI to Aeris dated 19 May 2026 confirms receipt.		
	(c) commencement of mining operations under the consent;		Commencement of operation is a future phase to be advised in due course.	
	(d) commencement of demolition under the consent;		No demolition is planned at this stage.	
	(e) any period of suspension of mining operations (i.e., care and maintenance); and		Operation of the mine is a future phase of the project, as such care and maintenance notification is not due at this stage.	
	(f) cessation of mining operations (i.e., mine closure).		Mine closure is a future phase.	
	The notification must be provided at least two weeks before the commencement of each phase and no more than three months before the commencement of each phase.	Letter to Director - Resource Assessments at DPHI, dated 21 April 2026	The letter submitted to DPHI is dated two weeks prior to commencement dates noted therein.	
A11	A11. If the phases of the development are to be further staged, the Department must be notified in writing at least two weeks before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.	Letter to Director - Resource Assessments at DPHI, dated 21 April 2026	The letter submitted to DPHI notes dates of commencement of development and construction, noting further phases will be notified. No further staging is anticipated.	not triggered
PLANNING AGREEMENT				
A12	A12. Monetary contributions must be made to Council in accordance with:	Audit discussions on 15 Jun 2026.	The cost calculations were done by a qualified third party consultant against the planning agreement requirements. The evidence is commercial in confidence and was sighted at the audit.	Compliant
	(a) Division 7.1 of Part 7 of the EP&A Act; and	Email record dated 2 Jun 2026 with screenshot of evidence of payment made to Bogan Shire Council on 28 May 2026 for the amount of \$193,133.70 incl GST.		
	(b) the general terms of the Planning Agreement summarised in Appendix 6.			
PAYMENT OF REASONABLE COSTS				
A13	A13. The Applicant must pay all reasonable costs incurred by the Department to engage a suitably qualified, experienced, and independent expert(s) to review the adequacy of any environmental management document required under this consent.	Audit discussions	There were no cost payment requested from DPHI to review the adequacy of any environmental management document during this audit period.	not triggered
PROTECTION OF PUBLIC INFRASTRUCTURE				
A14	A14. Unless the Applicant and the applicable authority agree otherwise, the Applicant must:	Audit discussions, site observations, agency consultation.		not triggered
	(a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the development; and		There has not been any infrastructure damaged during this audit period	
	(b) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the development.		No infrastructure required relocating during this audit period.	
DEMOLITION				
A15	A15. All demolition must be carried out in accordance with Australian Standard AS 2601-2001 The Demolition of Structures (Standards Australia, 2001), or its latest version.	Audit discussions, site observations, agency consultation	There has not been any demolition works during this audit period.	not triggered

STRUCTURAL ADEQUACY				
A16	A16. All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA.	Audit discussions, site observations		not triggered
Notes:				
• Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works.				
• Part 8 of the Environmental Planning and Assessment (Development Certification and Fire Safety) Regulation 2021 sets out the requirements for the certification of the development.				
OPERATION OF PLANT AND EQUIPMENT				
A17	A17. All plant and equipment used on site, or to monitor the performance of the development must be:	Site Observations	During the site inspection visit, workers were witnessed as operating various machinery/plant and equipment for trenching for laying of pipe, for welding of poly-pipe etc. Tool box talk evidence was sighted in the contractor's site office. Employee (heavy plant operators) competency verification assessment is undertaken prior to engagement. Equipment maintenance records were sighted as uptodate, kept in the site office.	Compliant
	(a) maintained in a proper and efficient condition; and	maintenance records kept by Neill Contractor sighted (photo)		
	(b) operated in a proper and efficient manner.	Verification of Competency of personnel operating heavy mobile equipment, Neill Earthmoving (eg Scott Twiss, verification dated 15 June 2026).		
COMPLIANCE				
A18	A18. The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	Verification of Competency of personnel operating heavy mobile equipment, Neill Earthmoving (eg Scott Twiss, verification dated 15 June 2026).	Construction management plan (CMP) is the main document provided to the Contracted personnel. Declaration signed by employee indicates understanding of obligations regarding pre-start checks, safe operation, traffic management, communications and emergency response. The CMP refers to the SSD Consent conditions at various sections as relevant. Section 5.3 of CMP includes responsibilities for Aeris and Contractor Teams including ensuring compliance with the conditions of consent. A summary document of CMP Environmental Responsibility matrix was sighted with sector-specific (air quality, hazardous materials, noise etc) requirements and responsibility/ accountability role. It is noted that section 10.7.3 of CMP states IEA is required at within 12 weeks of commencement of construction followed by intervals no greater than 3 years from construction completion. I.e., it refers to initial construction IEA but not any subsequent construction phase IEAs. While the CMP refers to the Development Consent requirements, specific reference to conditions of consent or CMP is not evident within the contractor's induction and pre-start documents.	Compliant
		Site Induction sheets signed by employees, (eg Aaron Leek 3 Jun 2026, Craig Huntly 21 May 2026, Matthew Turner 11 Jun 2026)		
		Site general induction presentation refers to project footprint and other site requirements		
		Okeh Road Site Induction Assessment forms (Neill Earthmoving) completed by employees, (eg Danny Waterhouse)		
		Construction Management Plan 20-C-C-PLA-001 v.1 dated 8 April 2026 (document footer states issue date as 7 April 2025 with next review date as 30 Sept 2025)		
		CMP Responsibility Matrix		

SSD-4157891 Part B - Environmental Management Conditions

Condition of Consent	Requirement	Evidence Collected	Independent Audit Finding	Recommendation	Compliance Status	Unique ID Noncompliance
ENVIRONMENTAL MANAGEMENT STRATEGY						
B1	B1. An environmental management strategy must be prepared for the development. The strategy must:	TRL Environmental Management Strategy TRL-HSET-PLN-0023 rev 1.1, noting approvals from DPHI (28 April 2026) and Council (6 May 2026) covering Constellation Project along with various other mining projects operated by Tritton Resources Limited.	The footer of the document shows published date and next review date as 00/00/0000		Compliant	
	(a) be submitted for approval to the Planning Secretary prior to the commencement of construction;	DPHI letter dated 28 April 2026 noting that the Department is 'satisfied that it generally meets the requirements of the relevant conditions of consent' approving Rev1.1 of the strategy, dated 23 April 2026. DPHI Letter dated 21 April 2026 with review comments/RFI for previous rev of the EMS attached. Council letter dated 6 May 2026 accepting the EMS dated 12 Feb 2026 with no comments.	This clause of this condition is satisfied. Commencement of construction is 5 May 2026 as per other information verified in this audit.			
	(b) describe the environmental management context and outline the scope of the plan, including:					
	(i) the relationship of the plan to other environmental management documents;		Section 2 of the EMS provides EMS Framework while section 5.8 represents strategies and management plans based on environmental aspects.			
	(ii) relevant statutory criteria, and the limits, performance measures, criteria and operational requirements of conditions of this consent, and any other legislative or regulatory licences, guidelines, policies or standards;		Section 3 details and lists relevant statutory obligations, policies and guidelines and legislation across various mining projects operated by Tritton Resources including Constellation Project. An obligations register is maintained in Excel (as live document). It is noted that some of the requirement instruments such as a Mining Lease and EPL are awaited. This is to be included in the EMS once received.			
	(iii) sensitive receivers;		Section 5.8 refers to various management plans regarding specific sensitive receiver management for each environmental aspect.			
	(iv) consideration of the consultation outcomes from the EIS or other environmental management documents required by this consent; and		Consultation outcomes for specific environmental plans and EIS are included in each document.			

(v) detailed plans of the site location and development, sensitive receivers and environmental monitoring locations;		Section 6.1 provides environmental monitoring programs and locations and states that routine environmental monitoring is referred to in specific management plans.	
(c) list the role and responsibility of all key personnel and contractors involved in the environmental management of the development;		Section 5.1 Table 4 provides roles and responsibilities of all personnel	
(d) include an environmental risk assessment of the development and specific risk management controls and mitigations to:		Section 5.2 details the purpose, content and review requirements for the Environmental Risk Register maintained by Tritton Resources Limited, for operations including the Constellation Project.	
(i) comply with statutory requirements, and the limits, performance measures, criteria and operational requirements of conditions of this consent;	TRL Environmental Management Strategy TRL-HSET-PLN-0023 rev 1.1, section 3; Constellation Project Risk Register	Legal requirements are discussed in Section 3 of EMS. Section 3.6 discusses key commitments and processes to undertake risk management as per Tritton Risk Management Framework.	
(ii) manage the predicted impacts and risks identified in the EIS; and	TRL Environmental Management Strategy TRL-HSET-PLN-0023 rev 1.1, section 5 Constellation project EIS (aarc environmental solutions, 27 Jun 2024) Section 2.5.3	The EIS referred to 75 environmental risks with 14 of them being Class III (generally unacceptable). The risk register include currently managed risks - including risk evaluation, risk level etc.	
(iii) manage any other environmental impact or risk that has been identified after the EIS was submitted;		It is noted in section 5.2 that specific risk control measures are included in specific management plans with overall procedure detailed in the EMS. This is applicable after the EIS was finalised.	
<i>Note: Environmental risk assessment cannot be used to identify and assess physical changes to the development or an increase in impacts that are not described and assessed in the EIS. These may require a new planning approval and may need to be referred to the Department.</i>	EMS Section 5.2	Noted. Section 5.2 of the EMS details the Environmental Risk process and it is not intended for physical changes.	
(e) include processes to review the environmental risk assessment annually and determine whether the measures implemented to manage the risks are effective;	TRL Environmental Management Strategy TRL-HSET-PLN-0023 rev 1.1, sections 4.1, 5.2, 7; Constellation Project Risk Register (Excel)	Section 4.1 of EMS refers to review of Environmental Risk Register as part of continual improvement of objectives and targets. Section 5.2 says that the Environmental Risk Register is reviewed on at least an annual basis as per Tritton Resources procedures with additional review triggers listed. Section 7 of EMS refers to Management Review, including that of the Environmental Risk Register.	
(f) include an adaptive management process that would be implemented if the risk assessment review identifies measures that are not effective in managing the identified risk(s);	TRL Environmental Management Strategy TRL-HSET-PLN-0023 rev 1.1, section 7	Section 7 of EMS details the Management Review processes including review and approval of Environmental Risk Register. Continuous Improvement processes are included in section 7.1 of EMS.	

(g) include a clear plan depicting all the monitoring to be carried out under the conditions of this consent;	TRL Environmental Management Strategy TRL-HSET-PLN-0023 rev 1.1, section 6.1	Section 6.1 of the EMS details environmental monitoring processes and programs. An EPL is awaited at the time of this audit.	
(h) describe the training and/or awareness programs that would be carried out for all personnel involved in the development to ensure they understand and can effectively implement the plan; and	TRL Environmental Management Strategy TRL-HSET-PLN-0023 rev 1.1, section 5.3; Site Induction Presentation; Employee induction and competency review forms (Neill Earthmoving) as reviewed against condition A18.	Training and Competence review process is provided in section 5.3. Employee competency assessment review and general site induction processes are also included.	
(i) include procedures to:			
(i) address the findings of any audit undertaken for the development; and	TRL Environmental Management Strategy TRL-HSET-PLN-0023 rev 1.1, section 6.5.3.3	Details of organising, undertaking and reporting independent environmental audits are provided in section 6.5.3.3 for Constellation Project, as per the audit guidelines.	
(ii) respond to any non-compliance and/or incident.	TRL Environmental Management Strategy TRL-HSET-PLN-0023 rev 1.1, section 6.5.3.3 and 7.1	Section 6.5.3.3 provides process to prepare written responses for audit findings and tracking the same, or updating relevant strategy or management plans as required. Section 7.1 of EMS provides process for continuous improvement with opportunities, including, from internal and external audits.	

B2	B2. The development must not commence until the environmental management strategy is approved by the Planning Secretary.	DPHI letter dated 28 April 2026 noting that the Department is 'satisfied that it generally meets the requirements of the relevant conditions of consent' approving Rev1.1 of the strategy, dated 23 April 2026. DPHI Letter dated 21 April 2026 with review comments/RFI attached for previous rev of the EMS. Council letter dated 6 May 2026 accepting the EMS dated 12 Feb 2026 with no comments.	This clause of this condition is satisfied. Commencement of construction is 5 May 2026 as per other information verified in this audit.	Compliant
B3	B3. The environmental management strategy, as approved by the Planning Secretary, must be implemented for the development.	Site observations	Details of EMS are found to be in the process of being implemented at this initial audit, to be further reviewed in subsequent audits.	Compliant
MANAGEMENT PLAN REQUIREMENTS				
B4	B4. Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:			Compliant
	(a) quality control information including document version control details and the management plan author(s);	Required Plans: TRL-HSET-PLN-0024 Air Quality and Greenhouse Gas Management Plan, v1.1 dated 5 May 2026; TRL-HSET-PLN-0048 Biodiversity and Land Management Plan rev0.2 including approval by DPHI, dated 28 April 2026;	It is noted that the footer of the plans provide Published Date: 00/00/0000 and Next Review Date: 00/00/0000. The auditee advised that it will be corrected once the plans are uploaded into the management system. Heritage MP footer provides no Document No. This is not an MP required per this condition.	
	(b) a summary of the environmental management context, including;			
	(i) a brief project description, including visual representation of any project staging; and	TRL-HSET-PLN-0032 Water Management Plan rev0.2 including approval by DPHI, dated 1 May 2026;	Section 3 of the management plan provides site overview, project information etc.	
	(ii) the purpose and scope of the management plan;	TRL-HSET-PLN-0043 Traffic Management Strategy, 12 Feb 2026;	Section 1 of the management plan provides purpose, relationship to overall EMS, scope and objectives of the plan.	
	(c) the relationship of the management plan with other environmental management documents or systems;	Additional Plans: Heritage Management Plan, prepared by OzArk Environment & Heritage, rev0, dated 26 Feb 2026;	EIS commitments are noted in Appendices of the management plans (eg Appendix A in Water Management Plan, Appendix B in Biodiversity and Land Management Plan), section 1.2 refers to relationship with other environmental management framework components.	
	(d) a site location plan identifying the project boundary, disturbance area and related environmental aspects;	TRL-HSET-PLN-0028 Natural Hazards Management Plan v1.1 dated 18 May 2026; Waste Management Plan v0.1 dated 8 Jan 2026;	Site layout and footprint is included in Figures 1 and 3 of the management plans. Environmental aspects are depicted in other figures as relevant in each management plan (eg Figure 2 in Water Management Plan)	
	(e) a brief summary of background or baseline data, where relevant;	TRL-HSET-PLN-0029 Noise and Vibration Management Plan v1.2 dated 1 May 2026	Baseline information is included in section 3 of the management plan, eg section 3.3 in Water Management Plan and 3.2 in Biodiversity and Land Management Plan.	
	<i>Note: If detailed baseline data must be included in a management plan, it must be appended and summarised in the main text of the management plan.</i>			

(f) a summary of consultation undertaken during the preparation of the management plan that includes when and how consultation was undertaken and the outcomes of the consultation;
(g) details of the statutory requirements, limits or performance measures and any specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;
(h) a description of the measures to be implemented to comply with statutory requirements, and the limits, performance measures, criteria and operational requirements of conditions of this consent;
(i) a program to monitor and report on the:
(i) impacts and environmental performance of the development; and
(ii) effectiveness of the management measures implemented for the development;

Evidence of consultation undertaken with stakeholders relevant to each management plan sighted in this audit. Summary/process is included in the management plans as approved.
Section 2 of each management plan provides discussion on relevant statutory and other requirements, consent conditions and commitments, licenses, permits etc. including applicable performance measures and limits. Section 4 of the management plans provide roles and responsibilities relevant to the plan.
Section 7 of each management plan provides details of management measures to comply with relevant requirements, performance measures etc.
Sections 7.5, 8, 9 and 10 of each management plan details the monitoring program and environmental inspections and tracking of actions and activities with regard to environmental management.

	(j) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible; and		Section 6 of the Management Plans details, as relevant to each plan, the risk assessment and management measures specifically. Sections 11-13 (exact sub section numbers slightly varying across different management plans) provides details of environmental compliance tracking, incident and emergency planning, preparedness and response processes including reference to PIRMP.	
	(k) a protocol for periodic review of the plan.		Process for management review and improvement of the plan is included in the management plan (eg Section 15 in AQGGMP and Biodiversity and land management plan, section 16 in Water MP / Noise and Vibration MP etc). Reference to EMS section 7 on Management Review and Continuous Improvement is included in the management plans.	
	<i>Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.</i>		No waiver noted	
	EVIDENCE OF CONSULTATION			
B5	B5. Prior to submitting any environmental management document required by this consent to the Planning Secretary, any consultation with an identified party must be completed. Documentary evidence and a tabulated summary of the consultation must be submitted with the subject document via the Major Projects Website, including:	Constellation Water Management Plan; Consultation Outcomes V0; NSW EPA letter to Aeris dated 10 March 2026 (offering no comments) regarding Water MP; CPHR (DCCEEW) consultation letter on Biodiversity and Land Management Plan dated 18 Feb 2026; Section 5, Biodiversity and Land Management Plan v0.2; Post Approval major projects portal submission forms; Traffic Management Strategy v1.2	Evidence of consultation with DPHI and Council, including the major projects portal upload form sighted in this audit for the three management plans referred to above (for B4). Tabulated consultation outcomes include date of consultation, feedback received, amendments made etc are included. Consultation evidence is included within the approved plan document as section 5. Reference to the Tritton Community Consultative Committee (CCC) is included.	Compliant
	(a) dates of the consultation with the identified party, copies of the identified party's response, and a summary of the issues raised;			
	(b) the outcome of that consultation, including how the issues have been addressed in the subject document; and			
	(c) and details of any disagreement remaining between the party consulted and the Applicant, and how the Applicant has addressed the matters not resolved.	Stakeholder consultation in this audit; audit discussions.	This sub clause is not triggered. There were no disagreements noted.	
	APPLICABILITY OF GUIDELINES			
B6	B6. References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.	Audit discussions Various documents sighted in this audit as referenced to other conditions in this audit checklist.	Noted. Latest available guidelines, standards and protocols are referenced in the environmental documentation.	Compliant
B7	B7. However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	Audit discussions, stakeholder consultation in this audit.	No directions have been obtained during this audit period with regard to specific guidelines, protocol, standard or policy.	Not triggered

STAGING, COMBINING AND UPDATING ENVIRONMENTAL MANAGEMENT DOCUMENTS				
B8	B8. With the approval of the Planning Secretary, any environmental management document required by this consent may be staged, combined or updated.	Aeris letter dated 13 Jan 2026 request for approval to combine environmental management plans across the Constellation project, Avoca Tank project, North East Copper Mine and Murrawombie Copper Mine with the DA41/98 Tritton Copper Mine documentation. Letter from DPHI to Aeris, dated 20 March 2026, indicating approval to combine management plans for Tritton Copper Mine and Constellation project, noting clarifications discussion and conditions.	The request for approval to combine documentation referred to EMS, Air Quality and Greenhouse Gas Management Plan, Noise and Vibration Management Plan, Waste Management Plan (with Disposal Management Plan, Acid Mine Drainage Sstrategy, Tailings Extraction Management Plan), Traffic Management Strategy, Biodiversity and Land Management Plan (with Contingency Strategy, Landscape Plan, Management and Monitoring Plan excludign for this project) and Water Management Plan (excl this project)	Compliant
B9	B9. Staging requests made to the Planning Secretary must include a clear description of the trigger for staging, the specific stage and scope of the development to be staged and any future stages planned.	Audit discussions, consultation with DPHI in this audit.	There were no specific staging requests made to DPHI during this audit period.	Not triggered
B10	B10. If the Planning Secretary agrees, an environmental management document may be staged or updated without: (a) consultation being undertaken with all parties required to be consulted in the relevant condition in this consent; and/or (b) addressing particular requirements of the relevant condition of this consent if those requirements are not applicable to the particular stage.	Refer to B8 above	There was no staging requirements that required required updating of environmental management document at the time of this audit.	Not triggered
B11	B11. Any request to combine environmental management documents must demonstrate a clear relationship between the nominated documents.	Aeris letter dated 13 Jan 2026 request for approval to combine environmental management plans across the Constellation project, Avoca Tank project, North East Copper Mine and Murrawombie Copper Mine with the DA41/98 Tritton Copper Mine documentation. Letter from DPHI to Aeris, dated 20 March 2026, indicating approval to combine management plans for Tritton Copper Mine and Constellation project, noting clarifications discussion and conditions.	The request for approval to combine documentation referred to EMS, Air Quality and Greenhouse Gas Management Plan, Noise and Vibration Management Plan, Waste Management Plan (with Disposal Management Plan, Acid Mine Drainage Sstrategy, Tailings Extraction Management Plan), Traffic Management Strategy, Biodiversity and Land Management Plan (with Contingency Strategy, Landscape Plan, Management and Monitoring Plan excludign for this project) and Water Management Plan (excl this project)	Compliant

REVISION OF ENVIRONMENTAL MANAGEMENT DOCUMENTS				
B12	B12. Within three months of:			Not triggered
	(a) the submission of an incident report under conditions D3;	EMS section 5.8.1.2	Incident/NC reports were submitted as per condition D3 but no revision of documentation was warranted. The three month timeline has not been triggered during this audit period.	
	(b) the submission of an Independent Environmental Audit under condition D5;	Audit discussions	This audit is the initial IEA and is currently underway, the three month timeline has not been triggered.	
	(c) the approval of any modification of the conditions of this consent; and	Audit discussions, Development Consent	Conditions of consent has not been modified during this audit period.	
	(d) notification of a change in the development phase required under condition A11;		Change of development phase has not occurred during this audit period.	
	the Applicant must review and, if necessary, revise the strategies, plans and programs required under this approval to the satisfaction of the Planning Secretary. Where this review leads to revisions in any such document, the revised document must be submitted to the Planning Secretary for approval within four weeks of the review.			
	<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>			

SSD-4157891 Part C - Specific Environmental Conditions

Condition of Consent	Requirement	Evidence Collected	Independent Audit Finding	Recommendation	Compliance Status	Unique ID Noncompliance
AIR QUALITY AND GREENHOUSE GAS						
Air Quality Operating Conditions						
C1	C1. All reasonable and feasible mitigation and management measures must be implemented to minimise:	TRL-HSET-PLN-0024 Air Quality and Greenhouse Gas Management Plan Rev 1.1 dated 5 May 2026	The relevant mitigation and management measures to be implemented as described in the AQGGMP.		Compliant	
(a)	(a) odour, fume and particulate matter emissions from the development;		Minimal dust plumes observed from traffic on the road corridor, mix of construction vehicles and local traffic. A water cart was in operation, by Neill Contractors. No odour was experienced, no cause for odour or fumes were noted or expected in the works along haul road at this time.			
(b)	(b) any visible off-site air pollution generated by the development;		No off-site air pollution is anticipated or observed as per scope of works at the time of the audit.			
(c)	(c) the extent of potential dust generating surfaces exposed on the site through implementation of progressive rehabilitation, including use of interim stabilisation and temporary vegetation strategies;		Construction works have only commenced recently and progressive rehabilitation is not expected to be possible at the time of this audit. A water cart truck was sighted to be operational to reduce dust emissions from within project footprint (road corridor). It is understood that construction works at the mine site had not started at the time of this audit - the site could not be visited due to access restrictions. This is to be inspected and verified at next construction audit.			

(d)	(d) the air quality impacts of the development during adverse meteorological conditions; and	AQGGMP 7.2.11 provides Adverse Weather Conditions TARP. Natural Hazards Management Plan section 7 includes management measures for severe weather (including those that can cause air quality impact such as damaging winds). The existing dirt road is to be surfaced with asphalt as part of this project, which is expected to ameliorate any adverse weather impacts in the future.	
(e)	(e) the greenhouse gas emissions from the development.	Greenhouse gas emissions are expected from use of road plant, with mitigation and management measures expected from proper use and maintenance of equipment. Section 7.3.2 of the AQGGMP provides management measures relating to emissions management and efficiency regarding mobile diesel powered equipment.	
Air Quality and Greenhouse Gas Management Plan			
C2	C2. An air quality and greenhouse gas management plan must be prepared for the development. This plan must:	AQGGMP as approved was sighted. The plan covers Tritton Mine, Murrawombie Mine, North East Development, Avoca Tank and Constellation Project.	Compliant
(a)	(a) describe the measures to be implemented to ensure compliance with the operating conditions of this consent;	Conditions of consent are included in section 2.2 of the AQGGMP. Management measures are described in section 7 of the plan.	
(b)	(b) describe measures to demonstrate that best practice management is being employed to minimise the development's air quality impacts including the development's Scope 1 and 2 greenhouse gas emissions; and	Section 7.3 of the AQGGMP refers to greenhouse gas emissions management measures as per legislative requirements. Section 7.4 provides Best Practice Management Review process and outcomes regarding Scope 1 and 2 emissions. Section 7.5 provides management and mitigation measures.	
(c)	(c) include an air quality monitoring program, undertaken in accordance with the Approved Methods for Sampling and Analysis of Air Pollutants in New South Wales (DEC, 2007), that uses monitors at representative locations upwind and downwind of operations to measure and to evaluate the performance of the development against the impact assessment criteria in the "Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales" and to guide day to day planning of mining operations.	Section 8 of the AQGGMP provides air quality monitoring program including details of the meteorological stations and generally on the monitoring activities and relevant standards/methods.	

	<i>Note: In accordance with its Climate Change Action Plan 2023-26, the NSW EPA is preparing guidance for the preparation and implementation of various climate change related guidelines (including but not limited to Climate Change Mitigation and Adaptation Plans or similar). If such a plan is required to be prepared and implemented under an EPL for the development then this could be used to satisfy the requirements of condition C2 in relation to greenhouse gas emissions.</i>		Once the EPL4501 has been amended for Constellation Project and issued, the requirement for a Climate Change Mitigation and Adaptation Plan is to be considered. EPL was not yet issued at the time of this audit.	
C3	C3. Development under this consent must not commence until the air quality and greenhouse gas management plan is approved by the Planning Secretary.	Letter from DPHI dated 1 May 2026 noting review and satisfaction that the plan generally meets the requirements of conditions of consent, approving the plan Rev1.1.	Plan section 5 includes a statement that the Project development will not commence until the AQGGMP is approved. Evidence of review by DPHI and updates to the plan are noted within the AQGGMP as sighted. Approval of the current version of the plan is noted as letter from DPHI, prior to commencement of development date on 5 May 2026.	Compliant
C4	C4. The air quality management plan must be implemented for the development.	Site observations	Plan section 5 includes a statement that TRL will implement AQGGMP as approved. This is in progress as per audit day observations.	Compliant

NOISE					
Construction Noise					
C5	C5. All reasonable and feasible noise mitigation measures must be implemented to achieve the noise management levels detailed in the Interim Construction Noise Guideline (DECC, 2009). Any activities that could exceed the noise management levels must be identified and managed in accordance with the environmental management strategy required under condition B1.	TRL-HSET-PLN-0029 Noise and Vibration management plan v1.2 dated 1 May 2026 TRL-HSET-PLN-0023 Environmental Management Strategy	At the time of audit, no specific noise mitigation measures were implemented or required. Noise and Vibration Management Plan covers Tritton Mine, Murrawombie Mine, North East Development, Avoca Tank and Constellation Project - section 7.2.2.1 of NVMP gives details of traffic noise management measures which will be implemented once the haul road construction is complete (ie, traffic related to construction of mine). Noise reduction measures to be implemented during the road construction phase is listed.		Compliant
C6	C6. An out-of-hours-work protocol must be submitted to the Planning Secretary for approval prior to the commencement of any out-of-hours construction work. The protocol must:	TRL-HSET-PLN-0050 Out of Hours Work protocol internal draft sighted, being prepared as per this condition requirements.	OOHW protocol has been drafted, under internal review, to be submitted for approval, as at the time of this audit. The Protocol addresses the requirements in sub conditions. One incident of OOHW happened due to a misinterpretation by a sub contractor, this was duly notified to DPHI as a non compliance (see A8). This is noted in this audit. The sub section for Construction within 7.2.2.1 of the Noise and Vibration Management Plan plan states that an OOHW protocol has been developed and approved by the Secretary, this has not yet occurred at the time of this audit.	Ensure adequate explanation of protocol is provided to all employees, operators and contractor staff _____ _____ _____ _____ _____	Non-Compliant NC-1 _____ _____ _____ _____ _____
(a)	(a) describe the construction activities proposed to be undertaken outside the hours defined in condition A8;				
(b)	(b) be consistent with the requirements of the Interim Construction Noise Guideline (DECC, 2009);				
(c)	(c) justify why the construction needs to be undertaken as out-of-hours construction;				
(d)	(d) identify low, medium and high-risk out-of-hours work, proposed mitigation and management measures; and				
(e)	(e) include written notification arrangements for affected residences for approved out-of-hours work.				

Operational Noise limits

C7	C7. Other than the exceptions identified in conditions C6 and C11, noise generated by mining operations must not exceed the noise limits in Table 2.	audit discussions	Operational phase of works has not yet commenced	Not triggered														
Table 2: Noise limits dB(A) <table> <tr> <th rowspan="2">Location</th><th>Day</th><th>Evening</th><th colspan="2">Night</th></tr> <tr> <th>L_{Aeq} (15 min) dB(A)</th><th>L_{Aeq} (15 min) dB(A)</th><th>L_{Aeq} (15 min) dB(A)</th><th>L_{Af} Max dB(A)</th></tr> <tr> <td>Any privately owned residence</td><td>40</td><td>35</td><td>35</td><td>52</td></tr> </table>					Location	Day	Evening	Night		L _{Aeq} (15 min) dB(A)	L _{Aeq} (15 min) dB(A)	L _{Aeq} (15 min) dB(A)	L _{Af} Max dB(A)	Any privately owned residence	40	35	35	52
Location	Day	Evening	Night															
	L _{Aeq} (15 min) dB(A)	L _{Aeq} (15 min) dB(A)	L _{Aeq} (15 min) dB(A)	L _{Af} Max dB(A)														
Any privately owned residence	40	35	35	52														
C8	C8. The noise limits in condition C7 do not apply if the applicant has an agreement with the owner/s of the relevant residence to exceed the noise limits and the applicant has provided evidence of this agreement to the satisfaction of the Planning Secretary.	audit discussions	No noise related agreements in place at this stage.	Not triggered														
C9	C9. Should any noise complaints be received, noise generated by the development must be investigated and noise monitoring undertaken and measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Noise Policy for Industry (EPA, 2017).	audit discussions	Operational phase of works has not yet commenced, no noise complaints have been received so far.	Not triggered														
C10	C10. Noise generated by the development must be monitored and measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Noise Policy for Industry (EPA, 2017). Standard meteorological conditions and noise enhancing meteorological conditions as defined in Part D of the NSW Noise Policy for Industry (EPA, 2017) and determined by monitoring at the meteorological station required under condition C12 apply to the noise limits in Table 2.	audit discussions	Operational phase of works has not yet commenced	Not triggered														
C11	C11. For very noise-enhancing meteorological conditions as defined in the NSW Noise Policy for Industry, the applicable noise limits are as defined in Table 2 plus 5 dB(A).	audit discussions	Operational phase of works has not yet commenced	Not triggered														

METEOROLOGICAL MONITORING																							
C12	C12. A meteorological station must be operating in the vicinity of the site for the life of the development. The meteorological station must:	Envirodata weather station specialists' email dated 4 Feb 2026 noting quotation for the 10m mast weather station and the inspection schedule required.	A purchase order has been raised for a weather station, access to the mine site is by 1 July, installation of the weather station will occur following that.	Not triggered																			
(a)	(a) comply with the requirements in the Approved Methods for Sampling and Analysis of Air Pollutants in New South Wales (EPA, 2022); and																						
(b)	(b) be capable of measuring meteorological conditions in accordance with the NSW Noise Policy for Industry (EPA, 2017),	Aeris purchase order 20273675 dated 19 May 2026 for the above quotation.																					
	unless a suitable alternative is approved by the Planning Secretary following consultation with the EPA.	audit discussions	No consultation with EPA has occurred for alternatives to meteorological station.																				
BLASTING																							
Blasting Limits																							
C13	C13. Blasting on the site must not cause exceedances of the limits in Table 3 at any residence on privately-owned land.	audit discussions	Operational phase of works has not yet commenced	Not triggered																			
	<table><tr><td colspan="4">Table 3: Blasting limits</td></tr><tr><th>Location</th><th>Airblast overpressure (dB(Lin Peak))</th><th>Ground vibration (mm/s)</th><th>Allowable exceedance</th></tr><tr><td rowspan="2">Residence on privately-owned land*</td><td>120</td><td>10</td><td>0%</td></tr><tr><td>115</td><td>5</td><td>5% of the total number of blasts over a calendar year</td></tr><tr><td>All other public infrastructure</td><td>-</td><td>50 (or a limit determined by the structural design methodology in AS2187, or other alternative limit, to the satisfaction of the Planning Secretary)</td><td>0%</td></tr></table> *Or other sensitive receiver location (e.g. a school or hospital)	Table 3: Blasting limits				Location	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance	Residence on privately-owned land*	120	10	0%	115	5	5% of the total number of blasts over a calendar year	All other public infrastructure	-	50 (or a limit determined by the structural design methodology in AS2187, or other alternative limit, to the satisfaction of the Planning Secretary)	0%	audit discussions	Operational phase of works has not yet commenced	
Table 3: Blasting limits																							
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All other public infrastructure	-	50 (or a limit determined by the structural design methodology in AS2187, or other alternative limit, to the satisfaction of the Planning Secretary)	0%																				
C14	C14. The blasting limits in Table 3 do not apply if the applicant has an agreement with the owner/s of the relevant residence to exceed the blasting limits, and the applicant has advised the Department in writing of the terms of this agreement.	audit discussions	Operational phase of works has not yet commenced	Not triggered																			
Blasting Hours																							
C15	C15. Blasting for open cut mining may only be carried out between 9 am and 5 pm (Monday to Saturday inclusive). No blasting is allowed on Sundays, public holidays or any other time without the prior written approval of the Planning Secretary.	TRL-HSET-PLN-0024 Noise and Vibration Management Plan v1.2; audit discussions	Blast protocol is provided in section 7.3 of the Noise and Vibration Management Plan. Operational phase of works has not yet commenced.	Not triggered																			
C16	C16. Blasting for underground mining may be undertaken at any time, subject to compliance with the conditions of this consent.	audit discussions	Operational phase of works has not yet commenced	Not triggered																			

Blast Operating Conditions				
C17	C17. All reasonable and feasible steps must be taken to:	audit discussions	Operational phase of works has not yet commenced	Not triggered
(a)	(a) ensure the safety of people and livestock from blasting impacts of the development;			
(b)	(b) protect public and private infrastructure and property in the vicinity of the site from blasting damage associated with the development;			
(c)	(c) minimise blast-related dust and fume emissions;			
(d)	(d) minimise the frequency and duration of any public road closures for blasting and use all reasonable efforts to avoid road closures during peak traffic periods;			
(e)	(e) enable the public to get up-to-date information on the proposed blasting schedule on site; and			
(f)	(f) carry out regular monitoring to determine whether the development is complying with the relevant conditions of this consent.			
WATER				
Water Supply				
C18	C18. The applicant must ensure that it has sufficient water for all stages of the development and, if necessary, adjust the scale of the development to match its available water supply.	Audit discussions Site audit observations (photo)	A pipeline is being constructed to transport water from Murrwombie to Constellation project site along the proposed haul route (a similar pipeline was previously constructed to access water from Tritton mine to Murrwombie which ensures water availability for the new site) for 300ML for the construction phase as general security water availability in addition to the 931ML approved for overall Tritton copper operations.	Compliant
C19	C19. Water extracted from the site each year (direct and indirect), including water taken under each water licence, must be reported in the annual review.	TRL-HSET-PLN-0047 Water Management Plan v0.2 sections 7 and 11; Request for Miscellaneous Work Number dated 20 Feb 2026 for variation of WAL31041 to include Constellation; Work Number 40MW416861 issued by DCCEEW Water Group in email dated 31 Mar 2026	As the Annual Review is due in September and having construction started only one month prior to this audit, this condition is not yet triggered. Water Management Plan includes performance measures. Application for a Water Access Licence sighted.	Not triggered
	<i>Note: Under the Water Act 1912 and/or the Water Management Act 2000, the applicant is required to obtain all necessary water licences for the development, including during rehabilitation and post mine closure.</i>			

Water Discharges																						
C20	C20. All surface discharges from the site must comply with:			Not triggered																		
(a)	(a) discharge limits (both volume and quality) set for the development in any EPL; and	Water management plan Audit discussions NSW EPA letter to Aeris dated 12 June 2026	Commencing a variation application with EPA for two emergency discharge points, the site design is for zero discharge. There has been no discharge during the audit period. The EPL is yet to be issued.																			
(b)	(b) all relevant provisions of the POEO Act.		EPL4501 is applicable however the EPL variation has not been issued to Aeris at the time of audit by EPA. A letter advising that this EPL will cover Constellation project was received on 12 June 2026.																			
Water Management Performance Measures																						
C21	C21. The development must comply with the performance measures in Table 4.	Water management plan Audit discussions Site observations Neill Earthmoving site inspection checklist eg dated 4 Jun 2026	Erosion and Sediment Control devices are being installed within trenches for water pipeline. The road surface was observed to be slightly lower than land on either side, or at same level during early construction phase. Existing stormwater channels were sighted at various places, as constructed by local authorities (as advised by Aeris). The existing dirt road is to be surfaced with asphalt as part of this project, which is expected to ameliorate any adverse weather impacts in the future. Most of the measures within Table 4 are not yet triggered as works are still in early construction phase.	Not triggered																		
Table 4: Water management performance measures																						
<table><tr><th>Feature</th><th>Performance measure</th></tr><tr><td>Water management – General</td><td> • Maintain separation between clean, dirty (i.e. sediment-laden) and mine water management systems • Minimise the use of clean and potable water on the site • Maximise water recycling, reuse and sharing opportunities • Minimise the use of make-up water from external sources • Design, install, operate and maintain water management systems in a proper and efficient manner • Minimise risks to the receiving environment and downstream water users </td></tr><tr><td>Aquifers</td><td> • Negligible impacts to alluvial and fractured rock aquifers caused by the development beyond those predicted in the EIS, including: – negligible change in groundwater levels beyond those predicted; – negligible change in water quality beyond those predicted; – negligible impact to other groundwater users; and – no exceedance of the minimal impact considerations in the NSW Aquifer Interference Policy </td></tr><tr><td>Surface water resources</td><td> • Negligible impacts to surface water resources caused by the development beyond those predicted in the EIS • Maximise, as far as reasonable and feasible, the diversion of all clean water around disturbed areas </td></tr><tr><td>Waste Rock Emplacement Areas</td><td> • Minimise, as far as reasonable and feasible, the potential for acid mine drainage </td></tr><tr><td>Flood mitigation</td><td> • Negligible change to off-site flood regime, including flows, levels, storage capacity or velocities </td></tr><tr><td>Erosion and sediment control works</td><td> • Designed, installed and maintained in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction</i> including <i>Volume 1: Blue Book (Landcom, 2004)</i> and <i>Volume 2E: Mines and Quarries (DECC, 2008)</i> </td></tr><tr><td>Any works within waterfront land</td><td> • Undertaken generally in accordance with the <i>Guidelines for Controlled Activities on Waterfront Land (DCCEEW 2025)</i> </td></tr><tr><td>Chemical and hydrocarbon storage</td><td> • Chemical and hydrocarbon products to be stored in bunded areas in accordance with the relevant Australian Standard </td></tr></table>					Feature	Performance measure	Water management – General	• Maintain separation between clean, dirty (i.e. sediment-laden) and mine water management systems • Minimise the use of clean and potable water on the site • Maximise water recycling, reuse and sharing opportunities • Minimise the use of make-up water from external sources • Design, install, operate and maintain water management systems in a proper and efficient manner • Minimise risks to the receiving environment and downstream water users	Aquifers	• Negligible impacts to alluvial and fractured rock aquifers caused by the development beyond those predicted in the EIS, including: – negligible change in groundwater levels beyond those predicted; – negligible change in water quality beyond those predicted; – negligible impact to other groundwater users; and – no exceedance of the minimal impact considerations in the NSW Aquifer Interference Policy	Surface water resources	• Negligible impacts to surface water resources caused by the development beyond those predicted in the EIS • Maximise, as far as reasonable and feasible, the diversion of all clean water around disturbed areas	Waste Rock Emplacement Areas	• Minimise, as far as reasonable and feasible, the potential for acid mine drainage	Flood mitigation	• Negligible change to off-site flood regime, including flows, levels, storage capacity or velocities	Erosion and sediment control works	• Designed, installed and maintained in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction</i> including <i>Volume 1: Blue Book (Landcom, 2004)</i> and <i>Volume 2E: Mines and Quarries (DECC, 2008)</i>	Any works within waterfront land	• Undertaken generally in accordance with the <i>Guidelines for Controlled Activities on Waterfront Land (DCCEEW 2025)</i>	Chemical and hydrocarbon storage	• Chemical and hydrocarbon products to be stored in bunded areas in accordance with the relevant Australian Standard
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Chemical and hydrocarbon storage	• Chemical and hydrocarbon products to be stored in bunded areas in accordance with the relevant Australian Standard																					

Water Management Plan				
C22	C22. A water management plan must be prepared for the development to the satisfaction of the Planning Secretary. This plan must:	TRL-HSET-PLN-0047 Water Management Plan v0.2	Water Management Plan has been approved by DPHI.	Compliant
(a)	(a) be prepared:			
(i)	(i) by a suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary;	DPHI letter dated 13 Jan 2026 endorsing Chris Bonomini to provide technical oversight, review and endorsement of WMP. DPHI letter dated 1 May 2026 approving the Water Management Plan rev 0.2 and noting consultation with EPA and DCCEEW Water, the plan is to be publicly available on project website.	Section 1.3.1 of WMP states that the plan has been prepared by Jeff Burton and reviewed by Chris Bonomini who have been endorsed by DPHI. Evidence letter sighted indicates Chris Bonomini, who provided technical oversight, was approved by DPHI.	
(ii)	(ii) in consultation with Water Group and the EPA; and		Consultation undertaken in preparing the WMP is detailed in Section 5 of the plan. Evidence as correspondence with EPA and DCCEEW Water sighted.	
(iii)	(iii) in accordance with the requirements of condition B4;	EPA Letter to Aeris dated 10 March 2026 in response to consultation correspondence, stating EPA has no comments on WMP.	The WMP has been reviewed against condition B4 in this audit as compliant.	
(b)	(b) consider the Guidelines for Groundwater Documentation for SSD/SSI Projects. Technical guideline (DPE, 2022);	DCCEEW Water letter to Aeris dated 12 March 2026 with review comments on WMP and detailed recommendations.	This Guideline (Part C) is referenced in section 2.3 of the WMP and included in section 19 References. WMP contains general prescribed content as per the Guideline.	
(c)	(c) describe the measures to be implemented to ensure that the development complies with the water management performance measures (see Table 4);	Email from Aeris to DPHI on 1 May 2026 submitting WMP review table of comments in response to DPHI RFI. Major Projects portal post approval submission forms submitting WMP and related documentation.	Section 7 of the WMP details management measures to be implemented for the project to address requirements in Table 4, condition 21 above. Section 8 of WMP provides details of monitoring program to be implemented. Sections 9 provides processes for Environmental Inspections and Section 10 details performance measure adaptive management framework including TARP to respond to exceedances as per the features in condition 21 Table 4.	

(d)	(d) include a:
(i)	(i) site water balance that includes details of: • predicted annual inflows and outflows from the site; • sources and security of water supply for the life of the development (including authorised entitlements and licences); • water storage capacity; • water use and management on the site; • licensed discharge points and limits; and • reporting procedures, including the annual preparation of an updated site water balance;
(ii)	(ii) surface water management plan that includes: • detailed baseline data on surface water flows and quality of watercourses and/or water bodies potentially impacted by the development; • details of the water licensing requirements for all water storages (i.e. exempt, harvestable rights and licenced); • detailed plans, design objectives and performance criteria for water management infrastructure; • surface water performance criteria, including trigger levels for identifying and investigating any potentially adverse impacts (or trends) associated with the development, for: – water supply for other water users; – downstream surface water flows, water quality and flooding impacts; and – lake, stream and riparian vegetation health; • a program to monitor and evaluate compliance with the relevant performance measures listed in Table 4 and the performance criteria in this plan; • reporting procedures for the results of the monitoring program, including notifying other water users of any exceedance of relevant performance measures or performance criteria; and • a trigger action response plan to respond to any exceedances of the relevant performance measures or performance criteria, and repair, mitigate and/or offset any adverse surface water impacts of the development; and
(iii)	(iii) groundwater management plan that includes: • detailed baseline data of groundwater levels, yield and quality for groundwater resources and groundwater dependent ecosystems potentially impacted by the development, including groundwater supply for other water users; • a detailed description of the groundwater management system, including measures to minimise acid mine drainage from potentially acid forming material;

Section 7.1 of WMP has site water balance modelling results including the required details and water transfers conceptual model.		
Section 7.2.2 provides Site Water Management Plan including various aspects for water availability, storage, treatment and disposal.		
Section 7.2 provides Surface Water Management Plan including performance measures (7.2.1), surface water management infrastructure (7.2.3), baseline surface water quality (7.2.4) with more details to address this condition in management measures (7.5), Surface Water Monitoring including performance measures and TARP (8.1), data assessment and reporting (8.2.4 and 8.3). Section 10 details performance measure adaptive management framework with TARP to respond to exceedances and impact reporting.		
Section 7.3 of WMP details groundwater management plan with discussion on baseline data (7.3.3), groundwater monitoring system (7.3.4), potential groundwater impact management (7.3.2 and 7.3.9), groundwater modelling (7.3.7), groundwater monitoring including		

C23	C23. Development under this consent must not commence until the water management plan is approved by the Planning Secretary.	Approval letter, DPHI 1 May 2026 Site development notification, 5 May 2026	WMP approved on 1 May 2026, site construction activities commenced on 5 May 2026.	Compliant										
C24	C24. The water management plan as approved by the Planning Secretary must be implemented for the development.	Audit discussions Groundwater monitoring results Site observations	Project is in early construction phase at the time of the audit. There is evidence sighted of early implementation of monitoring programs as noted in the WMP.	Compliant										
BIODIVERSITY														
Biodiversity credits														
C25	C25. The biodiversity credits specified in Tables 5 and 6 must be retired in accordance with the biodiversity offsets scheme of the BC Act before any impacts on the relevant biodiversity values.	Application for biodiversity credit transfer sighted; Major Projects portal upload form for biodiversity offset report submission; Email receipt and invoice from DCCEEW sighted;	Documentation confirming the biodiversity credits retirement sighted	Compliant										
<table><tr><td colspan="2">Table 5: Biodiversity credit requirements – ecosystem credits</td></tr><tr><th>Biodiversity value</th><th>Ecosystem credits required</th></tr><tr><td>PCT 103 Poplar Box - Gum Coolabah - White Cypress Pine shrubby woodland mainly in the Cobar Peneplain Bioregion</td><td>273</td></tr><tr><td>PCT 105 Poplar Box grassy woodland on flats mainly in the Cobar Peneplain Bioregion and Murray Darling Depression Bioregion</td><td>2</td></tr><tr><td>Total</td><td>275</td></tr></table>		Table 5: Biodiversity credit requirements – ecosystem credits		Biodiversity value	Ecosystem credits required	PCT 103 Poplar Box - Gum Coolabah - White Cypress Pine shrubby woodland mainly in the Cobar Peneplain Bioregion	273	PCT 105 Poplar Box grassy woodland on flats mainly in the Cobar Peneplain Bioregion and Murray Darling Depression Bioregion	2	Total	275	Biodiversity Credit Transfer Report 23 Feb 2026 ref TRAN605 and 3 Mar 2026 Ref TRAN606 (approved); TRL-HSET-PLN-0048 Biodiversity and Land Management Plan rev0.2	BC transfer is included in the Biodiversity and Land management plan section 7.1.1	
Table 5: Biodiversity credit requirements – ecosystem credits														
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C26	C26. Prior to any impacts on the relevant biodiversity values, evidence that the biodiversity offset credits have been retired must be provided to the department.	Major Projects portal upload form for biodiversity offset report submission; Email receipt and invoice from DCCEEW sighted	Form download of credit transfer report upload to major projects portal sighted.	Compliant										

Biodiversity Management Plan				
C27	C27. A biodiversity management plan must be prepared for the development to the satisfaction of the Planning Secretary. This plan must:	TRL-HSET-PLN-0048 Biodiversity and Land Management Plan rev0.2 dated 28 April 2026;	The biodiversity and land management plan rev0.2 has been approved by DPHI.	Compliant
(a)	(a) be prepared:			
(i)	(i) by a suitably qualified and experienced person/s;	Letter from DPHI dated 23 April 2026 with comments on initial review;	The suitability and experience of person preparing the plan is noted in the plan and also endorsed by DPHI.	
(ii)	(ii) in consultation with CPHR; and	Approval letter from DPHI dated 28 April 2026 approving the plan;	Consultation with CPHR is evident in major projects portal form of submission and also in CPHR response letter.	
(iii)	(iii) in accordance with the requirements of condition B4;	Evidence of submission to, and response from, CPHR as letter of approval dated 18 Feb 2026.	The BLMP has been reviewed against condition B4 as compliant.	
(b)	(b) describe the short, medium, and long-term measures to be undertaken to manage the remnant vegetation and fauna habitat on the site;	TRL-HSET-PLN-0046 Constellation Project Rehabilitation Strategy v0.1	BLMP section 7.1.2 provides details of biodiversity protection and enhancement program and management measures especially regarding vegetation and fauna management.	
		Constellation Project Construction Management Plan		
(c)	(c) include detailed performance and completion criteria for evaluating the performance of the measures undertaken under condition C27(b), including triggers for remedial action if these performance or completion criteria are not met;		Section 7.5 of the plan refers to Table 9 where performance and completion criteria and TARP are described. Section 8 and Table 10 details monitoring programs related to biodiversity and land management.	
(d)	(d) describe how biodiversity management would be integrated with similar measures within other management plans, including the rehabilitation strategy referred to in condition C48;		Relationship with other management plans is detailed in section 1.4 for Natural Hazard management plan, Rehabilitation Strategy and Rehabilitation Plan.	

(e)	(e) describe the measures to be implemented within the approved disturbance areas to:		
(i)	(i) minimise the amount of clearing;	Section 7.1.2 provides management measures to minimise impact on biodiversity values of project area, including general management measures, trenching protocol, hollow bearing trees and requirements for issuing a surface disturbance permit for any vegetation clearing or soil disturbance.	
(ii)	(ii) minimise impacts on fauna, including undertaking pre-clearance surveys and translocation of threatened species as guided by the NSW Government's Translocation Operational Policy 2019 (as amended from time to time); and	Pre-clearing survey process is detailed in section 7.1.2.5	
(iii)	(iii) maximise the salvage of resources, including tree hollows, vegetation and soil resources, for beneficial reuse, including fauna habitat enhancement;	Habitat salvage, habitat replacement program including re-erection of hollow bearing branches and trunks, soil salvage and woodland protection are detailed in sections 7.1.2.7 to 7.1.2.10.	
(f)	(f) describe the measures to be implemented on the site to:		
(i)	(i) minimise impacts on fauna habitat resources such as hunting and foraging areas, habitat trees, fallen timber and hollow-bearing trees;	Section 7.1.2 provides management measures to minimise impact on fauna habitat	
(ii)	(ii) protect vegetation and fauna habitat outside of the approved disturbance areas;	Section 7.1.2.10 provides procedures for woodland protection measures.	
(iii)	(iii) manage the collection and propagation of sufficient seeds for rehabilitation;	Section 7.1.2.6 describes seed collection and refers to Tritton Resource's existing seed securement program for rehabilitation and achieving final land use purposes.	
(iv)	(iv) control weeds, including measures to avoid and mitigate the spread of noxious weeds;	Section 7.2 provides weeds management measures as per Central West Regional Strategic Weed Management Plan 2023-2027. Priority weeds are identified and listed in Table 7 in the plan	
(v)	(v) control feral pests; and	Pests management measures are provided in section 7.3 with table 8 describing management strategy and performance measures for identified pest species.	
(vi)	(vi) control access to vegetated or revegetated areas.	Rehabilitation vegetation matters are mentioned in section 7.1.2.11 with protected areas shown in Figure 9.	

C28	C28. Development under this consent must not commence until the biodiversity management plan is approved by the Planning Secretary.	DPHI letter approving the plan, 28 April 2026 Site development commencement advice 5 May 2026	The plan was approved by DPHI on 28 April 2026, site construction commenced on 5 May 2026	Compliant																														
C29	C29. The biodiversity management plan, as approved by the Planning Secretary, must be implemented for the development.	Audit discussions, site observations	Aeris is in the process of implementing the plan at the time of this audit.	Compliant																														
TRAFFIC AND TRANSPORT																																		
Road upgrades																																		
C30	C30. The road and safety measures in Table 7 must be carried out in accordance with the timing specified in the table, unless otherwise agreed by the Planning Secretary.			not triggered																														
<table><tr><td colspan="4">Table 7: Road and safety upgrades</td><td rowspan="7">Site observations</td><td rowspan="7">Timing noted in Table 7 as per this condition is outside (in future of) this audit period. The upgrade measures are in the process of being implemented at the time of this audit as discussed at the audit meeting and observed during site inspection of this audit. Road corridor is an existing road open for local traffic. Aeris plans to seal the road (bitumen) as part of the road upgrade. Works on the new haul road sections and intersection with Mitchell Hwy have not commenced. TfNSW, in response to stakeholder consultation in this audit, referred to the initiation requests for the Works Authorisation Deed (WAD) having not been submitted at the time.</td></tr><tr><td>Location</td><td>Measures</td><td>Timing</td><td>Roads Authority</td></tr><tr><td>Okech Road At least 1 kilometre in each direction of Karingal Homestead (R1)</td><td>Sealed and upgraded in accordance with the road use agreement required under condition C33</td><td>Prior to commencement of haulage of ore</td><td>Council</td></tr><tr><td>Entire length of the new haul road between the Mitchell Highway and Okech Road (*this covers the intersection and council dam near the haul road)</td><td>Upgraded in accordance with the road use agreement required under condition C33</td><td>Prior to commencement of haulage of ore</td><td>Council</td></tr><tr><td>Intersection of the Mitchell Highway with the new haul road between the Mitchell Highway and Okech Road</td><td>Intersection upgrade to Channelised Right Turn with a short turn slot (CHR(s)) treatments This treatment must be designed and constructed in accordance with the relevant Austroads guidelines, Australian standards and TfNSW specifications</td><td>Prior to use of the new haul road between the Mitchell Highway and Okech Road</td><td>TfNSW</td></tr><tr><td>Intersection of the Mitchell Highway and Railway Road</td><td>This treatment must be designed and constructed in accordance with the relevant Austroads guidelines, Australian standards and TfNSW specifications</td><td>Prior to the commencement of haulage of ore</td><td>TfNSW</td></tr><tr><td>Entire length of Okech Road between the mine site area and the new haul road</td><td>Upgraded in accordance with the road use agreement required under condition C33</td><td>Prior to commencement of haulage of ore</td><td>Council</td></tr></table>					Table 7: Road and safety upgrades				Site observations	Timing noted in Table 7 as per this condition is outside (in future of) this audit period. The upgrade measures are in the process of being implemented at the time of this audit as discussed at the audit meeting and observed during site inspection of this audit. Road corridor is an existing road open for local traffic. Aeris plans to seal the road (bitumen) as part of the road upgrade. Works on the new haul road sections and intersection with Mitchell Hwy have not commenced. TfNSW, in response to stakeholder consultation in this audit, referred to the initiation requests for the Works Authorisation Deed (WAD) having not been submitted at the time.	Location	Measures	Timing	Roads Authority	Okech Road At least 1 kilometre in each direction of Karingal Homestead (R1)	Sealed and upgraded in accordance with the road use agreement required under condition C33	Prior to commencement of haulage of ore	Council	Entire length of the new haul road between the Mitchell Highway and Okech Road (*this covers the intersection and council dam near the haul road)	Upgraded in accordance with the road use agreement required under condition C33	Prior to commencement of haulage of ore	Council	Intersection of the Mitchell Highway with the new haul road between the Mitchell Highway and Okech Road	Intersection upgrade to Channelised Right Turn with a short turn slot (CHR(s)) treatments This treatment must be designed and constructed in accordance with the relevant Austroads guidelines, Australian standards and TfNSW specifications	Prior to use of the new haul road between the Mitchell Highway and Okech Road	TfNSW	Intersection of the Mitchell Highway and Railway Road	This treatment must be designed and constructed in accordance with the relevant Austroads guidelines, Australian standards and TfNSW specifications	Prior to the commencement of haulage of ore	TfNSW	Entire length of Okech Road between the mine site area and the new haul road	Upgraded in accordance with the road use agreement required under condition C33	Prior to commencement of haulage of ore	Council
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Notes: • The locations of the intersections with Mitchell Highway are depicted in Figures 1 and 2 of Appendix 4. • Under the Roads Act 1993, all necessary approvals and licences for the development must be obtained, including approval under Section 138. As road works are required on the Mitchell Highway, TfNSW will require the developer to enter into a Works Authorisation Deed (WAD).																																		
C31	C31. Heavy vehicles entering and leaving the site must have loads covered or contained.	TRL-HSET-PLN-0043 Traffic Management Strategy v1.2; TRL-ENV-FRM-020 Drivers Code of Conduct; Site observations; Audit discussions	Construction has recently commenced, no heavy vehicles are in operation at the time of this audit. This requirement is mentioned in section 7.2.1 of the Traffic Management Strategy.	not triggered																														

C32	C32. Reasonable and feasible measures must be implemented to:			Compliant
(a)	(a) minimise dust and/or sediment being tracked onto the public road network; and	TRL-HSET-PLN-0043 Traffic Management Strategy v1.2; TRL-ENV-FRM-020 Drivers Code of Conduct; Site observations; Audit discussions	A water cart is in operation to mitigate dust emissions. No major visible sediment tracking on to sealed public road network sighted. The work footprint is limited to existing Okeh Road, which is unsealed.	
(b)	(b) keep the public informed of any road or infrastructure upgrades, disruptions to traffic, the closure of roads or other infrastructure, oversize overmass vehicle use, peak construction periods, and any emergencies.	CCC meeting minutes of 20 May 2026	Community Consultative Committee is one method of public information dissemination (as per minutes of meeting on 20 May 2026 sighted where Constellation Project delivery status is included). Traffic Management Strategy sections 7.2.2-7.2.3 provide general measures for interaction with other road users and section 7.3 discusses specific measures for Constellation Project including on notifications.	
C33	C33. A road use agreement with Council must be executed prior to commencement of construction for the ongoing maintenance of public roads affected by the development. If there is any dispute in relation to this agreement, then either party may refer the matter to the Planning Secretary for resolution.	Road Use Agreement between Bogan Shire Council and Tritton Resources Limited, prepared by HopgoodGanim law firm, for Tritton Operations and Constellation Project, executed 9 Apr 26.	Road use agreement has been signed by Tritton Resources Limited and Bogan Shire Council prior to commencement of construction.	Compliant
C34	C34. Prior to undertaking any works within the rail corridor adjacent to the Mitchell Highway, the Applicant must consult with the country regional network operator on the proposed road upgrade design within the corridor.	Audit discussions; Email correspondence (reply) dated 17 Jun 2026 from UGL Regional Linx Third Party Works Officer to Aeris, noting processing of application ref 26-0147 and seeking PL and PI insurances.	No works have occurred within the rail corridor adjacent to Mitchell Highway. Consultation with the country regional network operator is in progress.	Compliant

Traffic Management Plan				
C35	C35. A traffic management plan must be prepared for the development. The plan must:	TRL-HSET-PLN-0043 Traffic Management Strategy v1.2 dated 1 May 2026;	The Traffic Management Strategy (TMS) document covers all five mining operations undertaken by Tritton Resources Limited around Nyngan.	Compliant
(a)	(a) be prepared:	DPHI Letter dated 1 May 2026 approving Traffic Management Strategy v1.2 dated 1 May 2026;		
(i)	(i) by a suitably qualified and experienced person/s;	TfNSW letters to Aeris dated 12 March 2026 (approval) and 4 Feb 2026 (review comments) regarding review of Traffic Management Strategy. TfNSW response to stakeholder consultation request in this Audit. Major projects portal submission of Traffic Management Strategy v.0 to Bogan Shire Council on 1 Dec 2025.	Section 1.3 of TMS lists the personnel involved in preparation of the TMS - Joshua Bridges (Principal Transport Planner, Aecom), Jeff Burton (Burton Environmental), William Olson (Aeris/TRL) and Gemma Brown (Aeris). It is noted that Joshua Brydges is a transport management specialist and suitably qualified and experienced, Jeff Burton is also a qualified consultant.	
(ii)	(ii) in consultation with Council and TfNSW; and		Section 5 of Traffic Management Strategy discusses consultation processes. DPHI approval letter dated 1 May 2026 notes that the Traffic Management Strategy has been prepared in consultation with TfNSW and Bogan Shire Council. Evidence of consultation is sighted in this audit.	
(iii)	(iii) in accordance with the requirements of condition B4;		This plan has been reviewed against condition B4 in this audit and found compliant.	
(iv)	(iv) include details of all transport routes and traffic types to be used for all development-related traffic;		Transport routes as assessed in the Transport Impact Assessment as part of EIS, are included in Figure 9 (indicating road types and the mine-related purpose and described in section 3.3.4	
(b)	(b) summarise the vehicle movements predicted by the EIS;			
(c)	(c) include details of the measures to be implemented to minimise traffic safety issues and disruption to local road users during the construction, operation and decommissioning phases of the development, including:	Section 7, Traffic Management Strategy	Section 7 describes management measures to be implemented to manage traffic related matters during various stages of the project.	
(i)	(i) temporary traffic controls, including detours and signage (where relevant);	Section 7.1.3 of Traffic Management Strategy; Site observations	Section 7.1.3 refers to temporary traffic controls during upgrade, construction and maintenance of access/haul road and associated intersections. During the audit at the early construction phase, some temporary traffic controls and signages were observed in place.	

(ii)	(ii) notifying the local community about development-related traffic impacts;	Traffic Management Strategy, section 7.3; Constellation Community Update meeting notification and presentation slides (5pm 21 April 2026)	Prior to construction activities, residents were notified via community meeting (section 7.3 of TMS) - Presentation slides and meeting notification sighted.	
(iii)	(iii) minimising potential for conflict with school buses and other motorists as far as practicable;	Section 7.2.2 of Traffic Management Strategy	It was advised that there is no dedicated schoolbus service along the roads impacted at the time of audit. If required, TRL will consult school bus operators and also other users of the road sections, and impose speed limit and HV movement as per section 7.2.2.1 of the Traffic Management Strategy.	
(iv)	(iv) scheduling haulage vehicle movements to minimise convoy length or platoons;		General measures for managing interactions with other road users (section 7.2.2.1) refer to minimising convoy/platoon lengths where practicable.	
(v)	(v) responding to local climate conditions that may affect road safety such as fog, dust, and wet weather;		As per section 7.4 of the TMS, local climate conditions that may impact road safety such as fog, heavy rainfall and reduced visibility will be actively considered in the planning of vehicle movements:	
(vi)	(vi) responding to any emergency repair or maintenance requirements; and	Section 7.8 of Traffic Management Strategy Road User Agreement, as executed between Tritton Resources and Bogan Shire Council.	Section 7.8 of TMS addresses the process for responding to emergency repair or maintenance matters.	
(vii)	(vii) a traffic management system for managing over-dimensional vehicles;	Section 7.2.3 of Traffic Management Strategy	Section 7.2.3 of Traffic Management Strategy refers to over-dimensional vehicles traffic management system including liaison with National Heavy Vehicle Regulator, TfNSW as required. TfNSW has approved the Traffic Management Strategy and raised no concerns in stakeholder consultation in this audit. Auditor was advised that the project design documentation comply with NHVR guidelines.	
(viii)	(viii) include details of the measures to be implemented to minimise impacts on the residents of Girilambone during the construction period;	Section 7.3 of Traffic Management Strategy	Traffic impact management measures are noted in section 7.3 of TMS noting periodic inspections and checks through the village of Girilambone.	

(ix)	(ix) include a drivers' code of conduct that includes procedures to ensure that drivers:	Section 7.5 of Traffic Management Strategy TRL-ENV-FRM-020 Drivers Code of Conduct	Driver's code of conduct (Appendix D of TMS) is referred to in section 7.5 of TMS	
(x)	(x) adhere to posted speed limits or other required travelling speeds;			
(xi)	(xi) adhere to the approved transport routes shown in Figure 1 of Appendix 2; and			
(xii)	(xii) implement safe driving practices;			
(d)	(d) include a complaints handling procedure; and	Sections 7.5 and 15 of Traffic Management Strategy TRL-ENV-FRM-020 Drivers Code of Conduct TRL-HSET-PLN-0023 Environmental Management Strategy	Section 7.5 includes process for managing complaints about driver behaviour. Community complaints are managed as per section 6.7 of Environmental Management Strategy. Section 15 of TMS has summarised the complaints protocol.	
(e)	(e) include a program to monitor and report on the effectiveness of the implementation of the measures in this plan.	Sections 8, 9 and 10 of Traffic Management Strategy	Sections 8-9-10 of TMS provide a monitoring program, process for environmental inspections and trackign of actions and activities.	
C36	C36. Development under this consent must not commence until the traffic management plan is approved by the Planning Secretary.	DPHI letter approving TMP, 1 May 2026 Commencement notification letter, 5 May 2026	Transport Management Plan was approved by DPHI via letter dated 1 May 2026. Construction activities commenced on 5 May 2026.	Compliant
C37	C37. The traffic management plan, as approved by the Planning Secretary, must be implemented for the development.	Audit discussions; Site observations; Documentation sighted in assessing compliance to condition C35 above; Neill Earthmoving site inspection checklist eg dated 4 Jun 2026.	The plan is being implemented at the time of audit, as per site observations, audit discussions and documentation sighted in this audit.	Compliant

ABORIGINAL HERITAGE				
Protection of heritage objects				
C38	C38. Aboriginal objects located within the sites identified in Table 1 of Appendix 5 and Aboriginal objects outside the approved disturbance areas must not be harmed.	Sections 5.1.3 and 5.6 of Heritage Management Plan (no document number) Rev0, dated 26 Feb 2026, by OzArk Environment & Heritage;	Aboriginal sites to be avoided are listed in Table 4 in section 5.1.3.1 and also identified in Figures 3 , 4 and 5 in Heritage Management Plan. Sites along Okeh Road sighted in site audit.	Compliant
	<i>Note: For the avoidance of doubt, Aboriginal sites within the disturbance area and not listed in Table 1 of Appendix 5 may be harmed</i>			
C39	C39. The Applicant must conserve and manage the Aboriginal objects at the Aboriginal sites identified in Table 2 of Appendix 5 and any unexpected finds under the supervision of a suitably qualified and experienced person and in consultation with the Registered Aboriginal Parties.	Letter from DPHI acknowledging receipt of Heritage Management Plan, noting approval is not required and noting consultation with RAPs. Site observations (photos)	Section 5.1.3.2 Table 5 lists aboriginal items that are approved for direct or indirect harm, salvage and relocation etc. Example scarred tree sighted. HMP includes evidence of consultation in Section 4.	Compliant
C40	C40. Aboriginal objects removed from the approved disturbance areas must be stored in a secure facility, and:		Scarred tree moved to a secure container on 8th May, the locked container was inspected and photographed in this audit on 15th May 2026.	Compliant
(a)	(a) the Applicant must maintain an inventory of the objects in storage to a professional standard;		Final salvage report is currently in preparation which will provide professional inventory from OzArk Environmental.	
(b)	(b) the applicant must notify the Planning Secretary of the location of this facility via the NSW planning portal (Major Projects); and		as above.	
(c)	(c) Aboriginal people must be allowed reasonable access to this facility.		Heritage management plan provide details of the process allowing access for Aboriginal people to the secure location.	
	<i>Note: Conditions C38 to C40 do not preclude examination and/or analysis of the objects by an experienced archaeologist, including excavation of Aboriginal hearths for chronological dating and detailed recording, analysis of stone artefacts, and detailed examination and recording of culturally modified trees.</i>			
Unexpected Finds Protocol				
C41	C41. An unexpected finds protocol must be developed in consultation with the Registered Aboriginal Parties to manage any previously unidentified Aboriginal objects on site.	Heritage Management Plan v.0 sections 4.1.2, 4.1.3 and 5.6.1	The protocol is included in HMP, section 5.6.1 includes detailed procedure for the management of discovery of unanticipated Aboriginal objects and/or historical heritage items. Sections 4.1.2 and 4.1.3 details RAP consultation on this plan and ongoing consultation protocols.	Compliant

C42	C42. If any suspected human remains are discovered:	Heritage Management Plan v.0 section 5.6.2	The protocol is included in HMP, section 5.6.2	Compliant
(a)	(a) all work at the location must immediately cease;			
(b)	(b) the area must be secured to avoid further harm to the remains;			
(c)	(c) local police and Heritage NSW must be notified as soon as practicable and details of the suspected remains and their locations provided; and			
(d)	(d) work must not recommence at the location unless authorised in writing by the Planning Secretary;			
C43	C43. Any human remains determined to be a traditional Aboriginal ancestral burial must be managed in consultation with the registered Aboriginal parties and Heritage NSW.	Heritage Management Plan v.0 section 5.6.2	The protocol is included in HMP, section 5.6.2	Compliant
Consultation Requirements				
C44	C44. The Applicant must consult with Registered Aboriginal Parties in relation to:	Sections 4.1.2, 4.1.3 of Heritage Management Plan v.0 detail consultation process, Appendix B provides consultation log and correspondence	RAP consultation is noted in section 4.1 of the Heritage Management Plan v.0. After initial consultation which apparently yielded no responses by the close date, ongoing consultation protocols are to be followed to continue liaison with RAPs throughout the life of the development including long term management of Aboriginal objectives and any archaeological salvage program, conservation and management of plant species of cultural value etc. Unexpected finds protocol is included in section 5.6 of the Heritage Management Plan.	Compliant
(a)	(a) the long-term management of Aboriginal objects;			
(b)	(b) the conservation and management of Aboriginal cultural heritage, including determining the plant species of cultural value to be included in the revegetating of the mine site during the rehabilitation phase; and			
(c)	(c) the protection and removal of Aboriginal objects, including opportunities for participation;			
(d)	(d) the preparation of the unexpected finds protocol required under condition C41.			
C45	C45. The results of any analysis of Aboriginal objects, consultation with Registered Aboriginal Parties and management and mitigation actions undertaken in relation to Aboriginal sites and Aboriginal objects must be reported in the annual review required by condition D4.	Commitment to undertake annual review and provide reports to RAPs is noted in section 9.1.1 of the Heritage Management Plan v.0	As the development (construction phase) has only recently commenced, an annual review is not yet due.	not triggered
<i>Note: Unexpected finds and any changes to the status of identified Aboriginal sites must be recorded in AHIMs</i>				

VISUAL AND LIGHTING				
C46	C46. All reasonable and feasible mitigation and management measures must be implemented for the development to:	Audit discussions, Site observations	No infrastructure works have commenced at the time of this audit, so no lighting requirements have been raised. This condition is not yet triggered.	not triggered
(a)	(a) minimise the visual and off-site lighting impacts of the development;	Biodiversity and Land Management Plan		
(b)	(b) shield views of mining operations and associated equipment from users of public roads and privately-owned residences;		As per the EIS, visual amenity measures as a line of trees has been implemented in front of Karingal homestead (sensitive receiver R1) along Okeh Road as noted in the Biodiversity and Land Management Plan (section 7.4).	
(c)	(c) ensure no fixed outdoor lights shine directly above the horizontal or above the building line or any illuminated structure;			
(d)	(d) ensure no in-pit mobile lighting rigs shine directly above the pit wall and other mobile lighting rigs do not shine directly above the horizontal (except where required for emergency safety purposes);			
(e)	(e) design lighting associated with the project generally in accordance with the principles Dark Sky Planning Guideline (DPE 2023);			
(f)	(f) ensure that all external lighting associated with the development complies with relevant Australian standards including the latest version of Australian Standard AS/NSW 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting; and			
(g)	(g) ensure that the visual appearance of any new buildings, structures, facilities or works (including paint colours and specifications) is aimed at blending as far as possible with the surrounding landscape.			

REHABILITATION																										
Rehabilitation Objectives																										
C47	C47. The site must be rehabilitated in accordance with the conditions imposed on the mining lease(s) associated with the development under the Mining Act 1992. Rehabilitation must be generally consistent with the proposed rehabilitation activities described the EIS and shown conceptually in Figures 8 and 9 of Appendix 2 and must comply with the objectives in Table 8 of this consent.	Site observations, Audit discussions, TRL-HSET-PLN-0046 Rehabilitation strategy v0.1 dated 7 May 2026	Mining Lease (ML) is yet to be released. Project is currently (at the time of audit) at early construction phase on haul road. Rehabilitation Strategy has been prepared, section 5 details the rehabilitation and mine closure objectives and section 8 describes implementation plans. Rehabilitation progress is to be reviewed in future audit against ML.	not triggered																						
<table><tr><th colspan="2">Table 8: Rehabilitation objectives</th></tr><tr><th>Feature</th><th>Objective</th></tr><tr><td>All areas affected by the development</td><td> - Safe, stable and non-polluting - Final landforms designed to incorporate micro-relief and integrate with surrounding natural landforms to the extent practicable - Minimise long term groundwater seepage zones - Minimise visual impact of final landforms as far as is reasonable and feasible - Minimise to the greatest extent practicable: - the size and depth of the final void - the drainage catchment of the final void - risk of flood interaction for all flood events up to and including the probable maximum flood </td></tr><tr><td>Final void</td><td> - Slopes within the final void to achieve a factor of safety of 1.5, unless otherwise agreed by the Resources Regulator - Minimise to the greatest extent practicable any pit wall geotechnical and erosional instability risks </td></tr><tr><td>Waste rock emplacement</td><td> - Minimise the potential for acid mine drainage and erosion - Slopes on the waste rock emplacement to achieve a factor of safety of 1.5, unless otherwise agreed by the Resources Regulator </td></tr><tr><td>Stopes</td><td> - Backfilled with paste fill material - Safe and stable - Negligible surface subsidence in the long term </td></tr><tr><td>Box cut, portals and vent shafts</td><td> - Backfilled and/or sealed </td></tr><tr><td>Surface infrastructure</td><td> - To be decommissioned and removed, unless the Resources Regulator agrees otherwise </td></tr><tr><td>Areas proposed for agriculture</td><td> - Establish/restore disturbed areas to support sustainable agriculture </td></tr><tr><td>Areas proposed for native vegetated land</td><td> - Restore ecosystem function, including maintaining or establishing self-sustaining ecosystems - Establish self-sustaining native ecosystems characteristic of vegetation communities found in the local area </td></tr><tr><td>Community</td><td> - Ensure public safety - Minimise adverse socio-economic effects associated with mine closure </td></tr></table>					Table 8: Rehabilitation objectives		Feature	Objective	All areas affected by the development	- Safe, stable and non-polluting - Final landforms designed to incorporate micro-relief and integrate with surrounding natural landforms to the extent practicable - Minimise long term groundwater seepage zones - Minimise visual impact of final landforms as far as is reasonable and feasible - Minimise to the greatest extent practicable: - the size and depth of the final void - the drainage catchment of the final void - risk of flood interaction for all flood events up to and including the probable maximum flood	Final void	- Slopes within the final void to achieve a factor of safety of 1.5, unless otherwise agreed by the Resources Regulator - Minimise to the greatest extent practicable any pit wall geotechnical and erosional instability risks	Waste rock emplacement	- Minimise the potential for acid mine drainage and erosion - Slopes on the waste rock emplacement to achieve a factor of safety of 1.5, unless otherwise agreed by the Resources Regulator	Stopes	- Backfilled with paste fill material - Safe and stable - Negligible surface subsidence in the long term	Box cut, portals and vent shafts	Backfilled and/or sealed	Surface infrastructure	To be decommissioned and removed, unless the Resources Regulator agrees otherwise	Areas proposed for agriculture	Establish/restore disturbed areas to support sustainable agriculture	Areas proposed for native vegetated land	- Restore ecosystem function, including maintaining or establishing self-sustaining ecosystems - Establish self-sustaining native ecosystems characteristic of vegetation communities found in the local area	Community	- Ensure public safety - Minimise adverse socio-economic effects associated with mine closure
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Rehabilitation Strategy																										
C48	C48. A rehabilitation strategy must be prepared for the development. The strategy must:	Audit discussions, TRL-HSET-PLN-0046 Rehabilitation strategy v0.1 dated 7 May 2026	Rehabilitation strategy has been submitted, awaiting approval prior to mine development. It is noted that sub section numbering were repeated in 8.3 in the version of document sighted in the audit. <i>(This has since been corrected in the latest version sighted during reporting stage of this audit - post audit period)</i> .	Compliant																						
(a	(a) be submitted to the Planning Secretary for approval prior to the commencement of mining operations under this consent;	Post Approval Form dated 7 May 2026, for submission of the Rehabiliration Strategy.	Mine operations have not commenced at the time of this audit. This sub condition is not triggered. The Rehabilitation Strategy has been submitted via Major Projects portal as per post approval submission form sighted.																							

(b)	(b) be prepared in consultation with the Resources Regulator and Council;	Aeris email dated 8 April 2026 to Bogan Shire Council with Rehabilitation Strategy attached; Bogan Shire Council letter to Aeris dated 6 May 2026; NSW Resources Regulator letter dated 4 May 2026; Rehabilitation Strategy consultation outcomes table	Council letter on 6 May indicates receipt and review of Rehabilitation Strategy dated 8 April 2026 with two comments. NSW Resources Regulator letter dated 4 May 2026 with two comments on the Rehabilitation Strategy. Consultation process is detailed in section 6 of the Rehabilitation Strategy.	
(c)	(c) include a stakeholder engagement plan to guide rehabilitation outcomes for the site, and address all aspects of rehabilitation including mine closure, final landform (including the final void), post-mining land use/s and water management;	TRL-HSET-PLN-0046 Rehabilitation strategy v0.1 dated 7 May 2026	Ongoing stakeholder engagement plan is included in section 6.3 of the Rehabilitation Strategy detailing measures to address mine closure, final landform, post mining land use and water management. A targeted campaign of consultation focussing on mine closure and post-mining land use is to be organised five years prior to forecast mine closure stage.	
(d)	(d) align with strategic rehabilitation and mine closure objectives and address the principles of the Strategic Framework for Mine Closure (ANZMEC and MCA);		Section 7.1.2 provides details of the Strategic Framework for Mine Closure referencing relevant framework guidelines/standards from ANZMEC and MCA. Key objectives and how these are addressed in the Strategy are included.	
(e)	(e) describe how the rehabilitation measures would be integrated with the measures in the biodiversity management plan referred to in condition C27;		Section 1.4.2 of Rehabilitation Strategy discusses relationship with the Biodiversity and Land Management Plan. Weeds and pests are to be managed as detailed in the BLMP.	
(f)	(f) include details of target vegetation communities and species to be established within the proposed revegetation areas;		Section 8.3.2 Rehabilitation Techniques details management of soils including seeding/hydroseeding and materials balance and project methods, achieving final land uses, revegetation plant species list (Table 7 for Grassland and Table 8 for Woodland), fauna habitat enhancement measures, management of weeds and pests etc.	

(g)	(g) include a post-mining land use strategy to investigate and facilitate post-mining beneficial land uses for the site (including the final voids), that:		Post mining land use strategy is described in sections 7 and 8 of the Rehabilitation Strategy.	
(i)	(i) align with regional and local strategic land use planning objectives and outcomes;		Alignment with strategic land use objectives with the Council LEP and other key principles are included in Section 7.1	
(ii)	(ii) support a sustainable future for the local community;		As per section 8.3.3, ongoing stakeholder consultation will be undertaken to assess social impacts to consider economic, social and environmental factors. One of the final land use domain is agricultural grazing which will support sustainable future for local community.	
(iii)	(iii) utilise existing mining infrastructure, where practicable;		Section 8.3.1 Infrastructure provides plans to retain or remove infrastructure regarding future land uses.	
(iv)	(iv) includes a description of long-term land management objectives, including bushfire management, weed and feral animal control, water quality and public safety; and		Section 8 overall, and section 8.3.2 Rehabilitation Technicals specifically, provide description of long term land management objectives and implementation strategy.	
(v)	(v) includes consideration of the integration of post-mining land uses with surrounding mining operations; and		Sections 8.1, 8.2 and 8.3 of the Rehabilitation Strategy discusses integration of post mining land uses, infrastructure outside mining lease area, plans for ongoing consultation with council and adjacent landholders	
(h)	(h) investigate ways to minimise adverse socio-economic effects associated with rehabilitation and mine closure.		As per section 8.3.3, ongoing stakeholder consultation will be undertaken to assess social impacts to consider economic, social and environmental factors.	
C49	C49. Mining operations under this consent must not commence until the rehabilitation strategy is approved by the Planning Secretary.	Audit discussions; Site observations	Mining operations have not commenced at the time of this audit. Approval of rehabilitation strategy is awaited.	not triggered
C50	C50. The rehabilitation strategy, as approved by the Planning Secretary, must be implemented.	Audit discussions; Site observations; Rehabilitation Strategy section 10	Mining operations have not commenced at the time of this audit. Implementation of the Rehabilitation Strategy is to be reviewed in future audits.	not triggered

SUBSIDENCE MANAGEMENT				
Subsidence performance measures				
C51	C51. The Applicant must ensure that all stopes and associated backfilling maintains long term stope stability and that the development results in negligible subsidence impacts or environmental consequences.	Site observations	Works are stil in early construction phase of haul road. Works have not commenced in the mine site.	not triggered
WASTE				
C52	C52. All reasonable mitigation and management measures must be implemented to minimise the waste generated by the development.	TRL-HSET-PLN-0031 Waste Management Plan v0 dated 1 Dec 2025	The Waste Management Plan refers to the Constellation Project. As per section 8.2.2.6, disposal of suitable waste from all Tritton Copper Operations within the Tritton Copper Mine landfill, including from the Constellation Project. No waste has been generated from the project at the time of this audit.	not triggered
C53	C53. All waste generated by the development must be classified in accordance with the Waste Classification Guidelines (EPA, 2014)(or its latest version), and must be stored and handled in accordance with its classification.	Audit discussions	The development stage has not triggered generation of considerable amount of waste to be classified, stored and handled. Waste classification process is provided in the Waste Management Plan.	not triggered
C54	C54. All waste must be removed from the site as soon as practicable and reused, recycled or sent to an appropriately licensed waste facility for disposal.	Site observations, Audit discussions	JR Richards waste contractor has been contracted to manage waste materials. No waste materials sighted in this audit.	not triggered
C55	C55. The effectiveness of the waste minimisation and management measures must be monitored and reported in the annual review required by condition D4.	Condition D4	Annual review is due by September, development commenced in May 2026 - this condition has not been triggered at this audit.	not triggered
C56	C56. No waste must be received, stored, treated, processed, re-processed or disposed of on the site except as expressly permitted in an applicable EPL, specific resource recovery order or exemption under the Protection of the Environment Operations (Waste) Regulation 2014.	EPA Letter to Aeris regarding variation of EPL4501; Site observations; Audit discussions	EPL4501 for Murrawombie Mine is being amended to include Constellation Project. However the EPL variation has not been issued to Aeris at the time of audit by EPA. A letter advising that this EPL will cover Constellation project was received on 12 June 2026. The development is at construction phase, no material has been received on site.	not triggered
C57	C57. On-site sewage must be treated and disposed of in accordance with the requirements of Council.	Site observations, Audit discussions	No on-site generation of sewage as at the time of this audit.	not triggered

Hazardous Materials Management					
C58	C58. Dangerous goods, as defined by the Australian Code for the Transport of Dangerous Goods by Road and Rail, must be stored and handled strictly in accordance with:	Site observations, Audit discussions	No dangerous or hazardous materials are used on site at the time of this audit or planned to be used until completion of construction phase and commencement of operations.		not triggered
(a)	(a) all relevant Australian standards; and				
(b)	(b) the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual (for liquids).				
	In the event of an inconsistency between the documents referenced above, the most stringent requirement must prevail to the extent of the inconsistency.				
C59	C59. The design and operation of the development must comply with:	Site observations, Audit discussions			not triggered
(a)	(a) all requirements under the Explosives Act 2003 and Explosives Regulation 2024;		No explosives are stored on site at this time. Aeris is in the process of preparing application documentation for Explosives Act approvals at the time of audit. This condition is to be inspected in future audits.		
(b)	(b) all relevant Australian Standards, including and not limited to Australian Standard 2187: Explosives - Storage, transport and use; and				
(c)	(c) the AIESG Code of Practice for the Storage and Handling of UN3375 in regards to ammonium nitrate emulsions, suspensions or gels.				
BUSHFIRE MANAGEMENT					
C60	C60. The development must:		Bushfire Management Plan is provided in the Natural Hazards Management Plan as sighted (section 7.3) and refers to requirements in the Planning for Bushfire Protection (RFS, 2019). Potential fire sources, water sources and assets are identified.		Compliant
(a)	(a) provide for asset protection in accordance with the relevant requirements in the Planning for Bushfire Protection (RFS, 2019) guideline (or latest version thereof);	TRL-HSET-PLN-0028 Natural hazards management plan v1.1 dated 18 May 2026			
(b)	(b) ensure that there is suitable equipment to respond to any fires on the site; and		Section 7.6 (Table 6) of the NHMP provides bushfire management and mitigation measures, identifies minimum asset protection zone, access for fire fighters, accountable personnel and onsite fire fighting equipment.		
(c)	(c) assist the RFS and emergency services to the extent practicable if there is a fire in the vicinity of the site.				

WORKFORCE ACCOMMODATION STRATEGY				
C61	C61. A workforce accommodation strategy must be prepared and implemented for the development prior to the commencement of the development. This plan must:	TRL-HRS-PLN-0001 Workforce Accommodation Strategy;	Workforce Accommodation Strategy document sighted.	Compliant
(a)	(a) be prepared in consultation with Council;	Letter correspondence with Council in October to December 2025, comments from Council (email dated 22 Dec 2025) on draft Workforce Accommodation Strategy	Consultation has occurred with Council as per sighted correspondence records.	
(b)	(b) provide details of the workforce numbers and likely demand for accommodation throughout all stages of the development; and	Stakeholder consultation with Council in this audit Audit discussions	Council requested, in their response and among other things, estimated workforce numbers at each stage of construction/operations. The strategy notes that accommodation modelling is undertaken as per overall Tritton Mine requirements, however no specific number is included in the strategy. Though specific workforce numbers are not noted in the Strategy document, sections 6-7-8 detail demand management and modelling process based on forecast planning and responsibility has been assigned to Site Manager. Though "details of workforce numbers and likely demand" is included, exact workforce numbers at each stage is not specified.	
(c)	(c) demonstrate that the construction workforce can be suitably housed in approved accommodation facilities.		The document states that the strategy outlines approach to managing accommodation needs for the operational workforce. As stated, overall workforce numbers are expected to remain broadly consistent with existing levels with personnel being redeployed across various sites/projects.	

SSD-4157891 Part D - Reporting and Compliance Conditions

Condition of Consent	Requirement	Evidence Collected	Independent Audit Finding	Recommendation	Compliance Status	Unique ID Noncompliance
COMPLIANCE						
Non-compliance notification						
D1	D1. Within seven days of becoming aware of a non-compliance, the Applicant must notify the Department of the non-compliance. The notification must: (a) be in writing; (b) be submitted via the NSW planning portal (Major Projects); (c) identify the development (including the development application number and name); (d) set out the condition of this consent that the development is non-compliant with; (e) describe why it does not comply; (f) describe the reasons for the non-compliance (if known); and (g) describe what actions have been undertaken, or will be undertaken and when, to address the non-compliance. <i>Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.</i>	-Notification to DPHI of Out-Of-Hours-Work Protocol Non-Compliance dated 2 Jun 2026 '-Consultation through major projects portal	A non-compliance was reported for an out of hours work that occurred prior to finalising the OOHW protocol - documentation sighted confirms all requirements in this condition was satisfied. This indicates a process in place for reporting NCs.		Compliant	
Incident notification						
D2	D2. The Applicant must notify the Department within 24 hours of becoming aware of an incident. The notification must be made via the NSW planning portal (Major Projects) and include details about the incident including: (a) the date, time and location; (b) a brief description of what occurred and why it has been classified as an incident; (c) a description of what immediate steps were taken in relation to the incident; and (d) identifying a contact person for further communication regarding the incident.	-Incident notification dated 4 May 2026 to DPHI - Aboriginal Site Harm (scarred tree) '-Reportable incident notification dated 9 May 2026 to DPHI - aboriginal site harm (scarred tree) '-Subsequent incident reports to DPHI dated 11 May 2026 and 14 May 2026 '-Consultation through major projects portal	An example incident report sighted for an scarred tree impact, indicating a process is in place and followed for incident notification.		Compliant	
D3	D3. The Applicant must provide the Department with a subsequent incident report in accordance with Appendix 7 (Incident Notification and Reporting Requirements).				Compliant	

ANNUAL REVIEW				
D4	D4. An annual review reporting the environmental performance of the development must: (a) be submitted: (i) to the department by the end of September each year after the commencement of development under this consent, or other timeframe agreed by the Planning Secretary; and (ii) to Council. (b) describe the development (including any rehabilitation) that was carried out in the previous calendar year, and the development that is proposed to be carried out over the current calendar year; (c) include a comprehensive review of the monitoring results and complaints records of the development over the previous calendar year, including a comparison of these results against the: (i) relevant statutory requirements, limits or performance measures/criteria; (ii) requirements of any plan or program required under this consent; (iii) monitoring results of previous years; and (iv) relevant predictions in the EIS; (d) identify any non-compliance or incident which occurred in the previous calendar year, and describe what actions were (or are being) taken to rectify the non-compliance and avoid reoccurrence; (e) evaluate and report on: (i) the effectiveness of the noise and air quality management systems; and (ii) compliance with the performance measures, limits and operating conditions of this consent; (f) identify any trends in the monitoring data over the life of the development; (g) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and (h) describe what measures will be implemented over the next calendar year to improve the environmental performance of the development.		The construction phase commenced in May 2026 and as per this original Development Consent condition, annual review is due in September.	not triggered
INDEPENDENT ENVIRONMENTAL AUDIT				
D5	D5. Independent environmental audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements published on the Department's website.	This audit discussions	This audit is being undertaken as per this condition	Compliant

MONITORING AND ENVIRONMENTAL AUDITS				
D6	D6. Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification and independent audit.	Dust gauge quote from supplier EnviroPaul dated 18 May 2026 for six DDGs sighted. Envirodata weather station specialists' email dated 4 Feb 2026 noting quotation for the 10m mast weather station and the inspection schedule. Aeris purchase order 20273675 dated 19 May 2026 for the above quotation; NSW EPA letter to Aeris dated 12 June 2026; Noise and Vibration Management Plan.	Surface water monitoring and groundwater monitoring has commenced at the time of this audit. Air quality monitoring (dust gauges) are to be installed in July (equipment purchased). Noise monitoring is scheduled for September and will be monitored in accordance with the approved noise and vibration management plan. Aeris commented that the weather station will be installed as soon as possible. Upon installing relevant monitoring equipment, reporting shall commence. Internal environmental audits shall be undertaken. Incident and non-compliance reports that were sighted did not warrant any monitoring updates.	Compliant
D7	D7. For the purposes of the conditions of this consent, as set out in the EP&A Act, "monitoring" is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an "environmental audit" is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.	Constellation Project groundwater results extract (excel file); Water Management Plan	Groundwater monitoring is being undertaken as per results sighted, as per the Water Management Plan.	Compliant
D8	D8. Noise, blast and/or air quality monitoring under this consent may be undertaken at suitable representative monitoring locations instead of at privately-owned residences or other locations listed in Part B, providing that these representative monitoring locations are set out in the respective management plan/s.	Audit discussions, Air Quality and Greenhouse Gas Management Plan, Noise and Vibration Management Plan	Noise and blast monitoring monitoring locations as per Noise and vibration management plan. Air quality monitoring shall be undertaken via dust gauges as per AQGGMP. As per audit discussions, Aeris is in the process of procurement of required gauges to be installed.	not triggered

ACCESS TO INFORMATION				
D9	D9. Within 12 months of the commencement of development under this consent until the completion of all rehabilitation required under this consent, the following information and documents must be publicly available on the development website as they are obtained, approved or as otherwise stipulated within the conditions of this consent: (a) the EIS; (b) all current statutory approvals for the development; (c) all approved environmental management documents required under the conditions of this consent; (d) the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; (e) regular reporting on the environmental performance of the development in accordance with the reporting requirements in any environmental management documents approved under the conditions of this consent; (f) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved environmental management documents; (g) a summary of the current phase and progress of the development; (h) contact details to enquire about the development or to make a complaint; (i) complaints register, updated monthly; (j) audit reports prepared as part of any Independent Environmental Audit of the development and the Applicant's response to the recommendations in any audit report; (k) any other matter required by the Planning Secretary; and (l) kept such information up to date.	Audit discussions	The construction phase commenced in May 2026. This condition is not yet due, Aeris to undertake the required actions within the prescribed timeframe of 12 months. The auditor was advised that the Aeris website is in the process of updating to include details of Constellation project including the requirements under this condition of consent. This is to be reviewed in subsequent audits.	not triggered

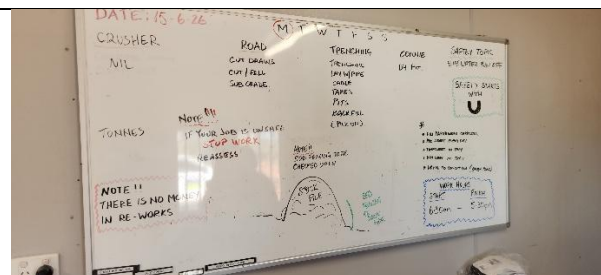
APPENDIX D – SITE PHOTOGRAPHS

	
Hollow bearing tree marked, Mitchell Hwy	One of several hollow bearing trees marked, Okeh Road
	
Traffic control along Okeh Road	
	
Minor dust emission from local traffic on Okeh Road	Water pipe being installed, Okeh Road
	
Water pipe installation works along Okeh Road with ERSED in place	End capping of welded water pipes to be installed

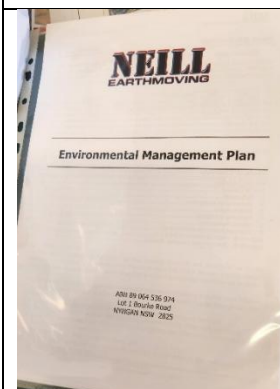
	
ERSED, pipe laying trenching, Okeh Road	Water conveyance pipe welding, Okeh Road
	
Visual amenity tree line, Karingal property	Scar tree salvage remnants, Okeh Road
	
End of Okeh Road, outside Okeh property	View of Okeh Road from outside Okeh property
	
Stormwater drainage infrastructure constructed by Council, near Okeh Road	
	
Water truck in operation for dust control	Site office power generator with spill kit



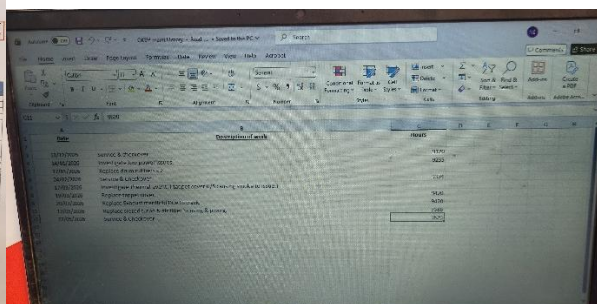
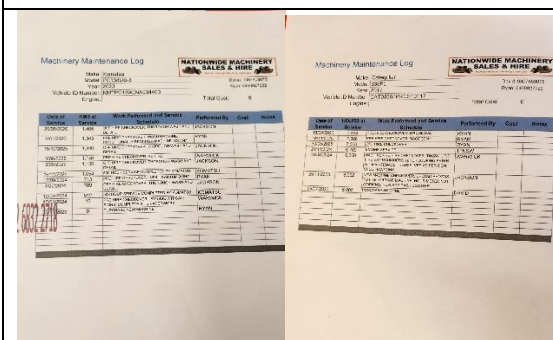
Site office, Neill Earthmoving



Daily toolbox talk evidence on whiteboard



Neill Earthmoving contractor's Management System documentation on display at site office



Plant and equipment maintenance records kept by Neill Earthmoving contractor



Scar tree salvage location, Okeh Road



Scar trees remnants protected in place, Mitchell Highway



Off-site container where Scar tree salvaged items are protected, and contents



Rags are used to protect scar tree #15 salvage item, in the locked up container