Independent Environmental Audit
Tritton Copper Mine

transport | community | mining | industrial | food & beverage | energy



Prepared for:	**Aeris Resources Limited**
Client representative:	**Dean Woods**
Date:	**16 Nov 2018** **Rev 1**

pitt&sherry

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Prepared by:	**Avanish Panikkar**	Date:	14 Nov 2018
Reviewed by:	**Ken Holmes**	Date:	14 Nov 2018
Authorised by:	**Ken Holmes**	Date:	14 Nov 2018

Revision History

Rev No.	Description	Prepared by	Reviewed by	Authorised by	Date
A	Draft report (internal)	A. Panikkar	K. Holmes	-	-
0	Draft report (client)	A. Panikkar	K. Holmes	K. Holmes	14 Nov 2018
1	Final report (client)	A. Panikkar	K. Holmes	K. Holmes	16 Nov 2018

Acronyms

BSC	Bogan Shire Council
CCC	Community Consultative Committee
DECC	Department of Environment and Climate Change
DoI	Department of Industries
DPI	Department of Planning and Infrastructure
DP&E	Department of Planning and Environment (formerly DP&I)
DRE	Department of Resources and Energy
EA	Environmental Assessment
EMP	Environmental Management Plan
EP	Extraction Plan
EPA	NSW Environment Protection Authority
EPL	Environmental Protection Licence
EP&A Act	Environmental Planning and Assessment Act 1979
I&I	NSW Industry & Investment NSW
ML	Mining Lease
MOP	Mine Operations Plan
NOW	NSW Office of Water
OEH	NSW Office of Environment and Heritage
OoW	Office of Water
RMP	Rehabilitation Management Plan
SCA	Sydney Catchment Authority
SoC	Statement of Commitments
TSF	Tailings Storage Facility
TSS	Total Suspended Solids
Water NSW	(formerly SCA and State Water Corporation) NSW State-owned Corporation acting as bulk water supplier and operator of rivers, dams and pipelines
WMP	Water Management Plan

Executive Summary

Pitt&sherry was engaged by Aeris Resources Limited / Tritton Resources Pty Limited, to conduct an Independent Environmental Audit (IEA) of the Tritton Copper Mine located on Yarrandale Road, Hermidale, New South Wales (NSW). The audit comprised a site inspection on Wednesday 25 September 2018 and Thursday 26 September 2018, document review, interviews with personnel, consultation with agencies and reporting of the findings. The audit was undertaken in accordance with the brief outlined in the **pitt&sherry** Proposal (dated 12 July 2018). Environmental performance of the project is reviewed by way of compliance with the requirements and conditions of the following regulatory approvals and provides recommendations to improve the environmental performance of the project.

- Consolidated Consent on the Development Application 41/98 (Mod 5, dated 7 April 2015)
- Environmental Protection Licence (EPL) No. 11254
- Mining Lease 1544

The IEA was required in accordance with Condition 8, Schedule 2 of the Consolidated Consent on the Development Application 41/98 for the mine. In line with this, an initial independent external environmental audit was to be undertaken two years after commencement of site operations and every 3 years thereafter. The previous IEA was undertaken in November 2014 and report finalised in May 2015. This present audit covered the period from 1 January 2015 to 26 September 2018.

The site was found to be in reasonably good condition during the site inspection and the operations were contained to within the site boundaries. Detailed review of documentation and interviews identified a number of issues that need to be addressed and these are outlined in the compliance section of this audit report (Table 4) as well as summarised below.

Some of the non-compliances identified in the previous audit have been satisfactorily addressed by the auditee while some remain outstanding, as noted in the compliance review table in this report. In general, operational environmental management activities observed during the site inspection were being carried out in a competent manner, with the non-compliances identified by the Auditors being the exception. Those non-compliances and observations are detailed in the body of this report.

During the site inspection and audit review, non-compliances and opportunities for improvement were identified in the following areas:

- Tailings Storage Facility
- General Site Management and Housekeeping and
- Records / Documents Management.

Auditor Certification

Independent Audit Certification Form	
Development Name	Tritton Resources Pty Ltd, Hermidale
Development Consent No.	Consolidated Consent on the Development Application 41/98
Description of Development	Copper Mine
Development Address	Yarrandale Road, Hermidale NSW 2831
Proponent	Aeris Resources Pty Ltd
Operator Address	Tritton Resources Pty Ltd PO Box 386 Nyngan NSW 2825
Independent Audit	
Title of Audit	Tritton Copper Mine Independent Environmental Audit
I certify that I have undertaken the independent audit and prepared the contents of the attached independent audit report and to the best of my knowledge: *• The audit has been undertaken in accordance with relevant approval condition(s) and in accordance with the auditing standard AS/NZS ISO 19011:2011 and Post Approval Guidelines – Independent Audits* *• 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, in an unbiased manner and did not allow undue influence to limit or over-ride objectivity in conducting the audit;* *• I am not related to any owner or operator of the development as an employer, business partner, employee, sharing a common employer, having a contractual arrangement outside the audit, spouse, partner, sibling, parent, or child;* *• I do not have any pecuniary interest in the audited development, including where there is a reasonable likelihood or expectation of financial gain or loss to me or to a person to whom I am closely related (i.e. immediate family);* *• Neither I nor my employer have provided consultancy services for the audited development that were subject to this audit except as otherwise declared to the lead regulator prior to the audit; and* *• I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from fair payment) from any owner or operator of the development, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.* *Note.* *a) The Independent Audit is an 'environmental audit' for the purposes of section 122B(2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, $1 million and for an individual, $250,000.* *b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or $22,000, or both).*	
Signature	
Name of Lead/Principal Auditor	Ken Holmes
Address	4 Baeckea Place, Frenchs Forest, NSW
Email Address	kholmes@pittsh.com.au
Auditor Certification (if relevant)	Exemplar Global 14065
Date	14 November 2018

1. Introduction

pitt&sherry was engaged by Tritton Resources Pty Ltd, to conduct an Independent Environmental Audit (IEA) of the Aeris Tritton Copper Mine located on Yarrandale Road, Hermidale, NSW 2831. The IEA was required in accordance with condition 8, schedule 2 of the Consolidated Consent to Development Application (Mod 5, dated 7 April 2015) for the mine. In line with this, an independent external environmental audit is to be undertaken at two years after the commencement of operations and every 3 years thereafter. The previous IEA was undertaken in November 2014 and report finalised in May 2015. This present audit covered the period from 1 January 2015 to 26 September 2018.

This IEA report details the audit process, presents the audit findings and provides recommendations that if implemented will facilitate improved compliance with environmental approvals.

1.1 Tritton Copper Mine

Aeris Resources operates the Tritton Copper Mine, located on Yarrandale Road, Hermidale, New South Wales (NSW). The Project Approval 41/98 was granted on 1 September 1999 under Section 91 of the NSW EP&A Act by the NSW Minister for Urban Affairs and Planning and has been modified five times since that time.

1.2 Audit Summary

Audit Title:	Tritton Copper Mine Independent Environmental Audit
Site:	Yarrandale Road, Hermidale
Client Contact:	Dean Woods
Position:	Environmental Coordinator
Client:	Aeris Resources Limited
Client Address:	PO Box 386 Nyngan NSW 2825
Mine Address:	Tritton Warehouse, Yarrandale Road, Hemidale NSW 2831
Client Telephone:	02 6838 1100
Client Email:	dwoods@tritton.com.au
Auditors:	Ken Holmes – Certified Lead Auditor Dr Avanish Panikkar – Certified Principal Auditor
Auditor's Telephone:	0438 046 261
Auditor's Fax:	(02) 8008 1600
Date of Site Visit	25-26 September 2018
Audit Scope:	The audit was undertaken as per the brief outlined in the **pitt&sherry** Proposal (dated 12 July 2018). As such, the audit provides an assessment of the environmental performance of the project by way of compliance with the requirements and conditions of the following regulatory approvals and provides recommendations to improve the environmental performance of the project. • Consolidated Consent to Development Application 41/98 (Mod 5, dated 7 April 2015) • Environmental Protection Licence (EPL) No. 11254 • Mining Lease 1544

2. Audit Process

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

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

2.1 Preliminary Activities

Off-site planning for the site audit comprised:

- Initial discussions with Dean Woods, Environmental Coordinator, to organise the site inspection
- Prepare and Review the audit protocol / compliance checklist
- Completion of a **pitt&sherry** Site Risk Assessment
- Undertake Tritton Mines safety induction
- Review of Tritton Copper Mine online information
- Submission of a preliminary document / record request
- Consultation with relevant agencies.

2.1.1 Consultation with Agencies

In accordance with Condition 8(b) of DA41/98, pitt&sherry consulted with the following agencies during the audit planning stage:

- NSW Environmental Protection Authority (EPA)
- Bogan Shire Council
- WaterNSW (environmental assessments)
- Department of Resources and Energy and
- Department of Planning & Environment (Mark Buchan)

Emails were sent to each of the above agencies advising them of the planned audit and the scope of the audit and inviting them to provide comments/requirements or specific environmental issues they required the audit to target.

Responses were received as below:

- DP&E (Mark Buchan, via phone on 24 Oct 2018)
- NSW EPA (Helen Smith, via phone and email on 24 Oct 2018)

Both agencies advised the items listed below to be of interest, based on the recent AEMR review and site inspection they had undertaken:

- Waste disposal in the tailings dam
- The level of the tailings dam
- Erosion of the tailings dam
- Hydrocarbon storage and management
- Wastewater management around workshop

2.2 Information Review and Compliance Register

Prior to the site inspection the Auditors reviewed and revised the compliance register which formed both the audit checklist used during the site inspection and is the compliance register presented in the Appendices of this report. The compliance register specifies the conditions within:

- Consolidated Consent to Development Application 41/98 (Mod 5, dated 7 April 2015)
- Environmental Protection Licence (EPL) No. 11254
- Mining Lease 1544

2.3 Site Audit

The audit team conducted the site inspection component of the Tritton Copper Mine audit on 25-26 September 2018.

2.3.1 Opening meeting

Following site inductions, the opening meeting was held on-site at Tritton Copper Mine office. It was attended by the following personnel:

- Dean Woods (Environmental Coordinator)
- Derek Garment (HSET Manager)
- Ken Holmes (Lead Auditor) and
- Dr Avanish Panikkar (Principal Auditor).

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

2.3.2 Site Inspection

A general tour of the site was attended by the audit team, Ken Holmes and Dr Avanish Panikkar, accompanied by Dean Woods. Further site inspection visit was also undertaken to visit specific areas of interest, by Ken Holmes and Dr Avanish Panikkar, accompanied by Dean Woods and Stephen Bodycott (Environmental Technician). After undertaking necessary site inductions, this included observation of:

- Hydrocarbon and chemical storage areas
- Workshop and related facilities
- Mine Portal
- Tailings Storage Facility
- Tritton landfill
- Biodiversity offset areas
- Permanent water source for native animals
- Aboriginal site protection area.

Photographs from the site inspection visit are reproduced in **Appendix A** of this report.

2.3.3 Site Interviews

Audit interview comprised of discussions during site inspection visit and also at the Tritton Mines offices with:

- Dean Woods - Environmental Coordinator
- Derek Garment – HSET Manager
- Stephen Bodycott – Environmental Technician
- Osvaldo Gonzalez – Senior Geologist
- Raymond Tollameche, Senior Maintenance Planner.

2.3.4 Document review

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

2.4 Reporting

The compliance register was completed using notes and observations recorded during the site inspection / interviews and review of appropriate documentation. The completed compliance registers are presented in **Appendix B**. A summary of the non-compliances identified during this audit are provided in **Table 4.** Audit Criteria

The audit criteria used to determine compliance for this audit is defined in Table 1.

Table 1 Compliance assessment criteria

Assessment	Criteria
Compliant	**Compliance** The site complies with the requirements of applicable regulatory instruments (DA/Licence/Permit) & associated environmental requirements. A judgment made by an auditor that the activities undertaken and the results achieved fulfil the specified requirements of the audit criteria. While further improvements may still be possible, the minimum requirements are being met.
Non-Compliant	**Non-Compliance** Clear evidence has been collected to demonstrate the particular requirement has not been complied with and is within the scope of the audit. Site displays little or no evidence of compliance with the requirements of the regulatory documentation.
Observation	**Observation (Minor non-compliance)** Evidence of controls being partially in place, but with some gaps evident. * May have an understanding of requirement but cannot verify its implementation.
Not Verified	Where the auditor has not been able to collect sufficient verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit. In the absence of sufficient verification, the auditor may in some instances be able to verify by other means (visual inspection, personal communication, etc.) that a requirement has been met. In such a situation, the requirement should still be assessed as not verified. However, the auditor

Assessment	Criteria
	could note in the report that they have no reasons to believe that the operation is non-compliant with that requirement.
Not Triggered	**Not Applicable / Not Triggered** The respective condition / requirement was not activated within the scope of the audit.
Noted	A statement or fact, where no assessment of compliance is required.

Risk levels for any non-compliances were identified consistent with Table 2.

Table 2 Risk levels for non-compliances

Risk Level	Description
High	Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence.
Medium	Non-compliance with: • potential for serious environmental consequences, but is unlikely to occur; or • potential for moderate environmental consequences, but is likely to occur.
Low	Non-compliance with: • potential for moderate environmental consequences, but is unlikely to occur; or • potential for low environmental consequences, but is likely to occur.
Administrative non-compliance	Only to be applied where the non-compliance does not result in any risk of environmental harm (e.g. submitting a report to government later than required under approval conditions).

3. Statutory Compliance & Recommendations

The environmental performance of the Tritton Copper Mine has been reviewed by assessing compliance against the various documentation related to project approval, as listed in section 2.2 of this report. Compliance Registers presented in **Appendix B** provide a detailed review of the compliance status of the site, including recommendations to address non-conformances.

3.1 Summary of Compliance Status

A summary of compliance with statutory requirements is provided in Table 3**.** The number of conditions include sub-clauses within each approval document.

Table 3 Summary of Statutory Compliance

Approval/ Licence	No. of Conditions	Compliant	Non-Compliant	Observation	Noted	Not Audited	n/a or Not Triggered
Consolidated Consent (DA 41/98)	133	58	15	10	26	10	14
EPL No. 11254	82	31	6	3	16	0	26
Mining Lease 1544	98	48	0	2	24	2	22
TOTAL	313	137	21	15	66	12	62

3.2 Non-Compliances and Observations

Non-compliances identified during the site inspection, interviews and document reviews are recorded in detail in the Compliance Registers in **Appendix B** and are summarised in Table 4. Observations are listed in Table 5. Recommendations have been made to address all identified Non-Compliances and Observations. Please note that Table 4 includes conditions that could not be verified as compliant during this IEA.

Table 4 Non-Compliances and Recommendations

#	DA 41/98 Condition	Observation	Recommendation	Risk Level
1	4 (v) A copy of the MOP, excluding commercial in confidence information, shall be forwarded to the Council and Secretary within 14 days of acceptance by DRE.	Evidence was not available to confirm that the MOP had been distributed to the Council and Secretary within 14 days of acceptance by DRE.	Evidence of distribution of the MOP to relevant agencies should be maintained.	
2	6 (ii) a Contingency Strategy prepared in consultation with OEH for any threatened species that maybe affected by the construction and operation of the mine;	While the F&FMP identifies the presence of threatened species, neither that plan nor the EMP Framework contains a Contingency Strategy. Consequently, no evidence of consultation with OEH was sighted	Review and update the Land Management Plan and Flora and Fauna Management Plans to ensure that the potential or actual presence of any threatened species is accurately addressed. Prepare a contingency strategy in consultation with OEH.	
3	6 (iii) a Traffic Management Strategy prepared in consultation with the RMS;	Traffic Management Plan for Tritton and Girilambone Mines sighted. No evidence of consultation with RMS was sighted by the Auditors.	Revise the TMP and attach relevant consultation with RMS.	
4	6 (v) The management plans described in (i) to (v) above are to be revised/updated at least every five years in consultation with relevant government authorities and to the satisfaction of the Secretary to reflect changing environmental requirements or changes in technology/operational practices.	Evidence of revision in the last 5 yrs is available for the listed management plans in the document control pages based on current revision dates; however, consultation with relevant authorities not sighted.	Evidence of consultation with relevant agencies should be noted in the next revision of the plans and copies of relevant correspondence retained for future audits.	
5	6A Within 3 months of any modification to the conditions of this consent (unless the conditions require otherwise), the Applicant shall review the EMP required under condition 6 of schedule 2. Where this review leads to revisions of the EMP, then within 2 months of the review, the revised document must be submitted to the Secretary for approval.	The TRL Framework EMP rev 2 as sighted by the Auditors is dated Sept 2012. It is noted that this EMP has not been revised following the April 2015 modification to the Consent. It is noted that the MOP and various specific Management Plans as noted in the MOP were revised in 2016 except: * ESCP 2015 * Remedial Action Plan 2013 * Cultural Heritage Management Plan 2015	Review and Revise the EMP and related Plans in accordance with this Condition.	

6	9 The Tailings Storage Facility shall be designed, constructed, operated, monitored, maintained and finally stabilised so as to: (a) be in accordance with the documents referred to in conditions 1(g) and 1(h) of Schedule 2; (b) be otherwise in accordance with the EIS, the supplementary document prepared in response to Government submissions, and the document titled "Nord Australex Nominees/Straits Mining Joint Venture – Tailings Storage Facility Preliminary Design Report"; (c) ensure that water received in the facility is evaporated, retained, or reused and that there is no overflow of tailings water to the environment unless approved by EPA; and (d) ensure that there is no excessive seepage or leakage from the facility, and that any leakage or seepage is managed in accordance with the requirements of EPA and DRE.	Tailings Storage Facility is operated, monitored and maintained in accordance with the TSF Operations and Maintenance Manual, as sighted by the Auditors. However, a range of waste materials including a large number of 205 L steel drums were observed to have been placed in the TSF that is not as per the original intent of the facility. It is understood that, this matter was raised by EPA and DPE at a AEMR review meeting at the site on 14 August 2018. The EPA also noted that following issues raised: * Waste disposal (drums and plastic bags deposited at various places in the TSF) * Level of tailings dam was noted, visually, to be too close to the embankment and the next lift may cause this to impact the freeboard * Evidence of erosion was noted, visually, on the eastern side of the TSF wall The previous IEA reviewed and commented on the dam surveillance report prepared in 2013 Coffey Mining Pty Ltd that the conditions of this consent were in compliance with the EIS and the Preliminary Design Report. No water overflow was observed at the site audit inspection. TSF surveillance report is prepared annually. The reports prepared by external specialist consultants detail the design and construction activities to-date, details of site surveillance review etc. Section 7 of the 2017 surveillance report details water monitoring.	Ensure TSF is maintained for tailings storage only- plastic materials and drums should not be placed in the TSF and existing wastes deposited with the TSF be removed if safe to do so. Ensure the matters raised by EPA and DPE following 2017 AEMR review inspection are closed out in a timely manner in consultation with EPA and DPE	
7	21 The Applicant shall consult with the OEH when implementing the recommendations detailed in section 4.6.1.1 and 4.6.2.1 of the EIS, including the placement of a fence around the Tailings Storage Facility prior to tailings production.	Letter from Nyngan Rural Land Protections Board was sighted by the Auditor, which gave support to Nord Resources (Pacific) Pty Ltd to erect a fence around the TSF, as required by the referenced sections in the EIS. Perimeter fencing was observed by the Auditor during the Audit inspection. Evidence of consultation in relation	Evidence of consultation with OEH should be noted in the plan and copies of relevant correspondence maintained for reference in future audits.	

		to compliance with OEH is not available during the Audit.		
8	23 Prior to the construction of the tailings dam, and following consultation with the DRE 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 and be submitted to the Department one month prior to the commencement of the works. The Plan shall include but not be limited to:	Revision 4a (2016) of the TSF Operations and Maintenance Manual was sighted by the Auditors. Correspondence confirming consultation with DRE and EPA and approval of DPE (Secretary) was not available.	The TSF Manual should be revised to address requirements of this condition, in consultation with DRE and EPA.	
9	23 (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;	The TSF Operations and Maintenance Manual does not cover the requirements of this Clause.		
10	23 (ii) A toxic profile of these chemicals and reagents (ie in tailings water);			
11	23 (iii) An assessment of expected effects of the chemicals and reagents on the species of concern, particularly threatened species;			
12	23 (iv) Ameliorative measures and contingency planning measures to ensure adverse impacts on wildlife are minimised;			
13	23 (v) Provisions for on-going monitoring of the chemical and reagent concentrations of the tailings dam and wildlife use of the dam; and			
14	23 (vi) The monitoring component of the plan shall also include provision for the monitoring of wildlife usage of the alternative water supply required by Condition 22.			

15	27 (a) Put in place pre-start monitoring. Any Kultarr located should be relocated to suitable habitat as near as possible to the capture site. This habitat shall be defined by a suitably qualified person; and	The auditors did not sight a pre-start checklist that refers to pre-start monitoring of Kultarr and any procedures for their relocation if captured specifically. Section 3.7 of the 2015 AEMR and Section 6.7 of 2016-2017 AEMRs identifies the Kultarr as a relevant threatened fauna to be included in the monitoring activities. A targeted flora and fauna survey was conducted in 2011 by EnviroKey and previously by GHD in 2008 and by Straits Tritton Mines. Dean Woods reported that Tritton Mines undertakes pre-clearance surveys prior to clearing of any vegetation. Any identified threatened fauna will be relocated to compensatory planting area or adjacent vegetation. Hollow logs and trees found in the surveyed area will also be moved to compensatory planting area for habitat creation. No targeted surveys were undertaken during the audit period. No Kultarrs were observed during the audit period on the mine or TSP sites.	Update pre-start procedure /check list to include observations for the presence of Kultarrs.	
#	EPL 11254 Condition	Observation	Recommendation	Risk Level
16	EPL11254 L2.7 Wastes identified above as solid or inert may only be landfilled at the location identified in map titled "Tritton Copper Project Proposed Landfill Location" submitted to the EPA in document "DOC07/48105" on the 26 November 2007.	Wastes other than tailings (drums, pallets, bore cores and boxes, metal) were observed to have been dumped into the TSF.	Update the Waste Management Plan to specify the proper disposal procedures for all waste types and provide updated information and training to relevant personnel (and contractors).	

17	EPL11254 O1.1 Licensed activities must be carried out in a competent manner. This includes: (a) the processing, handling, movement and storage of materials and substances used to carry out the activity: and (b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Observations made by the Auditor during the site inspections confirmed that the processing, handling, movement and storage of materials and substances used to carry out the activity were being carried out in a competent manner. The Auditor's observations in relation to the disposal of waste materials in contravention of Condition L2.7 demonstrate that the disposal of wastes in not being undertaken in a competent manner.	Update the Waste Management Plan to specify the proper disposal procedures for all waste types and provide updated information and training to relevant personnel (and contractors).	
18	EPL11254 O4.4 (b) In the case of drum or container storage areas, a bund floor and wall be constructed of impervious materials. The bunded area must be of sufficient capacity to contain 10% of the total storage capacityof the area. Bund walls must be not less than 250 millimetres in height.	The previous IEA had raised a minor non-compliance to this condition noting the height of the bund at an outdoor drum and container area did not meet the 250mm height requirements and storage capacity requirement. During the current audit, all observed bunds were constructed of concrete. Self-bunded shipping containers have been hired (August 2018), for elevated storage of Class 3 dangerous goods, from RoyalWolf. As per that company's website, this container has 2,400L bund capacity and is designed for storage of Class 3 Hazardous Goods and Liquids. In the mine maintenance area, a number of instances where hydrocarbon and other liquids in 200L drums and 1000L IBCs stored at the edge of bunds were noted. Also observed: * IBCs with no/wrong labels liquid stored on unsealed areas * IBCs with Renolin Lub oil stored on ground in mine storage area * IBCs on bunded pallets not designed for that purpose * drums and IBCs used as bollards, some with liquids in them and original (hydrocarbon) labelling still afixed on the IBCs/drums. * Waste bins for oil filters and hydraulic hoses were found to be stored on unsealed surfaces.	Ensure drums are fully stored within bunds and the bunds have adequate containment volume. Ensure containers are used with correct labelling. Waste materials with hydrocarbons should be stored and disposed of appropriately. Ensure the matters raised by EPA and DPE following 2017 AEMR review inspection are closed out in a timely manner in consultation with EPA and DPE.	

19	EPL11254 O4.6 The bund(s) for the elevated storage of transportable containers must be designed and constructed to ensure that containers cannot, if dislodged, discharge materials or liquids outside the bunded area(s).	The previous IEA had raised a minor non-compliance to this condition. During this site audit, an area was sighted where IBCs were stacked on an elevated storage (two rows of shelves) where the bund wall was too close to the containers - any rupture to the container wall would cause discharge of the liquid to be spilled outside the bunded area. Self-bunded shipping containers were sighted as hired (August 2018) for elevated storage of Class 3 dangerous goods - this container has been hired from RoyalWolf. As per that company's website, this container has 2,400L bund capacity and is designed for storage of Class 3 Hazardous Goods and Liquids.	Ensure stacked drums are fully stored within bunds and the bunds have adequate spill / leak discharge capture volume.	
20	EPL11254 M2.1 and M2.2 For each monitoring / discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns: Water and/or Land Monitoring Requirements	TRL reported (Annual Return) that groundwater sampling points 18, 19, 20, 23, 24 & 25 were not sampled for the required quarterly events due to misinterpretation of EPL reporting period. All locations were sampled during July 2015 however reporting period begins on 30 July. It is noted that appropriate action, to update the monitoring schedule has been undertaken by TRL. In the reporting year 2016-2017, groundwater monitoring for points 15, 30 and 31 were not undertaken four times and groundwater monitoring point 22 was not sampled once due to the bores being dry. In the reporting year 2017-2018, groundwater monitoring points 15, 22, 30 and 31 were not sampled for the same reason. Monthly Environmental Monitoring Report was sighted for July 2018 for EPL 11254 (published 21 August 2018) which is in line with the annual return for the year.	No corrective actions required	

21	EPL11254 M3.1 Subject to any express provision to the contrary in this license, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area that must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	As reported in the EPA Compliance Audit report of Dec 2015, a non-compliance had been raised regarding sample collection and handling- it was noted that pH was recorded from laboratory analysis and not field pH measurement. This requirement was not included in the EPA Compliance Audit March 2017 scope. As per Water Management Plan section 6.2, groundwater sampling is undertaken in accordance with AS/NZS 5667.1:1998 - Water Quality Sampling Standard.	Ensure all sample collection and handling is undertaken in accordance with EPA Approved Methods.	

Table 5 Observations and Recommendations

#	Condition	Observation	Recommendation	Risk Level
1	DA 41-98 Condition 5 (v) The Applicant shall ensure that suitably qualified personnel are appointed to: 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.	The authority and independence required in this condition is not clearly stated in the Position Description of Environmental Coordinator, however the role is expected to 'assist in the management of systems that ensure a safe working environment at the mine' and the required actions.	It is recommended that the role of Environmental Coordinator or the direct supervising role of Resident Manager is included in the Emergency Management team with adequate authority and independence as required by this condition.	

#	Condition	Observation	Recommendation	Risk Level
2	DA 41-98 Condition 6 (iv) a Noise and Vibration Management Strategy in consultation with the EPA including noise management procedures, monitoring protocols and measures for mitigating impacts that can be implemented where necessary throughout the life of the project under normal meteorological conditions; and	Noise and Vibration Management Plan draft was submitted to DPE for comment in August 2015. This plan was finalised in January 2016. It is noted that this plan does not include the role of Environmental Advisor / Coordinator in section 4 Responsibilities and Accountabilities. Consultation with EPA - Letter from EPA dated 21 March 2016, signed by Jessica Creed, A/Head Far West Operations to TRL in response to ESCP stated that EPA does not review or comment on plans, programs and strategies prepared to meet statutory obligations, unless there is a specific reason to do so. Dean Woods reported that the Noise and Vibration Management plan was not sent to EPA based on this advice by EPA.	Revise the Noise and Vibration Management Plan including updating the section 4. While EPA has decided not to review the plans, TRL should send the plan to EPA for information as required by this Condition.	
3	DA 41-98 Condition 6 (vi) The Plan shall also include but not be limited to: details of the mine infrastructure and facilities to be developed;	Section 2 Figure A and Table 3 of the MOP indicates the area proposed to be impacted by mining activity and major assets in each Domain.	Clearly Reference the relevant section within the MOP that describes the mine infrastructure and facilities within the Framework Environmental Management Plan	
4	DA 41-98 Condition 6 (ix) The Plan shall also include but not be limited to: the recommendations of the Preliminary Hazard Analysis prepared by McCracken Consulting, dated December 1998;	No specific reference to the PHA was found in the EMP and sub-plans.	If the PHA recommendations are addressed in the EMP and sub-plans, it should be clarified in the next revision of the plans.	

#	Condition	Observation	Recommendation	Risk Level
5	DA 41-98 Condition 17 Soil stripping and stockpiling procedures for use in future site rehabilitation are to be carried out as outlined in Section 4.4.2 of the EIS in consultation with EPA.	As per Section 4.3 in AEMR 2016-2017 and Section 2.2 in AEMR 2015, all site surface disturbance activities require the completion of a Surface Disturbance Permit. The procedure noted in AEMR is in accordance with Section 4.4.2 of the EIS. There was one permit request in 2017 and five requests in 2016. It is noted that the section numbering (4.3 in AEMR 2016 and 2017) is repeated for Land Preparation and for Construction.	Ensure section numbering is corrected in future AEMRs	
6	DA 41-98 Condition20 prepare an acid mine drainage strategy in consultation with the EPA; and	The procedure for managing waste rock is detailed in the Waste Rock Characterisation and Management Plan section 6. The process was explained (and observed) during site audit interview by Senior geologist Osvaldo Gonzalez. Consultation with EPA - Letter from EPA dated 21 March 2016, signed by Jessica Creed, A/Head Far West Operations to TRL in response to ESCP stated that EPA does not review or comment on plans, programs and strategies prepared to meet statutory obligations, unless there is a specific reason to do so. Dean Woods reported that the plan was not sent to EPA based on this advice by EPA.	Evidence of consultation with EPA should be noted in the plan and copies of relevant correspondence maintained for reference in future audits. While EPA has decided not to review the plans, TRL should send the plan to EPA for information as required by this Condition.	
7	DA 41-98 Condition 29 The Applicant shall submit a Landscape Plan to Council prior to the issuing of a Construction Certificate. The Plan shall be prepared by a suitably qualified person and shall address, but not be limited to, the following matters:	Original Landscape plan was submitted to Council for approval on 25 September 2007. The auditors sighted the latest revision of this plan, dated January 2016. However, the file name indicates the date of preparation as 2013. The plan does not identify who prepared it. It is understood that this revision of the plan has not been submitted to the Council.	Issue the revised Landscape management plan to Council.	

#	Condition	Observation	Recommendation	Risk Level
8	DA 41-98 Condition 31 All disturbed areas are to be revegetated as soon as practicable on completion of construction using species and fertilisers in combinations and at such rates acceptable to the OEH's Nyngan Catchment Advisory Officer.	Progressive rehabilitation has occurred mainly on the tailings storage facility embankment. Tritton Mine Resident Manager, in a letter to the Manager of RLPB in July 2007 referred to previous discussions to RLPB regarding collection of seeds from plants on the Travelling Stock Reserves and Routes around NSW and in particular from RLPB areas. The letter requested approval to collect native plant seed for teh life of the operations in the area. A similar letter was sighted by the Auditors requesting an agreement with Central West Catchment Management Authority for approval and access to local knowledge on grass seeds collection and use of seed collecting equipment. Responses regarding approval of species and fertilisers were not available at the audit and following review.	Acceptance should be sought from OEH Nyngan Catchment Advisory Officer on the plant species and fertilisers as required by this condition.	
9	DA 41-98 Condition 33 All heavy vehicle movements associated with the subject development shall use the Barrier Highway and the sealed section of Yarrandale Road for site ingress and egress, ie with the exception of any movement of equipment and supplies between the Girilambone Mine and the Tritton Project Site, and the transportation of waste rock.	During the site inspection, the access routes were observed to meet this requirement. The access routes are mentioned in the project EIS however the Traffic Management Plan does not include these details. The TMP has not been revised since being prepared in 2013.	Revise TMP to include access details	

10	DA 41-98 Condition 38 (i) during day time (7am-10pm), an LA10 (15 minute) noise levels of 35dB(A)	Section 5.0 (Noise and Vibration Controls) of the Noise Management Plan covers the requirement of the Condition. Noise levels were generally measured in accordance with the requirements of the plan and were reported in AEMRs for 2016-2017 (LA10 was not reported in 2015, however compliance with the EPL limits -LAeq - was demonstrated). It is noted that the noise monitoring is undertaken at the rural property boundary and not at the associated residence that is located further away from the mine than the rural property boundary. The 2015 AEMR reported the results of attended acoustic monitoring undertaken by Mueller Acoustic Consultants. The monitoring confirmed compliance with this Condition at the time of monitoring. The 2016 AEMR reported the results of attended acoustic monitoring undertaken by Mueller Acoustic Consultants. The monitoring results indicated that noise levels were not compliant with this Condition at the time of monitoring. However, the background noise levels at the time of monitoring were considered (by the Noise Consultant) to exceed both day time and night time noise criteria. The 2017 AEMR reported the results of attended acoustic monitoring undertaken by Mueller Acoustic Consultants. The monitoring confirmed compliance with this Condition at the time of monitoring. Mueller Acoustic Consultants conducted attended monitoring on 7 August 2018. While the day time LA10 measurement at 3:28pm was 46dBA, the mine's contribution to the measured noise was assessed as being between 24 and 30 dBA.	The noise monitoring undertaken to date is at the rural property boundary, not the actual property residence. It is recommended that consideration be given to undertaking a series of attended noise monitoring at the actual residence and correlating the noise levels associated with the mine operations at the residence with actual noise levels measured at the mine with the intention of calibrating a noise model. This approach would provide the mine with a tool that would allow noise monitoring to be undertaken at the mine and noise impacts at the residence to be calculated that could eliminate the issue of elevate background noise levels and simplify the assessment of compliance against this Condition.	

#	Condition	Observation	Recommendation	Risk Level
11	EPL11254 L2.4	The following observations have been made in relation to the operation of the landfill: 1. Approximately 10 tonnes of waste was reported (AEMR) to have been landfilled during 2017. In a letter from Michael Hanlon, Acting Resident Manager at TRL to Jason Scarborough at the Environment Protection and Regulation Division dated 11 Oct 2007, it was reported that the landfill receives up to 5 tonnes per year.A below few issues are noted: 2. The AEMRs refer to Condition L5(EPL11254) in relation to Landfilling of wastes. The correct Condition Reference is L2. 3. Each of the three AEMRs covering the audit period state that the landfill was last compacted and covered during September 2013. This information is most likely inaccurate (based on observations made during the audit). 4. The Waste Management Plan provides information that is not consistent with the waste management practices implemented (as described and demonstrated to the Auditor). For example (this is not a comprehensive list of issues to be addressed): (a) the WMP states that food scraps may be disposed of to the landfill; (b) the WMP does not properly identify what wastes may be sent to the on-site landfill and what wastes are to be sent off-site; (c) the WMP does not specifically prohibit the disposal of wastes into the TSF. A full revision of this plan is warranted.	1. The quantity of waste reported to have been disposed of into the landfill is inconsistent. It is recommended that the volume of waste disposed of is determined annually and that reports to the EPA (and other Agencies) and the AEMR are consistent). 2. Ensure that the EPL Conditions are correctly referenced in future AEMRs and other reports. 3. Correct information regarding compaction and covering, quantity of waste landfilled and what the landfill can receive should be included in future AEMRs. 4. Waste Management Plan should be reviewed and revised.	

#	Condition	Observation	Recommendation	Risk Level
12	EPL 11254 M5.2 The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	The public complaints phone line number is publicly announced through newspaper advertisement. The advertisement in Nyngan Observer page 9 on Wednesday 21 February 2018 was sighted by the Auditors. It is noted, from the EPA compliance audit report of December 2015, that this advertisement had been published in the newspaper in May and June 2015. The Tritton Mine (Aeris Resources) website does not clearly indicate the public complaints line number. It is noted that this had been raised as a non-compliance in the Dec 2015 EPA compliance audit report and as a partial non-compliance in the previous IEA.	Aeris Resources / Tritton Mine website should clearly indicate the public complaints line number.	
13	EPL11254 R1.1 The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:	As per the EPA online database for this EPL, an unreported non-compliance for monitoring points 15, 18, 22, 30 and 31 had been raised - on monitoring table Section B of the Annual Return it was noted as dry conditions however not reported in Section C. This had not been repeated in subsequent reports.	Ensure all sections of the Annual Returns are completed and reviewed prior to submission.	
14	ML1544 – Condition 28 The lease holder must prepare a Mine Closure Plan in accordance with the "Strategic Framework for Mine Closure" produced by the Minerals Council of Australia and the Australian and New Zealand Minerals and Energy Council. This Plan must detail all aspects of mine closure 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 Mine Closure Plan is considered to form part of the Mining Operations Plan (MOP).	The MOP 2016 sighted by the Auditors refers to Mine Closure Plan 2011 as Appendix 5; however, the Mine Closure Plan provided to the Auditors has been revised in August 2014.	Update MOP to refer to the latest Mine Closure Plan The Mine Closure Plan should refer to the correct Strategic Framework for Mine Closure as required by ML1544	

#	Condition	Observation	Recommendation	Risk Level
15	ML1544 Condition 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.	Section 2 of the Framework EMP provides overall roles and responsibilities for environmental management at Tritton Mines. The role of Environmental Coordinator addresses this requirement. This role reports to the Resident Manager. Environmental Coordinator is supported by Environmental Officer. Position Description for both roles (last reviewed 9 September 2007) were sighted by the Auditors. The role of Environmental Advisor (which is the same as Environmental Coordinator, as reported by Dean Woods) was filled by Nathan Jones till August 2017 and thereafter by Dean Woods. Email correspondence with DoI was sighted by Auditors where Dean Woods introduced himself to Ben Gazi at DoI upon commencement of employment. Ben Gazi responded congratulating Dean and advising of new contact details at DoI. The DPE approval of appointment of Dean Woods during this audit period was not sighted by the Auditors.	Seek formal approval from DPE for the appointment of the Environmental Advisor.	

3.3 Opportunities for Improvement

During the site inspection and documentation review, a range of observations related to environmental risk management and performance were identified. These observations and subsequent recommendations are presented below.

3.3.1 Tailings Storage Facility

Improved maintenance of the TSF is required to comply with relevant conditions and in addressing the non-compliances identified in this audit. Waste other than tailings liquids from the processing operations should not be deposited in the TSF.

3.3.2 General Site Management and Housekeeping

Empty IBCs used for bollards should be appropriately placed and labelled. Placement of containers with incorrect labels poses the risk of inadvertent placement of other containers that may contain hazardous materials.

Hydrocarbon and chemical containers should be placed in appropriately designed bunded structures and appropriately placed to ameliorate the risk of leaks from external factors.

Washing of trucks and equipment should be undertaken only within bunded areas so that wastewater does not cause pollution on the ground. Waste materials such as used oil filters and other contaminated materials should be appropriately disposed of.

3.3.3 Records/Document Management

There were several occasions where evidence of consultation with relevant agencies as required by specific condition was not available. A few management plans have been identified as to require revision or development, such as the Contingency Strategy that was not available for review.

Aeris Resources / Tritton Mine website should clearly indicate the public complaints line number.

4. Limitations

This section should be read before reliance is placed on any of the opinions, advice, recommendations or conclusions herein set out.

This report has been prepared for and at the request of Tritton Mines / Aeris Resources (The Client) pursuant to their appointment of Pitt & Sherry (Operations) Pty Ltd, (**pitt&sherry**), to act as its Independent Environmental Auditor. Save for the Client, no duty is undertaken or warranty or representation made to any party in respect of the opinions, advice, recommendations or conclusions herein set out.

Regard should be had to the terms and conditions of **pitt&sherry's** Proposal when considering this report and reliance to be placed on it.

All work carried out in preparing this report has used, and is based upon, **pitt&sherry's** professional knowledge and understanding of the current relevant environmental legislation.

Changes in the below may cause the opinion, advice, recommendations or conclusions set out in this report to become inappropriate or incorrect. **pitt&sherry** will have no obligation to advise the Client of any such changes, or of their repercussions.

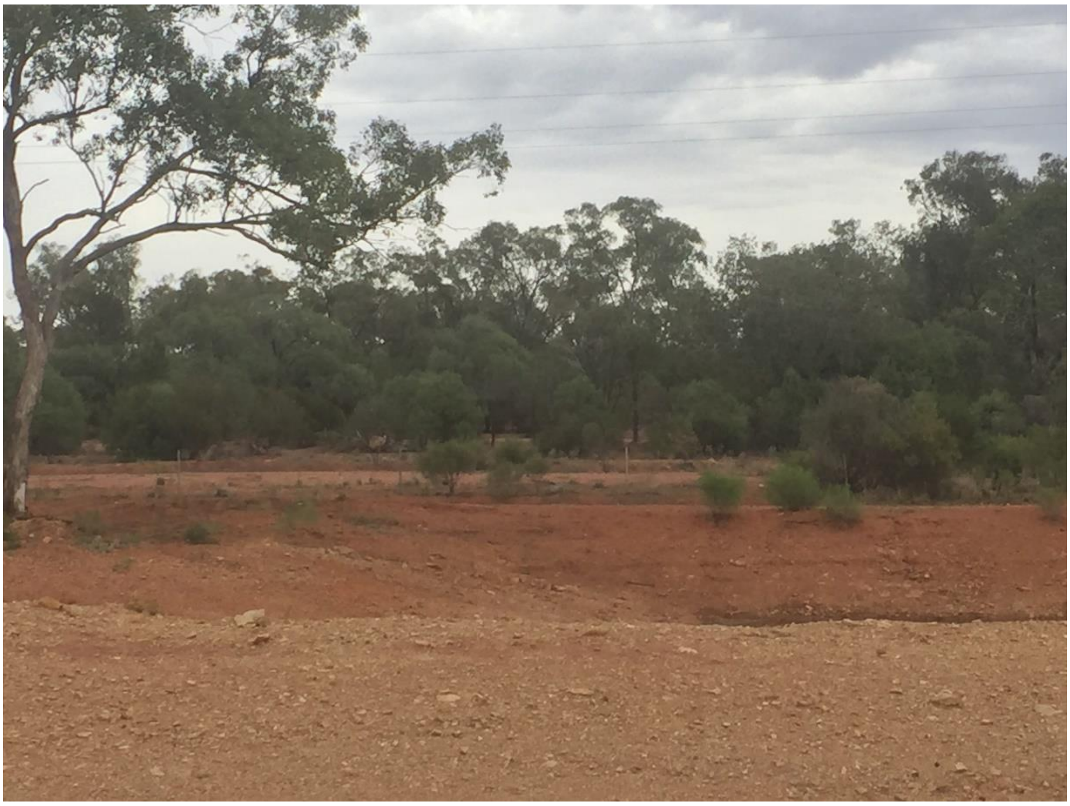
This report is based on observations during the Environmental Audit and information provided by the client. The information collected during the audit is believed to be true and is solely based on visual inspection (or site conditions and documentation presented) and information provided by the auditee. **pitt&sherry** is of the belief that all the information provided by the auditee is correct and true at the time of the audit.

Assessment of the adequacy of any environmental management strategies, plans and programs was limited to a brief desktop review only with regards to the Audit Scope. The EMS was not reviewed against ISO14001.

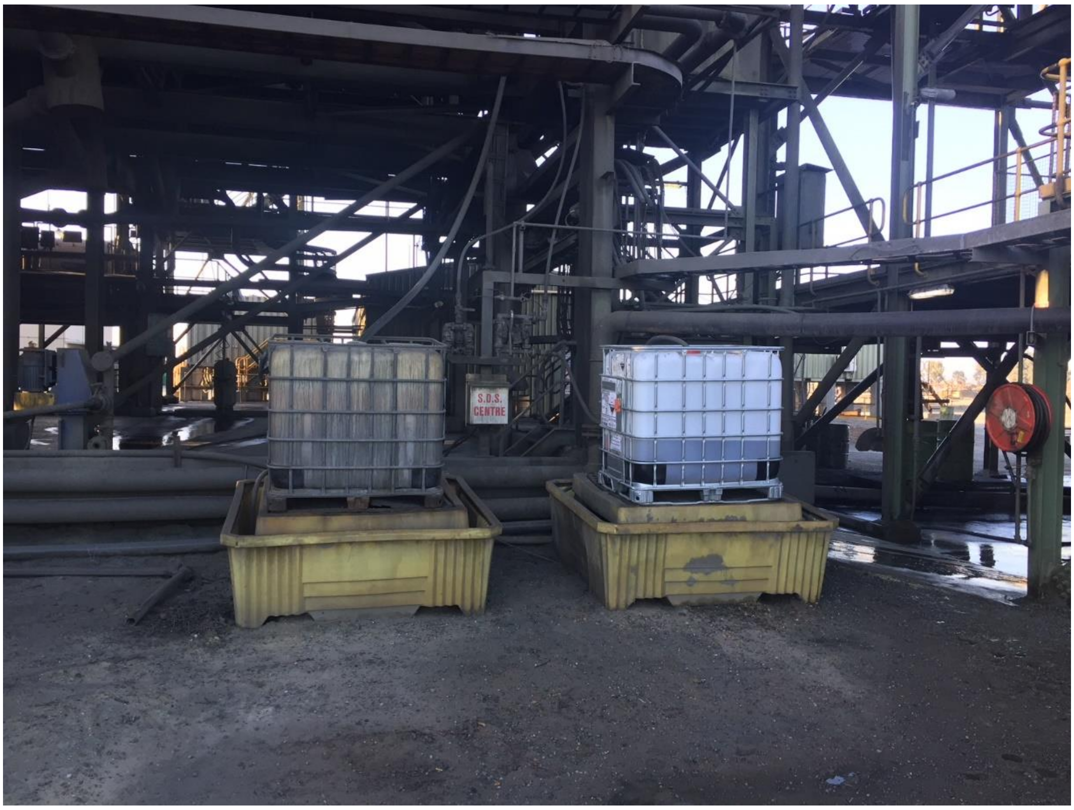
The content of this report represents the professional opinion of experienced environmental consultants. **pitt&sherry** does not provide specialist legal advice and the advice of appropriate legal professionals may be required.

Appendix A

Site Photographs



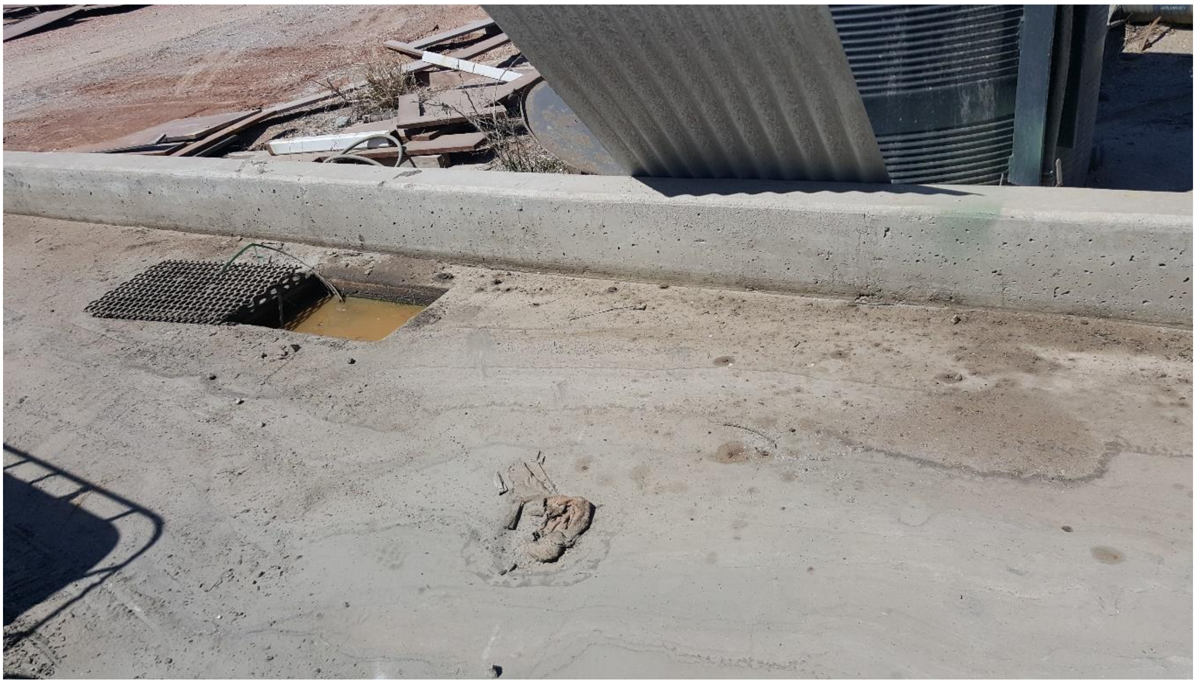
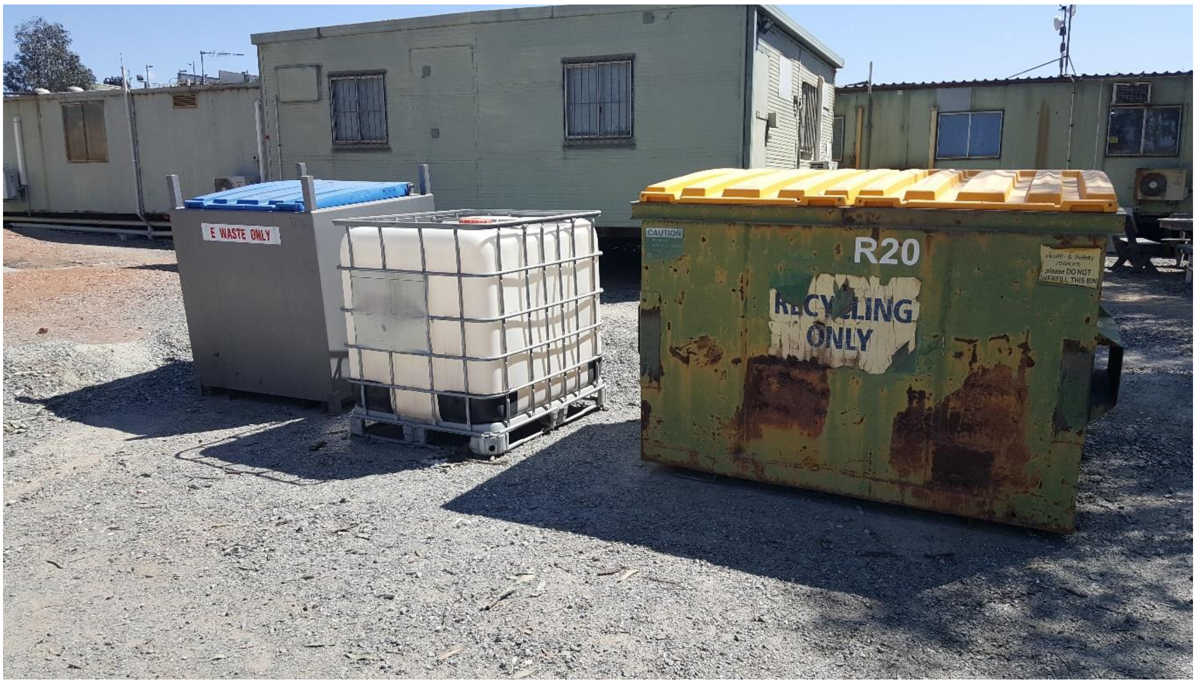
Fence around TSF area



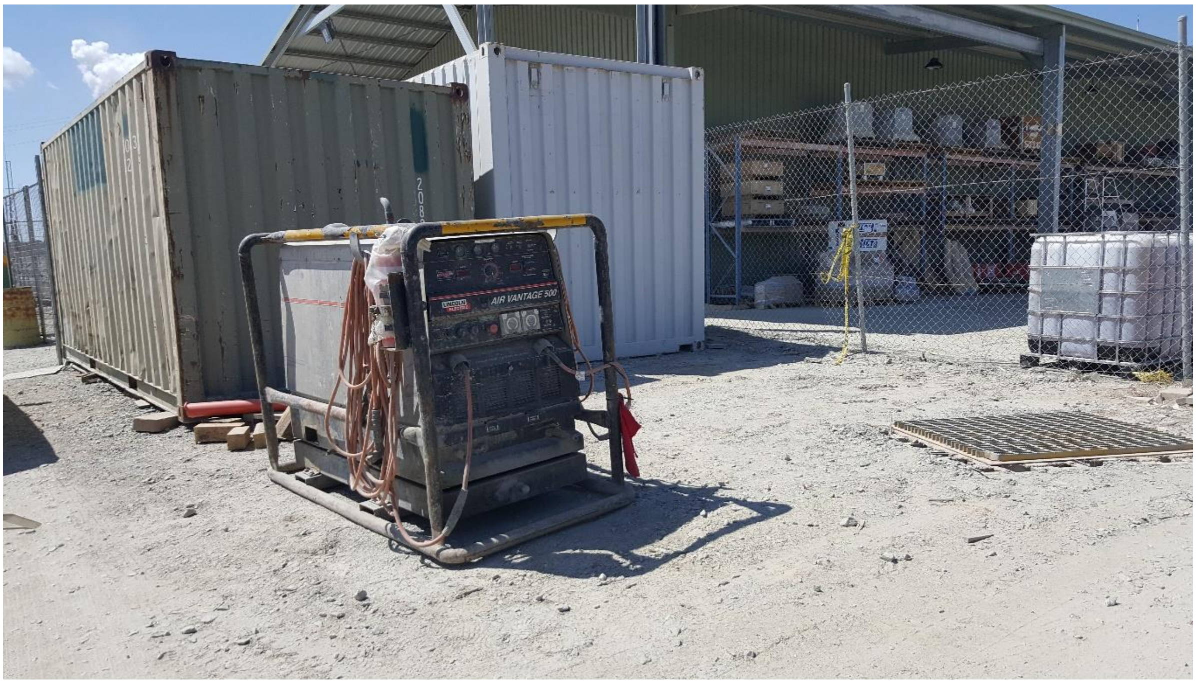
Workshop area (discolouration on ground is visible)

Aboriginal site protection (site ID in inset)


Survey marker identified and protected

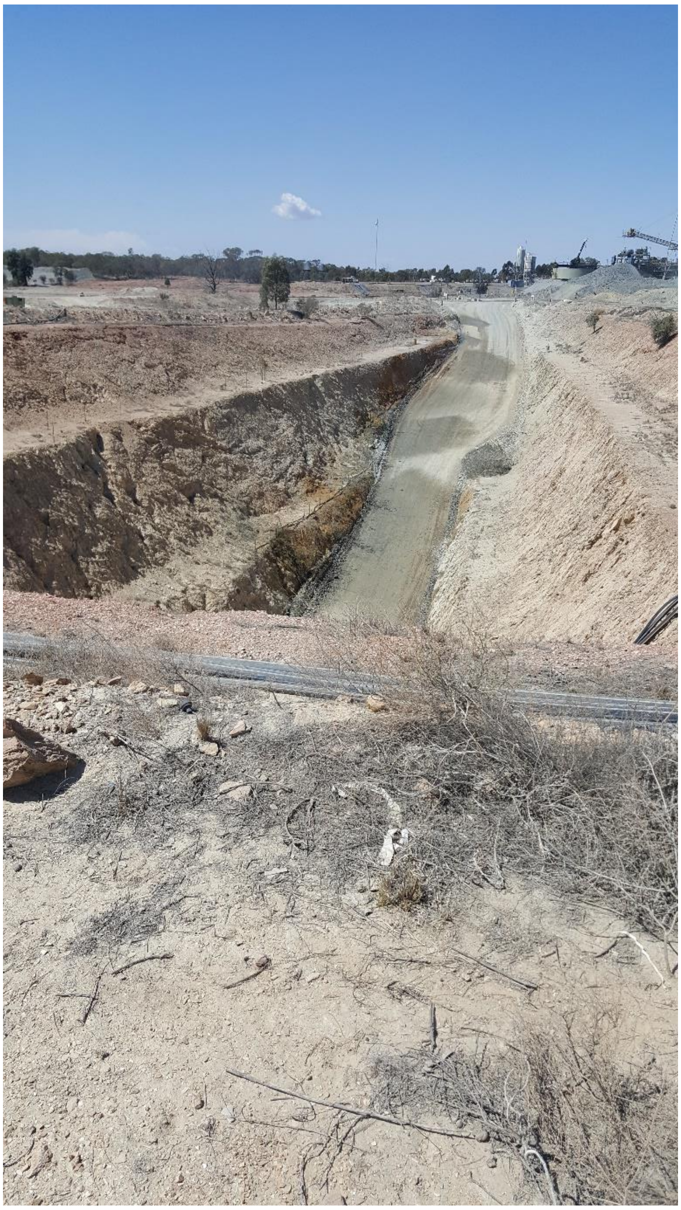

Drain within bunded area


Waste management on site

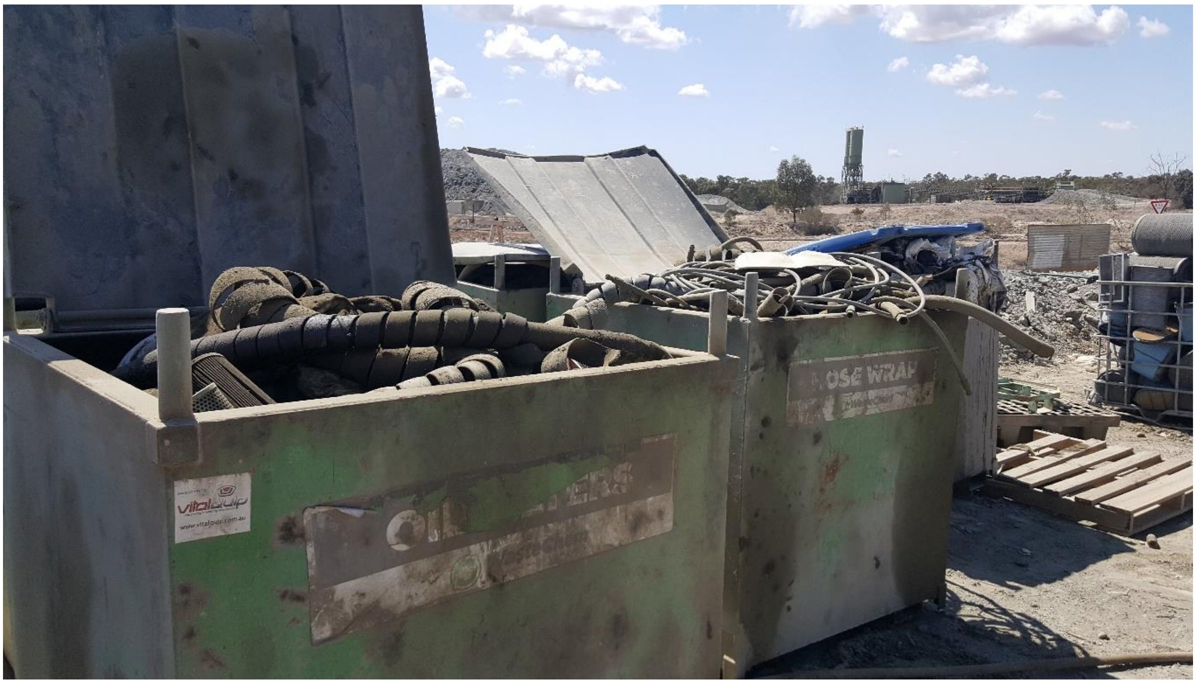


Placement of generator without bunding or pad

Storage of IBCs without bunding



Dust control meaures – entry to box cut



Waste materials in temporary storage for pickup

Waste materials placed on ground

Appendix B

Compliance Registers

Red type represents modification of 26 August 2004
Detailed Findings and Recommendations

DA 41/98 as amended

Condition no	Condition Text	Compliance	Audit Finding	Objective Evidence	Recommendation
	GENERAL				
1	The Applicant shall carry out the development generally in accordance with the:		It is noted that a number of partial non-compliances were recorded in the previous IEA report.	Independent Environmental Audit report by 3E dated 15 May 2015	
	(a) Development Application No. 41/98	Noted			
	(b) EIS titled Tritton Copper Project-Environmental Impact Statement, dated June 1998, prepared by R W Corkery & Co Pty Limited;	Noted		Tritton Copper Project EIS prepared by R W Corkery & Co Pty Ltd, dated June 1998	
	(c) (Species Impact Statement, dated December 1998, prepared by Countrywide Ecological Service in conjunction with Greg Richards and Associates and Geoff Cunningham Natural Resource Consultants;	Noted			
	(d) Information accompaning modification application No.41/98 MOD-1, dated 15 June, prepared by Tritton Resources Limite,	Noted			
	(e) Information accompanying modification application No. 41/98 MOD-2, dated 30 June 2005, prepared by Tritton Resources Limited;	Noted			
	(f) modification application No. 21_3_2007, dated 20 February 2007, and accompanying SEE for a proposed Surface Waste Rock Dump at the Tritton Copper Mine, Hermidale, prepared by Tritton Resources Limited;	Noted			
	(g) modification application DA 41/98 MOD 4, dated 3 October 2007, and accompanying SEE for the Tritton Expansion Project-Stage 2, prepared by Straits Resources Limited;	Noted		Statement of Environmental Effects for ML1544 Tritton Expansion Project Stage 2, prepared by Tritton Resources Limited, dated September 2007	
	(h) the response submissions prepared by Straits Resources Limited and received by the Department on 26 November 2007;	Noted			
	(i) Environmental Assessment titled Environmental Assessment for the Tritton Copper Mine Modification 5, dated November 2014, including the associated response to submissions dated 19 January 2015, and additional information dated 26 February 2015; and	Noted			
	(j) conditions of this consent	Noted			
1A.	If there is any inconsistency between the above documents, the latter document shall prevail over the former to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.	Noted			
	STATUTORY AND OTHER REQUIREMENTS				
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.	Noted			
2(b)	The Applicant shall comply with all reasonable requirements of the Secretary in respect of the implementation of any measures arising from reports submitted in accordance with the conditions of this consent, within such time as the Secretary may agree.	Noted			
	DURATION AND SCOPE OF CONSENT				
3	The Application may carry out mining operations on site until 21 December 2024. Note: This consent will continue to comply to all other aspects – other than the right to conduct mining operations – until the rehabilitation of the site and any additional undertakings have been carried out satisfactorily.	Noted			

	MINING OPERATIONS PLAN/S (MOP/s)				
4	The Applicant shall submit and have accepted by DRE, a Mining Operations Plan (MOP) in accordance with current guidelines issued by DRE. The Plan should cover mining operations for a period to be determined by DRE.	Compliance	The MOP for March 2016-2022 was submitted to Department of Industry (DoI) as required under the Minind Lease, ML1544, in February 2016 and was approved in April 2016. The Notice of Approval states that the MOP approved by Departement of Resources and Energy (DRE) is limited to: * the rehabilitation objectives and completion criteria; and * the schedule of rehabilitation activities proposed for the MOP period.	Mining Operations Plan, Prepared by R. W. Corkery & Co Pty Limited, Report No 440/11 dated February 2016 MOP Submission letter from the General Manager of Tritton Resources Ltd dated 1 Feb 2016 to DoI Division of Resources and Energy. Letter from DRE dated 29 April 2016, titled Mining authorisation number 1544, Mining Act 1992, Tritton Resources Pty Ltd Approval of Mining Operations Plan - Notice of Approval	
	The MOP shall:				
(i)	be prepared in accordance with DRE Guidelines for the Preparation of Mining Operations Plans (Document 08060002.GUI or its most recent equivalent);	Compliance	Section 1.1.2 of the MOP states that "This MOP has been prepared in accordance with the guideline ESG3: Mining Operatrions Plan (MOP) Guidelines, September 2013 and provides detailed information on mining, processing and rehabilitation operations within the Mine Site. The format generally complies with that provided under the heading 'Compiling a Mining Operations Plan' in the Guideline".	Mining Operations Plan, Prepared by R. W. Corkery & Co Pty Limited, Report No 440/11 dated February 2016	
(ii)	demonstrate consistency with the conditions of this consent and any other statutory approvals;	Compliance	The relevant Conditions of Consent and section of the MOP addressing those Conditions are provided in Tables 1 and 2 of the MOP.	Mining Operations Plan, Prepared by R. W. Corkery & Co Pty Limited, Report No 440/11 dated February 2016	
(iii)	demonstrate consistency with the Environmental Management Plan required by Condition 6;	Compliance	Section 3.2 of the MOP refers to Environmental Risk Management and associated management plans. The MOP includes, in section 3, Environmental Risk Management measures for: * Erosion and Sediment Control; * Flora and Fauna; * Air Quality; and * Operational Noise, Vibration and Air Blast. TRL Framework EMP has been sighted by the Auditors which is consistent with the MOP.	Mining Operations Plan, Prepared by R. W. Corkery & Co Pty Limited, Report No 440/11 dated February 2016 TRL Framework Environmental Management Plan Sept 2012	
(iv)	provide the basis for implementing mining operations, environmental management, and ongoing monitoring and reporting (ie AEMR); and	Compliance	The MOP section 10 covers the reporting process on AEMR for each reporting period. The Framework EMP as sighted by the Auditors, section 9 details the reporting basis for AEMRs in accordance with the Department of Mineral Resource's Guidelines to the Mining, Rehabilitation and Environmental Management Process (version 3, Jan 2006).	Mining Operations Plan, Prepared by R. W. Corkery & Co Pty Limited, Report No 440/11 dated February 2016 TRL Framework Environmental Management Plan Sept 2012	
(v)	identify a schedule of proposed mine development for the period covered by the plan and include: * the area proposed to be impacted by mining activity and resource recovery mining methods and remediation measures including rehabilitation * areas of environmental, heritage or archaeological sensitivity and proposals to appropriately minimise surface impact * water management, and * proposals to appropriately minimise surface impacts	Compliance	Section 1.1.1 indicates the earlier versions of the MOP and time frames covered by those documents. * First MOP - 1 Jan 2003 to 31 Dec 2010 * Second MOP - 1 Jan 2011 to 29 Feb 2016 * Third (current) MOP - 1 Mar 2016 to 31 Dec 2022 Sections 2 of the MOP provides proposed mining activities over the current MOP term. Section 2.2 Figure A and Table 3 indicates the areas proposed to be impacted by mining activities and major assets in each Domain. Section 3 includes details of aboriginal and non-aboriginal heritage items identified in the area and the management thereof. Various environmentally sensitive matters are discussed in this section, and in Table 20 under "environmental risk management". Section 3 also includes discussion on surface and groundwater quality impacts and management, with reference to water management plan 2016. Section 13 of the MOP shows various plans that show the changes to the area impacted by mining activity from pre-MOP natural environment to post-mining land use, mining methods and remediation measures including rehabilitation. The Cultural Heritage Management Plan also details the heritage management aspects of the mine.	Mining Operations Plan, Prepared by R. W. Corkery & Co Pty Limited, Report No 440/11 dated February 2016 Cultural Heritage Management Plan, Rev 1, dated 23 Jan 2015	

	A copy of the MOP, excluding commercial in confidence information, shall be forwarded to the Council and Secretary within 14 days of acceptance by DRE.	Non Compliance	Evidence was not available to confirm that the MOP had been distributed to the Council and Secretary within 14 days of acceptance by DRE.	Letter from DRE dated 29 April 2016, titled Mining authorisation number 1544, Mining Act 1992, Tritton Resources Pty Ltd Approval of Mining Operations Plan - Notice of Approval	Evidence of distribution of the MOP to relevant agencies should be maintained.
	ENVIRONMENTAL MANAGEMENT SERVICES				
5	The Applicant shall ensure that suitably qualified personnel are appointed to:	Compliance	Section 2 of the Framework EMP provides overall roles and responsibilities for environmental management at Tritton Mines. The role of Environmental Coordinator addresses this requirement. This role reports to the Resident Manager. Environmental Coordinator is supported by Environmental Officer. Position Description for both roles (last reviewed 9 September 2007) were sighted by the Auditors. The role of Environmental Coordinator was filled by Nathan Jones till August 2017 and thereafter by Dean Woods.	TRL Framework EMP Sept 2012 Position Description for Environmental Coordinator Position Description for Environmental Officer	
(i)	be responsible for the preparation of relevant environmental documentation;	Compliance			
(ii)	be responsible for considering and advising on matters specified in the conditions of this consent and compliance with such matters;	Compliance			
(iii)	be responsible for receiving and responding to any complaints;	Compliance			
(iv)	facilitate an induction and training program for all persons involved with construction activities, mining and remedial activities (including surface drainage mitigation works); and	Compliance	The auditors were provided with surface works induction documentation by Dean Woods.	Surface works induction presentation document	
(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.	Observation	The authority and independence required in this condition is not clearly stated in the Position Description of Environmental Coordinator, however the role is expected to 'assist in the management of systems that ensure a safe working environment at the mine' and the required actions.	Position Description for Environmental Coordinator	It is recommended that the role of Environmental Coordinator or the direct supervising role of Resident Manager is included in the Emergency Management team with adequate authority and independence as required by this condition.

	ENVIRONMENTAL MANAGEMENT PLANS				
6	The Applicant shall prepare an Environmental Management Plan (EMP) for the mining operation, which shall include, the preparation of the following:	Compliance	A comprehenisve EMP consisting of a Framework EMP and the following management plans: * Bush Fire management Plan; * Contaminated Land Management Plan; * Dust Management Plan; * Flora Fauna Management Plan; * Hazardous Substance and Dangerous Goods Management Plan; * Heritage Management Plan; * Land Management Plan; * Rehabilitation Management Plan * Surface Water and Groundwater Management Plans * Waste Rock Characterisation and Management Plan; and * Weed Management Plan. Environmental Management Requirements are also refererenced in the MOP. The Annual Environmental Managment Reports (AEMR) report on Environmental Management and Performance including: * Erosion and Sediment (section 3.2) * Threatened Flora and Fauna (sections 3.6 and 3.7) * Operational Noise (section 3.10) * Air quality (section 3.1)	TRL Framework EMP Sept 2012 and nominated Sub-Plans. Mining Operations Plan, Prepared by R. W. Corkery & Co Pty Limited, Report No 440/11 dated February 2016 AEMRs 2015-2017	
(i)	an Erosion and Sediment Control Strategy prepared in consultation with DRE and the EPA and including details of all control measures to be implemented during both the construction and operational phases of the mine (including the construction of the water pipeline from the Girilambone Mine to the Tritton site);	Compliance	An Erosion and Sediment Control Plan (ESCP) prepared by R W Corkery & Co Pty Ltd - Rev 1 dated July 2015 has been sighted by Auditors. Consultation with EPA was sighted in email correspondence with EPA responding to Tritton that EPA will not review the ESCP and stating that the Plan should meet the requirements of the blue book and prevent pollution of water. Letter from EPA dated 21 March 2016, signed by Jessica Creed, A/Head Far West Operations to TRL stated that EPA does not review or comment on plans, programs and strategies prepareed to meet statutory obligations, unless there is a specific reason to do so. Consultation with DRE was sighted as email correspondence with Dan Adams at Department of Industry - raising one comment regarding stabilising of stockpiles during rain. Further correspondence on 9 Nov 2015 indicates acceptance of the revised ESCP by DRE.	Erosion and Sediment Control Plan 2015 prepared by R W Corkery & Co Pty Ltd for Straits Tritton Copper. Email from Nathan Jones, Tritton Mines, to Matthew Riley at DPE dated 26 August 2015 Email from Nathan Jones to Michelle Gibson at EPA on 19 Oct 2015, and reply email from Brad Tanswell on 19 Oct 2015. Letter from EPA dated 21 March 2016, signed by Jessica Creed, A/Head Far West Operations to TRL. Email from Nathan Hones to Dan Adams on 3 Nov 2015 and reply email dated 5 Nov 2015. Email to Dan Adams from Nathan Jones with amended ESCP dated 6 Nov 2015 with reply email dated 9 Nov 2015.	
(ii)	a Contingency Strategy prepared in consultation with OEH for any threatened species that maybe affected by the construction and operation of the mine;	Non Compliance	While the F&FMP identifies the presence of threatened species, neither that plan nor the EMP Framework contains a Contingency Strategy. Consequently no evidence of consultation with OEH was sighted	TRL Land Management Plan, Rev 1.1 dated January 2016 TRL Flora and Fauna Management Plan, Rev 1.1 dated January 2016	Review and update the Land Management Plan and Flora and Fauna Management Plans to ensure that the potential or actual presence of any threatened species is accurately addressed. Prepare a contingency strategy in consultation with OEH.
(iii)	a Traffic Management Strategy prepared in consultation with the RMS;	Non Compliance	Traffic Management Plan for Tritton and Girilambone Mines sighted. No evidence of consultation with RMS was sighted by the Auditors.	Traffic Management Plan Rev 0, dated 28 March 2013 - TCM-HSET-MP-003	Revise the TMP and attach relevant consultation with RMS.

(iv)	a Noise and Vibration Management Strategy in consultation with the EPA including noise management procedures, monitoring protocols and measures for mitigating impacts that can be implemented where necessary throughout the life of the project under normal meteorological conditions; and	Observation	Noise and Vibration Management Plan draft was submitted to DPE for comment in August 2015. This plan was finalised in January 2016. It is noted that this plan does not include the role of Environmental Advisor / Coordinator in section 4 Responsibiliteis and Accountabilities. Consultation with EPA - Letter from EPA dated 21 March 2016, signed by Jessica Creed, A/Head Far West Operations to TRL in response to ESCP stated that EPA does not review or comment on plans, programs and strategies prepared to meet statutory obligations, unless there is a specific reason to do so. Dean Woods reported that the Noise and Vibration Management plan was not sent to EPA based on this advice by EPA.	Noise and Vibration Management Plan for Tritton Mine, Murrawombie Mine and North East Mine, Rev 1.1, dated January 2016 Letter from EPA dated 21 March 2016, signed by Jessica Creed, A/Head Far West Operations to TRL.	Revise the Noise and Vibration Management Plan including updating the section 4. While EPA has decided not to review the plans, TRL should send the plan to EPA for information as required by this Condition.
(v)	a Dust Management Strategy having regard to the tailing's dams, ore stockpiles and processing facilities detailing air quality safeguards and procedures for dealing with dust emissions.	Compliance	Dust Management Plan rev2 was sighted. The Plan describes the air quality safeguards and procedures to deal with dust emissions on site.	Dust Management Plan Rev 2 dated August 2015	
	The management plans described in (i) to (v) above are to be revised/updated at least every five years in consultation with relevant government authorities and to the satisfaction of the Secretary to reflect changing environmental requirements or changes in technology/operational practices.	Non Compliance	Evidence of revision in the last 5 yrs is available for the listed management plans in the document control pages based on current revision dates; however consultation with relevant authorities not sighted.		Evidence of consultation with relevant agencies should be noted in the next revision of the plans and copies of relevant correspondenace retained for future audits.
	The Plan shall also include but not be limited to				
(vi)	details of the mine infrastructure and facilities to be developed;	Observation	Section 2 Figure A and Table 3 of the MOP indicates the area proposed to be impacted by mining activity and major assets in each Domain.	Mining Operations Plan, Prepared by R. W. Corkery & Co Pty Limited, Report No 440/11 dated February 2016 Straits Tritton Mine Frame Environmental Management Plan Sept 2012	Clearly Reference the relevant section within the MOP that describes the mine infrastructure and facilities within the Framework Environmental Management Plan
(vii)	where relevant, monitoring procedures relating to water quality, groundwater flows, air quality, noise and vibration, and the tailings storage facility;	Compliance	Section 8 of the Framework EMP refers to monitoring and management of rehabilitated sites. Water Quality and Groundwater monitoring is covered in Water Management Plan ML1544 and reported in sections 6.3-6.4 of the AEMR Air Quality monitoring is covered in reported in TRL Dust Management Plan with particular reference to AS NZS 3580 10 1-2003 Methods for sampling and analysis of ambient air - Determination of particulate matter and reported in section 6.1 of the AEMR Noise and Vibration monitoring procedures are given in Noise and Vibration Management Plan 2016 and reported in section 6.10 of the AEMR Tailings storage facility monitoring is detailed in TSF Operations Manual	TRL Framework EMP Sept 2012 and nominated Sub-Plans: Water Management Plan ML1544 Feb 2016 Dust Management Plan Aug 2015 Noise and Vibration Management Plan Jan 2016 Tailings Dam Operational Manual rev 4a dt April 2016 Mining Operations Plan, Prepared by R. W. Corkery & Co Pty Limited, Report No 440/11 dated March 2016 AEMRs 2015-2017	
(viii)	management and protection measures for all recorded Aboriginal archaeological sites within the subject land;	Compliance	The CHMP includes relevant regulations and requirements as well as methods of audit and maintenance of aboriginal sites within the mine site.	Cultural Heritage Management Plan Rev 1, dated Jan 2015	
(ix)	the recommendations of the Preliminary Hazard Analysis prepared by McCracken Consulting, dated December 1998;	Observation	No specific reference to the PHA was found in the EMP and sub-plans.		If the PHA recommendations are addressed in the EMP and sub-plans, it should be clarified in the next revision of the plans.
(x)	management measures for any fauna and flora species listed under the Threatened Species Conservation Act 1995 that occur on the site.	Compliance	Woodland Area to the north of the Tailing Storage Dam that has been assigned a high biodiversity value. No threatened flora species have been recorded within the operational areas of TRL, whilst one threatened ecological community (TEC) has been recorded ("Benson ID 82 - Inland Grey Box – Poplar Box – White Cypress Pine tall woodland", EnviroKey, 2012). The Cobar Greenhood Orchid, a threatened flora species, has previously been identified in a non-active area of ML1544 . The Flora and Fauna Management Plan section 4.1.3 states that Cobar Greenhood Orchid is listed as Vulnerable under the TSC Act and the EPBC Act. Management measures for the identified Threatened species are provided in the Flora and Fauna Management Plan and reported in section 6.7 of the AEMR.	TRL Land Management Plan, Rev 1.1 dated January 2016 TRL Flora and Fauna Management Plan, Rev 1.1 dated January 2016 AEMRs 2015-2017	
	The EMP shall be prepared to the satisfaction of the Secretary in consultation with relevant agencies and shall be submitted at least 1 (one) month prior to the commencement of construction, or within such period as otherwise agreed to by the Secretary.	Compliance	This condition is not relevant in this audit period as it relates to commencement of construction and was covered in previous audits.		
	(Note: The Applicant may prepare the EMP required by this condition in conjunction with the MOP/s required by Condition 5 provided the MOP/s specifically addresses the matters listed in this condition).	Noted			

	COMPLIANCE REPORTS				
6A.	Within 3 months of any modification to the conditions of this consent (unless the conditions require otherwise), the Applicant shall review the EMP required under condition 6 of schedule 2. Where this review leads to revisions of the EMP, then within 2 months of the review, the revised document must be submitted to the Secretary for approval.	Non Compliance	The TRL Framework EMP rev 2 as sighted by the Auditors is dated Sept 2012. It is noted that this EMP has not been revised following the April 2015 modification to the Consent. It is noted that the MOP and various specific Management Plans as noted in the MOP were revised in 2016 except: * ESCP 2015 * Remedial Action Plan 2013 * Cultural Heritage Management Plan 2015	TRL Framework EMP Sept 2012 Mining Operations Plan Feb 2016 Different Management Plans as noted above	Review and Revise the EMP and related Plans in accordance with this Condition.
7(a)	At least 2 (two) weeks prior to the commencement of substantial construction (or within such period as otherwise agreed to by the Secretary), the Applicant shall submit to the Secretary a report detailing compliance with all the relevant conditions that apply at this stage.	Noted	This condition relates to the commencement of construction of the mine infrastructure and therefore is outside the period covered by this audit. This condition was covered in previous audits.		
7(b)	At least 2 (two) weeks prior to the commencement of operations associated with the development (or within such period as otherwise agreed to by the Secretary), the Applicant shall submit to the Secretary a report detailing compliance with all the relevant conditions that apply at this stage.	Noted	This condition relates to the commencement of operations of the mine and therefore is outside the period covered by this audit. This condition was covered in previous audits.		
	INDEPENDENT ENVIRONMENTAL AUDITING				
8	2 years after the commencement of operations, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an independent environmental audit of the development. This audit must	Compliance	The previous IEA was undertaken by 3E with site visit undertaken on 18-19 November 2014 with report completed on 15 May 2015. The audit report Version 2, dated 10 Feb 2015 was submitted to DPE via email on the 13th Dec 2015. The final version 3 report was approved by the DPE in August 2015. The present IEA was commissioned on 7 Sept 2018	IEA report by 3E dated 15 May 2015 Email from Nathan Jones dated 13 Feb 2015 to Kane Winwood at DPE with the IEA report Version 2 attached to it. DPE Letter dated 4 Aug 2015 titled Tritton Resources Limited DA 41/98 Independent Environmental Audit 2015 - Version 3	
8(a)	be conducted by a suitably qualified, experienced, and independent team of experts whose appointment has been endorsed by the Secretary;	Compliance	The audit team for the 2018 IEA (this audit) has been approved by DPE on 21 Sept 2018 via emailed letter, in response to email from Dean Woods to DPE with proposed Auditors' CVs sent on 10 August 2018.	DPE letter titled "Tritton Copper Mine Project (DA41/98) Independent Environmental Audit 2018 dated 21 Sept 2018	
8(b)	include consultation with the relevant agencies;	Compliance	This audit included consultation with NSW EPA (Joshua Loxley), Bogan Shire Council (admin generic email and Jackson Wright), WaterNSW (environmental assessments) and Department of Resources and Energy / DP&E (Mark Buchan)	Consultation undertaken by the Auditors	
8(c)	assess, in respect of the requirements of this consent and any relevant mining lease or environment protection licence, the environmental performance of the development and its effects on the surrounding environment.	Noted	This audit is undertaken against DA41-98, EPL 11254 and Mining Lease 1544.	This audit report	
8 (d)	assess wether the development is complying with relevant standards and performance measures specified in these approvals (including under any strategy, plan or program required under these approvals) and with other statutory requirements;	Noted	This audit is undertaken against DA41-98, EPL 11254, Mining Lease 1544 and Water Bore licence conditions 80BL245969	This audit report	
8(e)	review the adequacy of strategies, plans or programs required under these approvals; and, if necessary,	Noted	This audit is undertaken against DA41-98, EPL 11254, Mining Lease 1544 and Water Bore licence conditions 80BL245969	This audit report	
8(f)	recommend measures or actions to improve the environmental performance of the development, and/or any strategy, plan or program required under these approvals.	Noted	This audit is undertaken against DA41-98, EPL 11254, Mining Lease 1544 and Water Bore licence conditions 80BL245969	This audit report	
	Note: this audit team must be led by a suitably qualified auditor and include an expert in the field of mine rehabilitation.	Noted	The audit team for the 2018 IEA (this audit) has been approved by DPE on 21 Sept 2018 via emailed letter, in response to email from Dean Woods to DPE with proposed Auditors' (Ken Holmes) and relevant specialists (David Pritchard, Douglas Ford) CVs as included in pitt&sherry proposal sent on 12 July 2018.	DPE letter titled "Tritton Copper Mine Project (DA41/98) Independent Environmental Audit 2018 dated 21 Sept 2018	
8A	Within 6 weeks of completing this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary with a response to any recommendations contained in the audit report.	Noted	The site audit was undertaken on 25-26 September 2018	This audit report	
8B	Within 3 months of submitting the audit report to the Secretary, the Applicant shall review and if necessary revise the strategies/plans/programs required under this consent, to the satisfaction of the	Noted			

	TAILINGS STORAGE FACILITY				
9	The Tailings Storage Facility shall be designed, constructed, operated, monitored, maintained and finally stabilised so as to: (a) be in accordance with the documents referred to in conditions 1(g) and 1(h) of Schedule 2; (b) be otherwise in accordance with the EIS, the supplementary document prepared in response to Government submissions, and the document titled "Nord Australex Nominees/Straits Mining Joint Venture – Tailings Storage Facility Preliminary Design Report"; (c) ensure that water received in the facility is evaporated, retained, or reused and that there is no overflow of tailings water to the environment unless approved by EPA; and (d) ensure that there is no excessive seepage or leakage from the facility, and that any leakage or seepage is managed in accordance with the requirements of EPA and DRE.	Non Compliance	Tailings Storage Facility is operated, monitored and maintained in accordance with the TSF Operations and Maintenance Manual, as sighted by the Auditors. However, a range of waste materials including a large number of 205 L steel drums were observed to have been placed in the TSF that is not as per the original intent of the facility. It is understood that, this matter was raised by EPA and DPE at a AEMR review meeting at the site on 14 August 2018. The EPA also noted that following issues raised: * Waste disposal (drums and plastic bags deposited at various places in the TSF) * Level of tailings dam was noted, visually, to be too close to the embankment and the next lift may cause this to impact the freeboard * Evidence of erosion was noted, visually, on the eastern side of the TSF wall The previous IEA reviewed and commented on the dam surveillance report prepared in 2013 Coffey Mining Pty Ltd that the conditions of this consent were in compliance with the EIS and the Preliminary Design Report. No water overflow was observed at the site audit inspection. TSF surveillance report is prepared annually. The reports prepared by external specialist consultants detail the design and construction activities to-date, details of site surveillance review etc. Section 7 of the 2017 surveillance report details water monitoring.	Tailings Storage Facility surveillance review reports for 2015 (Coffey dated 23 Mar 2016), 2016 (Coffey dated 4 May 2017) and 2017 (CMW Geosciences 12 Apr 2018) TSF Operations and Maintenance Manual & DSC Emergency Action Plans Rev4a April 2016 Site audit observations; Auditors' discussions with EPA and DPE Tritton Copper Project EIS by R W Corkery & Co. Pty Ltd for Nord Astralex Nominees Pty Ltd / Straits Mining Pty Ltd dated June 1998 Letter dated 14 Dec 2005 from Dept of Planning to the Resident Manager at Tritton Copper Mine with title "Management Plans - Tritton Copper Mine" approving draft Emergency Plan and TSF Management and Monitoring Plan. TSF Preliminary Design Report for Tritton Copper Project, Ref 218/1 dated June 1998 by Knight Piesold Consulting Engineers	Ensure TSF is maintained for tailings storage only- plastic materials and drums should not be placed in the TSF and existing wastes deposited with the TSF be removed if safe to do so. Ensure the matters raised by EPA and DPE following 2017 AEMR review inspection are closed out in a timely manner in consultation with EPA and DPE
10	Prior to the construction of the TSF, and prior to raising the Facility above 10 meters in height (to a maximum height of 14.5), the Applicant must submit detailed design plans to DRE and the NSW Dams Safety Committee for approval	Compliance	An email was sighted, dated 27 Oct 2015. sent by the then Environmental Advisor to DPE stating reasons for correcting an apparent administrative error by DPE in stating this condition and detailing why the TSF height should be 19m or 272m RL. As per the 2017 TSF surveillance report, design and planning of embankment design of Stages 6 & 7 have been completed and in the process of being submitted to the regulators for review and approval. As per section 5.7, future embankment raising is currently under DSC approval to RL270.0 for Stage 6 and RL272.0 for Stage 7.	Email dated 27 Oct 2015 from Nathan Jones to Matthew Riley at DPE Tailings Storage Facility surveillance report for 2017 by CWM Geosciences dated 12 Apr 2018	
11	Construction of the TSF shall be supervised at all times and certified by the Applicant's dam design engineer.	Not Triggered	This condition is not triggered for this audit period as operations had commenced prior to the audit period.		
12	Piezometers (monitoring bores) are to be installed to monitor the Tailings Storage Facility prior to any tailings being placed in the Tailings Storage Facility. The location and standard of the piezometers must be determined in consultation with the NOW's Regional Hydrogeologist.	Compliance	Placement of piezometers were undertaken prior to the audit period The piezometers as installed were inspected during site audit inspection and found to be in working condition.	Site audit observations	
13	Standing water levels in the piezometers are to be measured prior to any tailings being placed in the Tailings Storage Facility and then at 6 monthly intervals. Sampling and a complete water analysis for each piezometer must be undertaken prior to any tailings being placed in the Tailings Storage Facility and thence annually. Results of measurements and sample analysis are to be interpreted and reported in the Annual Environmental Management Reports (AEMR). [8.6]	Compliance	Annual TSF Surveillance Reports (eg Section 7.1 in the 2017 report) and AEMRs (eg Sections 6.3 and 6.4 in AEMR 2017) include results of water levels and water analysis.	AEMRs 2015-2017 TSF surveillance reports for 2015, 2016, 2017 Site audit observations	
	WATER				
14	Surface water management is to be carried out in accordance with the methods described under Section 4.2 of the EIS in consultation with NOW.	Compliance	The EIS section 4.2 provides water management controls and monitoring parameters. Water Management Plan ML1544 dt Feb 2016 sections 6 detail monitoring and management of surface water quality at the site. It is stated in section 7 that all water monitoring results are assesseed against ANZECC livestock drinking water quality and irrigation guidelines. Table 14 in AEMR 2017, Table 12 in AEMR 2016 and Table 10 in AEMR 2015 provides Surface Water Monitoring Schedule. As per advise by Dean Woods, the AEMRs are provided to various regulatory bodies, including NOW, for review. Previous consultation with DECCW (now NOW) sighted by the auditor.	Tritton Copper Project EIS Jun 1998 prepared by R W Corkery & Co Pty Ltd Water Management Plan, February 2016 Site audit discussion (Dean Woods) AEMRs 2015-2017 Letter from Straits Tritton Mines to DECCW dated 7 April 2010 with information on pollution studies against EPL and changes made to Surface Water Management Plan	
15	Initial groundwater inflows into the mine are to be monitored for volume of inflow and thereafter at 6 monthly intervals, with sampling and a complete water analysis of inflow water being undertaken annually. Results of measurements and sample analysis are to be interpreted and reported in the AEMR.	Compliance	Table 14 in AEMR 2017, Table 12 in AEMR 2016 and Table 10 in AEMR 2015 provides Surface Water Monitoring Schedule. Section 6.3.2 of AEMRs 2016 & 2017 and section 3.3.2 of AEMR 2015 provides water analytical results description and interpretation. Section 6.4 in AEMRs 2016 & 2017 detail groundwater monitoring results and interpretation. The groundwater measurement and analysis results are reported in EPL11254 Annual Returns. Tritton contributed to a national project under the Australian Centre for Minerals Extension and Research and UQ, aimed to develop models that will allow improved understanding of rehabilitation cover systems.	AEMRs 2015-2017 EPL11254 Annual Returns 2015-2018 Site Audit discussions (Dean Woods, Derek Garmin	
16	In respect of the license requirements for the mine, the Applicant shall consult with the NOW's Water Administration Manager (Macquarie);	-			
	i) to amend the water license arrangements for the Girilambone Mine to reflect the new location of use at the Tritton Site;	Noted	There was no change to Water Licence in this audit period	Site audit discussions Previous IEA report by 3E	

	ii) to obtain the necessary license under the *Water Act 1912* for the use of groundwater from mine dewatering for any purpose; and,	Compliance	There are multiple Water Licences applicable to this site, a list of these and the Consolidated Water Licence 80BL245969 dated 25 Jun 2010 sighted by the Auditors	Water Licence 80BL245969	
	iii) to obtain the necessary licence under the *Water Act 1912* for the construction and use of all monitoring bores (piezometers) associated with the project.	Compliance	There are multiple Water Licences applicable to this site, a list of these and the Consolidated Water Licence 80BL245969 dated 25 Jun 2010 sighted by the Auditors	Water Licence 80BL245969	
17	Soil stripping and stockpiling procedures for use in future site rehabilitation are to be carried out as outlined in Section 4.4.2 of the EIS in consultation with EPA.	Observation	As per Section 4.3 in AEMR 2016-2017 and Section 2.2 in AEMR 2015, all site surface disturbance activities require the completion of a Surface Disturbance Permit. The procedure noted in AEMR is in accrdance with Section 4.4.2 of the EIS. There was one permit request in 2017 and five requests in 2016. It is noted that the section numbering (4.3 in AEMR 2016 and 2017) is repeated for Land Preparation and for Construction.	TRL EIS dated Jun 1998 AEMRs 2015-2017 Site Disturbance Permit using form TRL-ENV-FRM-001, sampled Permit No ENV-SDP-108 for works by Joe Reinhard dated 7 Jun - 7 Jul 2016	Ensure section numbering is corrected in future AEMRs
	MULLOCK MANAGEMENT				
18	All potentially acid producing mullock materials shall be stockpiled in controlled discharge areas such that there is no discharge of leachate beyond the designed water management system.	Compliance	The previous IEA reported this condition as non-compliant due to placement of acid producing mullock being stockpiled in waste rock stockpile area. The auditees reported to the Auditor that this has been rectified. The procedure for managing waste rock is detailed in the Waste Rock Characterisation and Management Plan section 6. The PAF management processes were explained during site audit interview by Senior Geologist Osvaldo Gonzalez. The PAF management areas were inspected by the Auditor and were being managed in accordance with the Plan.	Waste Rock Characterisation and Management Plan, Rev 1.1, dated jan 2016 Audit interview (Dean Woods, Osvaldo Gonzalez) Auditor Observations	
19	Prior to the construction and the commencement of mining operations, and during the operational life of the mine, the Applicant shall conduct regular investigations to determine whether potentially acid-producing mullock will be mined.	Compliance	The procedure for managing waste rock, including the process for identifying and managing PAF is detailed in the Waste Rock Characterisation and Management Plan section 6. The process was explained (and observed) during site audit interview by Senior geologist Osvaldo Gonzalez. The PAF management areas were inspected by the Auditor and were being managed in accordance with the Plan.	Waste Rock Characterisation and Management Plan, Rev 1.1, dated jan 2016 Site audit interview (Dean Woods, Osvaldo Gonzalez) Audit Observations.	
20	Should investigations reveal the existence of potentially acid producing mullock, the Applicant shall:		-		
	• prepare an acid mine drainage strategy in consultation with the EPA; and	Observation	The procedure for managing waste rock is detailed in the Waste Rock Characterisation and Management Plan section 6. The process was explained (and observed) during site audit interview by Senior geologist Osvaldo Gonzalez. Consultation with EPA - Letter from EPA dated 21 March 2016, signed by Jessica Creed, A/Head Far West Operations to TRL in response to ESCP stated that EPA does not review or comment on plans, programs and strategies prepared to meet statutory obligations, unless there is a specific reason to do so. Dean Woods reported that the plan was not sent to EPA based on this advice by EPA.	Waste Rock Characterisation and Management Plan, Rev 1.1, dated jan 2016 Site audit interview (Dean Woods, Osvaldo Gonzalez) Letter from EPA dated 21 March 2016, signed by Jessica Creed, A/Head Far West Operations to TRL.	Evidence of consultation with EPA should be noted in the plan and copies of relevant correspondence maintained for reference in future audits. While EPA has decided not to review the plans, TRL should send the plan to EPA for information as required by this Condition.
	• encapsulate the material with non-acid forming material if it is to be located in the mullock stockpile area or be left underground.	Compliance	Section 6.2 of the Waste Rock Characterisation and Management Plan briefly explains the process for encapsulating PAF in the TSF.	Waste Rock Characterisation and Management Plan, Rev 1.1, dated jan 2016 Site audit interview (Dean Woods, Osvaldo Gonzalez) Audit Observations	
20A.	The non acid forming rock waste dump shall be a maximum of 20 metres in height from the land surface.	Compliance	A survey of the current stockpile by the Mine Surveyor indicated that the highest area in the South East corner of the stock pile had a height of 17.673m from base to top. This is in line with section 4.2 statement in the Waste Rock Characterisation and Management Plan Rev 1.1 for storage of non-acid forming waste rock. An inspection of the Stockpile by the Auditor confirmed that the height of the existing stockpile did not exceeed twenty metres.	Email from Charlie Rabbits, Mine Surveyor at Tritton Mines, to Dean Woods dated 27 September 2018 Waste Rock Characterisation and Management Plan, Rev 1.1, dated jan 2016 Audit Observations	

	FLORA AND FAUNA				
21	The Applicant shall consult with the OEH when implementing the recommendations detailed in section 4.6.1.1 and 4.6.2.1 of the EIS, including the placement of a fence around the Tailings Storage Facility prior to tailings production.	Non Compliance	Letter from Nyngan Rural Land Protections Board was sighted by the Auditor, which gave support to Nord Resources (Pacific) Pty Ltd to erect a fence around the TSF, as required by the referenced sections in the EIS. Perimeter fencing was observed by the Auditor during the Audit inspection. Evidence of consultation in relation to compliance with OEH is not available during the Audit.	Letter from Nyngan Rural Land Protections Board, dated 31 July 2000.	Evidence of consultation with OEH should be noted in the plan and copies of relevant correspondence maintained for reference in future audits.
22	The Applicant shall ensure that, following the production of tailings, there is an alternative and permanent source of potable water for wildlife. Details should be included in the Contingency Strategy required by Condition 6(ii).	Compliance	An Environmental Water Pond has been established adjacent to the TSF. The Auditor inspected the pond, that is located outside of, but adjacent to the TSF. Raw water levels are checked during weekly inspections and the pond is replenished from the water line established from the Girilambone site. Usage of the pond was approved by Council in 2004 as evidenced by letter signed by Bogan Shire Council Manager for Engineering Services.	Site audit observations and discussions Letter from Bill West at Bogan Shire Council dated 9 Jun 2004 with subject Wildlife Watering Hole	
23	Prior to the construction of the tailings dam, and following consultation with the DRE 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 and be submitted to the Department one month prior to the commencement of the works. The Plan shall include but not be limited to:	Non Compliance	Revision 4a (2016) of the TSF Operations and Maintenance Manual was sighted by the Auditors. Correspondence confirming consultation with DRE and EPA and approval of DPE (Secretary) was not available.	Tailings Storage Facility Operations and Maintenance Manual Rev 4a, dated April 2016	The TSF Manual should be revised to address requirements of this condition, in consultation with DRE and EPA.
(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;	Non Compliance	The TSF Operations and Maintenance Manual does not cover the requirements of this Clause.	Tailings Storage Facility Operations and Maintenance Manual Rev 4a, dated April 2016	
(ii)	A toxic profile of these chemicals and reagents (ie in tailings water);	Non Compliance	The TSF Operations and Maintenance Manual does not cover the requirements of this Clause.	Tailings Storage Facility Operations and Maintenance Manual Rev 4a, dated April 2016	
(iii)	An assessment of expected effects of the chemicals and reagents on the species of concern, particularly threatened species;	Non Compliance	The TSF Operations and Maintenance Manual does not cover the requirements of this Clause.	Tailings Storage Facility Operations and Maintenance Manual Rev 4a, dated April 2016	
(iv)	Ameliorative measures and contingency planning measures to ensure adverse impacts on wildlife are minimised;	Non Compliance	The TSF Operations and Maintenance Manual does not cover the requirements of this Clause.	Tailings Storage Facility Operations and Maintenance Manual Rev 4a, dated April 2016	
(v)	Provisions for on-going monitoring of the chemical and reagent concentrations of the tailings dam and wildlife use of the dam; and	Non Compliance	The TSF Operations and Maintenance Manual does not cover the requirements of this Clause.	Tailings Storage Facility Operations and Maintenance Manual Rev 4a, dated April 2016	
(vi)	The monitoring component of the plan shall also include provision for the monitoring of wildlife usage of the alternative water supply required by Condition 22.	Non Compliance	The TSF Operations and Maintenance Manual does not cover the requirements of this Clause.	Tailings Storage Facility Operations and Maintenance Manual Rev 4a, dated April 2016	
24	The Applicant shall implement the Management and Monitoring Plan in accordance with its provisions.	Compliance	TSF Operations and Maintenance Manual Section 12 provides monitoring provisions. Tailing Storage Facility is inspected routinely and an annual surveillance report is prepared by specialist consultant. The annual surveillance report is submitted to DSC for review, as evidenced by DSC's response and review comments.	AEMRs 2015-2017 TSF Surveillance Reports 2015-2017 DSC letter to John Miller at Tritton Mines dated 2 Jun 2017 on receipt of the 2016 TSF surveillance report	
25	Prior to any tree clearing for the Tailings Storage Facility, the Applicant shall inspect the area for potential bat roost trees and nest hollows. Identified trees should be retained where possible, or if lost, any bat colonies should be relocated in consultation with OEH. The locations of trees with hollows and any other significant threatened fauna attributes should be identified and presented in the contingency plan required by Condition 6(ii) of this consent.	Compliance	Pre-clearing surveys are planned to be undertaken prior to any surface disturbance. As per AEMRs inspected, no tree clearing was undertaken or planned during the audit period. Therefore no pre-clearing surveys were undertaken during this period. It is noted that the planned works to increase the capacity of the TSF that will be undertaken in the next audit period will not require the clearing of any additional native vegetation or potential habitat trees.	Tailings Storage Facility Operations and Maintenance Manual Rev 4a, dated April 2016 AEMRs 2015-2017	
26	All hollowed vegetation, stumps and logs removed during the construction of the Tailings Storage Facility shall be relocated to the designated areas of compensatory planting identified in Figure 2.12 of the EIS.	Not Triggered	This condition is not triggered this audit period as the construction of the TSF had been completed prior to the audit period.		

27	In relation to the Kultarr, the Applicant shall;				
(a)	Put in place pre-start monitoring. Any Kultarr located should be relocated to suitable habitat as near as possible to the capture site. This habitat shall be defined by a suitably qualified person; and	Non Compliance	The auditors did not sight a pre-start checklist that refers to pre-start monitoring of Kultarr and any procedures for their relocation if captured specifically. Section 3.7 of the 2015 AEMR and Section 6.7 of 2016-2017 AEMRs identifies the Kultarr as a relevant threatened fauna to be included in the monitoring activities. A targeted flora and fauna survey was conducted in 2011 by EnviroKey and previously by GHD in 2008 and by Straits Tritton Mines in 2009. Dean Woods reported that Tritton Mines undertakes pre-clearance surveys prior to clearing of any vegetation. Any identified threatened fauna will be relocated to compensatory planting area or adjacent vegetation. Hollow logs and trees found in the surveyed area will also be moved to compensatory planting area for habitat creation. No targeted surveys were undertaken during the audit period. No Kultarrs were observed during the audit period on the mine or TSP sites.	AEMRs 2015-2017 Audit discussions	Update pre-start procedure /check list to include observations for the presence of Kultarrs.
(b)	Any captured Kultarr to be relocated shall be held for a period no longer than 10 days in suitable conditions.	Not Triggered	No Kultarrs were captured or observed during the audit period on the mine or TSP sites.	AEMRs 2015-2017	
28	The Applicant shall, where practicable, ensure that the identified communities containing the species *Pterostylis cobarensis* are protected from mining and mining related disturbance by means of a buffer area at least 20 m wide.	Not Triggered	Section 4.1.3 of the Flora and Fauna Management Plan states that One threatened flora species, Cobar Greenhood Orchid (Pterostylis cobarensis) has been previously recorded within ML1544 (GCNRC 1998). That report states that “A small *Pterostylis cobarensis* population was found in a regenerating Green mallee community on a ridge about one kilometre south of the southern boundary of the tailings storage facility”. Cobar Greenhood Orchid is listed as Vulnerable under the TSC Act and the EPBC Act. Section 5.1.2, under Management Strategy, states that the Cobar Greenhood Orchid has not been identified within the mining area during any of the flora assessments undertaken for the operation to date. The AEMRs do not include any further reporting of this species.	Flora and Fauna Management Plan, Rev 1.1 dated Jan 2016; AEMRs 2015-2017	
	LANDSCAPE PLAN				
29	The Applicant shall submit a Landscape Plan to Council prior to the issuing of a Construction Certificate. The Plan shall be prepared by a suitably qualified person and shall address, but not be limited to, the following matters:	Observation	Original Landscape plan was submitted to Council for approval on 25 September 2007. The auditors sighted the latest revision of this plan, dated January 2016. However the file name indicates the date of preparation as 2013. The plan does not identify who prepared it. It is understood that this revision of the plan has not been submitted to the Council.	Visual Amenity and Landscape Management Plan Rev 1.0 dt January 2016 Letter dated 25 Sept 2007 to General Manager at Bogan Shire Council from Resident Manager, Tritton Mine.	Issue the revised Landscape management plan to Council.
(i)	Details on screen planting around the Tailings Storage Facility, with particular attention to minimising the visibility of the facility from Yarrandale Road; and	Compliance	Section 1.2.2 of the Visual Amenity and Landscape Management Plan lists the relevant requirements as per this condition. The plan provides basic procedures for screen planting and Section 2.1.1 detail existing plantings at the office and site boundary areas. It has been stated that, "once established, the plantings will provide a visual barrier surrounding the Tritton site".	Visual Amenity and Landscape Management Plan Rev 1.0 dt January 2016	
(ii)	Details on the proposed landscaping treatment of the mine processing area, Tailings Storage Facility and office area.	Compliance	Section 2.1.1 of the Visual Amenity and Landscape Management Plan lists the planted tree species. It is stated that "If the trees fail to grow or die for some reason, a replant will take place to fill in any gaps that occur within the tree screens to maintain the aesthetic outlook toward the mine". Section 2.4.1 mentions management maintenance of existing cover and maitnenance of a corridor of woody vegetation between TSF and Yarrandale Road.	Visual Amenity and Landscape Management Plan Rev 1.0 dt January 2016	
30	All landscaping and tree planting works referred to in Condition 29 shall be completed as far as practicable within 12 (twelve) months of the commencement of operations.	Compliance	The previous IEA reported a non-complaince against this Condition. Observations made during this audit confirmed that additional planting has been completed between Yarrandale Road and the Waste Rock Emplacement.	Audit Observations	

31	All disturbed areas are to be revegetated as soon as practicable on completion of construction using species and fertilisers in combinations and at such rates acceptable to the OEH's Nyngan Catchment Advisory Officer.	Observation	Progressive rehabilitation has occured mainly on the tailings storage facility embankment. Tritton Mine Resident Manager, in a letter to the Manager of RLPB in July 2007 referred to previous discussions to RLPB regarding collection of seeds from plants on the Travelling Stock Reserves and Routes aroudn NSW and in particular from RLPB areas. The letter requested approval to collect native plant seed for teh life of the operations in the area. A similar letter was sighted by the Auditors requesting an agreement with Central West Catchment Management Authority for approval and access to local knowledge on grass seeds collection and use of seed collecting equipment. Responses regarding approval of species and fertilisers were not available at the audit and following review.	Audit Observations and Site audit discussions. Letter dated 10 July 2007 to Manager, Nyngan Rural Lands Protection Board (RLPB) regarding Seed Collection in RLPB Managed Areas. Letter dated 16 July 2007 to Central West Catchment Management Authority regardign Seed Collection with Tritton Copper Mine.	Acceptance should be sought from OEH Nyngan Catchment Advisory Officer on the plant species and fertilisers as required by this condition.
	EXTERNAL APPEARANCE OF BUILDINGS AND STRUCTURES				
32	The Applicant shall ensure that the external colour and texture of all structures shall, where practical, blend into the natural surroundings of the locality.	Compliance	The Auditor inspected all permanent structures on the mine site. The external colour and textures on all structures reasonably comply with this requirement.	Site audit observations	
	TRANSPORTATION AND TRAFFIC				
33	All heavy vehicle movements associated with the subject development shall use the Barrier Highway and the sealed section of Yarrandale Road for site ingress and egress, ie with the exception of any movement of equipment and supplies between the Girilambone Mine and the Tritton Project Site, and the transportation of waste rock.	Observation	During the site inspection, the access routes were observed to meet this requirement. The access routes are mentioned in the project EIS however the Traffic Management Plan does not include these details. The TMP has not been revised since being prepared in 2013.	Site audit observations and discussions Traffic Management Plan Rev 0, dated 28 March 2013 - TCM-HSET-MP-003 TRL EIS dated Jun 1998	Revise TMP to include access details
33A.	The Applicant may: (a) transport up to 30,000 tonnes of waste rock from the site in any calendar year; and (b) receive up to 1 million tonnes of ore material in any calendar year.	Compliance	(a) Dean Woods reported that no waste rock is taken off-site. (b) The mine received the following ore materials from the North East & Murrawombie sites during the Audit Period: July15-June16 – 425,190 tonnes July16-June17 – 417,165 tonnes July17-June18 – 468,096 tonnes	Site audit discussions; AEMRs 2015 - 2017	
33B.	The Applicant shall ensure: (a) all vehicles exporting waste rock enter and exit the site via the haul road entrance/Yarrandale Road intersection (see Appendix 1); and (b) transportation of waste rock only occurs between 7.00 am and 10.00 pm.	Not Triggered	(a) Dean Woods reported that no waste rock has been taken off-site. (b) This requirement is addressed in the Driver's code of conduct TRL-ENV-FRM-020.	Site audit discussions; Previous IEA report by 3E; AEMRs 2015 - 2017; Driver's code of conduct Rev 1.1, dated Jan 2016	
34	Prior to the commencement of construction of the mine or as otherwise agreed to by the RMS and Council, the Applicant shall at its own cost:				
(i)	seal the length of Yarrandale Road to a width of 7 metres, from the end of the existing seal to the Tritton project site; [4.8.1]	Compliance	The entire road from the Barrier Highway to (and past the mine site) has be sealed in accordance with this Condition.	Audit Observations	
(ii)	upgrade the intersection of Yarrandale Road and the Barrier Highway to an intersection type AUR for westbound traffic on the Barrier Highway, and the intersections for both northbound and southbound traffic on Yarrandale Road to intersections type BAL 4.8.35 for use by articulated vehicles in accordance with the RMS Road Design Guidelines;	Compliance	The intersection has been upgraded in accordance with this Condition.	Audit Observations	
(iii)	in consultation with the RMS, ensure that there is an adequate bitumen area to accommodate the sweep path generated by the vehicles that will regularly use the site during both the construction and operational phase;	Compliance	The entire road from the Barrier Highway to (and past the mine site) has be sealed in accordance with this Condition. Note that as this condition was satisfied during a previuos audit period, evidence of consultation with RMS has not be sort.	Audit Observations	
(iv)	prior to carrying out any concentrate transport operations (other than during daylight hours), provide adequate overhead night time lighting for the intersection of the Barrier Highway and Yarrandale Road to the approval of the RMS and Council;	Compliance	The entire road from the Barrier Highway to (and past the mine site) has be upgraded and sealed in accordance with this Condition. Note that as this condition was satisfied during a previuos audit period, evidence of consultation with RMS has not be sort.	Audit Observations	
(v)	construct the turnout to the Tritton site from Yarrandale Road to an intersection type AUL in accordance with the RMS's Road Design Guide (1991). This area shall include a suitable deceleration length applicable to all proposed transport modes;	Compliance	The entire road from the Barrier Highway to (and past the mine site) has be upgraded and sealed in accordance with this Condition. Note that as this condition was satisfied during a previuos audit period, evidence of consultation with RMS has not be sort.	Audit Observations	
(vi)	in accordance with the RMS's Road Design Guide (1991) provide an appropriate intersection for right turn movements into the Girilambone Mine Site to the satisfaction of Council; [1.5.2 (f)]	Compliance	The entire road from the Barrier Highway to (and past the mine site) has be upgraded and sealed in accordance with this Condition. Note that as this condition was satisfied during a previuos audit period, evidence of consultation with RMS has not be sort.	Audit Observations	
(vii)	to the approval of the RMS and Council, erect appropriate warning signs on both approaches to both the turnout to the Tritton site and on both approaches to the Yarrandale Road intersection. At a minimum, the signs shall comprise a TRUCK sign (Entering or Crossing) sign type W5-22C and with a DISTANCE sign, sign type W8-5C located beneath it. The distance sign is to show a distance of 200 metres; and	Compliance	The required warning signs were sighted during site audit inspection.	Audit Observations	
(viii)	provide GIVE WAY signs, *sign type R1-3B* on the access road facing traffic about to enter Yarrandale Road, and on Yarrandale Road facing traffic about to enter the Barrier Highway.	Compliance	The required warning signs were sighted during site audit inspection.	Audit Observations	
35	Any road works undertaken on or adjacent to the Highway formation are to be advised and controlled in accordance with the requirements set down by Australian Standard AS1742 and the RMS's "Traffic Control at Worksites, Version 2 October 1998".	Not Triggered	No road works were undertaken during this audit period.	Audit Observations	

36	The Applicant shall ensure that the vehicles engaged in the transport of concentrates:		-		
	• comply with the design requirements and vehicle specifications for this type of vehicle; and	Compliance	The Auditee reported that Concentrate is transported from the site by Contractors. The Haulage Contract (TRL_KPC_2018_013 for Concentrate Haulage from Tritton Mine to Hermidale Rail Siding, sighted by Auditors) requires contractors to be accredited under the National Heavy Vehicle Accrediation Scheme. Within Schedule 3 Scope of Works in the contract, clause 2. a) Concentrate Haulage details the vehicle specifications and haulage requirements and cleaning requirements.	TRL_KPC_2018_013 (Haulage Contract) TRL-HSET-HMP-WHS-008 Movement of Vehicles and Plant Hazard Management Plan; Traffic Management Plan Rev 0 dated March 2013	
	• are adequately covered so as to prevent any materials falling from the truck and trailer onto the road pavement.	Compliance	Driver's Code of Conduct includes this requirement and is part of driver induction for the site. During the audit, all concentrate trucks leaving the site were appropraitely covered.	Driver's Code of Conduct as per form TRL-ENV-FRM-020 Rev 1.1 Jan 2016 Audit Observations.	
37	The Applicant shall, in liaison with the local bus operators, ensure that any heavy vehicle haulage is to avoid school bus times when and if school buses travel along Yarrandale Road.	Not Triggered	No school buses use Yarrandale Road.		
37A	Prior to exporting any waste rock as permitted by condition 33A, the Applicant shall prepare and implement a code of conduct for the transportation of waste rock on public roads. The code of conduct must be prepared in consultation with RMS and to the satisfaction of the Secretary.	Compliance	Driver's Code of Conduct includes this requirement and is part of driver induction for the site. Correspondence sighted as evidence of consultation with RMS and submission to DPE. Approval of amended Code of Conduct by DPE was sighted as letter signed by Mike Young, Director Resource Assesments on 31 July 2015.	Driver's Code of Conduct as per form TRL-ENV-FRM-020 Rev 1.1 Jan 2016 Emailed letter from Nathan Jones to Andrew McIntyre at RMS dated 14 July 2015 with draft Code of Conduct. Emailed response from Fiona Francis at RMS to Nathan Jones dated 21 July 2015 Letter from Mike Young, Director Resource Assessments at DPE dated 31 July 2015. Email from Nathan Jones to Katrina Reilly and Paul Rutherford at DPE on 18 May 2016 with Code of Conduct Rev 1.1 pdf.	
	NOISE				
38	The Applicant shall ensure that the LA10 (15 minute) noise levels due to the normal operation of the mine, when measured or computed at any residence (other than any premises under the control of the Applicant), shall not exceed:	Compliance	Section 3.10 in AEMR 2015 and 6.10 in AEMRs 2016 and 2017 describe operational noise management. Noise is measured/monitored at Wilga Downs as noted in the AEMR and teh Noise Monitoring Assessment report by Muller Acoustic Consulting. The closest residence had been selected as the representative receiver, at 2865 Yarrandale Road, Girilambone.	AEMRs 2015-2017 Noise Monitoring Assessment report, dated August 2018, Muller Acoustic Consulting	
	i) during day time (7am-10pm), an LA10 (15 minute) noise levels of 35dB(A) ii) during night time (10pm-7am), an L A10 (15 minute) noise levels of 33dB(A)	Observation	Section 5.0 (Noise and Vibration Controls) of the Noise Management Plan covers the requirement of the Condition. Noise levels were generally measured in accordance with the requirements of the plan and were reported in AEMRs for 2016-2017 (LA10 was not reported in 2015, however compliance with the EPL limits -LAeq - was demonstrated). It is noted that the noise monitoring is undertaken at the rural property boundary and not at the assocaited residence that is located further away from the mine than the rural property boundary. The 2015 AEMR reported the results of attended acoustic monitoring undertaken by Mueller Acoustic Consultants. The monitorining confirmed compliance with this Condition at the time of monitoring. The 2016 AEMR reported the results of attended acoustic monitoring undertaken by Mueller Acoustic Consultants. The monitorining results indicated that noise levels were not compliant with this Condition at the time of monitoring. However the background noise levels at the time of monitoring were considered (by the Noise Consultant) to exceed both day time and night time noise criteria. The 2017 AEMR reported the results of attended acoustic monitoring undertaken by Mueller Acoustic Consultants. The monitorining confirmed compliance with this Condition at the time of monitoring. Mueller Acoustic Consultants conducted attended monitoring on 7 August 2018. While the day time LA10 measurement at 3:28pm was 46dBA, the mine's contribution to the measured noise was assessed as being between 24 and 30 dBA.	Noise and Vibration Management Plan for Tritton Mine, Murrawombie Mine and North East Mine, Rev 1.1, dated January 2016 AEMRs 2015-2017 EPL Annual Returns 2015-2018 Noise Monitoring Assessment report, dated August 2018, Muller Acoustic Consulting	The noise monitoring undertaken to date is at the rural property boundary, not the actual property residence. It is recommended that consideration be given to undertaking a series of attended noise monitoring at the actual residence and correlating the noise levels associated with the mine operations at the residence with actual noise levels measured at the mine with the intention of calibrating a noise model. This approach would provide the mine with a tool that would allow noise monitoring to be undertaken at the mine and noise impacts at the residence to be calculated that could eliminate the issue of elevate background noise levels and simplfy the assessment of compliance against this Condition.
	Should a noise complaint be received from any nearby residence, the Applicant shall investigate the complaint and implement appropriate mitigation measures as required. Any such complaints and subsequent actions undertaken by the Applicant shall be addressed in the AEMR required by Condition 6(a).	Not Triggered	No noise complaints were received during the audit period.	AEMRs 2015-2017; EPL Annual Returns 2015-2018; Complaints Register	

39	The Applicant shall ensure that noise measurements shall be undertaken under prevailing weather conditions, in the absence of temperature inversions and over a period of time sufficient to be representative of the noise levels being emitted from the mine.	Noted	See recommendation for Condition 38.	AEMRs 2015-2017 Noise Monitoring Assessment report, dated August 2018, Muller Acoustic Consulting	
40	All aboveground blasting shall be carried out between 9:00am and 6:00pm Monday to Friday. Blasting shall only be allowed on public holidays in special circumstances and with the prior approval of the EPA.	Not Triggered	No Blasting has been undertaken during the audit period.		
41	The Applicant shall ensure that no private or company vehicles are utilising Yarrandale Road within 400 metres of the entrance to the Tritton Project Site when surface blasting is being undetaken.	Not Triggered	No Blasting has been undertaken during the audit period.		
42	The Applicant shall ensure that air blast overpressure and vibration monitoring and control is generally carried out in accordance with relevant Australian Standards in consultation with the EPA.	Not Triggered	No Blasting has been undertaken during the audit period.		
43	The Applicant shall monitor all surface blasts and blasts within 200 metres of the mine portal and record the overpressure and peak particle velocity at locations agreed by EPA and the DRE.	Not Triggered	No Blasting has been undertaken during the audit period.		
	HERITAGE				
44	The Applicant shall ensure that all Aboriginal archaeological sites that have been identified within the subject land are avoided and not disturbed. This shall include the site referred to as H/G-OS-2.	Compliance	Section 3 of the MOP includes details of aboriginal and non-aboriginal heritage items identified in the area and the management thereof. Section 13 of the MOP shows various plan drawings indicating the changes to the area impacted by mining activity from pre-MOP natural environment to post-mining land use, mining methods and remediation measures including rehabilitation. Cultural Heritage Management Plan also details the heritage management aspects of the mine. AEMRs include Figure 8 - Identified Cultural Heritage Artefact Locations	Mining Operations Plan, Prepared by R. W. Corkery & Co Pty Limited, Report No 440/11 dated February 2016 Cultural Heritage Management Plan, Rev 1, dated 23 Jan 2015 AEMRs 2015-2017	
45	The Applicant shall prepare management and protection measures in consultation with the OEH and the relevant local Aboriginal groups for those Aboriginal sites within the subject land within 50 metres of any proposed area of disturbance, that have been identified to date and for any other sites that may be identified in the future.	Compliance	A Cultural Heritage Management Plan (CHMP) has been prepared for the mine. The CHMP includes site heritage registers in appendices that have been developed in consultation with OEH and the relevant local Aboriginal Groups. No changes to the mine operations have occurred during this audit period that have resulted in any encroachment or impact on archealogical sites or artefacts. No subsequent heritage item surveys have been undertaken during this audit period.	Mining Operations Plan, Prepared by R. W. Corkery & Co Pty Limited, Report No 440/11 dated February 2016 Cultural Heritage Management Plan, Rev 1, dated 23 Jan 2015	
	These protective measures are to include the procedures recommended in the Archaeological Report of the EIS prepared by J Kelton.	Compliance	The CHMP includes protective measures recommended in the EIS.	Tritton Copper Project EIS prepared by R W Corkery & Co Pty Ltd, dated June 1998 Cultural Heritage Management Plan, Rev 1, dated 23 Jan 2015	
46	In the event that Aboriginal artifacts are identified within the subject land during earthworks, construction or operation of the mine, the Applicant shall contact the OEH and cease work in the relevant location pending investigation and assessment of its heritage value by OEH and the relevant local Aboriginal groups.]	Not Triggered	No new areas of the mine have been cleared or worked during this audit period.	Audit Interviews	
47	The Applicant shall place temporary fencing or flagging around those Aboriginal sites identified within 50 metres of the proposed areas of disturbance to prevent the possibility of accidental damage during the mine's construction phase in accordance with the relevant recommendations of the Archaeological Report of the EIS prepared by J Kelton.	Compliance	The Auditors were provided with photographs of temporary fencing placed around Aboriginal sites - Avoca Tank 3 Hearth 1, listed in the Culture and Heritage Management Plan.	Previous IEA report Photographic evidence presented by TRL	
	AIR QUALITY				
48	The Applicant shall implement, in consultation with the EPA, dust control measures aimed at achieving relevant EPA dust deposition standards.	Compliance	Dust fallout gauges are installed around the mine site to monitor dust dispersion. Monitoring activities are undertaken as per AS3580.10.1-1991 with monthly sampling and dust gauges replaced every month. There is no EPA requirement for dust monitoring as per EPL. Dust control measures, as reported in AEMRs (section 6.1 in AEMR 2016-17), include water trucks and spray systems. Apart from submission of AEMRs to DPE, no other consultation was undertaken as the EPL does not require dust monitoring. Tritton Mines previously explained monthly dust deposition gauge results and external factors impacting high readings in various instances to DECCW in 2009 and elaborated on dust monitoring activities. A new network of dust gauges was proposed at the time.	AEMRs 2015-2017 Letters from DRE (DPE) on acceptance of AEMRs- Letter dated 16 Jul 2015 on AEMR 2014 Letter dated 13 Oct 2016 on AEMR 2015 Letter dated 6 Nov 2017 on AEMR 2016 DPE letter dated 8 Mar 2018 on acceptance of AEMR 2017 Letter from Straits Copper Mines to DECCW dated 23 Jun 2009 Discussions with Dean Woods	
49	Deposited dust sampling shall occur at any nearby property as required by the EPA following the request of a resident and at any other locations determined by the EPA with the results submitted to the EPA.	Compliance	Dust fallout gauges are installed around the mine site to monitor dust dispersion. Monitoring activities are undertaken as per AS3580.10.1-1991 with monthly sampling and dust gauges replaced every month. There is no requirement in the Environment Potection Licence (EPL) for dust monitoring. Dust control measures, as reported in AEMRs, include water trucks and spray systems. There have been no request from a resident or EPA for dust sampling measurement to be undertaken during the audit period. All dust monitoring results are provided to EPA via submission of AEMRs.	AEMRs 2015-2017 Discussions with Dean Woods	

	BLASTING PROTOCOL				
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. The protocol shall include;	Not Audited	Note historical non-compliance recorded in the previous audit report.		
	• a means for notifying any property owners within 5 km of the site of the proposed blasting program; [16.10] (b)and,	Not Audited			
	· the proposed methods for keeping any records of complaints to enable remedial action to be undetaken to prevent recurrence.	Not Audited			
	HAZARDS AND SAFETY				
	Note: Conditions 51 to 53 relate to offsite risk to people, property and the biophysical environment. The safety of all persons and operations on site is the responsibility of the Department of Mineral Resources under the Mines Inspection Act and Dangerous Goods Act.	Not Audited	Note historical non-compliance recorded in the previous audit report.		
	The Applicant may choose to meet these Conditions by demonstrating to the Department that the plans and systems developed to meet the requirements of the mining lease also meet the requirements set out in the Hazardous Industry Planning Advisory Papers as appropriate.	Not Audited			
	Pre-Construction Studies				
51	At least one month prior to the commencement of construction of the proposed development (except for construction of those preliminary works that are outside the scope of the hazard studies), or within such further period as the Secretary may agree, the Applicant shall prepare and submit for the approval of the Secretary a final hazard analysis as set out below. Construction, other than of preliminary works, shall not commence until approval has been given by the Secretary.	Not Audited	Note historical non-compliance recorded in the previous audit report.		
	Final Hazard Analysis				
	Note: the purpose of the final hazard analysis is to demonstrate that there have been no changes during design that would materially affect the findings of the preliminary hazard analysis, in addition to showing that any recommendations from the latter have been appropriately implemented				
52	A final hazard analysis of the proposed development. The analysis should be prepared in accordance with the department of Urban Affairs and Planning's Hazardous industry Planning Advisory Paper No. 6, 'Guidelines for Hazard Analysis". The analysis shall in particular address the issues relating to (i) the freeboard capacity and overflow frequency for the TSF as raised in recommendation No. 9 of the preliminary hazard analysis and (ii) the hazards associated with the blasting as identified in recommendations 2 and 11 of the preliminary hazard analysis	Not Audited	Note historical non-compliance recorded in the previous audit report.		
	Pre-Commissioning Studies				
53	No later than two months prior to the commencement of commissioning of the proposed development, or within such period as the Secretary may agree, the applicant shall prepare and submit for approval of the Secretary the studies set out under subsections (a) and (b) (the pre-commissioning studies). Commissioning shall not commence until the Director has given approval	Not Audited	Note historical non-compliance recorded in the previous audit report.		
(a)	**Emergency Plan**				
	A comprehensive emergency plan and detailed emergency procedures for the proposed development. This plan shall include detailed procedures for the safety off all people outside of the development who may be at risk from the development. The plan shall be in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1, "Industry Emergency Planning Guidelines". The plan should address the matters raised in recommendation No 5 of the preliminary hazard analysis	Not Audited	Note historical non-compliance recorded in the previous audit report.		
(b)	**Safety Management System**	Not Applicable			
	A document setting out a comprehensive safety management system, covering all operations on-site and associated transport activities involving hazardous materials. This document shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures. Records shall be kept on-site and shall be available for inspection by the Secretary upon request. The Safety Management System shall be developed in accordance with the Departments Hazardous Industry Planning Advisory Paper No. 9 "Safety Management". The safety management system should take into account recommendations 2 and 8 of the preliminary hazard analysis.	Not Audited	Note historical non-compliance recorded in the previous audit report.		

Environmental Protection Authority
Environmental Protection Licence 11254
Section 55 Protection of the the Environment Operations Act 1997

	Criteria/ Requirement Administrative Condtions	Compliance	Audit Finding	Objective Evidence	Recommendation
A1	**What the licence authorises and regulates?**				
A.1.1.					
A.1.1.	The license authorizes the carrying out to the scheduled activities listed below at the premise specfied in A2. The acitivites listed according to their schedule activity classification, fee based activites and scale of operation. Unless otherwise further restricted by a condition of this license, the scale at which the activity is carried out must not exceed the maximum sacle specified in this condtion. **Scheduled Activity** / **Fee Based Activity** / **Scale** Mining for Minerals / Mining for minerals / > 500000 - 2000000 T produced	mpliance	In 2015, 1,664,072 dry tonnes of ore was processed producing 125,592 tonnes of copper concentrate. In 2017 the mill processsed a total of 1,450,498 tonnes of dry ore during 2017, producing 99,449 tonnes of copper concentrate. In 2016 the mill processed1,657,133 dry tonnes of ore was processed producing 114,809 tonnes of copper concentrate.	AEMRs 2015 - 2017	
A. 2	**Premises to which this license applies**				
A.2.1	This license applies ot the following premises	Noted			
	Premises Details				
	TRITTON COPPER MINE				
	YARRANDALE ROAD				
	HERMIDALE NSW 2831				
	PART LOT 13 DP 751346, PART LOT 14 DP 751346, PART LOT 61 DP 875925,				
	PART LOT 62 DP 875925, LOT 41 DP 879206, LOT 42 DP 879206				
A3	**Other activities**				
A3.1	This licence applies to all other activities carried on at the premises, including:	Noted			
	Crushing, Grinding or Separating Works				
	Mineral Processing or Metallurgical Works				
	Waste Facilities - solid & inert waste landfilling				
A4	**Information supplied to the EPA**				
A4.1	Works or activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to the ' licence application' includes a reference to: (a) the application for any licences (including former pollution control approvals) which this license replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998: and (b) the license information form provided by the licencee to the EPA to assist the EPA in connection with the issuing of this licence.	Noted			

2	**Discharges to Air and Water and Applications to Land**				
P1	Location of monitoring/discharge points and areas				
P1.1	The following points referred to the in the table are identified in this licence for the purposes of the monitoring and/or setting of limits for discharge of pollutants to water from the point.	Noted			
P1.2	The following ultilisation areas referred to in the table below are identified in this licence for the purpose of the monitoring and/or setting of limits for any application of solids or liquids to the utilisation area.	Compliance	These points are identified in the groundwater monitoring reports and EPL Annual Returns with monitoring results.	Annual Returns for the reporting periods during 2015-2018	

Water and land

EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description
12	Groundwater monitoring point		Piezometer labelled as "PZH-001" on map titled "Tritton Copper Project Bore Monitoring Locations" submitted to the EPA 25 April 2008 (DOC08/19282).
13	Groundwater monitoring point		Piezometer labelled as "PZH-002" on map titled "Tritton Copper Project Bore Monitoring Locations" submitted to the EPA 25 April 2008 (DOC08/19282).
14	Groundwater monitoring point		Piezometer labelled as "PZH-003" on map titled "Tritton Copper Project Bore Monitoring Locations" submitted to the EPA 25 April 2008 (DOC08/19282).
15	Groundwater monitoring point		Piezometer labelled as " PZH-004" on map titled "Tritton Copper Project Bore Monitoring Locations" submitted to the EPA 25 Apri 2008 (DOC08/19282).
16	Groundwater monitoring point		Piezometer labelled as "PZH-005" on map titled "Tritton Copper Project Bore Monitoring Locations" submitted to the EPA 25 April 2008 (DOC08/19282).
17	Groundwater monitoring point		Piezometer labelled on map "PZH-006" on map titled "Tritton Copper Project Bore Monitoring Locations" submitted to the EPA 25 April 2008 (DOC08/19282).
18	Groundwater monitoring point		Piezometer labelled as "PZH-007" on map titled "Tritton Copper Project Bore Monitoring Locations" submitted to the EPA 25 April 2008 (DOC08/19282).
19	Groundwater monitoring point		Piezometer labelled as "PZH-008" on map titled "Tritton Copper Project Bore Monitoring Locations" submitted to the EPA 25 April 2008 (DOC08/19282).
20	Groundwater monitoring point		Piezometer labelled as "PZH-009" on map titled "Tritton Copper Project Bore Monitoring Locations" submitted to the EPA 25 April 2008 (DOC08/19282).
22	Groundwater monitoring point		Piezometer labelled as "PZH013" on map titled "Plan 4: Tritton Mine Site Proposed Mining Activities" received by the EPA on 17/12/10 (DOC10/57214).
23	Groundwater monitoring point		Piezomter labelled as "PZH014" on map titled "Map 4: Tritton Mine Site Proposed Mining Activities" received by the EPA on 17/12/10 (DOC1057214).
24	Groundwater monitoring point		Piezometer labelled as "PZH015" on map titled "Map 4: Tritton Mine Site Proposed Mining Activities" received by the EPA on 17/12/10 (DOC10/57214).
25	Groundwater monitoring point		Piezometer labelled as "PZH017" on TRIM DOC15/9798 submitted to the EPA on 13 Jan 2015.
26	Groundwater monitoring point		Piezometer labelled as "PZH018" on TRIM DOC15/9798 submitted to the EPA on 13 Jan 2015.

3	**Limit Conditions**				
L1	**Pollution of waters**				
L1.1	Except as may be expressly provided in any other conditions of this licence, the licencee must comply with section 120 of the Protection of the Envrionment Operations Act 1997	Compliance	Review of surface and groundwater monitoring data and observations made during the audit inspections did not indentify any water quality compliance issues. It is noted that during the audit period (of predominantely drought conditions) that no surface water discharges had occurred from the mine site.	AEMR 2015-2017 Audit Observations Site audit interview (Dean Woods)	
L2	**Waste**				
L2.1	The licensee must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by the licence.	Compliance	No off-site generated wastes have been transported to the site for processing or disposal. An inspection of the waste storage and disposal areas by the Auditor did not idenfify and wastes likely to have been imported from other operations.	Site audit interview (Dean Woods) AEMRs 2015-2017 Audit Inspection	
L2.2	Only the following types of waste may be disposed of at the premises:	Noted			
L2.3	For Inert Waste Class 1 Landfill, the following wastes able to be landfilled: waste assessed as inert waste following the technical assessment procedure outlined in Technical Appendix 1 of the Waste Guidelines or that is specified as inert waste in Schedule 1 of the Protection of the Environment Operations Act 1997 and stabilised asbestos wastes in bonded matrix.	Not Triggered	The landfill is not designed (nor operated to a standard) that meets the requirements of a Inert Waste Class 1 Landfill.	Auditor Observations Site audit interview (Dean Woods)	
L2.4	For Inert Waste Class 2 Landfill, the following wastes able to be landfilled: Waste that is not a physically, chemically or biologically treated or processed waste that is assessed as inert waste following the technical assessment procedure outlined in Technical Appendix 1 of the Waste Guidelines or that is specified as inert waste in Schedule 1 of the Protection of the Environment Operations Act 1997 except biosolids.	Compliance	The landfill is designed and operated as an inert waste landfill. The landfill does not receive any Solid Wastes, recyclables or putrescibles (these are collected by a contractor for off-site disposal). An inspection of the waste collection and storage areas (around the mine and processing plant site) and of the landfill confirmed that most wastes generated by this operation are disposed of off-site, and only inert wastes (metal / timber etc) were observed at the landfill. As reported in Section 4.7 of the 2017 AEMR 2017 , oversized general waste items that don't fit into the contractor supplied skip bins located around the mine and processing plant areas, for collection of wastes (those wastes are taken off-site to a landfill at Cobar), are disposed in the Tritton landfill. Approximately 10 tonnes of waste was reported (AEMR) to have been landfilled during 2017. It is noted that in a letter from Michael Hanlon, Acting Resident Manager at TRL to Jason Scarborough at the Environment Protection and Regulation Division dated 11 Oct 2007, it was reported that the landfill receives up to 5 tonnes per year.	Site Audit observations Site audit interview (Dean Woods) AEMRs 2015-2017	

The first row's second column holds the following embedded table:

		the EPA on 13 Jan 2015.
27	Groundwater monitoring point	Piezometer labelled as "PZH019" on TRIM DOC15/9798 submitted to the EPA on 13 Jan 2015
28	Groundwater monitoring point	Piezometer labelled as "PZH020" on TRIM DOC15/9798 submitted to the EPA on 13 Jan 2015.
29	Groundwater monitoring point	Piezometer labelled as "PZH021" on TRIM DOC15/9798 submitted to the EPA on 13 Jan 2015.
30	Groundwater monitoring point	Piezometer labelled as "PZH022" on TRIM DOC15/9798 submitted to the EPA on 13 Jan 2015.
31	Groundwater monitoring point	Piezometer labelled as "PZH023"on TRIM DOC15/9798 submitted to the EPA on 13 Jan 2015.

	Observation	The following observations have been made in relation to the operation of the landfill: 1. Approximately 10 tonnes of waste was reported (AEMR) to have been landfilled during 2017. In a letter from Michael Hanlon, Acting Resident Manager at TRL to Jason Scarborough at the Environment Protection and Regulation Division dated 11 Oct 2007, it was reported that the landfill receives up to 5 tonnes per year.A below few issues are noted: 2. The AEMRs refer to Condition L5(EPL11254) in relation to Landfilling of wastes. The correct Condition Reference is L2. 3. Each of the three AEMRs covering the audit period state that the landfill was last compacted and covered during September 2013. This information is most likely inaccurate (based on observations made during the audit). 4. The Waste Management Plan provides information that is not consistent with the waste management practices implemented (as described and demonstrated to the Auditor). For example (this is not a comprehensive list of issues to be addressed): (a) the WMP states that food scraps may be disposed of to the landfill; (b) the WMP does not properly identify what wastes may be sent to the on-site landfill and what wastes are to be sent off-site; (c) the WMP does not specifically prohibit the disposal of wastes into the TSF. A full revision of this plan is warranted.	AEMRs 2015-2017 Letter from Michael Hanlon, Acting Resident Manager at TRL to Jason Scarborough at the Environment Protection and Regulation Division dated 11 Oct 2007 - Proposal for Tritton Copper Mine landfill upgrade. EPL 11254 Waste Management Plan January 2016	1. The quantity of waste reported to have been disposed of into the landfill is inconsistent. It is recommended that the volume of waste disposed of is determined annually and that reports to the EPA (and other Agencies) and the AEMR are consistent). 2. Ensure that the EPL Conditions are correctly referenced in future AEMRs and other reports. 3. Correct information regarding compaction and covering, quantity of waste landfilled and what the landfill can receive should be included in future AEMRs. 4. Waste Management Plan should be reviewed and revised.
L2.5 For Solid Waste Class 1 Landfill, the following wastes able to be landfilled: waste, including putrescible waste, that is assessed as inert waste or solid waste following the technical assessment procedure outlined in Technical Appendix 1 of the Waste Guidelines or that is specified as inert waste or solid waste in Schedule 1 of the Protection of the Environment Operations Act 1997 and asbestos waste (including asbestos waste in bonded matrix and asbestos fibre and dust waste resulting from the removal of thermal or acoustic insulating materials or from processes involving asbestos material, and dust from ventilation collection systems).	Not Triggered	The landfill is not designed (nor operated to a standard) that meets the requirements of a Solid Waste Class 1 Landfill.	Auditor Observations Site audit interview (Dean Woods)	
L2.6 With reference to condition L2.1 above, solid and inert waste generated at the Tritton Resources Limited Girilambone premises (licence no. 4501) only, is permitted to be received at the premises for disposal at the landfill identified in condition L2.7 below.	Compliance	As per site audit discussions, no wastes generated from other operations are disposed of into the landfill.	Site audit interview (Dean Woods) AEMRs 2015-2017	
L2.7 Wastes identified above as solid or inert may only be landfilled at the location identified in map titled "Tritton Copper Project Proposed Landfill Location" submitted to the EPA in document "DOC07/48105" on the 26 November 2007.	**Non Compliance**	Wastes other than tailings (drums, pallets, bore cores and boxes, metal) were observed to have been dumped into the TSF.	Auditor inspection of the TSF. Site audit interview (Dean Woods) AEMRs 2015-2017	Update the Waste Management Plan to specify the proper disposal procedures for all waste types and provide updated information and training to relevant personnel (and contractors).
L3 Noise limits				
L3.1 Noise from the premises is to be measured or computed at the most noise-affected point at boundary of the most affected receiver to determine compliance with this condition.	Compliance	Section 3.10 in AEMR 2015 and 6.10 in AEMRs 2016 and 2017 describe operational noise management. Noise is measured/monitored at Wilga Downs as noted in the AEMR and reported by Muller Acoustic Consulting. The closest residence has been selected as the representative receiver, at 2865 Yarrandale Road, Girilambone.	AEMRs 2015-2017 Noise Monitoring Assessment report, dated August 2018, Muller Acoustic Consulting Audit Observations	
Noise Measurement: For the purpose of noise measures required for this condition, the LAeq noise level must be measured or computed for the required period (ie, 15 minutes or full day, evening or night) using "FAST" response on the sound level meter.	Compliance	Muller Acoustic Consulting undertook noise monitoring assessment, the report mentions that all attended noise monitoring surveys for this assessment were conducted in general accordance with the procedures described in Australian Standard AS 1055:1997, "Acoustics - Description and Measurement of Environmental Noise" and the EPL. Three 15min measurements were undertaken during day, evening and night during full mine operations.	AEMRs 2015-2017 Noise Monitoring Assessment report, dated August 2018, Muller Acoustic Consulting	
For the purpose of the noise limits for this condition, 5 dB(A) must be added to the measured level if the noise is substantially tonal, impulsive, intermittent or low frequency in nature. Where two or more of these characteristics are present the maximum addition to the measured noise level is limited to 10dB(A).	Noted			

L3.2	The noise emission limits identified in this licence apply under all meteorological conditions except: a) during rain and wind speeds (at 10m height) greater than 3m/s; and b) under "non-significant weather conditions".	Noted		AEMRs 2015-2017 Noise Monitoring Assessment report, dated August 2018, Muller Acoustic Consulting	
	Note: Field meteorological indicators for non-significant weather conditions are described in the NSW Industrial Noise Policy, Chapter 5 and Appendix E in relation to wind and temperature inversions.	Noted			
L3.3	Noise from the premises must not exceed: (a) an L Aeq noise emission criteria of 50 dB(A) (7am to 6pm) on any day; and (b) an L Aeq noise emission criterion of 45 dB(A) during the evening (6pm to 10pm) on any day; (c) at all other times an L Aeq noise emission criterion of 40 dB(A), except as expressly provided by this licence.	Compliance	Section 5.0 (Noise and Vibration Controls) of the Noise Management Plan covers the requirement of the Condition. Noise levels were generally measured in accordance with the requirements of the plan and were reported in AEMRs for 2016-2017. The 2015 AEMR reported the results of attended acoustic monitoring undertaken by Mueller Acoustic Consultants. The monitorining confirmed compliance with this Condition at the time of monitoring. The 2016 AEMR reported the results of attended acoustic monitoring undertaken by Mueller Acoustic Consultants. The monitorining results indicated that noise levels were not compliant with this Condition at the time of monitoring. However the background noise levels at the time of monitoring were considered (by the Noise Consultant) to exceed both day time and night time noise criteria. The 2017 AEMR reported the results of attended acoustic monitoring undertaken by Mueller Acoustic Consultants. The monitorining confirmed compliance with this Condition at the time of monitoring. Mueller Acoustic Consultants conducted attended monitoring on 7 August 2018. While the day time LA10 measurement at 3:28pm was 46dBA, the mine's contribution to the measured noise was assessed as being between 24 and 30 dBA.	AEMRs 2015-2017 Noise Monitoring Assessment report, dated August 2018, Muller Acoustic Consulting	
	Definition: L Aeq if the equivalent continuous noise level - the level equivalent to the energy-average of noise levles emitted by the premises over the stated measurement period	Noted			
			Noise levels were generally measured in accordance with the requirements of the plan and were reported in AEMRs for 2016-2017 (LA10 was not reported in 2015, however compliance with the EPL limits -LAeq - was demonstrated). It is noted that the noise monitoring is undertaken at the rural property boundary and not at the assocaited residence that is located further away from the mine than the rural property boundary.		
4	**Operating Conditions**				
O1	**Activites must be carried out in a competent manner**		The 2015 AEMR reported the results of attended acoustic monitoring undertaken by Mueller Acoustic Consultants. The monitorining confirmed compliance with this Condition at the time of monitoring.		
O1.1	Licensed activities must be carried out in a competent manner. This includes: (a) the processing, handling, movement and storage of materials and substances used to carry out the activity: and (b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	**Non Compliance**	Observations made by the Auditor during the site inspections confirmed that the processing, handling, movement and storage of materials and substances used to carry out the activity were being carried out in a competent manner. The Auditor's observations in relation to the disposal of waste materials in contravention of Condition L2.7 demonstrate that the disposal of wastes in not being undertaken in a competent manner.	Site audit observations Site audit interview (Dean Woods) AEMR 2015 - 2017	Refer to recommendation L2.7
O2	**Maintenance of plant and equipment**				

O2.1	All plants and equipment installed at the premises or used in connection with the licensed acitivites (a) must be maintained in a proper and efficient condition:and (b) must be operated in a proper and efficient manner.	Compliance	The mine's plant and equipment maintenance program is managed by an SAP system. Maintenance personnel demonstrated the processes for registering, tracking and reporting on both planned and un-planned maintence activities. Observations made by the Auditor during the site inspections confirmed that the maintenance and operation of plant and equipment at the mine site were being carried out in a competent manner.	Site audit observations Site audit interview (Raymond Tollemache, Dean Woods) Site maintenance records - SAP system	
O3	**Dust**				
O3.1	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	Compliance	During site audit, Auditors observed full operations including trucks movement on and around the mine site and earth works on the TSF. At the time of the audit the weather was hot and dry. Dust suppression activities were being undertaken in general accordance with the Dust Managment Plan, including the use of water trucks and permanent sprinkler systems. While minor dust generation was observed on internal roads, no dust emissions were observed to be leaving the site. No complaints have been recieved relating to dust emissions during the audit period.	Site audit observations Site audit interview (Dean Woods) Complaints register	
O4	**Other operating conditions**				
O4.1	Tailings Storage Facility				
	The tailings storage facility must be designed to withhold at least a storm event with a 1 in 100 year return frequency and duration of 72 hours without over topping.	Compliance	The 2017 TSF surveillance report section 5.12.3 states: 'Based on a surveyed operating pond level of RL263.4m and a spillway invert level of RL266.5m the difference has been calculated at 3.1m. It has been assessed that this is adequate to contain the 1 in 100 AEP, 72-hour rainfall event.'	Previous audit report TSF Operations and Maintenance Manual Rev 4a April 2016 Tailings Storage Facility surveillance report for 2017 by CWM Geosciences dt 12 Apr 2018	
O4.2	Under dry weather conditions, a freeboard (the vertical distance between the free liquid level and the lowest point on the containment wall) must be maintained at not less than one metre.	Compliance	Site audit was undertaken in dry weather conditions. A freeboard of not less than one metre was observed by the Auditors (visual assessment only). The EPA Compliance Audit report from December 2017 confirmed that the last surveyed free board value was 3.8m.	Site Audit visual observations EPA Compliance Audit report Dec 2017 Tailings Storage Facility surveillance report for 2017 by CWM Geosciences dt 12 Apr 2018	
O4.3	The floor and the wall of the tailings dam must be lined with a contiguous layer of clay or other material and this must have a permeability of not more than 1 x 10-9 m/s.	Compliance	Earthworks Quality Control Construction Reports by Barnson, all construction works done at theTailing Storage Facility 1 were completed as per all drawings and design specifications and in accordance with the Dam Safety Committee requirements and additional requirements set out by Coffey Geosciences scope of works dated 17 September 2012. Representative samples from the site were subjected to a range of tests as per AS1289 including NATA compaction and permeability tests. As per section 4.1 of the 2015 report the permeability was adequate.	Earthworks Quality Control Construction Reports by Barnson for: Stage 4 Tailings Storage Dam Facility Works, April 2015 and Stage 5 Works Embankment Raising by 1.5m to 267.5 Tailings Dam1, Oct 2017.	
O4.4	Bunding Conditions				
	All areas storing chemical reagents and or hydrocarbon materials on the premises must be built to meet the following:-				
	a) In the case of bulk storage tanks, a bund floor and wall be constructed of impervious materials. The bunded area must be of sufficient capacity to contain 110% of the volume of the largest tank where a group of tanks are installed. Bund walls must be not less that 250 millimetres in height.	Compliance	Bulk storage tank for fuel storage was found to be commercially available self-bunded type, which provides 110% spill containment capacity.	Site Audit observations	

	b) In the case of drum or container storage areas, a bund floor and wall be constructed of impervious materials. The bunded area must be of sufficient capacity to contain 10% of the total storage capacityof the area. Bund walls must be not less than 250 millimetres in height.	**Non Compliance**	The previous IEA had raised a minor non-compliance to this condition noting the height of the bund at an outdoor drum and container area did not meet the 250mm height requirements and storage capacity requirement. During the current auidt, all observed bunds were constructed of concrete. Self-bunded shipping containers have been hired (August 2018), for elevated storage of Class 3 dangerous goods, from RoyalWolf. As per that company's website, this container has 2,400L bund capacity and is designed for storage of Class 3 Hazardous Goods and Liquids. In the mine maintenance area, a number of instances where hydrocarbon and other liquids in 200L drums and 1000L IBCs stored at the edge of bunds were noted. Also observed: * IBCs with no/wrong labels liquid stored on unsealed areas * IBCs with Renolin Lub oil stored on ground in mine storage area * IBCs on bunded pallets not designed for that purpose * drums and IBCs used as bollards, some with liquids in them and original (hydrocabon) labelling still afixed on the IBCs/drums. * Waste bins for oil filters and hydraulic hoses were found to be stored on unsealed surfaces.	Site Audit observations Auditors' discussions with DPE and EPA (Email from Helen Smith to Avanish Panikkar dt 26 Oct 2018) Previous IEA report Hydrocarbon and Chemical Management Plan 2016 Rev 1.1 Email from Morgan Osborne, RoyalWolf, to Angus Anderson on 15 August 2018 regarding hire of 20ft side opening container for Class 3 dangerous goods. https://www.royalwolf.com.au/product/dangerous-goods/	Ensure drums are fully stored within bunds and the bunds have adequate containment volume. Ensure containers are used with correct labelling. Waste materials with hydrocarbons should be stored and disposed of appropriately. Ensure the matters raised by EPA and DPE following 2017 AEMR review inspection are closed out in a timely manner in consultation with EPA and DPE.
			It is understood that, the following issues have been raised by EPA and DPE at a AEMR review meeting at the site on 14 August 2018 and EPA is following up with Tritton Mine: * Storage of hydrocarbon - while fuel is stored in dual walled self contained structures, the refueling activity is undertaken outside any bunded areas. * Evidence of contamination had been observed near the workshop area where wastewater from truck washing was observed to have impacted the ground		
	c) Unless approved by the EPA, any pipework from the enclosed tank(s) and/or pump(s) must be directed over the bund wall and not throught it. The bund must not be emptied by means of a drain valve.	Compliance	The Auditors did not sight any pipework built through bund walls.	Site Audit observations	
O4.5	Hose couplings must terminate within bunded areas so that wastes and/or spillages are contained. Where couplings cannot be terminated within bunds, suitable means for collecting and retaining wastes and or/spillages must be provided.	Compliance	No hose couplings outside of bunded areas were sighted at this audit. It is noted that the previous IEA had raised a potential minor non-compliance to this condition noting hose couplings from IBCs containing chemical reagents terminating within the bunded area. The Site Environmental Advisor reported that this has now been moved to bunded mill area.	Site Audit observations Previous IEA report Discussion with Dean Woods	
O4.6	The bund(s) for the elevated storage of transportable containers must be designed and constructed to ensure that containers cannot, if dislodged, discharge materials or liquids outside the bunded area(s).	**Non Compliance**	The previous IEA had raised a minor non-compliance to this condition. During this site audit, an area was sighted where IBCs were stacked on an elevated storage (two rows of shelves) where the bund wall was too close to the containers - any rupture to the container wall would cause discharge of the liquid to be spilled outside the bunded area. Self-bunded shipping containers were sighted as hired (August 2018) for elevated storage of Class 3 dangerous goods - this container has been hired from RoyalWolf. As per that company's website, this container has 2,400L bund capacity and is designed for storage of Class 3 Hazardous Goods and Liquids.	Site Audit observations Previous IEA report Email from Morgan Osborne, RoyalWolf, to Angus Anderson on 15 August 2018 regarding hire of 20ft side opening container for Class 3 dangerous goods. https://www.royalwolf.com.au/product/dangerous-goods/	Ensure stacked drums are fully stored within bunds and the bunds have adequate spill / leak discharge capture volume.

5	**Monitoring and recording conditions**				
M1	**Monitoring Records**				
M1.1	The results of any monitoring required to be conducted by this licence of a load calculation protocol must be recorded and retained as set out in this condition.	Compliance	Records of all monitoring undertaken were available for review by the Auditor. MonitorPro 5 is used for the storage and reporting on all environmental monitoring results.	Annual Return 2015-2016, Annual Return 2016-2017 and Annual Return 2017-2018 EPA Compliance audit reports Dec 2015 and March 2017	
M1.2	All records required to be kept be this licence must be: (a) in legible form or in a form that can be readily be reduced to a legible form (b) kept for a least 4 yrs after the monitoring or event to which they relate took place and (c) produced in legible form to any authorised officer of the EPA who asks to see them.	Compliance	(a) Examples of groundwater sampling field records were sighted by teh Auditor, a template is available for field data entry with the required details included in it. (b) Dean Woods confirmed in site audit discussions that records are maintained as required. All monitoring records were sighted for the audit period. c) noted	Groundwater sampling field record form TRL-ENV-FRM-012 completd for GNR001 on 16 July 2018 at 8am; PZH001 at 1.33pm on 28 Nov 2017; PZH002 at 3.27pm on 13 Jan 2016 prepared by Stephen Bodycott. Monthly Environmental Monitoring Report for July 2018 ALS Environmental COA work order ES1811344 issued 27 April 2018; ES1601388 issued 28 Jan 2016	
M1.3	The following records must be kept in repect of any samples required to be collected for the purposes of this license (a) the date on which the sample was taken (b) the time which the sample was collected (c) the point in which the sample was taken and the (d) the name of the person who collected the sample	Compliance	Groundwater sampling field records were sighted, and contain all of the required sample collection data. All of the required sample collection data is recorded for all samples collected within the MonitorPro 5 datasbase.	Groundwater sampling field record form TRL-ENV-FRM-012 completd for GNR001 on 16 July 2018 at 8am; PZH001 at 1.33pm on 28 Nov 2017; PZH002 at 3.27pm on 13 Jan 2016 prepared by Stephen Bodycott. MonitorPro % database	
M2	**Requirement to monitor concentration of pollutants discharged**				
M2.1 M2.2	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns: Water and/or Land Monitoring Requirements	**Non Compliance**	TRL reported (Annual Return) that groundwater sampling points 18, 19, 20, 23, 24 & 25 were not sampled for the required quarterly events due to misinterpretation of EPL reporting period. All locations were sampled during July 2015 however reporting period begins on 30 July. It is noted that appropriate action, to update the monitoring schedule has been undertaken by TRL. In the reporting year 2016-2017, groundwater monitoring for points 15, 30 and 31 were not undertaken four times and groundwater monitoring point 22 was not sampled once due to the bores being dry. In the reporting year 2017-2018, groundwater monitoring points 15, 22, 30 and 31 were not sampled for the same reason. Monthly Environmental Monitoring Report was sighted for July 2018 for EPL 11254 (published 21 August 2018) which is in line with the annual return for the year.	Annual Return 2015-2016, Annual Return 2016-2017 and Annual Return 2017-2018 Monthly Environmental Monitoring Report for July 2018 EPA Online database for EPL 11254	No actions required.

POINT 12,13,14,15,16,17,18,19,20,22,23,24

Pollutant	Units of measure	Frequency	Sampling Method
Iron	milligrams per litre	Quarterly	Representative sample
Nickel	milligrams per litre	Quarterly	Representative sample

POINT 12,13,14,15,16,17,18,19,20,22,23,24,25,26,27,28,29,30,31

Pollutant	Units of measure	Frequency	Sampling Method
Arsenic	milligrams per litre	Quarterly	Representative sample
Barium	milligrams per litre	Quarterly	Representative sample
Beryllium	milligrams per litre	Quarterly	Representative sample
Cadmium	milligrams per litre	Quarterly	Representative sample
Chloride	milligrams per litre	Quarterly	Representative sample
Chromium	milligrams per litre	Quarterly	Representative sample
Cobalt	milligrams per litre	Quarterly	Representative sample
Conductivity	microsiemens per centimetre	Quarterly	Representative sample
Copper	milligrams per litre	Quarterly	Representative sample
Lead	milligrams per litre	Quarterly	Representative sample
Manganese	milligrams per litre	Quarterly	Representative sample
Mercury	milligrams per litre	Quarterly	Representative sample
pH	pH	Quarterly	Representative sample
Sulfate	milligrams per litre	Quarterly	Representative sample
Vanadium	milligrams per litre	Quarterly	Representative sample
Zinc	milligrams per litre	Quarterly	Representative sample

M3	**Testing methods - concentration limits**	-			
M3.1	Subject to any express provision to the contrary in this license, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area that must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	**Non Compliance**	As reported in the EPA Compliance Audit report of Dec 2015, a non-compliance had been raised regarding sample collection and handling- it was noted that pH was recorded from laboratory analysis and not field pH measurement. This requirement was not included in the EPA Compliance Audit March 2017 scope. As per Water Management Plan section 6.2, groundwater sampling is undertaken in accordance with AS/NZS 5667.1:1998 - Water Quality Sampling Standard.	EPA Compliance audit reports Dec 2015 and March 2017 Water Management Plan Rev 1.1 February 2016	Ensure all sample collection and handling is undertaken in accordance with EPA Approved Methods.
M4	**Recording of pollution complaints**	-	-	-	-
M4.1	The licensee must keep a legible record of all complaints made to licensee or any employee or agent of the licensee in relation to pollution arising form any activitiy to which the license applies.	Compliance	Public complaints register, maintained as an excel workbook, was reviewed by the Auditors, that has entries from 2008 to 2015 including two contaminaton/pollution related complaints made in June 2015.	Public Complaints Register; AEMRs 2015, 2016 and 2017	
M4.2	The record must include details of the following: (a)the dates of the complaint (b)the method by which the complaint was made (c)any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect, (d) the nature of the complaint (e) the action taken by the licensee in relation to the complainant and: (f) if no action was taken by the licensee, the reasons why no action was taken.	Compliance	The Public Complaints Register includes all the details as required by this condition.	Public Complaints Register; AEMRs 2015, 2016 and 2017	
M4.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Compliance	Public complaints register, maintained as an excel workbook, was reviewed by the Auditors, that has entries from 2008 to 2015.	Public Complaints Register; AEMRs 2015, 2016 and 2017	
M4.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Noted			
	Telephone Complaints Line				
M5.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints form members of public in relation to activities conducted at the premises or by the vechicle or mobile plany, unless otherwise specified in the license.	Compliance	Aeris Tritton Operations maintains 02 6838 1222 as the telephone complaints line	Newspaper advertisement	
M5.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	Observation	The public complaints phone line number is publicly announced through newspaper advertisement. The advertisement in Nyngan Observer page 9 on Wednesday 21 February 2018 was sighted by the Auditors. It is noted, from the EPA compliance audit report of December 2015, that this advertisement had been published in the newspaper in May and June 2015. The Tritton Mine (Aeris Resources) website does not clearly indicate the public complaints line number. It is noted that this had been raised as a non-compliance in the Dec 2015 EPA compliance audit report and as a partial non-compliance in the previous IEA.	Newspaper advertisement EPA Compliance Audit report Dec 2015 Previous IEA report (2015) by 3E	Aeris Resources / Tritton Mine website should clearly indicate the public complaints line number.
M5.3	Conditions of M5.1 and M5.2 do not apply until 3 months after the date the issue of this licence.	Noted			

6 Reporting conditions

R1 Annual return documents

	What documents must an Annual Return contain?				
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:	Observation	As per the EPA online database for this EPL, an unreported non-compliance for monitoring points 15, 18, 22, 30 and 31 had been raised - on monitoring table Section B of the Annual Return it was noted as dry conditions however not reported in Section C. This had not been repeated in subsequent reports.	Annual Return 2015-2016; EPA Online database for EPL 11254	Ensure all sections of the Annual Returns are completed and reviewed prior to submission.
(a)	a Statement of Compliance; and	Compliance	The EPL Annual Returns are prepared using the approved form and includes Statement of Compliance in sections C to G.	Annual Return 2017-2018; EPA Online database for EPL 11254	
(b)	a Monitoring and Complaints Summary.	Compliance	The Annual Return includes Monitoring and Complaints Summary in section B.	Annual Return 2017-2018; EPA Online database for EPL 11254	
	A copy of the form in which the Annual Return must be supplied to the EPA accompanies this licence. Before the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.	Noted			

	Period covered by Annual Return				
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.	Compliance	EPL Annual Returns are prepared for reporting period 30th July to 29 July of submission year.	Annual Return 2017-2018; EPA Online database for EPL 11254	
R1.3	Where this licence is transferred from the licensee to a new licensee,				
(a)	the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and	Not Triggered	There was no transfer of EPL during the audit period	EPA Online database for EPL 11254	
(b)	the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.	Not Triggered	There was no transfer of EPL during the audit period	EPA Online database for EPL 11254	
R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on	Not Triggered	There was no surrender or revocation of this EPL during the audit period.	EPA Online database for EPL 11254	
	(a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or	Not Triggered	There was no surrender or revocation of this EPL during the audit period.	EPA Online database for EPL 11254	
	(b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	Not Triggered	There was no surrender or revocation of this EPL during the audit period.	EPA Online database for EPL 11254	
R1.5	The Annual Return for the reporting period must be supplied to the EPA by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	Compliance	As per the EPA online database for this EPL, the relevant Annual Returns were submitted within 60 days (second half of September) for each reporting year.	EPA Online database for EPL 11254	
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA	Compliance	Copies of the previous four years' Annual Returns were available for review by the auditor	Annual Return Reports	

R1.7	Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	Compliance	Section H of the Annual Return is signed by senior officials of the company. The 2017-2018 EPL Annual Return was sighted and was signed by the Executive Chairman and CFO on 17 September 2018.	Annual Return 2017-2018; EPA Online database for EPL 11254	
Note:	The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.	Noted			
Note:	An application to transfer a licence must be made in the approved form for this purpose	Noted			
R2	**Notification of environmental harm**	-			
R2.1	Notifications must be made by telephoning the EPA's Pollution Line service on 131 555.	Not Triggered	TRL is aware of the requirement as evidenced by incident reporting evidence at the nearby Girilambone Operations Site. No reportable incidents have been recorded at Tritton Operations site.	EPA Incident Report No reference C18318-2017 and Incident Report by Aeris Resources sent to Joshua Loxley and Bradley Tanswell at NSW EPA on 15 November 2017.	
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.	Not Triggered	TRL is aware of the requirement as evidenced by incident reporting evidence at the nearby Girilambone Operations Site. No reportable incidents have been recorded at Tritton Operations site.	EPA Incident Report No reference C18318-2017 and Incident Report by Aeris Resources sent to Joshua Loxley and Bradley Tanswell at NSW EPA on 15 November 2017.	
Note:	The licensee or its employees must notify the EPA of incidents causing or threatening material harm to the environment as soon as practicable after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.	Not Triggered	TRL is aware of the requirement as evidenced by incident reporting evidence at the nearby Girilambone Operations Site. No reportable incidents have been recorded at Tritton Operations site.	EPA Incident Report No reference C18318-2017 and Incident Report by Aeris Resources sent to Joshua Loxley and Bradley Tanswell at NSW EPA on 15 November 2017.	
R3	**Written report**				
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that:	Not Triggered	Based on information available to the Auditors, this condition was not been triggered during the Audit period.	EPA compliance audit reports Dec 2015 and March 2017	
(a)	where this licence applies to premises, an event has occurred at the premises; or	Not Triggered	Based on information available to the Auditors, this condition was not been triggered during the Audit period.		
(b)	where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	Not Triggered	Based on information available to the Auditors, this condition was not been triggered during the Audit period.		
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	Not Triggered	Based on information available to the Auditors, this condition was not been triggered during the Audit period.	EPA compliance audit reports Dec 2015 and March 2017	
R3.3	The request may require a report which includes any or all of the following information:	Not Triggered	Based on information available to the Auditors, this condition was not been triggered during the Audit period.	EPA compliance audit reports Dec 2015 and March 2017	
(a)	the cause, time and duration of the event;	Not Triggered	Based on information available to the Auditors, this condition was not been triggered during the Audit period.		
(b)	the type, volume and concentration of every pollutant discharged as a result of the event;	Not Triggered	Based on information available to the Auditors, this condition was not been triggered during the Audit period.		
(c)	the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; and	Not Triggered	Based on information available to the Auditors, this condition was not been triggered during the Audit period.		
(d)	the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;	Not Triggered	Based on information available to the Auditors, this condition was not been triggered during the Audit period.		
(e)	action taken by the licensee in relation to the event, including any follow-up contact with any complainants;	Not Triggered	Based on information available to the Auditors, this condition was not been triggered during the Audit period.		
(f)	details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event;	Not Triggered	Based on information available to the Auditors, this condition was not been triggered during the Audit period.		
(g)	any other relevant matters.	Not Triggered	Based on information available to the Auditors, this condition was not been triggered during the Audit period.		
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	Not Triggered	Based on information available to the Auditors, this condition was not been triggered during the Audit period.	EPA compliance audit reports Dec 2015 and March 2017	
7	**General conditions**				
G1	**Copy of licence kept at the premises**				
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	Compliance	A copy of the EPL is kept in hardcopy file on site.	EPL copy kept in hardcopy on file	
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Noted			
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Noted			

Tritton Copper Mine - Independent Environmental Audit 2018
Detailed Findings and Recommendations

Mining Lease 1544

Condition no	Condition Text	Compliance	Audit Finding	Objective Evidence	Recommendation
	Notice to Landholders				
1	Within a period of three months from the date of grant/renewal of this lease or within such time as the Minister may allow, the lease holder must serve on each landholder of the land a notice in writing indicating that this lease has been granted /renewed and whether the lease includes the surface. The notice must be accompanied by an adequate plan and description of the lease area.	**Not Audited**	The mining lease was granted on 22 December 2003.		
	If there are ten or more landholders affected, the lease holder may serve the notice by publication in a newspaper circulating in the region where the lease area is situated. The notice must indicate that this lease has been granted/renewed; state whether the lease includes the surface and must contain an adequate plan and description of the area.	**Not Audited**	The mining lease was granted on 22 December 2003.		
	Mining, Rehabilitation, Environmental Management Process (MREMP)				
2	**Mining Operations Plan**				
(1)	Mining operations, including mining purposes, must be conducted in accordance with a Mining Operations Plan (the Plan) satisfactory the Director-General. The Plan together with environmental conditions of development consent and other approvals will form the basis for:- a) ongoing mining operations and environmental management; and b) ongoing monitoring of the project	**Compliance**	The MOP has been prepared and approved by DRE. Based on the auditors review of the MOP and mining operations, it is considered that the mining operations are being conducted in general accordance with the MOP.	Mining Operations Plan, Prepared by R. W. Corkery & Co Pty Limited, Report No 440/11 dated February 2016 Letter from General Manager of Tritton Resources Ltd dated 1 Feb 2016 to DoI Division of Resources and Energy. Letter from DRE dated 29 April 2016, titled Mining authorisation number 1544, Mining Act 1992, Tritton Resources Pty Ltd Approval of Mining Operations Plan - Notice of Approval	
(2)	The Plan must be prepared in accordance with the Director-General's guidelines current at the time of lodgement.	**Compliance**	The MOP was reviewed by and subsequentially approved by DRE 29 April 2016.	Mining Operations Plan, Prepared by R. W. Corkery & Co Pty Limited, Report No 440/11 dated February 2016 Letter from General Manager of Tritton Resources Ltd dated 1 Feb 2016 to DoI Division of Resources and Energy. Letter from DRE dated 29 April 2016, titled Mining authorisation number 1544, Mining Act 1992, Tritton Resources Pty Ltd Approval of Mining Operations Plan - Notice of Approval	
(3)	A Plan must be lodged with the Director-General:-	**Compliance**	The MOP has been submitted to and approved by DRE. It is not clear whether the plan had been submitted to other agencies / departments	Mining Operations Plan, Prepared by R. W. Corkery & Co Pty Limited, Report No 440/11 dated February 2016 Letter from General Manager of Tritton Resources Ltd dated 1 Feb 2016 to DoI Division of Resources and Energy. Letter from DRE dated 29 April 2016, titled Mining authorisation number 1544, Mining Act 1992, Tritton Resources Pty Ltd Approval of Mining Operations Plan - Notice of Approval	
(a)	Prior to the commencement of mining operations (includes mining purposes)				
(b)	Subsequently as appropriate prior to the expiry of any current Plan: and	**Compliance**	The MOP has been revised following modification to the DA 41/98.		
(c)	in accordance with any direction issued by the Director-General.	**Compliance**	Section 1.5.3 of the MOP refers to consultation with DoI - DRE during preparation of the MOP. Evidence of submission of draft MOP to DRE and response is noted in the letters. The draft MOP had been approved by DRE limited to: * the rehabilitation objectives and completion criteria; and * the schedule of rehabilitation activities proposed for the MOP period		

(4)	The Plan must present a schedule of proposed mine development for a period of up to seven (7) years and contain diagrams and documentation which identify:-		-		
(a)	area(s) proposed to be disturbed under the Plan;	**Compliance**	Section 2 of the MOP details the areas proposed to be disturbed from the proposed mining activities.	Mining Operations Plan, Prepared by R. W. Corkery & Co Pty Limited, Report No 440/11 dated February 2016	
(b)	mining and rehabilitation method(s) to be used and their sequence;	**Compliance**	Section 2 of the MOP details the areas proposed to be disturbed from the proposed mining activities. Different sub-sections also detail rehabilitation processes.		
(c)	areas to be used for disposal of tailings/waste;	**Compliance**	Sections 2.3.4, 2.3.5 and 2.3.6 provides details of the Waste Rock Emplacement, Processing Residues and Tailings and Waste management.		
(d)	existing and proposed infrastructure;	**Compliance**	Section 2.2 provides the Asset Register, detailing infrastructure proposed for the mine. Section 2.3.5.1 details the proposed processing infrastructure		
(e)	existing flora and fauna on the site;	**Compliance**	Section 3.2.7 refers to flora and fauna surveys undertaken on the site since 1996 for the preparation for the original EIS for the project. The MOP refers to the Flora and Fauna Management Plan which details management of site with relevance to this requirement. Section 3.2.14 refers to management of weed and non-native fauna. Weed Management Plan also refers to weed management.	Mining Operations Plan, Prepared by R. W. Corkery & Co Pty Limited, Report No 440/11 dated February 2016 TRL Flora and Fauna Management Plan, Rev 1.1 dt January 2016 TRL Weed Management Plan, Rev 1.1 dt January 2016 - Report No EM.0360	
(f)	progressive rehabilitation schedules;	**Compliance**	Section 4 of the MOP refers to Post Mining Land Use and rehabilitation requirements. Table 11 details the Final Land Use Strategy and Table 12 details the Rehabilitation Objectives and Targets. Section 5 of the MOP details rehabilitation phases. This section includes Table 16 that details Rehabilitation Performance Indicators and Completion Criteria including progressive rehabilitation. Section 7.2 describes the proposed rehabilitation activities during the MOP term.	Mining Operations Plan, Prepared by R. W. Corkery & Co Pty Limited, Report No 440/11 dated February 2016	
(g)	areas of particular environmental, ecological and cultural sensitivity and measures to protect these areas;	**Compliance**	Section 3.2 of the MOP describes Environmental Risk Management including environmental, ecological and cultural (visual amenitity, aboriginal heritage, non-aboriginal heritage) aspects.	Mining Operations Plan, Prepared by R. W. Corkery & Co Pty Limited, Report No 440/11 dated February 2016	
(h)	water management systems (including erosion and sediment controls);	**Compliance**	Erosion and Sediment Control Plan has been prepared by R W Corkery & Co Pty Ltd - rev 1 dated July 2015 has been sighted by Auditors. The MOP itself does not include Water Management Systems details. The Water Management Plan includes details of management and monitoring of groundwater and surface water.	Erosion and Sediment Control Plan 2015 prepared by R W Corkery & Co Pty Ltd for Straits Tritton Copper. TRL Water Management Plan Rev 1.1 dt February 2016	
(i)	proposed resource recovery; and	**Compliance**	Mining operations and waste management processes are included in Section 2.3 of the MOP	Mining Operations Plan, Prepared by R. W. Corkery & Co Pty Limited, Report No 440/11 dated February 2016	
(j)	where the mine will cease extraction during the term of the Plan, a closure plan including final rehabilitation objectives/methods and post mining landuse/vegetation.	**Compliance**	Mine Closure Plan Rev 1 has been sighted by the Auditors	Mine Closure Plan Rev 1 dt August 2014	

(5)	The Plan when lodged will be reviewed by the Department of Mineral Resources.	**Compliance**	The draft MOP was lodged with Department of Mineral Resources / DRE on 4 April 2016. The DRE issued a letter of approval on 29 April 2016 - the approval is until 31 December 2022.	Mining Operations Plan, Prepared by R. W. Corkery & Co Pty Limited, Report No 440/11 dated February 2016 Letter from General Manager of Tritton Resources Ltd dated 1 Feb 2016 to DoI Division of Resources and Energy. Letter from DRE dated 29 April 2016, titled Mining authorisation number 1544, Mining Act 1992, Tritton Resources Pty Ltd Approval of Mining Operations Plan - Notice of Approval	
(6)	The Director-General may within two (2) months of the lodgement of the Plan, require modification and re-lodgement.	**Not Triggered**	Based on information available to the Auditors, this condition was not been triggered during the Audit period.		
(7)	If a requirement in accordance with clause (6) is not issued within two months of the lodgement of a Plan, the lease holder may proceed with the implementation of the Plan.	**Not Triggered**	Based on information available to the Auditors, this condition was not been triggered during the Audit period.		
(8)	During the life of the Mining Operations Plan, proposed modifications to the Plan must be lodged with the Director-General and will be subject to the review process outlined in clauses (5) - (7) above.	**Not Triggered**	Based on information available to the Auditors, this condition was not been triggered during the Audit period.		
3	**Annual Environmental Management Report (AEMR)**		-		
(1)	Within 12 months of the commencement of mining operations and thereafter annually or, at such other times as may be allowed by the Director-General, the lease holder must lodge an Annual Environmental Management Report (AEMR) with the Director-General.	**Compliance**	AEMRs have been prepared and submitted as required every calendar year.	AEMRs 2015 - 2017	
(2)	The AEMR must be prepared in accordance with the Director-General's guidelines current at the time of reporting and contain a review and forecast of performance for the preceding and ensuing twelve months in terms of:	**Compliance**	AEMRs are prepared and submitted per calendar year. Evidence of review by DPE has been sighted by the Auditors. Comments by DPE from review of the AEMR is addressed in an addendum report, as noted in the example for AEMR 2015.	AEMRs 2015 - 2017; Letter (emailed) to Katrina O'Reilly on 18 May 2015 as addendum report addressing AEMR 2015 review comments (wrong date)	
(a)	the accepted Mining Operations Plan;	**Compliance**	MOP section 10 briefly mentions preparation of AEMRs Auditors sighted Final Version of the MOP as submitted for Approval, dated March 2016. The MOP has been accepted by DRE as evidenced in a letter of approval on 29 April 2016 - the approval is until 31 December 2022.	AEMRs 2015 - 2017; MOP dated March 2016 and its appendices Letter from DRE dated 29 April 2016, titled Mining authorisation number 1544, Mining Act 1992, Tritton Resources Pty Ltd Approval of Mining Operations Plan - Notice of Approval (Ref OUT16/16904 MCV16-165)	
(b)	development consent requirements and conditions;	**Compliance**	The AEMR contains the information required in accordance with DA41-98	AEMRs 2015 - 2017	
(c)	Environmental Protection Authority and Department of Land and Water Conservation licences and approvals;	**Compliance**	The AEMRs contain information required as per EPL (section 6 in AEMRs 2016-2017) and Water Licences (sections 6.3 and 6.4 in AEMRs 2016-2017)	AEMRs 2015 - 2017	
(d)	any other statutory environmental requirements;	**Noted**			
(e)	details of any variations to environmental approvals applicable to the lease area; and	**Noted**			
(f)	where relevant, progress towards final rehabilitation objectives.	**Not Triggered**	Section 8 in AEMRs 2016-2017 details rehabilitation progress.	AEMRs 2015 - 2017	
(4)	The lease holder shall, as and when directed by the Minister, co-operate with the Director-General to conduct and facilitate review of the AEMR involving other government agencies and the local council.	**Noted**			
	Working Requirement		-		
4	The lease holder must:-		-		
(a)	ensure that at least 60 competent people are efficiently employed on the lease area on each week day except Saturday or any week day that is a public holiday,	**Compliance**	Section 4.2 in AEMR 2015 and section 9.2 in AEMRs 2016-2017 describes Community Liaison. As per statistical information provided, 360 staff were employed by Tritton Resources as at the end of 2017. This number has increased during the audit period.		

	OR	Compliance	No specific instrument in writing by the Minister to increase or decrease expenditure required or number of people employed has been recieved by TRL.	AEMRs 2015 - 2017 DPE letter to Dean Woods Ref 18/643660 dt 10 Sept 2018 (signed by David Humphris as delegate of the Minister for Resources for the State of NSW).	
(b)	expend on operations carried out in the course of prospecting or mining the lease area, an amount of not less than $1,050,000 during each year of the term of this lease.				
	The Minister may at any time or times after the period of 2 years from the date of grant/renewal of this lease, by instrument in writing served on the lease holder, increase or decrease the expenditure required or the number of people to be employed.	**Not Triggered**	DPE advised TRL in Sept 2018 via an Instrument of Variation that, in accordance with Cl 12 of Sch 1B of the Mining Act 1992, condition 4 of ML1544 has been omitted via a variation to the ML, with effect from 8 Oct 2018. This condition will cease to be in effect from this date.		
5	**Control of Operations**		-		
(a)	If an Environmental Officer of the Department of Mineral Resources believes that the lease holder is not complying with any provision of the Act or any condition of this lease relating to the working of the lease, he may direct the lease holder to:-		-		
(i)	cease working the lease; or	**Not Triggered**			
(ii)	cease that part of the operation not complying with the Act or conditions	**Not Triggered**			
	until in the opinion of the Environmental Officer the situation is rectified.	**Not Triggered**			
(b)	The lease holder must comply with any direction given. The Director-General may confirm, vary or revoke any such direction.	**Not Triggered**	There have been no directions on control operations given in the audit period		
(c)	A direction referred to in this condition may be served on the Mine Manager.	**Not Triggered**			
	Reports				
6	The lease holder shall provide, within a period of twenty eight days after each anniversary of the date this lease has effect or at such other date as the Director-General may stipulate, of each year a progress report(s) to the satisfaction of the Director-General containing the following:-		-		
(a)	Full particulars, including results, interpretation and conclusions, of all exploration conducted during the twelve months period;	**Compliance**	The AEMRs include the required monitoring results, interpretations and conclusions regarding mine operations. Exploration undertaken is also briefly referenced in different sections within the AEMRs, such as section 6.12 in AEMRs 2016-2017 on Aboriginal Heritage.	AEMRs 2015-2017	
(b)	Details of expenditure incurred in conducting that exploration;	**Compliance**	Section 2.2 of AEMR 2015 and section 4.2 of AEMR 2016-2017 describes Exploration activities during the reporting year.		
(c)	A summary of all geological findings acquired through mining or development evaluation activities;	**Compliance**			
(d)	Particulars of exploration proposed to be conducted in the next twelve month period;	**Compliance**	Section 6 in AEMR 2015 and section 12 in AEMRs 2016-2017 include proposed exploration in the next twelve months		
(e)	All plans, maps, sections, and other data necessary to satisfactorily interpret the report(s).	**Compliance**	Figure 3 in the AEMRs provide location of exploration leases		
7	**Licence to Use Reports**				
(a)	The lease holder grants to the Minister, by way of a non-exclusive licence, the right in copyright to publish, print, adapt and reproduce all exploration reports lodged in any form and for the full duration of copyright.	**Noted**			
(b)	The non-exclusive licence will operate as a consent for the purposes of section 365 of the Mining Act 1992	**Noted**			
8	**Confidentiality**				
(a)	All exploration reports submitted in accordance with the conditions of this lease will be kept confidential while the lease is in force, except in cases where;	**Compliance**	Exploration reports with the required details are only included in the AEMRs and are not publicly available. Brief notes on brownfield exploration is included in the Annual Reports available on Aeris Resources website.	AEMRs 2015-2017; Annual Reports on http://www.aerisresources.com.au/investor-centre/asx-announcements/2017.html	
(i)	the lease holder has agreed that specified reports may be made non-confidential.	**Noted**			

(ii)	reports deal with exploration conducted exclusively on areas that have ceased to be part of the lease.	**Noted**			
(b)	Confidentiality will be continued beyond the termination of a lease where an application for a flow-on title was lodged during the currency of the lease. The confidentiality will last until that flow-on title, or any subsequent flow-on title , has terminated.	**Noted**			
(c)	The Director -General may extend the period of confidentiality.	**Noted**			
	Terms of the non-exclusive licence		-		
9	The terms of the non-exclusive copyright licence granted undre condition 7(a) are:		-		
(a)	the Minister may sub-licence others to publish, print adapt and reproduce but not on-licence reports.	**Noted**			
(b)	the Minister and any sub-licencee will acknowledge the lease holder's and any identifiable consultant's ownership of copyright in any reproduction of the reports, including storage of reports onto an electronic database.	**Noted**			
(c)	the lease holder does not warrant ownership of all copyright works in the report and, the lease holder will use best endeavours to identify those parts of the report for which the lease holder owns the copyright.	**Noted**			
(d)	there is no royalty payable by the Minister for the licence.	**Noted**			
(e)	if the lease holder has reasonable grounds to believe that the Minister has exercised his rights under the non-exclusive copyright licence in a manner which adversely affects the operations of the lease holder, that licence is revocable on the giving of a period of not less than three months notice.	**Noted**			
10	**Blasting**				
(a)	Ground Vibration				
	The lease holder must ensure that the ground vibration peak particle velocity generated by any blasting within the lease area does not exceed 10 mm/second and does not exceed 5 mm/second in more than 5% of the total number of blasts over the period of 12 months at any dwelling or occupied premises as the case may be, unless determined otherwise by the Environmental Protection Authority.	**Not Triggered**	There has been no blasting on the site in the audit period.		
(b)	Blast Overpressure				
	The lease holder must ensure that the blast overpressure noise level generated by any blasting within the lease area does not exceed 120 dB (linear) and does not exceed 115 dB (linear) in more than 5% of the total number of blasts over the period of 12 months at any dwelling or occupied premises as the case may be, unless determined otherwise by the Environmental Protection Authority.	**Not Triggered**	There has been no blasting on the site in the audit period.		
	Safety				
11	Operations must be carried out in a manner that ensures the safety of persons or stock in the vicinity of the operations. All drill holes, shafts and excavations must be appropriately protected, to the satisfaction of the Director-General, to ensure that access to them by persons and stock is restricted. Abandoned shafts and excavations opened up or used by the lease holder must be filled in or otherwise rendered safe to a standard acceptable to the Director-General.	**Not Triggered**	There has been no safety incidents reported at the site.		
12	**Rehabilitation**				

(a)	Land disturbed must be rehabilitated to a stable and permanent form suitable for a subsequent land use acceptable to the Director-General and in accordance with the Mining Operations Plan so that:-	**Compliance**	Section 4 of the MOP refers to Post Mining Land Use and rehabilitation requirements. Table 11 details the Final Land Use Strategy and Table 12 details the Rehabilitation Objectives and Targets. Section 5 of the MOP details rehabilitation phases. This section includes Table 16 that details Rehabilitation Performance Indicators and Completion Criteria including progressive rehabilitation. Section 7.2 describes the proposed rehabilitation activities during the MOP term. Section 5 in AEMR 2015 and 8 in AEMRs 2016-2017 detail the rehabilitation works undertaken and progress on the development of Final Rehabilitation Plan. Section 6 AEMR 2015 and section 12 in AEMRs 2016-2017 details rehabilitation focus for the next 12 months.	Mining Operations Plan, Prepared by R. W. Corkery & Co Pty Limited, Report No 440/11 dated February 2016 AEMRs 2015-2017 Complaints Register Site audit inspection observations Auditors' discussions with EPA and DPE	
.	there is no adverse environmental effect outside the disturbed area and that the land is properly drained and protected from soil erosion.	**Compliance**	As per the AEMRs reviewed, there has been no adverse environmental effects outside the mined area.		
.	the state of the land is compatible with the surrounding land and land use requirements.	**Compliance**	As per the AEMRs reviewed, there has been no adverse land compatibility issues noted.		
.	the landforms, soils, hydrology and flora require no greater maintenance than that in the surrounding land.	**Compliance**	As per the AEMRs reviewed, there has been no adverse land compatibility issues		
.	in cases where revegetation is required and native vegetation has been removed or damaged, the original species must be re-established with close reference to the flora survey included in the Mining Operations Plan. If the original vegetation was not native, any re-established vegetation must be appropriate to the area and at an acceptable density.	**Compliance**	Sections in AEMRs on Threatened Flora and Threatened Fauna (sections 3.6-3.7 in AEMR 2015; sections 6.6-6.7 in AEMRs 2016-2017) provide discussion on relovation or removal and re-establishment of vegetation.		
.	the land does not pose a threat to public safety.	**Compliance**	There have been no public safety related incidents or complaints during the audit period.		
13	The lease holder must comply with any direction given by the Director-General regarding the stabilisation and revegetation of any mine residues, tailings or overburden dumps situated on the lease area..	**Not Triggered**	No directions have been issued by the DG during this audit period.		
	Prevention of Soil Erosion and Pollution				
14	Operations must be carried out in a manner that does not cause or aggravate air pollution, water pollution (including sedimentation) or soil contamination or erosion, unless otherwise authorised by a relevant approval, and in accordance with an accepted Mining Operations Plan. For the purposes of this condition, water shall be taken to include any watercourse, waterbody or groundwaters. The lease holder must observe and perform any instructions given by the Director-General in this regard.	**Compliance**	Section 3.2 in AEMR 2015 and section 6.2 in AEMRs 2016-2017 provide discussion on Erosion and Sediment management related to mining activities. Section 3.2.5 in the MOP refer to Environmental Risk Management related to erosion and sediment control. The Auditors are not aware of any specific instructions by DPE in this regard	Mining Operations Plan, Prepared by R. W. Corkery & Co Pty Limited, Report No 440/11 dated February 2016 AEMRs 2015-2017	
	Transmission lines, Communication lines and Pipelines				
15	Operations must not interfere with or impair the stability or efficiency of any transmission line, communication line, or pipeline or any other utility on the area without prior written approval of the Director-General and subject to any conditions he may stipulate.	**Noted**			
16	**Fences, Gates**				
(a)	Activties on the lease must not interfere with or damage fences without the prior written approval of the owner thereof or the Minister and subject to any conditions the Minister may stipulate.	**Not Triggered**	The Auditors are not aware of any negative impacts on fencing of neighbouring properties.		
(b)	Gates within the lease area must be closed or left open in accordance with the requirements of the landholder.	**Not Triggered**	Mining Operations do not require access to land owned by third parties.		

17	**Roads**				
(a)	Operations must not affect any road unless in accordance with an accepted Mining Operations Plan or with the prior written approval of the Director-General and subject to any conditions he may stipulate.	**Compliance**	Mining Operation Plan and Traffic Management Plan have been prepared. The access road to the site has been upgrades by TRL in accordance with the Project Approval and in consultation with RMS.	Mining Operations Plan	
(b)	The lease holder must pay to the local council, the Department of Land and Water Conservation or the Roads and Traffic Authority the cost incurred in fixing any damage to roads caused by operations carried out under the lease, less any amount paid or payable from the Mine Subsidence Compensation Fund.	**Not Triggered**	There have been no reported damages to roads		
18	Access tracks must be kept to a minimum and be positioned so that they do not cause any unnecessary damage to the land. Temporary access tracks must be ripped, topsoiled and revegetated as soon as possible after they are no longer required for mining operations. The design and construction of access tracks must be in accordance with specifications fixed by the Department of Land and Water Conservation.	**Noted**			
19	**Trees and Timber**				
(a)	The lease holder must not fell trees, strip bark or cut timber on the lease without the consent of the landholder who is entitled to the use of the timber, or if such a landholder refuses consent or attaches unreasonable conditions to the consent, without the approval of a warden.	**Not Triggered**	There has been no felling of trees or related activities undertaken during the audit period.		
(b)	The lease holder must not cut, destroy, ringbark or remove any timber or other vegetative cover on the lease area except such as directly obstructs or prevents the carrying on of operations. Any clearing not authorised under the Mining Act 1992 must comply with the provisions of the Native Vegetation Conservation Act 1997.	**Not Triggered**	There has been no felling of trees or related activities undertaken during the audit period.		
(c)	The lease holder must have any necessary licence from the Forestry Commission of New South Wales before using timber from any Crown land within the lease area	**Not Triggered**	There has been no felling of trees or related activities undertaken during the audit period.		
21	**Resource Recovery**				
(a)	Notwithstanding any description of mining methods and their sequence or of proposed resource recovery contained within the Mining Operations Plan, if at any time the Director-General is of the opinion that minerals which the lease entitles the lease holder to mine and which are economically recoverable at the time are not being recovered from the lease area, or that any such minerals which are being recovered are not being recovered to the extent which should be economically possible or which for environmental reasons are necessary to be recovered, he may give notice in writing to the lease holder requiring the holder to recover such minerals.	**Noted**	The mine was active during the entire Audit Period.		
(b)	The notice shall specify the minerals to be recovered and the extent to which they are to be recovered, or the objectives in regard to resource recovery, but shall not specify the processes the lease holder shall use to achieve the specified recovery.	**Noted**			
(c)	The lease holder must, when requested by the Director-General, provide such information as the Director-General may specify about the recovery of the mineral resources of the lease area.	**Noted**			
(d)	No notice shall be issued by the Director-General unless the matter has firstly been thoroughly discussed with and a report to the Director-General has incorporated the views of the lease holder.	**Noted**			
(e)	The lease holder may object to the requirements of any notice issued under this condition and on receipt of such an objection the Minister shall refer it to a Warden for inquiry and report under Section 334 of the Mining Act, 1992.	**Noted**			
(f)	After considering the Warden's report the minister shall decide whether to withdraw, modify or maintain the requirements specified in the original notice and shall give the lease holder written notice of the decision. The lease holder must comply with the requirements of this notice.	**Noted**			

	Indemnity				
22	The lease holder must indemnify and keep indemnified the Crown from and against all actions, suits, claims and demands of whatsoever nature and all costs, charges and expenses which may be brought against the lease holder or which the lease holder may incur in respect of any accident or injury to any person or property which may arise out of the construction, maintenance or working of any workings now existing or to be made by the lease holder within the lease area or in connection with any of the operations notwithstanding that all other conditions of this lease shall in all respects have been observed by the lease holder or that any such accident or injury shall arise from any act or thing which the lease holder may be licenced or compelled to do.	**Noted**			
23	**Security**				
(a)	Security, lodged by instalments at the times indicated below, must be lodged with the Minister by the lease holder for the purpose of ensuring the fulfilment by the lease holder of his obligations under this lease. If the lease holder fails to fulfil any one or more of such obligations the said sum may be applied at the discretion of the Minister towards the cost of fulfilling such obligations. For the purpose of this clause the lease holder shall be deemed to have failed to fulfil the obligations of this lease if he fails to comply with any condition or provision hereof, any provision of the Act or regulations made thereunder or any condition or direction imposed or given pursuant to a condition or provision hereof or of any provision of the Act or regulations made thereunder.	**Compliance**	Tritton Mine has a total Guarantee in place on ML1544 for $6,224,000 with NSW government. This is comprised of $5,022,000 held as Guarantee by Aeris Resources' financier PAG via an ANZ facility; and the balance $1,202,000 as requested as per increase notification - as per advice by Aeris Financial Controller, this has been fully paid with an agreement of instalment payments to 30 June 2018, agreed in a letter by DPE - this payment schedule applies to various Mining Leases held by Aeris Resources, including ML1544	Email confirmation from Dane Van Heerden, Group Financial Controller/Co-Company Secretary - Aeris Resources Limited, to Dean Woods on 8 Nov 2018 Letter from Kylie Westcott, Business Services Officer to Ian Sheppard, COO Aeris Resources Pty Ltd Ref 07/9031#2 dated 4 May 2017 Letter from DPE Resources & Geoscience to Tritton Resources Pty Ltd Ref 07/9031#3 regarding Repayment schedule for outstanding security bond and royalty dated 18 Jul 2017.	
(i)	an amount of $50,000 must be lodged prior to the grant of the lease;	**Compliance**	This condition has been superseded by the guarantees described in 23 (a).		
(ii)	additional amounts of $950,000 prior to the commencement of construction, and	**Compliance**	This condition has been superseded by the guarantees described in 23 (a).		
(iii)	$500,000 prior to the commencement of mining, and	**Compliance**	This condition has been superseded by the guarantees described in 23 (a).		
(iv)	a further $500,000 twelve months after the commencement of mining.	**Compliance**	This condition has been superseded by the guarantees described in 23 (a).		
(b)	The lease holder must provide the security required by sub-clause (a) hereof in one of the following forms:- (i) cash (ii) a security certificate in such form and given by such surety as may from time to time be approved by the Minister.	**Compliance**	Tritton Mine has a total Guarantee in place on ML1544 for $6,224,000 with NSW government. This is comprised of $5,022,000 held as Guarantee by Aeris Resources' financier PAG via an ANZ facility; and the balance $1,202,000 as requested as per increase notification - as per advice by Aeris Financial Controller, this has been fully paid with an agreement of instalment payments to 30 June 2018, agreed in a letter by DPE - this payment schedule applies to various Mining Leases held by Aeris Resources, including ML1544	Email confirmation from Dane Van Heerden, Group Financial Controller/Co-Company Secretary - Aeris Resources Limited, to Dean Woods on 8 Nov 2018 Letter from Kylie Westcott, Business Services Officer to Ian Sheppard, COO Aeris Resources Pty Ltd Ref 07/9031#2 dated 4 May 2017 Letter from DPE Resources & Geoscience to Tritton Resources Pty Ltd Ref 07/9031#3 regarding Repayment schedule for outstanding security bond and royalty.	
24	**Firearms**				
	Firearms must not be brought onto the lease area without the consent of the landholder.	**Compliance**	Dean Woods confirmed that firearms are not permitted on site.	Audit discussion with Dean Woods	
25	**Travelling Stock Reserves**				
	The lease holder must permit the free and uninterrupted passage of stock through that part of the lease area covered by Travelling Stock Reserve Nos 9606 and 60000 and must conduct operations in a manner that does not cause danger to travelling stock.	**Noted**			
26	**Trigonometrical Stations and Survey marks**				

26 (a)	The marks in connection with any trigonometrical station, Permanent Mark or State Survey Mark (under the Survey Co-ordination Act, 1949) erected on or near the lease area shall not be interfered with and the unrestricted right of access to such a station by authorised persons and also the right to clear sight lines to the surrounding stations is reserved at all times.	**Compliance**	Survey mark identified and protected was sighted	Site photograph provided by Dean Woods	
(b)	The lease holder shall take all necessary precautions to preserve the trigonometrical, Permanent Mark or State Survey Mark (under the Survey Co-ordination Act, 1949) and the cairn, mast and vanes which might be erected on the lease area.	**Compliance**	Survey mark identified and protected was sighted	Site photograph provided by Dean Woods	
(c)	In the event of operations interfering with or damaging any trigometrical station, Permanent Mark or State Survey Mark (under the Survey Coordination Act 1949) erected on or near the lease area, or if required to do so by the Minister, the lease holder shall relocate any such trigonometrical station, Permanent Mark or State Survey Mark (under the Survey Coordination Act 1949) to the satisfaction of, and in a position required by, the Department of Land and Water Conservation , the Land Information Centre, Bathurst and the Minister. Upon completion of operations if required to do so by the Minister, and subject to such conditions as the minister may impose, the lease holder shall relocate such trigonometrical station, Permanent Mark or State Survey Mark (under the Survey Coordination Act 1949) to its original position.	**Not Triggered**			
27	**Mine Safety Management System**				
	Prior to the commencement of operations and as required by the Director- General the lease holder must prepare a Mine Safety Management Plan to ensure the Mines Inspection General Rule 2000 is adhered to.	Compliance	The Auditors sighted the Health Safety and Environment Management System Framework version 1 volume 3 dated 17 March 2017	Aeris Tritton Operations Health Safety and Environment Management System Framework TRL-HSEMS-001	
28	**Mine Closure Plan**				
	The lease holder must prepare a Mine Closure Plan in accordance with the "Strategic Framework for Mine Closure" produced by the Minerals Council of Australia and the Australian and New Zealand Minerals and Energy Council. This Plan must detail all aspects of mine closure 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 Mine Closure Plan is considered to form part of the Mining Operations Plan (MOP) .	Observation	The MOP 2016 sighted by the Auditors refers to Mine Closure Plan 2011 as Appendix 5; however the Mine Closure Plan provided to the Auditors has been revised in August 2014.	Mining Operations Plan, Prepared by R. W. Corkery & Co Pty Limited, Report No 440/11 dated February 2016 Mine Closure Plan Rev 1 dt August 2014	Update MOP to refer to the latest Mine Closure Plan The Mine Closure Plan should refer to the correct Strategic Framework for Mine Closure as required by ML1544
	Waste Rock Characterisation and Management Plan				
29	The lease holder must prepare a Waste Rock and Management Plan detailing all measures required for effective storage and disposal of waste rock. This Plan is to be appended to the Mining Operations Plan (MOP) required to be lodged in accordance with Condition No. 2. For reporting and other purposes the Waste Rock Characterisation and Management Plan is considered to form part of the Mining Operations Plan (MOP) .	Compliance	MOP Appendix 6 includes various Management Plans. The Waste Rock and Management Plan has been sighted by the Auditors.	Waste Rock Characterisation and Management Plan, Rev 1.1, dt jan 2016	
1.4	**Tailings Management Plan**				
30	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 the 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) .	Compliance	Mine Closure Plan Rev 1 has been sighted by the Auditors. The compliance register included therein, in Appendix H, refers to Strategic Framework for Tailings Management in relation to ML1547 Tailings management is generally addressed in the Tailings Dam Operations and Maintenance Manual (OMM). Dean Woods stated that the Tailings Dam 1 Operations & Maintenance Manual functions as the Tailings Management Plan.	Mining Operations Plan, Prepared by R. W. Corkery & Co Pty Limited, Report No 440/11 dated February 2016 Mine Closure Plan Rev 1 dt August 2014 Tailings Dam 1 Operations and Maintenance Manual & DSC Emergency Action Plans, Rev 4a, dt April 2016 Site audit discussions with Dean Woods.	
1.5	**Environmental Officer**				

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.	Observation	Section 2 of the Framework EMP provides overall roles and responsibilities for environmental management at Tritton Mines. The role of Environmental Coordinator addresses this requirement. This role reports to the Resident Manager. Environmental Coordinator is supported by Environmental Officer. Position Description for both roles (last reviewed 9 September 2007) were sighted by the Auditors. The role of Environmental Advisor (which is the same as Environmental Coordinator, as reported by Dean Woods) was filled by Nathan Jones till August 2017 and thereafter by Dean Woods. Email correspondence with DoI was sighted by Auditors where Dean Woods introduced himself to Ben Gazi at DoI upon commencement of employment. Ben Gazi responded congratulating Dean and advising of new contact details at DoI. The DPE approval of appointment of Dean Woods during this audit period was not sighted by the Auditors.	TRL Framework EMP Sept 2012 Position Description for Environmental Coordinator dt Sept 2007 Position Description for Environmental Officer dt Sept 2007 Site audit discussions with Dean Woods Email from Dean Woods to Ben Gazi at DoI on 29 Aug 2017 and reply email on 1 Sept 2017.	Seek formal approval from DPE for the appointment of the Environmental Advisor.
1.6	**Additional Rehabilitation and Reporting**				
32	The lease holder must rehabilitate to the satisfaction of the Director-General any areas disturbed by operations carried out under the Exploration Licences Nos. 4038 and 4962 and must lodge any reports required in connection with these licences	Not Triggered	The AEMRs refer to EL4962 and as per Figure 3 in the AEMR this EL area surrounds the Tritton mine site. The AEMRs do not refer to EL4038. Table 16 in the AEMR provides rehabilitation summary including disturbed areas. The EL4038 and EL4962 are not included in this summary of site disturbance.	AEMRs 2015-2017 Site audit discussions	

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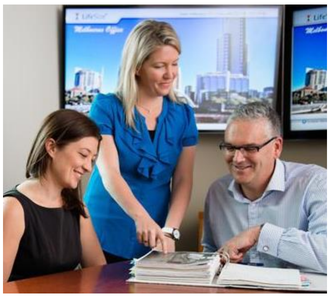

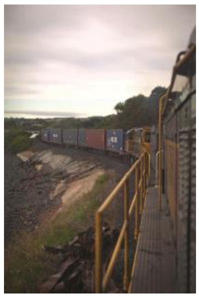

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