

| Source                    | No.    | Condition                                                                                                                                                                                                                                                                                                        | Observation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                             | Risk Level                    | Response                                                                                                                                                                                                                                                                                                                                                                                                                                    | Timeframe                                   |
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| Project Approval DA 41/98 | 2(a)   | The Applicant shall meet the statutory requirements of all public authorities having responsibilities for environmental protection, pollution control, and land and water conservation approvals and licences in respect of the mine operation and associated works encompassed by DA No. 41/98.                 | The EPL for the mine (Conditions O4.4, O4.5 and O4.6) specify the requirements for bulk fuel / liquids storage.<br>The EPA, during their inspection in early 2023 reported that the bulk diesel facility and the storage of some bulk liquids within existing bunds, did not comply with all of the requirements of AS1940 and therefore did not satisfy all of the requirements specified in the EPL. The EPA issued a Post Inspection Letter to Tritton on 21 February 2023 describing the deficiencies and requesting rectification of the issues identified.<br>Tritton commissioned an independent review of the fuel storage area, provided that report to the EPA and implemented the recommendations from that study.<br>During the site inspection 200 litre drums and 1000 litre IBCs were observed that were stored in unbunded areas or stacked on the edge of bunded areas where leaks from those containers would not be contained.                                                                                                                                                                                                           | Undertake a detailed survey of all fuel, oil, grease, chemical and liquid waste (including oils and greases) storage areas to determine the storage needs.<br>Provide sufficient bunded storage that complies with the requirements of AS/NZ 1940.                                                                                                                                                                                         | Medium                        | Tritton will conduct a site wide review of all hydrocarbon and chemical storage. Where inadequacies of storage bunding are identified, a further action plan will be developed to upgrade bunding to comply with AS/NZ 1940.                                                                                                                                                                                                                | 31/05/2025                                  |
| Project Approval DA 41/98 | 3J     | 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                                                            | Training materials covering elements of the approval were reviewed.<br>Records of training from the audit period were sighted.<br>It is noted that housekeeping, and in particular the storage of hydrocarbons and wastes do not meet minimum industry standards (refer to compliance findings below).<br>It was also noted that hydrocarbon spills in (at least) the laydown area were of a size that would potentially trigger incident reporting to the EPA and DPHI.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Prepare detailed guidelines for the storage of hydrocarbons, chemicals and wastes, including housekeeping and maintenance requirements.<br>Tritton should revise the PRIMP to provide clear guidance for the classification, management and reporting of hydrocarbon spills and leaks and ensure that those requirements are reflected in the EMS.<br>Provide training for all operational personnel in the management of those materials. | Administrative Non-Compliance | Tritton has an update of the Hydrocarbon and Chemical Management Plan is in progress. Outcomes from this audit will be used to further inform the update.<br><br>Tritton last reviewed the PIRMP in Feb 2024, this is scheduled for review and this review will consider this audit recommendation.<br><br>Tritton will develop a new training package for chemical and hydrocarbon management and commence training operational personnel. | 1/03/2025<br><br>1/04/2025<br><br>1/06/2025 |
| Project Approval DA 41/98 | 4      | A copy of the MOP, excluding commercial in confidence information, shall be forwarded to the Council and Secretary within 14 days of acceptance by DRG.                                                                                                                                                          | No evidence was available to verify the submission of the Rehabilitation Management Plan to either Council or DPHI.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Provide a copy of the Rehabilitation Management Plan to DPHI and Council.                                                                                                                                                                                                                                                                                                                                                                  | Administrative Non-Compliance | Tritton would like it noted that it has the current RMPs available on it's public website, however will send a copy to DPHI and Bogan Shire Council.                                                                                                                                                                                                                                                                                        | 31/01/2025                                  |
| Project Approval DA 41/98 | 5      | The Applicant shall ensure that suitably qualified personnel are appointed to:<br>i. be responsible for the preparation of relevant <u>environmental documentation</u> ;                                                                                                                                         | The Tritton Copper Mine, at the time of this IEA has a small environmental team including the Environmental Superintendent and a Senior Environmental advisor. The personnel in those positions had appropriate qualifications and experience. However, those personnel are shared across four projects and spend between 20% – 25% of their time working on the Tritton Mine.<br>During the audit period, there were periods during which the positions of Environmental Superintendent and Senior Environmental Advisor were vacant, including a period of at least three months when both of those positions were vacant.<br>It is the Auditor's opinion, based on the environmental resourcing available at the mine throughout the audit period, observations made during the audit site inspections and review of environmental documents and records, that the environmental and compliance performance of the mine has been impacted by the lack of environmental resources.<br>Further the current resourcing level (four part time personnel) is insufficient to fulfil all of the requirements of the Approval and other statutory requirements. | Undertake an urgent review of environmental resource requirements for the operation to ensure that sufficient resources are available to keep key documentation up to date, undertake regular (detailed) environmental inspections, provide environmental training and to advise managers on environmental performance requirements and compliance.                                                                                        | Medium                        | Tritton to complete a review environmental resourcing                                                                                                                                                                                                                                                                                                                                                                                       | 1/05/2025                                   |
| Project Approval DA 41/98 |        | ii. be responsible for considering and advising on matters specified in the conditions of this consent and compliance with such matters;                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                            |                               |                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                             |
| Project Approval DA 41/98 |        | iii. be responsible for receiving and responding to any complaints;                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                            |                               |                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                             |
| Project Approval DA 41/98 |        | iv. facilitate an induction and training program for all persons involved with construction activities, mining and remedial activities (including surface drainage mitigation works); and                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                            |                               |                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                             |
| Project Approval DA 41/98 |        | v. have the authority and independence to require reasonable steps to be taken to avoid or minimise unintended or adverse environmental impacts and failing the effectiveness of such steps, to stop work immediately if an adverse impact on the environment is likely to occur.                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                            |                               |                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                             |
| Project Approval DA 41/98 | 6      | The Applicant shall prepare an Environmental Management Plan (EMP) for the mining operation                                                                                                                                                                                                                      | An Environmental Management Strategy was being prepared at the time of this IEA.<br>The 2022 Independent Environmental Audit assessment of this Approval Condition referenced a Framework Environmental Management Plan (September 2012).<br>The Auditor understands that the Framework EMP is no longer in use and that the EMS that is being prepared is to meet the requirements of <u>Condition 6</u> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Finalise the Environmental Management Strategy and ensure that it meets all of the requirements of Condition 6 of the Approval                                                                                                                                                                                                                                                                                                             | Administrative Non-Compliance | Tritton is current progressing the development of the Environmental Management Strategy, our new framework document for our environmental management.                                                                                                                                                                                                                                                                                       | 28/02/2025                                  |
| Project Approval DA 41/98 | 6 (II) | The Applicant shall prepare an Environmental Management Plan (EMP) for the mining operation, which shall include the preparation of the following:<br>II. a Contingency Strategy prepared in consultation with BCS for any threatened species that maybe affected by the construction and operation of the mine; | The Flora and Fauna Management Plan does not contain a Contingency Strategy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Finalise the Biodiversity & Land Management Plan and ensure that it meets all of the requirements of the Approval including the inclusion of a Contingency Strategy and that, that strategy is prepared in consultation with BCS.                                                                                                                                                                                                          | Administrative Non-Compliance | Tritton is presently developing a new Biodiversity & Land Management Plan that will address this condition. Once internal review completed, there will be consultation with Biodiversity, Conservation & Science to meet this recommendation.                                                                                                                                                                                               | 1/03/2025                                   |

| Source                    | No.     | Condition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Observation                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Recommendation                                                                                                                                          | Risk Level                    | Response                                                                                                                                                                                                                                             | Timeframe  |
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| Project Approval DA 41/98 | 6 (IV)  | The Applicant shall prepare an Environmental Management Plan (EMP) for the mining operation, which shall include the preparation of the following:<br>IV. a Noise and Vibration Management Strategy in consultation with the EPA, including noise management procedures, monitoring protocols and measures to ensure compliance with the noise criteria and operating conditions in this consent; and                                                                                                                                                             | The noise criteria specified in the current Noise and Vibration Management Plan are not consistent with those specified in Condition 38.                                                                                                                                                                                                                                                                                                                       | Review and revise the Noise and Vibration Management Plan / strategy in consultation with TfNSW and Council.                                            | Administrative Non-Compliance | Tritton has scheduled to update the Noise and Vibration Management Plan in February 2025. Once internal review completed, there will be consultation with TfNSW and Bogan Shire Council to meet this recommendation.                                 | 1/04/2025  |
| Project Approval DA 41/98 | 6 (V)   | The Applicant shall prepare an Environmental Management Plan (EMP) for the mining operation, which shall include the preparation of the following:<br>V. a Dust Management Strategy for the development, prepared in consultation with the EPA. The strategy must describe the air quality management system in detail and describe the measures that would be implemented to ensure compliance with condition 48 of schedule 2 of this consent.                                                                                                                  | Dust Management Plan does not define dust trigger levels (as required under Condition 48) or provide a contingency plan should exceedances in the dust trigger levels occur.                                                                                                                                                                                                                                                                                   | Review and revise the Dust Management Plan / strategy in consultation with the EPA.                                                                     | Administrative Non-Compliance | Tritton has scheduled to develop a new Air Quality & Greenhouse Gas Management Plan that will address this condition. Once internal review completed, there will be consultation with EPA to meet this recommendation.                               | 1/04/2025  |
| Project Approval DA 41/98 | 6A      | By the end of March each year, unless the Secretary agrees otherwise, the Applicant must review the environmental performance of the development for the previous calendar year to the satisfaction of the Secretary.                                                                                                                                                                                                                                                                                                                                             | The annual Environmental Management Report for each reporting year of the audit period were reviewed.<br>Each of the annual reports provided the information required by this Condition.<br>The 2023 Annual Review was completed is August 2024, outside of the required reporting date.                                                                                                                                                                       | Ensure that future Annual Reviews are completed and submitted to DPHI before the end of March unless otherwise approved by DPHI.                        | Administrative Non-Compliance | Tritton notes the recommendation                                                                                                                                                                                                                     |            |
| Project Approval DA 41/98 | 6B      | The Applicant must review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Secretary within 3 months of the:<br>I. submission of an incident report under condition 7 of Schedule 2;<br>II. submission of an audit report under condition 8 of Schedule 2; or<br>III. any modification to the conditions of this consent.<br>Where this review leads to revisions in any such document, then within 6 weeks of the review the revised document must be submitted to the Secretary for approval. | A review of management plans was not undertaken within three months of the 2021 Independent Environmental Audit or the approval of MOD 8 in June 2022.<br>A plan for the review and revision of all management plans has been prepared and is being implemented.                                                                                                                                                                                               | Ensure that all management plans are reviewed and if necessary revised in accordance with the Management Plan Update Schedule prepared in October 2024. | Administrative Non-Compliance | Tritton has revised the Management Plan Update Schedule due to some delays, however remains committed to having all management plan updates completed by April 2025.<br>Any regulator consultations, reviews or approvals will follow this schedule. | 1/04/2025  |
| Project Approval DA 41/98 | 8       | Within 3 months of commencing an Independent Environmental Audit, or unless otherwise agreed by the Secretary, a copy of the audit report must be submitted to the Secretary, and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations.                                                                                                                                                                                            | The 2021 Independent Environmental Audit was commenced on 9 December 2021. A report was prepared and submitted to DPE on 31 March 2022.<br>Following the review of the report by DPE, amendments to the report were requested (by DPE) and a final version issued on 8 August 2022.<br>The first version of the 2021 IEA report was issued outside of the reporting period required by the Approval.                                                           | Ensure that all future audits are undertaken in accordance with the timings specified in the Approval.                                                  | Administrative Non-Compliance | Tritton notes the recommendation and comments further that this is captured in annual operational planning.                                                                                                                                          |            |
| Project Approval DA 41/98 | 8-1     | The recommendations of the Independent Environmental Audit must be implemented to the satisfaction of the Secretary.                                                                                                                                                                                                                                                                                                                                                                                                                                              | All recommendations and subsequent commitments made by Tritton have not been actioned.<br>For example, in response to the lack of access to a water cart for dust suppression works during the last IEA, Tritton committed to developing a Trigger Action Response Plan (TARP) to address this issue. Table 7 in the Draft Dust Management Plan describes the TARPs developed. However, the do not cover the breakdown or unplanned maintenance of water carts | Review all recommendations from the 2021 Independent Environmental Audit and ensure that they are actioned and closed out.                              | Administrative Non-Compliance | Tritton to review 2021 IEA to identify outstanding actions and close them out.                                                                                                                                                                       | 1/03/2025  |
| Project Approval DA 41/98 | 13F (c) | The Applicant must prepare a Water Management Plan for the development to the satisfaction of the Secretary. This plan must:<br>(c) be submitted to the Secretary for approval within                                                                                                                                                                                                                                                                                                                                                                             | The review of the plan from 2021 has not been completed.                                                                                                                                                                                                                                                                                                                                                                                                       | Ensure that the revised Water Management Plan is submitted to DPHI for review and approval                                                              | Administrative Non-Compliance | Tritton is presently undertaking a major update of the Water Management Plan. Once internal review completed, it will be submitted to DPHI for review and approval.                                                                                  | 31/03/2025 |

| Source                         | No.      | Condition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Observation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Recommendation                                                                                                                                                                 | Risk Level                    | Response                                                                                                                                                                                                                             | Timeframe  |
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| Project Approval DA 41/98      | 23       | Prior to the construction of the tailings dam, and following consultation with the RR and EPA, the Applicant shall prepare a Management and Monitoring Plan for the Tailings Dams to the satisfaction of the Secretary. The Plan shall be prepared by a suitably qualified person. The Plan shall include but not be limited to:<br>(i) A full list of chemicals and reagents and their concentrations to be released into the tailings dams and the expected dilutions of those chemicals and reagents after release;<br>(ii) (ii) A toxic profile of these chemicals and reagents (i.e. in tailings water). | The 2018 IEA raised a Non-Compliance against this condition as the document did not address all requirements of this Condition and for lack of evidence of consultation with the RR and EPA. In addition, an approval from DPE (Secretary) was not sighted. It is noted that the 2018 IEA reviewed Rev4a though the OMM was updated to Rev5 in June 2018 which was not cited in the 2018 IEA.<br>It is noted that the Aeris Resources Response to Audit Recommendations offered to revise the TSF OMM to address the Non-Compliance. The updated version Rev6 was sighted in the 2019 IEA, however specific requirements on chemicals and reagents were not addressed in the updated version. Evidence of consultation with RR and EPA was also not sighted. | Revise the Tailings Dam Management and Monitoring Plan, consult with the Resource Regulator and the EPA and ensure that the plan is submitted to DPHI for review and approval. | Administrative Non-Compliance | Tritton is presently undertaking a major update the Waste Management Plan, which will contain management measures and monitoring for Tailings. Once internal review completed, it will be submitted to DPHI for review and approval. | 30/04/2025 |
| Project Approval DA 41/98      | 24       | The Applicant shall implement the Management and Monitoring Plan in accordance with its provisions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | A copy of the Management and Monitoring Plan was not available to the Auditor. Compliance with this Condition could not be verified                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Ensure that the requirements of the Tailings Dam Management and Monitoring Plan are fully implemented.                                                                         | Administrative Non-Compliance | Tritton notes the recommendation. The Waste Management Plan will contain Tailings management and monitoring for implementation.                                                                                                      |            |
| Project Approval DA 41/98      | 45       | The Applicant shall prepare management and protection measures in consultation with the Heritage NSW and the relevant local Aboriginal groups for those Aboriginal sites within the development site within 50 metres of any proposed area of disturbance, that have been identified to date and for which there is a potential for disturbance.                                                                                                                                                                                                                                                              | Section 8 of the Draft Heritage Management Plan describes the measures to be implemented to protect heritage items and sites. No evidence was available to verify that these measures were prepared in consultation with the nominated parties.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Finalise the preparation of the Heritage Management Plan and ensure that Heritage NSW and all relevant Aboriginal parties are consulted.                                       | Administrative Non-Compliance | Tritton is finalising the Heritage Management Plan and once internal review is completed, it will go for external consultation including Heritage NSW and Aboriginal stakeholders.                                                   | 1/03/2025  |
| Project Approval DA 41/98      | 50       | Prior to undertaking any blasting activities, the Applicant shall prepare and submit a blasting protocol to the Secretary and EPA prior to the commencement of operations.                                                                                                                                                                                                                                                                                                                                                                                                                                    | A Blasting protocol has not been prepared.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Prepare a blasting protocol for all blasting (including sub-surface blasting).                                                                                                 | Administrative Non-Compliance | Tritton does not agree with the 2024 IEA recommendation as we do not believe this has been triggered as Tritton is an underground mine only. The 2021 IEA noted this was compliant as untriggered.                                   |            |
| Standard Mining Lease Condions | D3-15(1) | (1) The holder of a mining lease must do the following before the end of the initial period—<br>a) prepare a rehabilitation management plan, and                                                                                                                                                                                                                                                                                                                                                                                                                                                              | The Initial Period ended on 1 August 2022.<br>The first version of the Rehabilitation Management Plan (Rev 1.1) was, according to the revision table in the plan, published (and submitted to the RR) on 15 June 2023.<br>The completion of the RMP occurred after the end of the Initial Period.                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Ensure all future versions of the Rehabilitation Documents are prepared and/or submitted to the RR in accordance with the approved timelines.                                  | Administrative Non-Compliance | Tritton notes the recommendation                                                                                                                                                                                                     |            |
| Standard Mining Lease Condions |          | b) prepare rehabilitation outcome documents and give them, other than the rehabilitation completion criteria statement, to the Secretary for approval, and                                                                                                                                                                                                                                                                                                                                                                                                                                                    | The Initial Period ended on 1 August 2022.<br>The RR in their email of 1 December 2022 stating that the RR would not grant an extension of time for the submission of the Rehabilitation Objectives, Forward Program or Spatial Data.<br>The Submission of the completion criteria statement occurred after the end of the Initial Period.                                                                                                                                                                                                                                                                                                                                                                                                                   | Ensure all future versions of the Rehabilitation Documents are prepared and/or submitted to the RR in accordance with the approved timelines.                                  | Administrative Non-Compliance | Tritton notes the recommendation                                                                                                                                                                                                     |            |
| Standard Mining Lease Condions |          | c) prepare a forward program and give it to the Secretary.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | The Initial Period ended on 1 August 2022.<br>The RR in their email of 1 December 2022 stating that the RR would not grant an extension of time for the submission of the Rehabilitation Objectives, Forward Program or Spatial Data.<br>The Submission of the first forward program occurred after the end of the Initial Period.                                                                                                                                                                                                                                                                                                                                                                                                                           | Ensure all future versions of the Rehabilitation Documents are prepared and/or submitted to the RR in accordance with the approved timelines.                                  | Administrative Non-Compliance | Tritton notes the recommendation                                                                                                                                                                                                     |            |
| Standard Mining Lease Condions | D3-15(3) | (3) A rehabilitation completion criteria statement relating to completion of rehabilitation during a period covered by a forward program must be given to the Secretary for approval when the forward program is required to be given to the Secretary                                                                                                                                                                                                                                                                                                                                                        | The last version of the completion criteria statement is produced in the Rehabilitation Management Plan.<br>No evidence was available to verify that the completion criteria statement was submitted with the Forward Program.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Ensure all future revisions of the completion criteria statement are submitted to the RR in conjunction with the Forward Program.                                              | Administrative Non-Compliance | Tritton notes the recommendation                                                                                                                                                                                                     |            |
| Standard Mining Lease Condions | D3-16    | (3) If a document is published on the website of the holder of the mining lease, the holder must ensure that it is published—<br>(a) for a rehabilitation management plan—within 14 days after it is prepared or amended, or                                                                                                                                                                                                                                                                                                                                                                                  | The RR issued a formal warning to Tritton following its investigation relating to the failure to make the Remediation Management Plan Publicly available.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Ensure all future revisions of all remediation documentation required is made available on the project website within the timelines specified                                  | Administrative Non-Compliance | Tritton notes the recommendation                                                                                                                                                                                                     |            |
| Standard Mining Lease Condions | D4-18    | (1) The holder of a mining lease must provide the Minister with a written report detailing any non-compliance with-<br>(a) a condition of the mining lease                                                                                                                                                                                                                                                                                                                                                                                                                                                    | During this audit period a number of submission dates for key documents was missed. Those non-compliances were not reported to the RR. It is noted that TGO responded formally to the RR's commencement of investigation, however that response was in relation to advise provided by the RR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Track compliance against the Mining Lease Conditions and proactively report any non-compliances to the RR within seven days of becoming aware of those non-compliances.        | Administrative Non-Compliance | Tritton notes the recommendation                                                                                                                                                                                                     |            |

| Source                            | No.    | Condition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Observation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Recommendation                                                                                                                                                                                                                                                                                                                                      | Risk Level                    | Response                                                                                                                                                                                                                                                                            | Timeframe |
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| Standard Mining Lease Conditiions | D4- 19 | (1) The holder of a mining lease must nominate a natural person to be the contact person with whom the Secretary can communicate in relation to the mining lease for the purposes of the Act.<br>(2) The holder of the mining lease must give written notice to the Secretary of—<br>(a) the full name and contact details of the nominated person—within 28 days after the date on which the standard conditions apply to the mining lease under clause 31A of this Regulation, and<br>(b) any change in nomination or in the nominated person’s contact details— within 28 days after the change occurs. | Clause 19 in Schedule 8A requires the lease holder to Nominate a Contact Person (NCP) with whom the RR can communicate with in relation to the mining lease(s) for the purposes of the Mining Act 1992.<br>According to RR records, the Tritton Copper Mine failed to provide details of the nominated contact.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Ensure that the RR is advised of any future changes in the nominated contact person.                                                                                                                                                                                                                                                                | Administrative Non-Compliance | Tritton notes the recommendation                                                                                                                                                                                                                                                    |           |
| Mining Lease 1544                 | 28     | The lease holder must prepare a Tailings Management Plan in accordance with the "Strategic Framework for Tailings Management" produced by the Ministerial Council on Minerals and the Minerals Council of Australia. This Plan must detail all measures required for effective storage and disposal of tailings and be appended to the Mining Operations Plan (MOP) required to be lodged in accordance with Condition No. 2. For reporting and other purposes the Tailings Management Plan is considered to form part of the Mining Operations Plan (MOP).                                                | Mine Closure Plan has not been revised/updated as per gap analysis. The 2018 and 2021 IEAs raised noncompliances relating to the content of the plan and need to update the plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | This requirement has now been superseded by the 2022 changes to the Mining Act.                                                                                                                                                                                                                                                                     | Administrative Non-Compliance | Mine Closure Plan has been replaced by Rehabilitation Management Plans, however these do not cover Tailing Management. Tritton advises that management of Tailings is now covered by the Waste Management Plan (being updated) and the Tailings Dam Operations & Maintenance Manual |           |
| Mining Lease 1544                 | 31     | The lease holder must employ a suitably qualified and experienced Environmental Officer to be on site during the term of the mining lease. This Officer is to be responsible and accountable for all environmental and rehabilitation requirements under the mining lease. The appointment of an Environmental Officer is subject to the approval of the Director- General.                                                                                                                                                                                                                                | The Tritton Copper Mine, at the time of this IEA has a small environmental team including the Environmental Superintendent and a Senior Environmental advisor. The personnel in those positions had appropriate qualifications and experience. However, those personnel are shared across four projects and spend between 20% – 25% of their time working on the Tritton Mine.<br>During the audit period, there were periods during which the positions of Environmental Superintendent and Senior Environmental Advisor were vacant, including a period of at least three months when both of those positions were vacant.<br>It is the Auditor’s opinion, based on the environmental resourcing available at the mine throughout the audit period, observations made during the audit site inspections and review of environmental documents and records, that the environmental and compliance performance of the mine has been impacted by the lack of environmental resources.<br>Further the current resourcing level (four part time personnel) is insufficient to fulfil all of the requirements of the Approval and other statutory requirements. | Undertake an urgent review of environmental resource requirements for the operation to ensure that sufficient resources are available to keep key documentation up to date, undertake regular (detailed) environmental inspections, provide environmental training and to advise managers on environmental performance requirements and compliance. | Medium                        | Refer to response for Condition 5 Project Approval DA 41/98                                                                                                                                                                                                                         |           |