

BARNETT & MAY

Hera Mine

Independent Environmental Audit

Prepared for

Hera Resources Pty Ltd.

Client representative

Liam Richards

Date

6 March 2020

Revision 0



Contents

1	
1.	Introduction.....4
1.1	Hera Project. 4
2.	Definitions.....5
3.	Auditor Certification7
3.1	Auditee Details 8
4.	Audit process.....9
4.1	Preliminary activities 9
4.1.1	Approval of audit teams 9
4.1.2	Consultation with Agencies 9
4.2	Information Review and Compliance Register 10
4.3	Site audit 10
4.3.1	Opening Meeting 10
4.3.2	Site Inspections 10
4.3.3	Site Interviews 10
4.3.4	Document review 11
4.4	Reporting 11
5.	Stakeholder Consultation.....13
6.	Statutory Compliance and Recommendations16
6.1	Summary of Compliance Status 16
6.2	Non-Compliances and other recommendations 16
7.	Independent Audit Post Approval Requirements.....31
7.1	Project Environmental Management System 31
7.2	Implementation of the Operational Environmental Management Plan and Sub-plans 32
7.3	Status of Previous IEA Findings 33
7.4	Specialist Auditor Reports 42
7.5	Operational Environmental Impacts 42

List of tables

Table 1 - Compliance Assessment Matrix.....	11
Table 2 - Risk Assessment Matrix	12
Table 3 - Summary of Stakeholder Inputs.....	13
Table 4 - Summary of Statutory Compliance	16
Table 5 - Statutory Non-Compliances	17
Table 6 - Status of 2016 Audit Findings	33
Table 7 - Predicted vs Actual Impacts	42

Appendices

Appendix A – Audit Table

Appendix B - Audit Photographs

Appendix C - Auditor Approval Letter

Prepared by — K. Holmes



Date – 6 March 2020

Revision History

Rev No.	Description	Prepared by	Reviewed by	Authorised by	Date
A	Draft for client Review	K. Holmes	A. Wilkins	K. Holmes	24 February 2020
0	Final Report	K. Holmes	A. Wilkins	K. Holmes	6 March 2020

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1. Introduction

Hera Resources Pty Ltd, a wholly owned subsidiary of Aurelia Metals Ltd, is the operator of the Hera Project (PA 10_0191) located approximately 100 km south east of Cobar in western new South Wales. The operations commenced on April 2014.

The purpose of the audit, that was undertaken in accordance with the **Barnett and May's** proposal (dated 5 September 2019), was to determine if the compliance obligations contained in the Project Approval (PA 10_0191) Schedule 5, Conditions 9 and 10, which states:

C9 - "Within one year of the commencement of development of the site, and every three years thereafter, unless the Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must:

(a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;

(b) include consultation with the relevant agencies;

(c) assess the environmental performance of the project and assess whether it is complying with the relevant requirements in this approval and any relevant EPL or mining lease (including any assessment, plan or program required under these approvals);

(d) review the adequacy of strategies, plans or programs required under the abovementioned approval or licences; and

(e) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or Program required un these consents.

Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Secretary.

C10 – Within six weeks of completion of the audit, or as otherwise agreed by the Secretary, the Applicant must submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the Audit Report.

The Audit was commissioned on October 2019 following approval of the audit team by DPIE. The site inspection was undertaken by Ken Holmes (Accredited Lead Auditor) of Barnett & May from 19 November to 21 November. The audit covered the period from 25 September 2016 to 30 September 2019 (the Audit Period).

1.1 Hera Project.


The Hera Project is located approximately 100km south-east of Cobar in central NSW. Producing gold-silver doré bars and a 'bulk' (lead and zinc) concentrate, Hera is an underground mine utilising long-hole open stoping in a combination of bottom-up and top-down directions. The stopes are backfilled with cemented rock fill (CRF), waste rock fill or a combination of both. The Hera Process Plant is designed to process 505,000 tonnes per.

2. Definitions

Acronyms	Description
ACHMP	Aboriginal Cultural Heritage Management Plan
AER	Annual Environmental Review
AR	Annual Review
AQGMP	Air Quality and Greenhouse Gas Management Plan
BMP	Blast Management Plan
BioMP	Biodiversity Management Plan
BOS	Biodiversity Off-set Strategy
BSC	Bogan Shire Council
CC	Construction Certificate
CCC	Community Consultative Committee
CSC	Cobar Shire Council
DPE	Department of Planning and Environment (former planning department name)
DPI	(former) Department of Primary Industries
DPIE	Department of Planning, Industry and Environment.
EMS	Environmental Management System
EMSt	Environmental Management Strategy
EPA	NSW Environment Protection Authority
EP&A Act	NSW Environmental Planning and Assessment Act
EPBC	Environmental Protection and Biodiversity Conservation Act
EPL	Environmental Protection License
GMP	Groundwater Management Plan
FHA	Final Hazard Analysis
HMMP	Hazardous Materials Management Plan
IEA	Independent Environmental Audit
LMP	Landscape Management Plan

Acronyms	Description
MOP	Mining Operations Plan
NOW	NSW Office of Water
NMP	Noise Management Plan
OC	Occupation Certificate
OEH	NSW Office of Environment and Heritage
OEMP	Operational Environmental Management Plan
PA	Project Approval
PIRMP	Pollution Incident Response Management Plan
REF	Review of Environmental Factors
RMP	Rehabilitation Management Plan
SWB	Site Water Balance
SWMP	Surface Water Management Plan
SWVR	Surface Water Validation Report
TMP	Traffic Management Plan
TSF	Tailing Storage Facility
WMP	Water Management Plan
WRE	Waste Rock Emplacement
WRMP	Waste Rock Management Plan

3. Auditor Certification

Independent Audit Certification Form	
Development Name	Hera Project
Development Consent No.	10_0191
Description of Development	Gold /Silver/Lead / Zinc Mine
Development Address	Nymagee, New South Wales
Proponent	Aurelia Metals Limited
Operator Address	Suite 5, Level 2, 60-62 McNamara Street, Orange
Title of Audit	Hera Project Independent Environmental Audit
<p><i>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:</i></p> <ul style="list-style-type: none"> <i>The audit has been undertaken in accordance with relevant approval condition(s) and in general accordance with the auditing standard AS/NZS ISO 19011:2011 and in general conformance with the DPE's Independent Audit Post Approval Requirements (June 2018).</i> <i>The findings of the audit are reported truthfully, accurately and completely;</i> <i>I have exercised due diligence and professional judgement in conducting the audit;</i> <i>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> <i>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> <i>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);</i> <i>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> <i>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.</i> <p><i>Note.</i></p> <p><i>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.</i></p> <p><i>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).</i></p>	
Signature	
Name of Lead/Principal Auditor	Ken Holmes
Address	4 Baeckea Place, Frenchs Forest, NSW
Email Address	ken@baeckea.com.au
Auditor Certification (if relevant)	Exemplar Global 14065
Date	6 March 2020

3.1 Auditee Details

Audit Title:	Hera Project Independent Environmental Audit
Site:	Hera Project, Nymagee, New South Wales
Client Contact:	Liam Richards
Position:	Environmental Advisor
Client:	Hera Resources Pty Ltd
Client Address:	Suite 5, Level 2, 60-62 McNamara Street, Orange
Client Phone Number	0431 422 151
Client Email:	liam.richards@aureliametals.com.au
Audit Team:	Ken Holmes – Certified Lead Auditor
Auditor's Telephone:	0438 046 261
Auditor's Email:	ken@baeckea.com.au
Date of Site Visit	19-21 November 2019
Audit Scope:	The audit was undertaken as per the brief outlined in the Barnett and May proposal (dated 5 September 2019). As such, the audit provides an assessment of the compliance of the project with the conditions Consent 10_0191.

4. Audit process

The audit process and methodology are summarised 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.

4.1 Preliminary activities

Off-site planning for the site audit comprised:

- Initial discussions with client representative, to organise the site inspection and access to audit documentation
- Prepare the audit compliance checklist
- Completion of a project specific Risk Assessment
- Review of online information
- Submission of a preliminary document / record request
- Consultation with relevant agencies.

4.1.1 Approval of audit teams

Hera sought the Secretary's endorsement for the audit team to undertake this Independent Environmental Audit.

The Secretary approved the following team on 14 September 2019 (Appendix C):

- Ken Holmes – Certified Lead Auditor
- Adam Bishop – Surface Water Management
- Martin Jacobs – Hydrology and Water Modelling

4.1.2 Consultation with Agencies

The Auditor consulted with the following agencies during the audit planning stage:

- Department of Planning, Industry and Environment (DPIE);
- NSW Environment Protection Authority (EPA);
- Cobar Shire Council (CSC);
- Bogan Shire Council (BSC); and
- Community Consultative Committee (CCC).

Emails were initially sent (via Email) to each of the above agencies advising them of the audit and the scope of the audit and inviting them to provide comments/requirements or specific environmental issues they required the audit to target. Where required (where no response was provided by the nominated stakeholder organisation) a follow up email was sent to repeat the invitation to provide input into the audit.

4.2 Information Review and Compliance Register

Prior to the site inspection the Auditor prepared a detailed audit checklist (spreadsheet) that was used to assess and track compliance. This spreadsheet formed the basis of the compliance register presented in the Appendices of this report.

4.3 Site audit

The site inspection component of the audit was undertaken over three days from 19 to 21 November 2019.

4.3.1 Opening Meeting

Following site inductions, the opening meeting was held on-site. It was attended by the following personnel:

- Liam Richards (Environmental Advisor)
- Scott Ramsay (Mine General Manager)
- Ken Holmes (Lead Auditor) – Barnett ad May.

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.

4.3.2 Site Inspections

A initial tour of the site was undertaken by the Auditor, accompanied by Mr Richards and Mr Thompson. Subsequent detailed inspections of specific areas of the operation were subsequently undertaken. The site inspection included observation of:

- Site Access and Security;
- Surface mine infrastructure;
- Processing Plant;
- Tailings Storage;
- Waste storage areas;
- Fuel and dangerous goods storage areas;
- Equipment maintenance area;
- Rehabilitation Areas; and
- Surface water management infrastructure.

4.3.3 Site Interviews

Audit interviews comprised of a series of meetings with:

- Liam Richards (Environmental Adviser); and
- Jonathon Thompson (Group Manager Environment)
- Scott Ramsay (General Manager)
- Kent Ward (Commercial Manager)

- Terry Cox (Acting Maintenance Superintendent)

4.3.4 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. The Auditee's personnel 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.

4.4 Reporting

The compliance register was completed using notes and observations recorded during the site inspection / interviews and review of appropriate documentation. The completed compliance register is presented in **Appendix B**. A summary of the non-compliances identified during this audit are provided in Table 1. The audit criteria used to determine compliance for this audit is defined in Table 2..

Table 1 - Compliance Assessment Matrix

Assessment	Criteria
Compliance	<p>Compliance</p> <ul style="list-style-type: none"> • The site complies with the requirements of applicable pre-operational Consent Conditions. • 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-Compliance	<p>Non-Compliance</p> <ul style="list-style-type: none"> • Clear evidence has been collected to demonstrate the 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. <p>Note: Where the auditor has not been able to collect enough 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 enough 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. As the condition cannot be verified it is treated as a non-compliance.</p>
Not Triggered	<p>Not Applicable / Not Triggered</p> <ul style="list-style-type: none"> • 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 each non-compliance identified have been assessed in accordance with

Table 2 - Risk Assessment Matrix

Risk Level	Description
High	Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence.
Medium	Non-compliance with: <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> • 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).

5. Stakeholder Consultation

Table 3 - Summary of Stakeholder Inputs provides a summary of the Stakeholder Consultation undertaken by the Auditors.

Table 3 - Summary of Stakeholder Inputs

Department	Contact	Consultation Actions	Stakeholder Comments	Auditor Response
NSW Department of Planning, Industry and Environment	Katrina O'Reilly – Senior Compliance Officer.	<ol style="list-style-type: none"> 1. Email sent 30 Oct 2019. 2. Follow up email sent on 19 November 2019. 3. Telephone response received on 20 November 2019. <p>No further consultation was undertaken.</p>	<p>Issues for consideration during the audit:</p> <ul style="list-style-type: none"> • Tailing Management • Cyanide (WAD) levels • Height of stockpiles • Compensatory water supply agreements with neighbours • Site water management • Erosion and sediment control • Dust emission events 	The Auditor reviewed each of these issues during the Audit.
Cobar Council	Garry Ryman – Director Planning and Environmental Services	<ol style="list-style-type: none"> 1. Email sent 30 Oct 2019. 2. Follow up email sent on 19 November 2019. <p>No further consultation was undertaken.</p>		No response was received from Council.
Bogan Shire Council	Graham Burke – Director Engineering Services	<ol style="list-style-type: none"> 1. Email sent 20 November 2019. 2. No further consultation was undertaken. 		No response was received from Council.
NSW EPA	Brooke Emerton (Regional Operations Officer)	<ol style="list-style-type: none"> 1. Email sent 30 Oct 2019. 2. Email received on 6 November 2019. 	The only ongoing issue with Hera that I can see so far is exceedance of WAD Cyanide levels which has been recorded on their annual returns.	The Auditor noted this requirement during the Audit and has addressed WAD compliance and complaints in this Audit Report.

Department	Contact	Consultation Actions	Stakeholder Comments	Auditor Response
			Recently the EPA have been receiving complaints from the neighbouring property relating the air (dust) and noise pollution too which I am currently looking into.	
		<ol style="list-style-type: none"> 1. Email sent 30 Oct 2019. 2. Follow up email sent on 19 November 2019. 		
Natural Resources Access Regulator	Tim Baker – Senior Water Regulation Officer	<ol style="list-style-type: none"> 1. Email sent 30 Oct 2019. 2. Follow up email sent on 19 November 2019. 		No response was received from DPI
Resources Regulator	Mark Buchan – Senior Inspector Environment	<ol style="list-style-type: none"> 1. Email sent 30 Oct 2019. 2. Follow up email sent on 19 November 2019. 	I suggest you contact the EPA regarding the Hera Mine site regarding non-compliance issues. There have been multiple pollution reporting incidents required over the last few years. Ranging from dust, noise and water issues.	The Auditor has contacted the EPA for comment.
CCC	Garry West (Chair)	<ol style="list-style-type: none"> 1. Email sent 30 Oct 2019. 2. Email received on 8 November 2019. 	<p>Your email was reported to the Community Consultative Committee (CCC) at yesterday's meeting and nobody raised any matters needed to be addressed by the Auditor.</p> <p>As the Independent Chair (appointed February 2018) I note that at all CCC meetings the company openly reports on matters covering compliance and environmental performance. Any non-compliances are noted and what rectification is being undertaken and when completed. The CCC is always advised if any penalties have been raised by the regulators.</p>	No issues have been raised by the CCC.

Department	Contact	Consultation Actions	Stakeholder Comments	Auditor Response
			<p>I am always prepared to learn what changes may be necessary from time to time to improve the monitoring role of the CCC and if as a result of your audit you identify any matters you believe the committee should consider implementing I would be pleased to hear from you.</p>	

6. Statutory Compliance and Recommendations

Compliance with the Conditions of Consent and the Environment Protection Licence has been reviewed by assessing compliance against the various documentation related to project approval, as listed in section 2.2 of this report. The Compliance Register presented in Appendix B provides a detailed review of the compliance status of the site, including recommendations to address non-conformances.

6.1 Summary of Compliance Status

A summary of compliance with pre-operations statutory requirements is provided in Table 4 - Summary of Statutory Compliance. The number of conditions include sub-clauses within each approval document.

Table 4 - Summary of Statutory Compliance

Approval/ Licence	No. of Conditions	Compliant	Non- Compliant	Noted	Not Triggered
10_0191	172	112	34	6	20
EPL 20179	75	40	7	24	4
ML 1686	48	23	1	15	9
TOTAL	295	175	42	45	33

6.2 Non-Compliances and other recommendations

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 5.

Table 5 - Statutory Non-Compliances

No.	Condition	Observation	Recommendation	Risk Level
PROJECT APPROVAL – 10_0191				
S2.1	The Proponent shall implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation or rehabilitation of the project.	As a result of two (self-reported by Hera) leaks of contaminated water, the EPA issue a Clean Up Notice and subsequently in response to their assessment that these incidents evidenced potential or actual Material Harm and were therefore potential breaches of Sections 64, 12 and 142A of the POEO Act.	The cleanup actions relating to the incidents have been completed - there are no further actions required.	Medium
S2.2	The Proponent shall carry out the project generally in accordance with the: (a) EA; and (b) conditions of this approval.	During the Audit period, the Waste Rock stockpile height exceeded the 10m height limit. The Auditor notes that the proposed Modification 5 seeks to increase the Waste Rock stockpile height to 15m. It is the Auditor's view that an increase in stockpile height will not result in an additional impact on the environment.	Ensure that the waste rock dump height is maintained below the approved height.	Low
S2.7	The Proponent shall comply with the operating hours: (a) Vegetation Clearing: 7am to 6pm , 7 days a week (b) Construction: 24 hours, 7 days a week (c) Mining, maintenance and processing: 24 hours, 7 days a week (d) Rehabilitation: Day /Evening (e) Transportation of Concentrate and Gold Ore: 7am to 10pm , 7 days a week.	One non-compliance (concentrate truck departure at 0600) occurred during the Audit Period. No complaints relating to out of hours works (including truck movements to and from site) are recorded on the complaints register that has been uploaded to the Hera website. The Drivers Code of Conduct includes the requirement that no concentrate transport should occur outside of daylight hours (specifically 0700 to 1930).	No action required; the drivers code of conduct is up to date.	Low

No.	Condition	Observation	Recommendation	Risk Level
S2.13	Until they are replaced by an equivalent strategy, plan or program approved under this approval, the Proponent shall implement the existing strategies, plans or programs for the site that have been approved under the approved exploration activities described in Review of Environmental Effects entitled "Exploration Decline at the Hera Deposit within Exploration Licence 6162".	<p>The Environmental Management Strategy and related sub-plans required by this Approval have been drafted. All the plans are not up to date and / or approved (by DPIE). The unapproved plans are being implemented as opposed to the plans provided in the REF.</p> <p>The management plans that are loaded onto the company website are assumed to be those that are current and being implemented.</p> <p>Each of the Plans has been reviewed by the Auditor and while generally technically appropriate, they contain some inaccurate information, including for example regulatory references.</p>	Finalise the consultation and update of the 2019 versions of the management plans and then seek DPIE approval for the revised plans.	Administrative non-compliance
S3.3	The Proponent shall prepare and implement a Noise Management Plan for the project to the satisfaction of the Secretary. The plan must: (a) be prepared in consultation with the EPA, and submitted to the Secretary for approval within six months of this approval;	<p>A noise management plan has been prepared, the version on the Hera website is the 2013 update. No correspondence was available to verify that this plan was approved by DPE or that the EPA was consulted during preparation of the Plan. Finding: NOT VERIFIED</p> <p>NOTE: The Auditor assumes that the 2013 version of the NMP is the current version.</p> <p>Email correspondence from 2017/18 indicates that an updated to that plan was prepared and sent to DPE for review in 2017. DPE provided comment on the plan, however the plan has not been approved by DPE.</p> <p>No correspondence was sighted the confirmed that the EPA was consulted during the preparation of the 2017 Noise Management Plan update.</p>	Finalise the review and stakeholder consultation of the 2019 version of the NMP to ensure it up to date then, then seek DPIE approval for the revised plan.	Administrative non-compliance
S3.12	The Proponent shall ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the project do not exceed the criteria listed in Tables 4, 5 or to 6 at any privately-owned land.	The Air Quality and Greenhouse Gas Management Plan is being implemented. Appropriate dust controls are being used. However, dust deposition and PM10 measurements from the Audit Period showed elevated dust levels. It is likely that these exceedances were a result of the drought conditions being experienced and are not indicative of the	It is recommended that Hera consider placement of additional dust deposition gauges outside the site boundaries to provide more data on	Low

No.	Condition	Observation	Recommendation	Risk Level
	See Tables 2 - 4, including the notes on page 7 of the permit	impact of the mine operations.	background dust levels.	
S3.12	The Proponent shall ensure that all point-source discharge locations on the site are designed and operated to comply with the maximum discharge concentrations applicable under the Protection of the Environment (Clean Air) Regulation 2010 and the requirements of any Environment Protection License issued for the project under the POEO Act.	<p>Two licensed air emission point sources are located that the site (the gold room stacks, EPL Sampling Points 24 and 39).</p> <p>The emission testing results for September 2018 found that cadmium levels exceeded the Environment (Clean Air) Regulation (2010) emission limits.</p>	Ensure that any emission limit exceedances are fully investigated and reported to the EPA and DPIE.	Administrative non-compliance
3.15	<p>The Proponent shall prepare and implement an Air Quality and Greenhouse Gas Management Plan. The plan must:</p> <p>(d) include an air quality monitoring program that:</p> <p>(i) uses a combination of high volumes samplers and dust deposition gauges to evaluate the performance of the project; and</p> <p>(ii) includes a protocol for determining exceedances of the relevant conditions of this approval; and</p>	<p>Section 6 of the plan addresses air quality monitoring. Dust deposition monitoring and HVAS sampling (including PM10 monitoring) is covered in the plan, however the monitoring of the Gold room stacks is not covered in the plan, this is a requirement of the EPL.</p> <p>The monitoring plan must include all EPL monitoring requirements.</p>	Ensure that the 2019 version of the AQGGMP details all monitoring and compliance assessment actions required by this Approval and the EPL.	Administrative non-compliance
3.18	The Proponent shall ensure that all surface water discharges from the site comply with: (a) section 120 of the POEO Act; or (b) the discharge limits (both volume and quality) set for the project in any applicable EPL.	<p>The 2016/7 Annual review reported that two discharges from Licence Point 3 exceeded a number of water quality parameters identified in EPL 20179. The discharge occurred on 16 December 2016 and was reported to the DPE, EPA and DRE.</p> <p>The 2017/8 Annual review reported that there were several WAD cyanide incidents during this reporting period</p>	Investigate the cause of any discharge from site that exceeds any discharge criterion and identify and implement appropriate mitigation strategies.	Medium
3.19	The concentration of Weak Acid Dissociable (WAD) cyanide in tailings			Medium

No.	Condition	Observation	Recommendation	Risk Level
	discharged from the discharge point to the tailings storage facility shall not exceed 10 mg/L.	The 2018/9 Annual Review reported that During the reporting period there were no discharges from the sediment basin and no flows recorded in the clean water by pass drain through site. There were also no flows in any creeks or drainage courses across site as a result of the extended drought. Therefore, no surface water monitoring of creeks or drainage lines was able to be undertaken.		
3.20	The concentration of Weak Acid Dissociable (WAD) cyanide at the discharge point to the process water dam shall not exceed 20 mg/L (90th percentile) or 30 mg/L (maximum).			Medium
S3.22	The Proponent shall ensure that the floor and walls of: (a) the leachate management pond, seepage collection pond (associated with the tailings storage facility), process water dam and raw water dam are lined to achieve a permeability of no less than 1 x 10 ⁻⁹ m/s to a depth of at least 900 millimetres of clay (or equivalent); and	The leachate management system ponds are lined with 2 mm HDPE. The QA reports associated with the construction of the ponds does not certify the permeability of the liners. Finding: Not Verified.	Obtain a copy of the relevant engineering report certifying the permeability of the pond liners.	Administrative non-compliance
S3.25	The Proponent shall prepare and implement a Water Management Plan. The plan must be prepared by suitably qualified and experienced persons whose appointment has been approved by the Secretary,	DPIE endorsed the appointment of three experts to prepare the original plan on 31st August 2012. Correspondence from DPE approving the appointment of the authors of the 2016 or 2018 plan revisions was not sighted during the Audit. Finding: NOT VERIFIED	Request approval from DPIE for the appointment of the experts responsible for the (yet to be approved) 2019 Water Management Plan.	Administrative non-compliance
	and submitted to the Secretary for approval within six months of this approval, or prior to commencement of mining operations under this approval, whichever is sooner;	Correspondence verifying that the original plan was submitted to DPE / DPI was not sighted during the Audit. Finding: NOT VERIFIED	Ensure that the current version of the Water Management Plan is approved by DPIE.	Administrative non-compliance

No.	Condition	Observation	Recommendation	Risk Level
S3.29	Within 6 months of approval and prior to the commencement of vegetation clearing on the site under this approval, the Proponent shall submit a Biodiversity Management Plan for the project site to the Secretary for approval. This plan must:	A biodiversity management plan was prepared. The draft Biodiversity Management Plan incorporating a Biodiversity Offset Strategy was submitted to DPE by email (sighted) on 15 July 2016. Subsequent delays in relation to the off-set strategy and bio banking agreements resulted in continuing delays in the finalisation of the plan.	Seek DIPE Approval for the completion and finalisation of the Biodiversity Off-set Strategy and the Biodiversity Off-set Plan.	Administrative non-compliance
S3.35	Within 6 months of the date of this approval, the Proponent shall: (a) commission a suitably qualified independent expert, whose appointment has been approved by the Secretary, to undertake a review of the existing traffic control devices on Burthong Road and Priory Tank Road, which: (i) reviews all existing traffic devices, including traffic signs, traffic signals, pavement markings, guide posts, delineators and safety barriers, and identifies any deficiencies; and (ii) recommends appropriate upgrades in accordance with the applicable AUSTROADS standards; (b) install traffic control devices in accordance with the recommendations of the review in (a), to the satisfaction of CSC.	Hera commissioned the required report and funded the installation of the required traffic controls. Installation of traffic control devices in accordance with the recommendations of the review in paragraph (a) had not been completed within 6 months of the date of the Project Approval.	This is an historical non-compliance. The works have been completed. No further action required.	Administrative non-compliance
S3.35A	Prior to commencing the transport of concentrate to the Hermidale rail siding via Nymagee-Hermidale Road, or an alternative date nominated by BSC and CSC (with respect to the works within the relevant local government area), the Proponent shall implement, or contribute to the cost of implementing the recommendations in the report titled Visual Review of Traffic Control Devices – Hera Mine to Hermidale Siding prepared by	The recommendations in the Geolyse report dated 7 May 2014 had not been implemented prior to commencing the transport of concentrate to the Hermidale rail siding via Nymagee-Hermidale Road in October 2014.	This is an historical non-compliance. The works have been completed. No further action required.	Administrative non-compliance

No.	Condition	Observation	Recommendation	Risk Level
	Geolyse Pty Ltd and dated 7 May 2014, to the satisfaction of BSC and CSC.			
S3.38	The Proponent shall prepare and implement a Traffic Management Plan. The Plan must: (a) focus on traffic management along Nymagee-Hermidale Road, Burthong Road and Priory Tank Road, particularly in the vicinity of the villages of Nymagee and Hermidale;	The Traffic Management Plan does not clearly address traffic management along Nymagee-Hermidale Road, Burthong Road and Priory Tank Road, particularly in the vicinity of the villages of Nymagee and Hermidale.	Ensure that the latest revision of the Traffic Management Plan addresses traffic management along Nymagee-Hermidale Road, Burthong Road and Priory Tank Road, particularly in the vicinity of the villages of Nymagee and Hermidale.	Administrative non-compliance
S3.40	The Proponent shall prepare a Final Hazards Analysis (FHA) for the project to the satisfaction of the Secretary, in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis.	<p>The September 2016 IER found that a Final Hazards Analysis (FHA) had not been completed. The recommendation to complete a final hazard analysis has not been actioned.</p> <p>A Preliminary Hazard Analysis (PHA) was completed by RW Corkery & Co as part of the EA (Nov. 2011) (sighted).</p> <p>Section 5.1 of the Hazardous Materials Management Plan states that "As there are no changes to the design of the Mine, the PHA is considered by Hera Resources to be sufficient to satisfy the requirement of Condition 3(40) of Project Approval whereby a Final Hazards Analysis was to be prepared".</p> <p>The previous audit in July 2013 noted: "As the Hazardous Materials Management Plan has been approved by the Director-General, YTC Hera is compliant with this condition."</p> <p>However, the 2013 audit was conducted prior to the construction and operation of the processing plant; an area where the majority of the hazardous materials are stored or used. At the time of the audit in September 2016, it was observed that there are</p>	Conduct a Final Hazard Analysis on the complete operation, in accordance with Hazardous Industry Planning Advisory Paper No. 5 – Hazard Audit Guidelines	Administrative non-compliance

No.	Condition	Observation	Recommendation	Risk Level
		hazardous goods (e.g. LNG Class 2.1) and processes (e.g. Meta Foundries – gold room) that were not identified in the original PHA.		
3.41	The Proponent shall prepare and implement a Hazardous Materials Management. The plan must: (a) be prepared in consultation with the relevant government agencies including CSC, RMS, EPA, DPI Water, WorkCover NSW and DRE;	No correspondence was available to verify that the EPA, DPI Water, DRE, CSC, RMS, or Workcover were consulted during preparation of the Plan.	Finalise the review and agency consultation for the 2019 Hazardous Materials Management Plan.	Administrative non-compliance
	(d) describe the measures that would be implemented to: (i) ensure sodium cyanide and other toxic chemicals are stored and handled on the site in accordance with AS/NZ 4452 – The Storage and Handling of Toxic Substances; and (ii) ensure the transportation of hazardous materials to or from the site is undertaken in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 11 – Route Selection and the Australian Code for the Transport of Dangerous Goods by Road and Rail – current version; and	The HMMP does not satisfy paragraph (d)(i) in that it does not specify measures in relation to the storing and handling of lead nitrate (and toxic chemical). The plan does not satisfy paragraph (d)(ii) in that it does not describe the route selection for the transportation of cyanide from its point of origin to the mine in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 11 – Route Selection.	Finalise the review and agency consultation for the 2019 Hazardous Materials Management Plan and ensure it includes the relevant requirements of AS 4452.	Administrative non-compliance
	(e) detail the emergency procedures for the Project consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1 – Emergency Planning.	The HMMP does not satisfy paragraph (e) of this condition in that it does not include all of the procedures contained in the Department's Hazardous Industry Planning Advisory Paper No. 1 – Emergency Planning.	Finalise the review and agency consultation for the 2019 Hazardous Materials Management Plan and ensure it includes the relevant	Administrative non-compliance

No.	Condition	Observation	Recommendation	Risk Level
			requirements of Department's Hazardous Industry Planning Advisory Paper No. 1 – Emergency Planning.	
S3.43	The Proponent shall prepare and implement a Waste Rock Management Plan. The plan must: (b) submitted for the approval of the Secretary within six months of this approval;	DPE approved the Waste Rock Management Plan in July 2013. The WRMP had not been prepared and submitted for the approval of the Secretary within six months of this Project Approval (audit interview).	Finalise the stake holder consultation and review the 2019 Draft Waste Rock Management Plan to ensure it covers all issues required by this Condition, consult with the relevant Authorities and seek DPIE approval for the Plan.	Administrative non-compliance
	(d) reflect the groundwater and surface water monitoring programs to monitor potentially acid-forming waste rock and any leachate generated, including appropriately designed detection and response systems for acid generation (covering monitoring methods, trigger levels and proposed management actions);	Section 4.3.2.1 in the WRMP describes the monitoring programs to monitor potentially acid-forming waste rock and any leachate generated, including appropriately designed detection and response systems for acid generation. Specific visual levels trigger proposed management actions such as pumping to the process water dam. Trigger levels for acid detection (e.g. pH levels) have not been included in the WRMP.	Finalise the stake holder consultation and review the 2019 Draft Waste Rock Management Plan to ensure it covers all issues required by this Condition, consult with the relevant Authorities and seek DPIE approval for the Plan.	Administrative non-compliance
	(e) ensure effective isolation of potential acid forming material in rock dumps;	Measures to effectively isolate potential acid forming material in rock dumps is described in section 4.3.3 of the WRMP. However, it was stated that both PAF and NAF are stockpiled in Cell 1 (PAF) which is contrary to Table 5 and the material handling flowsheet in Figure 3 of the WRMP. Risk is created when using this material as differentiation between NAF and PAF relies on visual inspection. There is a risk where PAF, instead	Finalise the stake holder consultation and review the 2019 Draft Waste Rock Management Plan to ensure it covers all issues required by this Condition, consult with the relevant Authorities and seek DPIE approval	Administrative non-compliance

No.	Condition	Observation	Recommendation	Risk Level
		of NAF, is used for other works on site (which has occurred on one occasion when PAF was used to construct a clean water drain; it was retrieved on the same day and self-reported) (audit interview and observation).	for the Plan.	
S3.46	The Proponent shall prepare and implement a Rehabilitation Management Plan. The plan must: (a) be prepared in consultation with the Department, OEH, EPA, DPI Water and CSC;	CSC has not been consulted during the preparation of the MOP (and therefore the rehabilitation action plan. The most recent version of the MOP / rehab management plan (submitted for approval on 6 Feb 2020) has been prepared in consultation with these agencies.	No action required.	Administrative non-compliance
S5.1	The Proponent shall prepare and implement an Environmental Management Strategy. The Strategy must: (a) be submitted to the Director-General for approval prior to the commencement of Mining activities;	While the first version of the EMS was approved by DPE, the current version has not been reviewed and approved by the Department. The Auditor has been advised that only the version number / date has been changed (i.e. that the plan was not changed).	Advise DPIE that the EMS has been reviewed and that no changes have been made to the document, but that the revision number and issue date have been updated.	Administrative non-compliance
	(b) provide the strategic framework for environmental management of the project;	The EMS provides a simple framework for the management of the environmental obligations associated with the Project. The framework presented in the EMS is based on ISO 14001. The framework as implemented is not sufficient to adequately manage Hera's compliance obligations under this Approval.	Implement the Environmental Management System Recommendations described in Section 7.1 of this report.	Administrative non-compliance
S5.3	The Proponent shall ensure that the Management Plans required under this approval are prepared in accordance with any relevant guidelines, and include: (b) a description of: <ul style="list-style-type: none"> the relevant statutory requirements (including any relevant approval, license or lease conditions); any relevant limits or performance 	With the exception of the MOP, EMS and TMP, current versions of the Plans (that is those that were approved by DPE and uploaded to the mine website at the time of the audit) were prepared in 2012/13. Variations to the Project Approval had been approved during that time and those modifications are in general not fully reflected in most of the plans. The Auditor has been advised that those plans have	All management plans required under this Approval (including the Environmental Management Strategy) should be thoroughly reviewed and revised to reflect changes in the approval, legislative changes and	Administrative non-compliance

No.	Condition	Observation	Recommendation	Risk Level
	measures/criteria; and · the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the project or any management measures;	now been revised the consultation / approval of those plans has commenced.	developments in environmental management standards applicable to gold mining operations.	Administrative non-compliance
	(f) a program to investigate and implement ways to improve the environmental performance of the project over time;	The plans in general do not provide a program to investigate and implement ways to improve the environmental performance of the project over time.	During the review and revision of each plan required under this Approval, develop a program to investigate and implement ways to improve the environmental performance of the project over time.	
S5.4	By the end of December each year, the Proponent shall review the environmental performance of the project. The Review must: (c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;	The Annual Reviews submitted for 2016, 2017 and 2018 did not clearly identify all non-compliances against the emission / performance criteria specified in the Project Approval and the Environment Protection Licence. For example, Section 4.3 of the 2017/18 Environmental Review states "There were several WAD Cyanide incidents during the reporting period". The non-compliances were not specifically identified, nor was there any discussion of actions taken by Hera in response to the non-compliances.	Provide full details of all non-compliances against both the Planning Approval and EPL in the Annual Review. Provide details of actions taken in relation to each non-compliance.	Administrative non-compliance
S5.5	Within 3 months of: (a) the submission of an annual review under condition 3 above; (b) the submission of an incident report under condition 5 below; (c) the submission of an audit report under	While there are a number of draft management plans, it appears that, generally, the 2012 / 13 plans are the current version in use. The review and revision of all management plans required under this Approval is overdue.	All management plans required under this Approval (including the Environmental Management Strategy) should be thoroughly reviewed and revised to	Administrative non-compliance

No.	Condition	Observation	Recommendation	Risk Level
	condition 8 below; and (d) any modifications to this approval, the Proponent shall review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the Director-General.		reflect changes in the approval, legislative changes and developments in environmental management standards applicable to gold mining operations.	
S5.11	Prior to the commencement of construction on the site, the Proponent shall: (a) make copies of the following publicly available on its website: (i) the documents referred to in condition 2 of Schedule 2; (ii) all relevant statutory approvals for the project; (iii) all approved strategies, plans and programs required under the conditions of this approval;	The documents and records required by this Condition have been uploaded to the Hera website, except for the Mining Operations Plan (note that the appendices to that plan have been uploaded.	Ensure that all required plans (including the current version of the MOP) are loaded on the corporate website.	Administrative non-compliance
ENVIRONMENTAL PROTECTION LICENCE 20179				
L2.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	The 2016/7 Annual review reported that two discharges from Licence Point 3 exceeded a number of water quality parameters identified in EPL 20179. The discharges occurred on 20 July 2016 and 16 December 2016 and were reported to the DPE, EPA and DRE.	Investigate the cause of any discharge from site that exceeds any discharge criterion and identify and implement appropriate mitigation strategies.	Medium
L2.4	Water and/or Land Concentration Limits (refer to Tables in Condition L2.4)	During the 2019 reporting year on 3 occasions the cyanide destruction circuit failed and cyanide exceeding the licence limit of 10mg/l was discharged to the process water ponds. During the 2018 reporting year concentrations of weak acid dissociable (WAD) cyanide in discharges from Licence Point 1 and Licence Point 2 exceeded	Review the investigations relating to the WAD Cyanide non-compliances to determine if there are systemic issues in relation to cyanide level management in the process water system.	Medium

No.	Condition	Observation	Recommendation	Risk Level
		limits on several occasions. During the 2017 reporting year there were two non-complaint discharges from Point 3. Water quality concentration limit exceedances following heavy storm event. Pumps were set up to empty the sediment basin to reduce the amount of water discharged.		
O3.0	All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises. All dust control equipment must be operable at all times with the exception of shutdowns required for maintenance. Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading.	The Air Quality and Greenhouse Gas Management Plan is being implemented. Appropriate dust controls are being used. However, dust deposition and PM10 measurements from the Audit Period showed elevated dust levels. It is likely that these exceedances were a result of the drought conditions being experienced and are not indicative of the impact of the mine operations.	It is recommended that Hera consider placement of additional dust deposition gauges outside the site boundaries to provide more data on background dust levels.	Low
M2.1	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: (table on page 10).	2018/19: On 5 occasions testing for Weak Acid Dissociable (WAD) Cyanide within the detox circuit when discharging to the tailings storage facility, was not undertaken. 2017/18: Licence Points 1 and 2 were not sampled during daily discharge. Sample Point 27 were not tested quarterly for electrical conductivity	Prepare a document that details all environmental monitoring required (for compliance purposes) include details of sampling location, sample type, identify person (or organisation) responsible for sampling and analysis. Set up a system to automatically notify the Environmental Manager of up-coming sampling events.	Medium
M2.3	Refer to Discharge Limit Tables in Condition M2.3 of the EPL.	2018/19: On 5 occasions testing for Weak Acid Dissociable (WAD) Cyanide within the detox circuit when discharging to the tailings storage facility, was	Prepare a document that details all environmental	Medium

No.	Condition	Observation	Recommendation	Risk Level
		not undertaken.	monitoring required (for compliance purposes) include details of sampling location, sample type, identify person (or organisation) responsible for sampling and analysis. Set up a system to automatically notify the Environmental Manager of up-coming sampling events.	
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.	The 2016/7 Annual Return was received by the EPA on 17 May 2019 (61 days after the end of the reporting period). The 2017/8 and 2018/9 Annual Returns were received within 60 days of the end of the reporting periods.	Ensure that the Annual Returns are received by the EPA within the 60-day period required by the EPL.	Administrative non-compliance
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. Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.	A review of incidents over the audit period by the Auditor confirmed that relevant incidents have been reported to the EPA Pollution Line. Written reports have subsequently been provided to the EPA. Notifications (incident reports) were provided to the EPA on: - 4 January 2017 (incident 16 December 2016) sediment laden discharge during storm event from Point 3. The incident was reported on 4 January 2017. The delay in reporting related to the time required for off-site sample analysis.	Hera has submitted the required incident reports to the EPA, however due to delays, usually associated with lab testing, the 7-day reporting requirement has not been met. It is recommended that Hera request a modification to this EPL condition to modify the 7-day written report requirement to provide sufficient time for lab analysis to be completed.	Administrative non-compliance
MINING LEASE 1686				

No.	Condition	Observation	Recommendation	Risk Level
2(a)	The lease holder must implement all practicable measures to prevent and/or minimise any harm to the environment that may result from the construction, operation or rehabilitation of any activities under this lease.	As a result of two (self-reported by Hera) leaks of contaminated water, the EPA issue a Clean Up Notice and subsequently in response to their assessment that these incidents evidenced potential or actual Material Harm and were therefore potential breaches of Sections 64, 12 and 142A of the POEO Act.	The clean-up actions relating to the incidents have been completed - there are no further actions required.	Medium

7. Independent Audit Post Approval Requirements

This audit focused on the pre-operational compliance requirements established by the Conditions of Approval. While the scope of the audit, as specified in the Conditions of Consent do not refer specifically to the DPIE Independent Audit Post Approval Requirements (DPIE, June 2018), for completeness the Audit has, where possible made an assessment of the environmental performance of the project.

7.1 Project Environmental Management System

During the audit forty-two environmental non-compliances were identified. The range of non-compliances suggests that full implementation of the Environmental Management Plan and therefore the relevant environmental elements of the Hera Business Management System have not been consistent. The Auditor reviewed the systems in place to manage environmental compliance at the mine and the following general observations were made:

- Hera does not operate under a formal, documented (ISO 14001 compliant) Environmental Management System (EMS).
- A computer based environmental record keeping system (INX database) is utilised.
- Environmental records are maintained by the Environmental Advisor on site server file system (O: Drive). However, some historical environmental compliance records were not able to be located during the audit.
- In general compliance requirements are communicated to operational personnel through toolbox sessions. There is no formal "environmental awareness training provided to operational personnel. Environment is mentioned in the surface work induction. The environmental content of the induction is modest and does not, except for spill management mention responsibilities (for either management, supervisors or staff / contractors). It mentions that all plans need to be adhered to but gives no actual guidance.
- Documented operational procedures exist, however there are very few environmental management procedures in place.
- Effective signage is used around the site, for example to show workers where to disposed of wastes.
- A centralised incident register has not been developed, however records of incidents were saved on the O: Drive. A standard incident reporting form has met been developed (but could be reported via on-line safety management system).
- The Hera JSEA that is used at Hera does not cover environment specifically.

The site employs a full-time environmental advisor who is supported by the Group Manager - Environment. While the General Manager understands the need for effective environmental management and is supportive, the responsibility for day to day environmental management falls to the environmental advisor. If the environmental advisor identifies an issue, that issue is addressed. However, the general level of environmental awareness across operational personnel is limited and as there is limited environmental related procedural documentation, and therefore, the potential for non-compliances remains.

It is therefore recommended that Hera develop and implement, as an integral part of the Business Management System, a formal, documented environmental system covering for example:

- Establishment of environmental objectives and targets,
- Environmental hazard and risk identification.
- Environmental procedures, including spill management (where appropriate these should be integrated into the existing operational procedures.

- The identification of environmentally related roles and responsibilities that would be integrated into existing role / responsibility documentation.
- Centralised incident (including complaints) register and standardised incident reporting and investigation forms and procedure.
- Environmental checklists and internal reporting processes.
- Environmental Awareness and Training needs.
- Environmental Record keeping requirements (including record retention policy).

7.2 Implementation of the Operational Environmental Management Plan and Sub-plans

The Conditions of Approval required the preparation and implementation of the following management plans:

1. Aboriginal Cultural Heritage Management Plan.
2. Air Quality and Greenhouse Gas Management Plan.
3. Blast Management Plan.
4. Biodiversity Management Plan, that includes the Biodiversity Off-set Strategy.
5. Environment Management Strategy.
6. Hazardous Materials Management Plan.
7. Mine Operations Plan.
8. Traffic Management Plan.
9. Waste Rock Management Plan.
10. Water Management Plan.

During the document review phase of the project the contents of each of the plans was reviewed. Most plans were prepared in 2012 and 2013 and are now dated and should be thoroughly reviewed and revised to ensure that the contents are up to date and meet all of the requirements of the Project Approval. In addition, the revision tables in the existing plans are not consistent and the Audit suspects that some of the version tables are not accurate.

7.3 Status of Previous IEA Findings

The previous audit was completed in September 2016. Table 6 lists each non-compliance identified during the 2016 Audit and the status of those non-compliance. Of the fifty-eight non-compliances recorded in the 2016 Independent Environmental Audit, forty-six have been actioned and closed, while twelve remain open. Note that those outstanding non-compliances are included in the detailed compliance table presented in Appendix B.

Table 6 - Status of 2016 Audit Findings

Condition	Detail	Status	Auditor Comments
Planning Approval 10_0191 (Consolidated)			
Schedule 2 Condition 2	Terms of Approval – Stockpile Heights - Based on the survey and visual inspection by the auditor, the height of the Waste Rock Emplacement (WRE) above the original hill slope exceeded the indicative height of 10 metres referred to in the EA.	OPEN	The most recent survey (3 May 2019) identified that the stockpile height again exceeded the 10m limit.
Schedule 2 Condition 7	Limits on Approval - Hours of Operation- Minor Non-compliance: Hera identified some instances of non-compliance in relation to the transportation times for concentrate trucks (refer to letters of 4 August 2016 from Aurelia to the DPE and RMS).	CLOSED	Original issue was a misunderstanding of the conditions, this was dealt with in communications with transport company and the Drivers code of conduct. One instance occurred during the Audit Period (2017). The requirement is now covered in Drivers Code of Conduct.
Schedule 2 Condition 8	Structural Adequacy - Minor Non-compliance: Occupation Certificates for Construction Certificates 17.2/2014, 17.3/2014 and 379/2013 (part) were not able to be produced at the time of this audit in September 2016.	CLOSED	The outstanding certificates have been provided during this audit.
Schedule 2 Condition 11	Operation of Plant and Equipment - Minor Non-compliance (historical): A cyanide spillage incident in September 2014 (Incident Report 000379 of 27 September 2014 relating to a leaking sump in Area 50-55 which allowed cyanide tainted water to escape the bund) resulted in a clean-up notice from the EPA (health and safety).	CLOSED	No cyanide spills have occurred since the 2014 spill. The cleanup required under the EPA cleanup notice was completed.
Schedule 2 Condition 15	Road Maintenance Contributions - Potential Non-compliance: A payment advice of \$10,000 for a Bogan Shire Council (BSC) tax invoice dated 30/6/2015 was sighted. However, the reason for the payment could not be verified. Compliance with this condition could not be verified.	CLOSED	The Nymagee – Hermidale Road was fully sealed by mid-2018. Contributions after that time are no longer required under this Condition. Records of payment of the contribution (email from Bogan Shire Council) confirm that the require payment have been made.

Condition	Detail	Status	Auditor Comments
Schedule 3 Condition 12	Air Quality and Greenhouse Gas - Air Quality Criteria - (historical): Raw depositional dust data (Excel spreadsheet Data Summary DDG) for the audit period (July 2013 to September 2016) was reviewed. Eleven exceedances of the 4 g/m2/month deposition rate criteria for insoluble solids were recorded. There appeared to be no recording of dust deposition compared to the Maximum increase in deposited dust level criteria of 2 g/m2/month.	n/a	This reported non-compliance does not correlate with the finding in the main compliance table in the 2016 Audit Report entry for this condition.
Schedule 3 Condition 14	Air Quality and Greenhouse Gas - Potential Non-compliance: There was no evidence of documented procedures to address paragraph (c) of this condition. For example, the AQGGMP does not describe specific measures to be taken or SWIs to be followed to minimise the air quality impacts of the project during adverse weather conditions and extraordinary events.	OPEN	AQGCMP has been revised but has not be submitted for approval. With the approval of Mod 5, the revised plans will be submitted.
Schedule 3 Condition 18	Soil and Water - Water Discharges - Non-compliance: Three surface water discharges from the sediment basin (SB1), which exceeded the EPL quality parameters (for License Point 3), have occurred in the 12 months prior to this audit. The discharges occurred on the 1-2/11/2015 (incident report 581 sighted), 9/05/2016 (incident report 645 sighted) and 20/07/2016 (incident report 669 sighted).	CLOSED	The sedimentation basin has been expanded. See EPL documentation letter 17609 (EPL E1.1/ E1 Special Conditions/2017). Plus, letter in EPL E1.1/2017 letter report from EMM)
Schedule 3 Condition 19	Soil and Water - Water Discharges Exceedances of the 10 mg/1 WAD occurred on consecutive days from the 4-9/05/2015. Another exceedance occurred on the 20-21 /06/15 (incident reported 000531 sighted as well as email notifying relevant authorities). It was stated that a failsafe system was introduced in the processing plant after last exceedances in 2015 which prevents the discharge of elevated WAD solutions in the event the cyanide destruct process fails. A closed incident report was sighted, however, there was no evidence that recommendations had been undertaken and signed off.	OPEN	Further non-compliances have been occurred during the current audit period. There have been several suspected causes to the continued exceedances. The limit set the PA and EPL is very low (WAD 10mg / l). This is not consistent with the Cyanide Code WAD limit of 50 mg/l). <i>The Auditor recommends that Hera seeks to have the PA and EPL modified to meet the standard set in the Cyanide Code.</i>
Schedule 3 Condition 20	Soil and Water- Water Discharges - At the time of this audit in September 2016 Hera was non-compliant with this condition in the following respects: 1. An exceedance of the 20 mg/1 WAD occurred on consecutive days from the 4-7/05/2015 (incident reported 000503 sighted as well as email notifying relevant authorities). Preliminary findings indicated that there was a flaw in the control system that could allow barren solution to be discharged to the process water dam. There was no evidence that recommendations had been undertaken and	OPEN	Further non-compliances have been occurred during the current audit period. There have been several suspected causes to the continued exceedances. The limit set the PA and EPL is very low (WAD 10mg / l). This is not consistent with the Cyanide Code WAD limit of 50 mg/l). <i>The Auditor recommends that Hera seeks to have the PA and EPL modified to meet the standard set in the Cyanide Code.</i>

Condition	Detail	Status	Auditor Comments
	signed off. 2. Up until the time of this audit in September 2016, an incorrect sampling point had been utilised (i.e. the process water dam instead of the discharge point of the thickener overflow to the process water dam).		
Schedule 3 Condition 22	Soil and Water - Design and Permeability of Storages – Partial Non-compliance: In relation to paragraph (a) of this condition it was noted the process water dam and leachate management pond were lined with HDPE. A subcontractor's warranty (for the HOPE installation) dated 25 August 2013 was sighted, however, at the time of this audit in September 2016 there was no evidence of permeability testing having been undertaken for either structure (e.g. HOPE weld quality control results).	OPEN	The leachate management system ponds are lined with 2 mm HDPE. The QA reports associated with the construction of the ponds does not certify the permeability of the liners.
Schedule 3 Condition 23	Soil and Water- - Design and Permeability of Storages – Partial Non-compliance: No evidence was available at the time of this audit in September 2016 to verify that the construction met the design requirements to prevent the probable maximum flood from the catchment upstream of the facility from entering the facility.	CLOSED	A freeboard of at least 200mm is to be achieved as a minimum operational condition allowing capacity to capture the 100-year 72-hour design rainfall event (GHD: July 2016: Water Management Plan). Currently the process water dam height set point is controlled at 80%.
Schedule 3 Condition 24	Soil and Water- Design and Permeability of Storages- It could not be verified that the height set control level of 80% relates to a freeboard of 200mm.	CLOSED	Alarm set at 90%, pond marker showing 300mm free board has been installed.
Schedule 3 Condition 25	Soil and Water - Water Management Plan –There is no evidence of the WMP having been submitted to the DPE within the required six-month timeframe (or at all). In addition, in relation to paragraph (a) of this condition there was no evidence that comparisons of the site water balance for each calendar year are included in reporting.	OPEN	Correspondence verifying that the original plan was submitted to DPE / DPI was not sighted during the Audit.
Schedule 3 Condition 26	Biodiversity - Biodiversity Offset Strategy - At the time of this audit in September 2016 a Biodiversity Offset Strategy for the project had not been prepared to the satisfaction of the Secretary.	OPEN	A biodiversity management plan was prepared. The draft Biodiversity Management Plan incorporating a Biodiversity Offset Strategy was submitted to DPE by email (sighted) on 15 July 2016. Subsequent delays in relation to the off-set strategy and bio banking agreements resulted in delays in finalisation of the plan.
Schedule 3 Condition 27	Biodiversity - Biodiversity Offset Strategy – At the time of this audit in September 2016 the draft Biodiversity Offset Strategy had not been approved by the Secretary despite the deadline of 31 July 2016 in Condition 26 of this Schedule. Therefore, satisfactory implementation of a Biodiversity Offset Strategy has potentially been delayed.	OPEN	A biodiversity management plan was prepared. The draft Biodiversity Management Plan incorporating a Biodiversity Offset Strategy was submitted to DPE by email (sighted) on 15 July 2016. Subsequent delays in relation to the off-set strategy and bio banking agreements resulted in delays in finalisation of the plan.
Schedule 3	Biodiversity- Long Term Security- Potential Non-compliance: At the	Not	The biodiversity plan has not yet been approved.

Condition	Detail	Status	Auditor Comments
Condition 28	time of this audit in September 2016 the draft Biodiversity Offset Strategy had not been approved by the Secretary despite the deadline of 31 July 2016 in Condition 26 of this Schedule. Therefore, the making of suitable arrangements to conserve the offset area identified in the draft Biodiversity Offset Strategy in perpetuity has potentially been delayed.	Triggered	
Schedule 3 Condition 29	Biodiversity - Biodiversity Management Plan - Non-compliance: At the time of this audit in September 2016 a final Biodiversity Management Plan for the project had not been submitted to the Secretary for approval	OPEN	A biodiversity management plan was prepared. The draft Biodiversity Management Plan incorporating a Biodiversity Offset Strategy was submitted to DPE by email (sighted) on 15 July 2016. Subsequent delays in relation to the off-set strategy and bio banking agreements resulted in delays in finalisation of the plan.
Schedule 3 Condition 30	Biodiversity - Biodiversity Management Plan – Potential Non-compliance: At the time of this audit in September 2016 the draft Biodiversity Offset Strategy had not been approved by the Secretary despite the deadline of 31 July 2016 in Condition 26 of this Schedule. Therefore, Hera's submission of an updated Biodiversity Management Plan to the Secretary has potentially been delayed beyond 31 January 2017 (i.e. 6 months after 31 July 2016).	Not Triggered	The biodiversity plan has not yet been approved.
Schedule 3 Condition 31	Biodiversity- Conservation Bond - Potential Non-compliance: At the time of this audit in September 2016 the final Biodiversity Management Plan had not been submitted to the Secretary for approval in accordance with Condition 29 of this Schedule. Therefore, lodgment of the required conservation bond with the DPE has potentially been delayed.	Not Triggered	The biodiversity plan has not yet been approved.
Schedule 3 Condition 34	Transport - Road Upgrades - Non-compliance (historical): Intersection design and pavement upgrades had not been undertaken in accordance with the recommendations of the review within 6 months of the date of the Project Approval.	CLOSED	Works have been completed
Schedule 3 Condition 35	Transport - Road Upgrades - Non-compliance (historical): Installation of traffic control devices in accordance with the recommendations of the review in paragraph (a) had not been completed within 6 months of the date of the Project Approval.	CLOSED	Works have been completed
Schedule 3 Condition 35A	Transport - Road Upgrades - Minor Non-compliance (historical): The recommendations in the Geolyse report dated 7 May 2014 had not been implemented prior to commencing the transport of concentrate to the Hermidale rail siding via Nymagee-Hermidale Road in October 2014.	CLOSED	Council hasn't requested money Council have written to Hera stating that this condition will not be relevant when Mod 5 is approved.
Schedule 3	Transport- Transport of Concentrate to Hermidale Rail Siding - Minor Non-compliance: The transport of concentrate to the Hermidale rail	CLOSED	Original issue was a misunderstanding of the conditions, this was dealt with in communications with transport company and the

Condition	Detail	Status	Auditor Comments
Condition 37A	siding via the Nymagee Hermidale Road was outside of daylight hours on 12 occasions during the period 30/06/2015- 20/06/16.		Drivers code of conduct. One instance occurred during the Audit Period (2017). The requirement is now covered in Drivers Code of Conduct.
Schedule 3 Condition 38	Transport - Traffic Management Plan - Non-compliance: At the time of this audit in September 2016 the Traffic Management Plan (TMP) had not been updated to include traffic management along Nymagee-Hermidale Road, and there was no evidence that it had been developed in consultation with both BSC and CSC or been submitted to the Secretary for approval prior to carrying out any development on the site.	CLOSED	Management plan and code of conduct were approved on the 14 November 2017. (refer letter from DPE and management plan sent by email today). Evidence of consultation with Council was sighted. NOTE IS A NON-COMPLIANCE AGAINST CONDITION 38 (c)
Schedule 3 Condition 40	Hazardous Materials - Final Hazard Analysis - At the time of this audit in September 2016 a Final Hazards Analysis (FHA) had not been completed.	OPEN	A Preliminary Hazard Analysis (PHA) was completed by RW Corkery & Co as part of the EA (Nov. 2011) (sighted). Section 5.1 of the Hazardous Materials Management Plan states that "As there are no changes to the design of the Mine, the PHA is considered by Hera Resources to be sufficient to satisfy the requirement of Condition 3(40) of Project Approval whereby a Final Hazards Analysis was to be prepared". The previous audit in July 2013 noted: "As the Hazardous Materials Management Plan has been approved by the Director-General, YTC Hera is compliant with this condition." However, the 2013 audit was conducted prior to the construction and operation of the processing plant; an area where the majority of the hazardous materials are stored or used. At the time of the audit in September 2016, it was observed that there are hazardous goods (e.g. LNG Class 2.1) and processes (e.g. Meta Foundries – gold room) that were not identified in the original PHA.
Schedule 3 Condition 41	Hazardous Materials - Hazardous Materials Management Plan - At the time of this audit in September 2016 the current Hazardous Materials Management Plan (HMMP) (Revision 2 of 9 April 2013) had not been updated to include the observations from the previous July 2013 audit. The HMMP is non-compliant in several respects.	OPEN	The current version of the plan does not satisfy all of the requirements of this Condition.
Schedule 3 Condition 42	Waste - At the time of this audit in September 2016 the following issues were identified in relation to the Village Sewage System and the Office Sewage System. In relation to the Village Sewage System, a walkover of the area revealed effluent pooling underfoot in numerous areas, absence of warning signs and delineation and possible recreational use of the area by employees. In relation to the Office Sewage System, effluent runoff was observed at the disposal	CLOSED	Signage sighted No effluent run-off observed. Council construction certificate (emailed) saying designed in accordance with Australian Standards were sighted.

Condition	Detail	Status	Auditor Comments
	area in front of the offices and pending was evident in the spray irrigation area.		
Schedule 3 Condition 43	Waste - Waste Rock Management Plan - The WRMP does not comply with paragraphs (b), (c), (d), (e) and (k) of this condition.	OPEN	The current version of the plan does not satisfy all of the requirements of this Condition.
Schedule 3 Condition 44	Rehabilitation - Condition 44- Rehabilitation Objectives - Non-compliance: The rehabilitation objectives in section 4.3.4 of the RMP do not correspond with the objectives in Table 7 of this condition. For example, the RMP does not address the third dot point in the Mine Site (as a whole) feature of Table 7.	Closed	A plan was prepared in 2013, but the regulator has agreed that the MOP can be used as the rehab plan. The 2013 plan has therefore been superseded.
Schedule 3 Condition 46	Rehabilitation - Rehabilitation Management Plan - Partial Noncompliance: The RMP does not comply with paragraphs (b), (d) and (g) of this condition.	Closed	The current version of the plan satisfies the content requirements of this Condition.
Schedule 4 Condition 2	Notification of Landowners - For the period between the compliance audit in July 2013 and December 2014 (when Hera's current Environmental Officer commenced employment), it could not be verified that Hera notified or sent information to affected landholders and tenants under this condition when exceedances occurred (for example, the historical non-compliance for dust deposition referred to in Schedule 3 Condition 12).	Closed	No reports have been made to any landowner during this reporting period. No dust incidents have impacted any residents during this audit period. From 2018 no residents were notified of specific exceedances because of wind direction.
Schedule 5 Condition 1	Environmental Management Strategy- Partial Non-compliance: Section 5.2 of the strategy includes a list of strategies, plans and programs approved under the conditions of this approval; however, the plans are not included in the strategy document.	Closed	All plans are loaded onto the company website.
Schedule 5 Condition 3	Management Plan Requirements - The Management Plans referred to below do not comply with the paragraphs (a) and (g) of this condition.	OPEN	RMP has been reviewed (that is now the MOP). The current version of the plan does not satisfy all of the requirements of this Condition.
Schedule 5 Condition 5	Revision of Strategies Plans and Programs - Reviews are not being undertaken within three months of the submission of an Annual Review.	OPEN	Plans have not been reviewed and updated (and subsequently approved by Planning
Schedule 5 Condition 6	Community Consultative Committee - Non-compliance (historical): The first meeting of the CCC was held on Thursday 14 February 2013 at the Hera Mine, which was just outside the 6-month timeframe after the Project Approval of 31 July 2012.	CLOSED	No actions. CCC is operational
Schedule 5 Condition 7	Incident Reporting - Minor Non-compliance: As noted in relation to EPL Condition R2.2, Hera has not complied with the 7-day timeframe in relation to all reported incidents.	OPEN	Will be modified in Mod 5 to rectify the 7 days from incident to 7 days from becoming aware of the incident. This condition is not achievable because of the time frame for, for example the receipt

Condition	Detail	Status	Auditor Comments
			of lab data that could take more than a week to receive.
Schedule 5 Condition 8	Regular Reporting - Minor Non-compliance: The most recent AEMR (from 16 May 2015 to 15 May 2016) is not Aurelia's website at the time of this audit in September 2016. The link on Aurelia's website to	CLOSED	Is now on the website.
Schedule 5 Condition 11	Access to Information - Hera has not complied with aspects of sub-paragraphs (iii), (vi) and (vii) in paragraph (a) of this condition.	OPEN	The documents and records required by this Condition have been uploaded to the Hera website, except for the Mining Operations Plan (note that the appendices to that plan have been uploaded.
Environment Protection License 20179			
L2.1	Since the previous compliance audit in July 2013 three of the four points in the Table for Condition L2.4 have recorded exceedances.	OPEN	The 2016/7 Annual review reported that two discharges from License Point 3 exceeded a number of water quality parameters identified in EPL 20179. The discharges occurred on 20 July 2016 and 16 December 2016 and were reported to the DPE, EPA and DRE.
L 4.6	Noise monitoring is being conducted closer to the Hera Mine than the R1, R2, R3 and R4 locations.	CLOSED	The sampling locations and sampling procedures used by Hera's noise consultants meet the requirements of the EPL.
L4.8	The modification factors in Section 4 of the NSW Industrial Noise Policy may not have been applied to data in the Monthly Noise Monitoring spreadsheet since March 2014.	CLOSED	From 2017 noise consultant has been commissioned. EMM have undertaken the monitoring in accordance with this Condition.
O1.1	(historical): A cyanide spillage incident in September 2014 (Incident Report 000379 of 27 September 2014 relating to a leaking sump in Area 50-55 which allowed cyanide tainted water to escape the bund) resulted in a clean-up notice from the EPA (health and safety).	CLOSED	Investigated and closed out.
02,1	Minor Non-compliance (historical): A cyanide spillage incident in September 2014 (Incident Report 000379 of 27 September 2014 relating to a leaking sump in Area 50-55 which allowed cyanide tainted water to escape the bund) resulted in a clean-up notice from the EPA (health and safety).	CLOSED	Investigated and closed out.
04.1	At the time of this audit in September 2016 Hera was non-compliant with this condition in the following respects: 1. Hera could not verify that the cyanide plant bunding had been built to the AS4452: 1997 as per the design. 2. No bunding was observed in the (uncovered) concentrate loading area to ensure any concentrate spillage was returned via a sump to the process or to prevent any concentrate runoff to the surrounding environment.	CLOSED	Section 5.8 of the HMMP lists the cyanide controls to be used which are consistent with the International Cyanide Management Code for the Manufacture, Transport and Use of Cyanide in the Production of Gold (the Code).

Condition	Detail	Status	Auditor Comments
M2.1	The interval between testing at point 24 (13 November 2014 and 20 January 2016) exceeded the yearly frequency required under this condition and EPL Condition M2.2.	CLOSED	The sampling is done annually in accordance with this condition
M2.2	The interval between testing at point 24 (13 November 2014 and 20 January 2016) exceeded the yearly frequency required under this condition and EPL Condition M2.1.	CLOSED	The sampling is done annually in accordance with this condition
M2.3	At the time of this audit in September 2016 the WAD sample for Point 2 (discharge to Process Water Dam (WQTP1)) has been incorrectly sampled from the PWD instead of the discharge point to the PWD.	CLOSED	Samples now taken from the pipe (the discharge point)
R1.5	Hera was unable to produce eConnect EPA or registered post receipts for the submission of signed original copies of the Annual Return, supplied to the EPA for any of the reporting periods.	CLOSED	EPL Reports are now all submitted on-line. The EPA's Public Register lists the submission date of all reports
R2.1	(historical): At the time of this audit in September 2016, no evidence was available of any earlier notifications to the Environment Line service.	CLOSED	All incidents are now reported to the EPA Pollution Line.
R2.2	Written details of four incidents were not notified to the EPA within the required period of 7 days.	OPEN	Notifications (incident reports) were provided to the EPA on: - 4 January 2017 (incident 16 December 2016) sediment laden discharge during storm event from Point 3. The incident was reported on 4 January 2017. The delay in reporting related to the time required for off-site sample analysis.
R3.1	It could not be verified during this audit of September 2016 that Hera sent the validation report (Hera Project, Effectiveness of Clean-Up Report Stage 2 and 3, Electrical Conduit and Bund 50 Area) dated 27 October 2014 to the EPA by the EPA's deadline of COB 6 November 2014.	CLOSED	EPA issued a caution notice that closes out this issue – review (emailed) and the EPA has accepted that the cleanup was done and validated.
G2.1	Hera was not able to demonstrate that each monitoring and discharge point was marked by a sign that indicates the EPA point identification number.	CLOSED	An inspection during the audit checked 10 points and all were labelled.
U2.1 Pollution Studies	Rehabilitation Plan - Minor Non-compliance: Hera's proposal does not address various requirements of this condition.	CLOSED	These PRP requirements were removed from the license by the EPA.
Mining Lease ML1686			
1	(historical): Although Hera Resources Pty Ltd is a wholly owned subsidiary of Aurelia Metals Limited, a literal reading of this condition required Hera to have served a notice in writing on Aurelia regarding	CLOSED	The previous auditor's finding was incorrect. The intent of this condition relates to landholders other than the proponent.

Condition	Detail	Status	Auditor Comments
	the grant of the lease.		
2	As noted in relation to Conditions R3.1, R3.2 and R3.3 of the EPL, since the previous audit in July 2013 there has been an incident which could have caused harm to the environment.	CLOSED	Check EPL licence condition finding
3	The current approved MOP does not include the area approved for mining operations in Project Approval MOD 3. The carrying out of mining operations in the MOD 3 approved disturbed area would mean Hera is non-compliant with the current approved MOP, which limits mining operations to the DRE approved area.	CLOSED	Actions related to the incidents reported have been closed out.
5	Hera's incident report form does not have a field to record any actions that have, or will be, taken to prevent similar incidents from occurring in the future. Incident Report 000379 refers to a detailed investigation report, which may or may not contain this information.	CLOSED	The Auditor has reviewed the reported environmental incidents and licence exceedances (WAD and PM10 dust) for the Audit Period. The review of the correspondence provided indicates that all exceedances were reported to DPE, DRE, EPA and where required to Council.

7.4 Specialist Auditor Reports

No specialist auditor reports were prepared as part of this audit.

7.5 Operational Environmental Impacts

The assessment of actual impacts against those predicted in the EIS, prepared by RW Corkery, titled "*Environmental Assessment Major Project Application No 10_0191*" dated November 2011, are provided in Table 7. The actual impacts of the operations are taken from the 2019 AEMR.

Table 7 - Predicted vs Actual Impacts

Category	Predicted Impact	Actual Impact
Fauna	Project Impacts on threatened species is unlikely to be significant.	Fauna observations have decreased over the past decade. This decline was not considered significant (as per the 2019 AEMR). An overall downward trend is visible in the total fauna species seen since 2010 however this was noted to be likely linked to a decline in rainfall since 2010 rather than an increase in disturbance.
Flora	The Project would disturb approximately 77ha of land within the Project Site. No significant environmental impacts to threatened species, communities or populations of flora or fauna, due to the Project would occur.	Flora results were less diverse than 2017 monitoring results at both Hera and Chelsea Property, which were in turn less diverse than the 2016 monitoring results. Annual differences in species diversity were mainly due to changes in the composition of lower stratum perennial and annual herbs, forbs and grasses. Upper and mid stratum species generally remain stable and change gradually over longer time periods than lower stratum species. A severe drought is believed to be the primary factor responsible for the reduced number of lower stratum species compared to previous years.
Groundwater	The Project has the potential to impact on standing water levels within a single non-Project related registered bore (GW017386).	Hera has commenced negotiations with the impacted landowner regarding the reduction on groundwater levels in their bore. No other groundwater issues were identified during the audit.
Surface Water	<ol style="list-style-type: none"> 1. With the proposed sediment and erosion measures in place it is unlikely the Project would have the potential to adversely impact on the water quality of the receiving waters. 2. Negligible impacts associated with the final landform are envisaged since all created 	<ol style="list-style-type: none"> 1. No adverse impacts from sediment laden water have been detected from the mining operation. 2. No adverse impacts related to landform (ie significant erosion) were observed by the Auditor.

Category	Predicted Impact	Actual Impact
	<p>landforms would be stabilised in accordance with Landcom (2004) requirements.</p> <p>3. No adverse impacts associated with wastewater, generated within the Surface Facilities Area and the Mine Camp, would result since the wastewater would be treated appropriately and disposed of in designated irrigation areas.</p> <p>4. There would be no offsite discharges of contaminated water because the processing water and tailings water would be contained within appropriately constructed areas and surface water (and groundwater) monitoring would identify any leakage early, enabling the issue to be rectified.</p> <p>5. With the proposed mitigation measures in place it is concluded that the Project would not have a measurable detrimental impact on the surface water quality or quantity of the receiving waters downstream from the Project Site.</p>	<p>3. No adverse impacts from the disposal of camp and surface works sewage treatment have been detected.</p> <p>4. No adverse impacts from the management of process waters have been detected. Note that exceedances with WAD Cyanide have been detected, however no adverse environmental impacts have been detected.</p> <p>5. No adverse impacts from water discharges from the operations have been detected.</p>
Noise and Blasting	<p>1. The site establishment, operational and sleep disturbance predicted noise levels at the four nearest receivers are below the relevant criterion.</p> <p>2. The peak vibration velocities and peak blast over pressures at the closest residential property will be well below the relevant criteria.</p>	<p>1. No noise exceedances have been detected over the last two audit periods. Therefore, the Auditor concludes the operational noise levels are generally in accordance with the predictions in the EIS.</p> <p>2. The blasting assessment undertaken as part of the EA (Spectrum Acoustics, 2011) predicted that for receptor R3 (nearest receptor to the box cut) the peak vibration would be 0.1 mm/s. The majority of the blast vibration results (92%) were below this prediction. Additionally, Spectrum Acoustics (2011) predicted that for receptor R3 that the peak blast overpressure would be 105 dB. The majority of the blast overpressure results during the reporting period (99%) were below this prediction.</p>
Aboriginal Heritage	<p>Since no Aboriginal sites or objects were recorded during the EIA assessments and no area within the Project Site has been assessed as holding archaeological potential it has been concluded that there will be no impact to cultural heritage arising from the Project.</p>	<p>No aboriginal heritage impacts have been identified.</p>

Category	Predicted Impact	Actual Impact
European Heritage	The Project is unlikely to impact upon any items of historical heritage significance.	No European heritage impacts have been identified.
Air Quality and Greenhouse Gas	<ol style="list-style-type: none"> 1. The incremental and cumulative dust deposition levels as a result of the Project will satisfy the relevant criteria at all selected receptor locations. 2. The cumulative PM10 concentrations will be less than the applicable NSW criterion at all receptor locations. 3. The operation of the Project is expected to generate approximately 48 558t CO2-e annually (Scope 2 Emissions). 	<ol style="list-style-type: none"> 1. Dust deposition measurements from the Audit Period showed elevated dust levels. It is likely that these exceedances were a result of the drought conditions being experienced and are not indicative of the impact of the mine operations. 2. PM10 measurements from the Audit Period showed elevated dust levels. It is likely that these exceedances were a result of the drought conditions being experienced and are not indicative of the impact of the mine operations. 3. The 2017-2018 greenhouse gas emission data was comparable (within 5%) to the predictions made in the EA
Traffic and Transport	<ol style="list-style-type: none"> 1. There would be adequate vehicle access and parking within the Project Site. 2. The proposed heavy vehicle transportation route is designated for road trains and the additional heavy vehicle traffic generated by the Project would not have an unacceptable impact upon the operation of the roads along that route. 	<ol style="list-style-type: none"> 1. Sufficient on-site parking has been provided. 2. No more than eight vehicle movements (entering and leaving the site) per day, averaged over a calendar month. The EIA modelling predicted up to 12 truck movements daily.
Soils	The impacts of the Project on the soils to be disturbed within the Project Site are considered to be insignificant.	No significant impact on soils has been identified.
Visual Amenity	The Project would not impact significantly on the visual amenity surrounding the Project Site.	The operations are not visible from any public road or private residence.
Bushfire	The Project is unlikely to increase the fire hazard rating of the Project Site and the surrounding areas.	No bushfires have started on the mine site.
Waste	<ol style="list-style-type: none"> 1. It is unlikely that any potentially contaminating solid waste would enter the surrounding environment. 2. It is unlikely that any contamination of downstream local waterways, aquatic habitats and groundwater with hydrocarbons, litter and acid mine drainage would occur. 3. It is unlikely that any degradation of visual 	<ol style="list-style-type: none"> 1. There is no evidence that potentially contaminating materials have entered the surrounding environment. 2. There is no evidence that contamination of downstream waterways or other off-site locations has occurred. 3. No off-site litter was observed during the audit.

Category	Predicted Impact	Actual Impact
	amenity of the surrounding environment through litter dispersal from the Project Site and improper management of waste within the Project Site.	

Compliance Table

Appendix A

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S2.1	Terms of Approval	The Proponent shall implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation or rehabilitation of the project.	1. EPA Show Cause Notice relating to cyanide contaminated water leaks, EPA Reference 1580504, dated 13 June 2019. 2. EPA Clean-up Notice 157818.			As a result of two (self reported by Hera) leaks of contaminated water, the EPA issue a Clean Up Notice and subsequently in response to their assessment that these incidents evidenced potential or actual Material Harm and were therefore potential breaches of Sections 64, 12 and 142A of the POEO Act.	Non-Compliance	The clean-up actions relating to the incidents have been completed - there are no further actions required.
S2.2		The Proponent shall carry out the project generally in accordance with the: (a) EA; and (b) conditions of this approval.	1. Email from S.Heinrich (Senior Surveyor) to M Williams (Senior Environmental Advisor) titled " <i>Waste Pad Over Height</i> ", dated 3 May 2019. The email notified the Environmental Advisor that the survey of the stockpile had confirmed that the stockpile height had been exceeded.	1. J. Thompson 29 November 2019. An exceedance in stockpile height occurred in May 2019.	1. The stockpile is not visible from any adjacent properties or public roads.	During the Audit period, the Waste Rock stockpile height exceeded the 10m height limit. The Auditor notes that the proposed Modification 5 seeks to increase the Waste Rock stockpile height to 15m. It is the Auditor's view that an increase in stockpile height will not result in an additional impact on the environment.	Non-Compliance	Ensure that the waste rock dump height is maintained below the approved height.
S2.3		If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this approval shall prevail to the extent of any inconsistency.					Noted	
S2.4		The Proponent shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of: (a) any reports, plans, programs or correspondence that are submitted in accordance with this approval; and (b) the implementation of any actions or measures contained in these reports, plans, programs or correspondence.	1. Correspondence related to an exceedance of the bench heights of the tailing storage facility (in early 2016) and subsequent correspondence with DPE indicating that the issue had been dealt with. This correspondence related to an incident in 2016. No further records of directions from DPIE were identified.	1. J. Thompson 29 November 2019. No directions were received from DPIE during the audit period.		No directions for action (to be taken) were found relating to directions from DPE	Not Triggered	
S2.5	Mining Operations	The Proponent may carry out Mining operations on the site until 31 December 2022.				Administrative Statement	Noted	
S2.6	Ore Extraction and Processing	The Proponent shall not: (a) process more than 505,000 tonnes of ore from the site in any calendar year. (b) transport more than 50,000 tonnes of concentrate from the site in any calendar year.	1. Aurelia Metals Limited 2017 Annual Report 2. Aurelia Metals Limited 2018 Annual Report 3. Hera Annual Review 2019	1. J. Thompson 20 November 2019. The mine has not exceeded the ore processing or concentrate transport limits during the audit period.		The corporate annual reports and Annual Reviews provide a summary of production data for each year. These were: 2017 Financial Year: 368,086 tonnes of ore processed, 32,308 tonnes of concentrate transported from site. 2018 Year: 407,131 tonnes of ore processed, 40,756 tonnes of concentrate transported from site. 2019 Year: 468,358 tonnes of ore processed, 31,206 tonnes of concentrate transported from site.	COMPLIANCE	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S2.7	Hours of Operation	The Proponent shall comply with the operating hours: (a) Vegetation Clearing: 7am to 6pm , 7 days a week (b) Construction: 24 hours, 7 days a week (c) Mining, maintenance and processing: 24 hours, 7 days a week (d) Rehabilitation: Day /Evening (e) Transportation of Concentrate and Gold Ore: 7am to 10pm , 7 days a week.	1. Letter to DPIE from J Thompson, dated 7 December 2017 notifying DPIE of two non-compliances: a) 29 September 2017 concentrate truck departed site at 0600 b) 28 November 2017 weak acid dissociable (WAD) cyanide discharge to the SF exceeded licence conditions 2. Driver Training and / or Induction Materials 3. Complaints Register (uploaded to the Hera website).	1. Interview J Thompson, 19 November 2019. Hera has complied with the operating hours specified in the Approval except for one instance where a concentrate truck departed the site prior to 7am. Specifically: • No significant vegetation clearing has occurred during the Audit Period • No construction works have been undertaken during the Audit Period • No rehabilitation works have been undertaken on any area of the site • Transportation of concentrate has be confined to daylight hours.		One non-compliance (concentrate truck departure at 0600) occurred during the Audit Period. No complaints relating to out of hours works (including truck movements to and from site) are recorded on the complaints register that has been uploaded to the Hera website. The Drivers Code of Conduct includes the requirement that no concentrate transport should occur outside of daylight hours (specifically 0700 to 1930).	Non-Compliance	No action required; the drivers code of conduct is up to date.
S2.8	Structural Adequacy	The Proponent shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.	Plant and associated facilities Construction Certificates • CC 379/2013 issued 16 April 2013 • CC 20130148 issued 2 October 2013 • CC 17.2/2014 issued 20 March 2014 • CC 17.3/2014 issued 4 April 2014 Plant and associated facilities Occupation Certificates • OC 20130148 issued 28 January 2014 • OC 379.1/2013 issued 3 March 2014 • OC 17/2014 issued 6 July 2017 • OC 358/2017 issued 25 August 2017 Tailings Storage Facility • Tailings Storage Facility Design Report (MWP00768AA-AC Design Rep FS Rev0) • Dam Safety Committee TSF Surveillance Report Issued 14 April 2016 • Letter from Dam Safety Committee dated 16 July 2014 confirming acceptance of the Stage 1 Construction report for the TSF. Other • Johnson Explosives letter dated 27 August 2012 confirming compliance of the Explosives Magazine with AS2187.1 • Structural Condition Assessment (transportable Buildings) prepared by Geolyse, dated December 2017 • Building Certificate issued by CSC (related to office building and ablution blocks) dated 21 February 2018.	1. J. Thompson 20 November 2019. no new construction works have been undertaken during the audit period.		The present processing plant, workshops and associated office facilities were constructed prior to this Project Approval and were approved by the DPI in 2006 under Part 5 of the EP&A Act 1979. No new construction works were undertaken during the audit period. However the previous audit failed to cover approval of the TSF and therefore the Auditor has reassessed the compliance against this condition covering the current and previous Audit Periods. Note that the previous audit recorded a Non-Compliance against this condition. The review of the construction documentation undertaken during this audit has found that sufficient documentation has been retained by Hera to demonstrate that appropriate quality assurance measures were implemented during construction works and the required CCs and OCs have been obtained. Approval under the Dams Safety Act for the TSF have been obtained.	COMPLIANCE	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S2.9	Demolition	The Proponent shall ensure that all demolition work is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version.	1. Records of demolition 2. Contracts / specifications for demolition works	1.Interview L. Richards, 19 November 2019. No demolition works were undertaken during the Audit Period. A decommissioned crusher is awaiting demolition.		No demolition works have been undertaken during the audit period.	Not Triggered	
S2.10	Protection of Public Infrastructure	The Proponent shall: (a) repair, or pay the full costs associated with repairing, any public infrastructure damaged by the project; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure.	1. incident Register	1.Interview J Thompson, 19 November 2019. No requests have been received requesting repairs be made to any public infrastructure.		No instances of damage to public infrastructure have been identified for the Audit Period.	Not Triggered	
S2.11	Operation of Plant and Equipment	The Proponent shall ensure that all plant and equipment used at the site, or to transport extractive materials from the site, is:(a) maintained in a proper and efficient condition; and(b) operated in a proper and efficient manner.		Interview T. Cox Maintenance Supervisor: 1. Pronto (asset and facility management software) is used to plan and track routine maintenance of fixed and moving plant.2. Hera takes steps to ensure that all the plant and equipment used at the site is maintained in a proper and efficient condition. These steps include:• The mining contractor (PYBAR) is contracted to perform all mining vehicle plant maintenance functions on site and Hera maintains surface plant and equipment;• All equipment on site has to be MDG15 compliant (audit interview);• An equipment maintenance register (sighted for both Hera and PYBAR).• A maintenance schedule system is in place and current for plant (see above).• The concentrate transporter's (KPC Bulk) trucks are under a Maintenance Management system with the NHVR (National Heavy Vehicle Register) which requires them to be audited every twelve months.	1. Demonstration of Pronto software. The auditor witnessed the processes used to setup, manage and monitor fixed and mobile plant maintenance.2. Fixed and mobile plant sighted during the audit was operational and appropriately maintained.	The mine operates a popular maintenance management system. Maintenance records sighted (on the Pronto System) demonstrated that a comprehensive proactive maintenance program is in place.	COMPLIANCE	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S2.12	Staged Submission of Plans and Programs	With the approval of the Director-General, the Proponent may submit any strategy, plan or program required by this approval on a progressive basis.	Correspondence from DPIE approving staging of any plans or programs	1.Interview L. Richards. There are no plans to submit any strategy, plan or program required by this approval on a progressive basis at this stage		This condition has not been triggered.	Not Triggered	
S2.13		Until they are replaced by an equivalent strategy, plan or program approved under this approval, the Proponent shall implement the existing strategies, plans or programs for the site that have been approved under the approved exploration activities described in Review of Environmental Effects entitled "Exploration Decline at the Hera Deposit within Exploration Licence 6162".	1. Review of Environmental Effects entitled "Exploration Decline at the Hera Deposit within Exploration Licence 6162".	The Environmental Management Strategy has been approved. The only plans that have not been approved since project inception are the Water Management Plan and Biodiversity Management Plan. The draft plans are substantially the same as the documents included in the REF. Therefore, Hera is operating in general accordance with the Review of Environmental Factors (REF) for the Exploration Decline.		<p>The Environmental Management Strategy and related sub-plans required by this Approval have been drafted. All of the plans are not up to date and / or approved (by DPIE). The unapproved plans are being implemented as opposed to the plans provided in the REF.</p> <p>The management plans that are loaded onto the company website are assumed to be those that are current and being implemented. The majority of those plans were prepared in 2012/13 and may no longer provide up to date process information or mitigation measures relevant to the current operations.</p> <p>Each of the Plans has been reviewed by the Auditor and while generally technically sufficient contain some inaccurate information, for example regulatory references.</p> <p>The Auditor has been advised that the 2019 versions of the management plans have been reviewed and that consultation with the relevant regulators is underway.</p>	Non-Compliance	Finalise the consultation and update of the 2019 versions of the management plans and then seek DPIE approval for the revised plans.
S2.14	Planning Agreement	By 31 July 2016 unless otherwise agreed by the Secretary, the Proponent shall amend the planning agreement with CSC, in accordance with Division 6 of Part 4 of the EP&A Act, which provides for contributions to CSC. The terms of the planning agreement shall be consistent with the general terms of agreement between CSC and Hera Resources Pty Limited outlined in Appendix 2.	<p>1. Deed of Variation of Original Planning Agreement between Cobar Shire Council and Hera Resources Pty Ltd. 10 April 2013.</p> <p>2. Email from Cobar Shire Council (S Poulter) to DPE (E Donnelley) titled "Modification of Planning Agreement - Condition No. 14 of the third modified consent", dated 22 September 2016. The email confirms the execution of the deed of variation and compliance with Condition S2 C14 of the Approval.</p> <p>3. Tax Invoice issued by Cobar Shire Council on 3 May 2018 for the voluntary Planning Agreement Contributions of \$32,672 and \$61,260)</p>			<p>Hera entered into a planning agreement with Cobar Shire Council (CSC) in accordance with Division 6 of Part 4 of the EP&A Act. Schedule 1 in the original planning agreement.</p> <p>The terms of the planning agreement are consistent with the general terms of agreement between CSC and Hera outlined in Appendix 2. The total contributions of \$60,000 for road repair and maintenance contribution and \$32,000 for the community fund contribution listed in Appendix 2 are the same as the total contributions listed in Schedule A of the planning agreement.</p>	COMPLIANCE	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S2.15	Road Maintenance Contribution	By 30 September 2015, and annually thereafter until the cessation of transport operations, the Proponent shall make annual contributions of \$20,000 to BSC for the maintenance of the unsealed sections of Nymagee-Hermidale Road.	1. Council accounts database extracts: 31/7/2015 - \$10,000 14/06/2018 - \$82,500 18/1/2018 - \$22,000 13/10/2017 - \$43,500	1. Interview L Richards. The road related payments made to Council consist of: \$82,500 – Hera's contribution to the Hermidale-Nymagee sealing road project in 2018 \$22,000 – Maintenance grading of unsealed Hermidale-Nymagee Road (2017/18 annual contribution) \$43,500 – Maintenance grading of unsealed Hermidale-Nymagee Road (2015/16 & 2016/17 annual contributions) \$10,000 – Maintenance grading of unsealed Hermidale-Nymagee Road (2015/16 & 2016/17 annual contributions once grading was completed)	1. The Nymagee - Hermidale Road is sealed for its entire length (the Auditor travelled to the site via the concentrate transport route.	Payments have been made to BSC during the audit period totalling \$158,000 for road maintenance.	COMPLIANCE	
S3.1	Noise Criteria	The Proponent shall ensure that the noise generated by the project does not exceed the criteria in Table 2 at any residence on privately-owned land or on more than 25 per cent of any privately-owned land. Table 2: Noise Criteria dB(A) Receivers: All residential receivers Day : (LAeq(15-minute)) - 35 Evening(LAeq(15-minute)) - 35 Night (LAeq(15-minute)) - 35 / (LA1(max)) - 45 Note: Noise generated by the project is to be measured in accordance with the relevant requirements and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy. However, these criteria do not apply if the Proponent has an agreement with the relevant owner(s) to exceed the criteria,	1. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017</i> ; dated 14 August 2017 2. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018</i> ; dated 16 August 2018 3. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2019</i> ; dated 14 August 2019.			No noise exceedances were detected over the 2018/9 reporting period. No noise exceedances were detected over the 2017/8 reporting period. No noise exceedances were detected over the 2016/7 reporting period.	COMPLIANCE	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3.2	Operating Conditions	The Proponent shall:(a) implement best practice noise management to minimise the construction, operational and traffic noise of the project.	1. Complaints Register (http://aureliametals.com/projects/hera-nymagee/complaints-register)2. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017</i> ; dated 14 August 20173. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018</i> ; dated 16 August 20184. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2019</i> ; dated 14 August 2019.			Two noise complaints were received over the Audit Period relating noise (from the same complainant, one via the EPA). The complaints were investigated by Hera and responses provided to the Complainant. No noise exceedances were detected over the Audit Period.	COMPLIANCE	
		(b) maintain the effectiveness of any noise suppression equipment on site at all times and ensure defective equipment is not used operationally until fully repaired; and		1. Interview T Cox Maintenance Supervisor: Hera manage maintenance requests through the Pronto system. Routine maintenance program is managed using a manual (spreadsheet based) system.	1. The Auditor did not identify an maintenance issues during the site inspection. All equipment sighted appeared to be operational and appropriately maintained.	An effective maintenance system has been developed and implemented.	COMPLIANCE	
		(c) minimise the noise impacts of the project during meteorological conditions when the noise limits in this approval do not apply.	1. Complaints Register (http://aureliametals.com/projects/hera-nymagee/complaints-register) 2. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017</i> ; dated 14 August 2017 3. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018</i> ; dated 16 August 2018 4. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2019</i> ; dated 14 August 2019.			Two noise complaints were received over the Audit Period relating noise (from the same complainant, one via the EPA). The complaints were investigated by Hera and responses provided to the Complainant. No noise exceedances were detected over the Audit Period.	COMPLIANCE	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3.3	Noise Management Plan	The Proponent shall prepare and implement a Noise Management Plan for the project to the satisfaction of the Secretary. The plan must: (a) be prepared in consultation with the EPA, and submitted to the Secretary for approval within six months of this approval;	1. YTC Resources Ltd, <i>Environmental Management Plan Noise Management, Revision 5</i> , dated 19 August 2013. 2. <i>Draft Noise Management Plan Version 1.0 / Revision 6</i> , dated 24/11/2017. 3. Email from DPE (S Shoesmith) to Hera (J Thompson) titled "FW: Hera Noise Management Plan", dated 26 June 2018. The email provided three (minor) comments on the contents of the plan. 2. Letter from DPE (H Reed) to YTC Resources (S Haures) titled "Hera Project (MP 10_0191) Management Plan Approvals", dated 28 August 2012. The letter provided DPE approval for the Blast Management Plan, the Noise Management Plan and the Air Quality and Greenhouse gas Management Plans. NOTE this approval predates the current version of the Noise Management Plan.	J Thompson: Please note, the approval letter is dated the 28/9/12. The Document Control table on the first page of the Noise Management Plan that a review of the document was completed in 2013 and no changes were made. Therefore, the 2013 version is the same as the 2012 version and has been approved by DPIE; Unfortunately, I am unable to locate the correspondence documentation between EPA and Hera in 2012. However, as this was approved by DPIE this correspondence must have been provided to DPIE at the time of approval.		A noise management plan has been prepared, the version on the Hera website is the 2013 update. No correspondence was available to verify that this plan was approved by DPE or that the EPA was consulted during preparation of the Plan. Finding: NOT VERIFIED NOTE: The Auditor assumes that the 2013 version of the NMP is the current version. Email correspondence from 2017/18 indicates that an updated to that plan was prepared and sent to DPE for review in 2017. DPE provided comment on the plan, however the plan has not been approved by DPE. No correspondence was sighted the confirmed that the EPA was consulted during the preparation of the 2017 Noise Management Plan update.	Non-Compliance	Finalise the review and stakeholder consultation of the 2019 version of the NMP to ensure it up to date then, then seek DPE approval for the revised plan.
		(b) describe the measures that would be implemented to ensure compliance with conditions 1 and 2 of this schedule; and	1. YTC Resources Ltd, <i>Environmental Management Plan Noise Management, Revision 5</i> , dated 19 August 2013.			Section 5 of the NMP describes the measures to be implemented to ensure compliance.	COMPLIANCE	
		(c) include a monitoring program that: (i) adequately supports the noise management system on site; (ii) includes a protocol for determining exceedances of the criteria identified in Table 2; and (iii) evaluates and reports on the effectiveness of the noise management system on site.	1. YTC Resources Ltd, <i>Environmental Management Plan Noise Management, Revision 5</i> , dated 19 August 2013.	J Thompson: Four properties have been identified in the Management Plan. Refer to Figure 3. The reason only 3 monitoring locations have been identified is that R1 and R2 are monitored from the same location. This is in accordance with advice we have received from noise specialists (report attached outlining this advice).		Section 6 of the NMP describes the monitoring that will be undertaken to assess compliance. Section 6.1.2 (Table 6) lists the noise monitoring locations at which quarterly monitoring will be undertaken. Four properties are identified.	COMPLIANCE	
S3.4	Blasting Criteria	The Proponent shall ensure that blasting on the site does not cause exceedances of the criteria in Table 3.	1. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017</i> ; dated 14 August 2017 2. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018</i> ; dated 16 August 2018 3. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2019</i> ; dated 14 August 2019.			868 blasts were initiated during the 2016/7 reporting year. No vibration exceedances were detected at any privately owned properties. 868 blasts were initiated during the 2017/8 reporting year. No vibration exceedances were detected at any privately owned properties. 738 blasts were initiated during the 2018/9 reporting year. No vibration exceedances were detected at any privately owned properties.	COMPLIANCE	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3.5	Blasting Hours	The Proponent shall only carry out above ground blasting on site between 9:00am and 5:00pm Monday to Saturday, inclusive. No above ground blasting is allowed on Sundays, public holidays or at any other time without the written approval of the Secretary.		1. Audit interview (J Thompson): no above ground blasting has been undertaken during the Audit Period.		No above ground blasting has been undertaken during the Audit Period.	Not Triggered	
S3.6		Underground blasting may be undertaken at any time, subject to compliance with the conditions of this approval.					Noted	
S3.7	Blasting Frequency	In relation to above ground blasting, the Proponent may carry out a maximum of: (a) three blasts per day, unless an additional blast is required following a blast misfire; and (b) five blasts per week, averaged over a calendar year, for all operations on the site. This condition does not apply to blasts that generate ground vibration of 0.5 mm/s or less at any residence on privately-owned land, or blasts required to ensure the safety of the site or its workers.		1. Audit interview (J Thompson): no above ground blasting has been undertaken during the Audit Period.		No above ground blasting has been undertaken during the Audit Period.	Not Triggered	
S3.8	Operating Conditions	During operation of the project, the Proponent shall:(a) implement best management practice to:(i) protect the safety of people and livestock in the surrounding area;(ii) protect public or private infrastructure/property in the surrounding area from any damage; and(iii) minimise the dust and fume emissions from any blasting; and(b) operate a suitable system to enable the public to get up-to-date information on the proposed blasting schedule on site,to the satisfaction of the Secretary.		1. Audit interview (J Thompson): no damage to private property or livestock has occurred as a result of the blasting undertaken.		No damage to private property or livestock has occurred as a result of the blasting undertaken.	COMPLIANCE	
S3.9	Blast Management Plan	The Proponent shall prepare and implement a Blast Management Plan for the project to the satisfaction of the Secretary.	1. YTC Resources Ltd, <i>Environmental Management Plan Blast</i> , Revision 4, dated 30 August 2012. 2. <i>Blast Management Plan</i> Version 4.0 / Revision 5, dated May 2015.			A blast management plan has been prepared and is loaded onto the Hera Website.	COMPLIANCE	
		This plan must: (a) be prepared in consultation with the EPA, and submitted to the Secretary for approval within six months of this approval;	1. YTC Resources Ltd, <i>Environmental Management Plan Blast</i> , Revision 4, dated 30 August 2012. 2. Letter from DPE (H Reed) to YTC Resources (S Haures) titled " <i>Hera Project (MP 10_0191) Management Plan Approvals</i> ", dated 28 August 2012. The letter provided DPE approval for the Blast Management Plan, the Noise Management Plan and the Air Quality and Greenhouse gas Management Plans.			DPE approved the plan on 28 September 2012. Correspondence confirming that the EPA was consulted during preparation of the Plan was not sighted during the audit. DPE approval for the 2015 plan was not sighted during the audit.	COMPLIANCE	
		(b) describe the blast mitigation measures that would be implemented to ensure compliance with conditions 4-8 of this schedule; and	1. YTC Resources Ltd, <i>Environmental Management Plan Blast</i> , Revision 4, dated 30 August 2012.			Section 5 of the BMP describes the measures to be implemented to ensure compliance.	COMPLIANCE	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(c) include a blast monitoring program to evaluate the performance of the project.	1. YTC Resources Ltd, <i>Environmental Management Plan Blast</i> , Revision 4, dated 30 August 2012.			Section 5 of the BMP describes the blast monitoring program to be assess compliance.	COMPLIANCE	
S3.10	Odour	The Proponent shall ensure that no offensive odours, as defined under the POEO Act, are emitted from the site.	1. Complaints Register (http://aureliametals.com/projects/hera-nymagee/complaints-register)		1. No offensive odours at or near the site boundaries were detected by the Auditor during the site inspection.	No odour complaints have been received by Hera during the Audit Period.	COMPLIANCE	
S3.11	Greenhouse Gas Emissions	The Proponent shall implement all reasonable and feasible measures to minimise the release of greenhouse gas emissions from the site to the satisfaction of the Secretary.	1. YTC Resources Ltd, <i>Environmental Management Plan Air Quality and Greenhouse Gas</i> , Revision 3, dated 28 August 2012. 2. <i>Air Quality and Greenhouse Gas Management Plan</i> Version 2.0 / Revision 4, dated May 2015.			Greenhouse management strategy has been prepared for the Hera operation (Section 5.8 of the AQGMP).	COMPLIANCE	
S3.12	Dust	The Proponent shall ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the project do not exceed the criteria listed in Tables 4, 5 or to 6 at any privately-owned land. See Tables 2 - 4, including the notes on page 7 of the permit	1. YTC Resources Ltd, <i>Environmental Management Plan Air Quality and Greenhouse Gas</i> , Revision 3, dated 28 August 2012. 2. <i>Air Quality and Greenhouse Gas Management Plan</i> Version 2.0 / Revision 4, dated May 2015. 3. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017</i> ; dated 14 August 2017 4. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018</i> ; dated 16 August 2018 5. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2019</i> ; dated 14 August 2019.		1. During the site inspection, the Auditor observed: - Water trucks operating on the mine access road - that application of molasses (sealant) on site access roads and roads in an around the process plant. - the use of water sprays on stockpiles and transfer conveyors. - rehabilitation of formerly disturbed areas.	The Air Quality and Greenhouse Gas Management Plan is being implemented. Appropriate dust controls are being used. However, dust deposition and PM10 measurements from the Audit Period showed elevated dust levels. It is likely that these exceedances were a result of the drought conditions being experienced and are not indicative of the impact of the mine operations.	Non-Compliance	It is recommended that Hera consider placement of additional dust deposition gauges outside the site boundaries to provide more data on background dust levels.
S3.13		The Proponent shall ensure that all point-source discharge locations on the site are designed and operated to comply with the maximum discharge concentrations applicable under the Protection of the Environment (Clean Air) Regulation 2010 and the requirements of any Environment Protection Licence issued for the project under the POEO Act.	1. <i>Report Number R006532, Emission Testing Report Aurelia Metals, Nymagee</i> , dated 24 October 2018. The report details the sampling and analysis results for the two licenced point sources. The testing confirmed compliance with all limits except Cadmium (limit 0.2 mg/m3 - result 0.62 mg/m3). 2. <i>Report Number R004870, Emission Testing Report Aurelia Metals, Nymagee</i> , dated 5 October 2017. The report details the sampling and analysis results for the two licenced point sources. The testing confirmed compliance with all emission limits. 3. <i>Report Number R003726, Emission Testing Report Aurelia Metals, Nymagee</i> , dated 7 March October 2017. The report details the sampling and analysis results for the two licenced point sources. The testing confirmed compliance with all emission limits.			Two licenced air emission point sources are located that the site (the gold room stacks, EPL Sampling Points 24 and 39). The emission testing results for September 2018 found that cadmium levels exceeded the Environment (Clean Air) Regulation (2010) emission limits.	Non-Compliance	1. Ensure that any emission limit exceedances are fully investigated and reported to the EPA and DPIE.

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3.14	Operating Conditions	The Proponent shall: (a) implement best practice air quality management on site, including all reasonable and feasible measures to minimise the off-site odour, fume and dust emissions generated by the project;	1. YTC Resources Ltd, <i>Environmental Management Plan Air Quality and Greenhouse Gas</i> , Revision 3, dated 28 August 2012. 2. <i>Air Quality and Greenhouse Gas Management Plan</i> Version 2.0 / Revision 4, dated May 2015. 3. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017</i> ; dated 14 August 2017 4. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018</i> ; dated 16 August 2018 5. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2019</i> ; dated 14 August 2019.		1. During the site inspection, the Auditor observed: - Water trucks operating on the mine access road - that application of molasses (sealant) on site access roads and roads in an around the process plant (refer to Photo #1) - the use of water sprays on stockpiles and transfer conveyors. - rehabilitation of formerly disturbed areas.	The Air Quality and Greenhouse Gas Management Plan is being implemented. Appropriate dust controls are being used. However, dust deposition and PM10 measurements from the Audit Period showed elevated dust levels. It is likely that these exceedances were a result of the drought conditions being experienced and are not indicative of the impact of the mine operations.	COMPLIANCE	
		(b) minimise any visible air pollution generated by the project;			1. During the site inspection, the Auditor observed: - Water trucks operating on the mine access road - that application of molasses (sealant) on site access roads and roads in an around the process plant. - the use of water sprays on stockpiles and transfer conveyors. - rehabilitation of formerly disturbed areas.	The Air Quality and Greenhouse Gas Management Plan is being implemented. Appropriate dust controls are being used. However, dust deposition and PM10 measurements from the Audit Period showed elevated dust levels. It is likely that these exceedances were a result of the drought conditions being experienced and are not indicative of the impact of the mine operations.	COMPLIANCE	
		(c) minimise the air quality impacts of the project during adverse meteorological conditions and extraordinary events (see Noted in Tables 4-6);			1. During the site inspection, the Auditor observed:- Water trucks operating on the mine access road- that application of molasses (sealant) on site access roads and roads in an around the process plant.- the use of water sprays on stockpiles and transfer conveyors. - rehabilitation of formerly disturbed areas.	The Air Quality and Greenhouse Gas Management Plan is being implemented. Appropriate dust controls are being used. However, dust deposition and PM10 measurements from the Audit Period showed elevated dust levels. It is likely that these exceedances were a result of the drought conditions being experienced and are not indicative of the impact of the mine operations.	COMPLIANCE	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(d) take all practical measures to minimise dust emissions from the tailings storage facility; to the satisfaction of the Secretary			<p>1. During the site inspection, the Auditor observed:</p> <ul style="list-style-type: none"> - Water trucks operating on the mine access road - that application of molasses (sealant) on site access roads and roads in an around the process plant. - the use of water sprays on stockpiles and transfer conveyors. - rehabilitation of formerly disturbed areas. 	The Air Quality and Greenhouse Gas Management Plan is being implemented. Appropriate dust controls are being used. However dust deposition and PM10 measurements from the Audit Period showed elevated dust levels. It is likely that these exceedances were a result of the drought conditions being experienced and are not indicative of the impact of the mine operations.	COMPLIANCE	
S3.15	Air Quality and Greenhouse Gas Management Plan	The Proponent shall prepare and implement an Air Quality and Greenhouse Gas Management Plan for the project to the satisfaction of the Secretary.	<p>1. YTC Resources Ltd, <i>Environmental Management Plan Air Quality and Greenhouse Gas</i>, Revision 3, dated 28 August 2012.</p> <p>2. <i>Air Quality and Greenhouse Gas Management Plan</i> Version 2.0 / Revision 4, dated May 2015.</p>			<p>DPE approved the plan on 28 September 2012. Correspondence confirming that the EPA was consulted during preparation of the Plan was not sighted during the audit.</p> <p>DPE approval for the 2015 plan was not sighted during the audit.</p>	COMPLIANCE	
		This plan must: (a) be prepared in consultation with the EPA, and be submitted to the Secretary for approval within six months of this approval;	<p>1. Letter from DPE (H Reed) to YTC Resources (S Haures) titled "<i>Hera Project (MP 10_0191) Management Plan Approvals</i>", dated 28 August 2012. The letter provided DPE approval for the Blast Management Plan, the Noise Management Plan and the Air Quality and Greenhouse gas Management Plans.</p> <p>2. Letter from EPA (B Tanswell) to RW Corkery (R Corkery) dated 19 September 2012. The letter refers to the AQGMP provided for review.</p>			<p>DPE approved the plan on 28 September 2012. DPE approval for the 2015 plan was not sighted during the audit, however as the 2012 version is loaded onto the web site, it is the Auditor's understanding that the 2012 version is the version that is being implemented.</p> <p>Correspondence was available to verify that the EPA was consulted during preparation of the first version of the plan.</p>	COMPLIANCE	
		(b) describe the measures that would be implemented to ensure compliance conditions 10-14 of this schedule;	1. YTC Resources Ltd, <i>Environmental Management Plan Air Quality and Greenhouse Gas</i> , Revision 3, dated 28 August 2012.		<p>1. During the site inspection, the Auditor observed:</p> <ul style="list-style-type: none"> - Water trucks operating on the mine access road - that application of molasses (sealant) on site access roads and roads in an around the process plant. - the use of water sprays on stockpiles and transfer conveyors. - rehabilitation of formerly disturbed areas. 	The management measures to be implemented to control air emissions are provided in Section 5 of the plan. Note that the currently approved version of the AQGMP does not cover all of the current dust mitigation strategies (for example the use of molasses as a road sealant.	COMPLIANCE	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(c) describe the proposed air quality management system;	1. YTC Resources Ltd, Environmental Management Plan Air Quality and Greenhouse Gas, Revision 3, dated 28 August 2012.			The AQGMP adequately describes the air quality management system that is being implemented at the Mine.	COMPLIANCE	
		(d) include an air quality monitoring program that: (i) uses a combination of high volumes samplers and dust deposition gauges to evaluate the performance of the project; and (ii) includes a protocol for determining exceedances of the relevant conditions of this approval; and	1. YTC Resources Ltd, Environmental Management Plan Air Quality and Greenhouse Gas, Revision 3, dated 28 August 2012.	No where is this approval does it state that the Gold Room Stack must be monitored only that it should be designed to ensure compliance to air quality regulations. The requirement to monitor the gold room stack is a condition of the EPL and does not relate to this approval.	1. HVAS Sampler (refer to Photo #2) and Dust Deposition Gauges	Section 6 of the plan addresses air quality monitoring. Dust deposition monitoring and HVAC sampling (including PM10 monitoring) is covered in the plan, however the monitoring of the Gold room stacks is not covered in the plan, this is a requirement of the EPL.	Non-Compliance	Ensure that the 2019 version of the AQGGMP details all monitoring and compliance assessment actions required by this Approval and the EPL.
		(e) describe the measures that would be implemented to minimise the release of greenhouse gas emissions from the site.	1. YTC Resources Ltd, Environmental Management Plan Air Quality and Greenhouse Gas, Revision 3, dated 28 August 2012.			Greenhouse management strategy has been prepared for the Hera operation (Section 5.8 of the AQGMP).	COMPLIANCE	
S3.16	Meteorological Monitoring	For the life of the project, the Proponent shall ensure that there is a suitable meteorological station operating in the vicinity of the site that complies with the requirements in the Approved Methods for Sampling of Air Pollutants in New South Wales guideline.	1. Excel Spreadsheet titled "Daily_Summary (22).csv". The spreadsheet contained the weather station outputs from 9 September 2016 to 9 November 2019.		1. Met Station (refer Photo #3).	Weather station monitoring results for the Audit Period were sighted by the Auditor. The weather station satisfies the requirements of the Approved Methods for Sampling Air Pollutants in New South Wales Guidelines.	COMPLIANCE	
S3.17	Water Supply	The Proponent shall ensure that it has sufficient water for all stages of the project, and if necessary, adjust the scale of mining operations to match its available water supply, to the satisfaction of the Secretary.	1. Site Water Balance			Hera has prepared an appropriate water balance with the operation has identified sources of water to ensure that there is adequate supply for the site operations.	COMPLIANCE	
S3.18	Water Discharges	The Proponent shall ensure that all surface water discharges from the site comply with: (a) section 120 of the POEO Act; or (b) the discharge limits (both volume and quality) set for the project in any applicable EPL.	1. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017; dated 14 August 2017 2. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018; dated 16 August 2018 3. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2019; dated 14 August 2019			The 2016/7 Annual review reported that two discharges from Licence Point 3 exceeded a number of water quality parameters identified in EPL 20179. The discharges occurred on 20 July 2016 and 16 December 2016 and were reported to the DPE, EPA and DRE. The 2017/8 Annual review reported that there were several WAD cyanide incidents during this reporting period	Non-Compliance	Investigate the cause of any discharge from site that exceeds any discharge criterion and identify and implement appropriate mitigation strategies.
S3.19		The concentration of Weak Acid Dissociable (WAD) cyanide in tailings discharged from the discharge point to the tailings storage facility shall not exceed 10 mg/L.				The 2018/9 Annual Review reported that During the reporting period there were no discharges from the sediment basin and no flows recorded in the clean water by pass drain through site. There were also no flows in any creeks or drainage courses	Non-Compliance	Investigate the cause of any discharge from site that exceeds any discharge criterion and identify and implement appropriate mitigation strategies.

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3.20		The concentration of Weak Acid Dissociable (WAD) cyanide at the discharge point to the process water dam shall not exceed 20 mg/L (90th percentile) or 30 mg/L (maximum).				across site as a result of the extended drought. Therefore no surface water monitoring of creeks or drainage lines was able to be undertaken.	Non-Compliance	Investigate the cause of any discharge from site that exceeds any discharge criterion and identify and implement appropriate mitigation strategies.
S3.21	Compensatory Water Supply	<p>The Proponent shall provide a compensatory water supply to any owner on privately-owned land whose water supply is adversely impacted (other than an impact that is negligible) as a result of the project, in consultation with DPI Water, and to the satisfaction of the Secretary.</p> <p>The compensatory water supply measures must provide an alternative long-term supply of water that is equivalent in volume and quality to the loss attributed to the project. Equivalent water supply should be provided (at least on an interim basis) within 24 hours of the loss being identified, unless otherwise agreed with the landowner.</p> <p>If the Proponent and the affected landowner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Secretary for resolution.</p> <p>If the Proponent is unable to provide an alternative long-term supply of water, then the Proponent shall provide alternative compensation to the satisfaction of the Secretary.</p>	<p>1. Email from Hera (J Thompson) to DPI Water (T Baker) and DPE (K O'Reilly) titled "Standing water level WB18", dated 23 November 2018. The email states that Hera had commenced negotiations with a landholder in regards to a reduction in groundwater levels (at the landowners property).</p>			Negotiations have commenced with one impacted (groundwater) landowner.	COMPLIANCE	
S3.22	Design and Permeability of Storages	<p>The Proponent shall ensure that the floor and walls of:</p> <p>(a) the leachate management pond, seepage collection pond (associated with the tailings storage facility), process water dam and raw water dam are lined to achieve a permeability of no less than 1 x 10⁻⁹ m/s to a depth of at least 900 millimetres of clay (or equivalent); and</p>	<p>1. Email (and attachments) from Total Lining Systems (S Short) to YTC Resources (S Pearce) titled " <i>Sediment Pond Lining</i>", dated 7 August 2017. The email provides copies of the leachate pond design and construction QA/QC report.</p>		1. Process Water Management System (refer Photo #4).	<p>The leachate management system ponds are lined with 2 mm HDPE. The QA reports associated with the construction of the ponds does not certify the permeability of the liners.</p> <p>Finding: Not Verified.</p>	Non-Compliance	Obtain a copy of the relevant engineering report certifying the permeability of the pond liners.
		<p>(b) the tailings storage facility (except for the seepage collection pond) is lined to achieve a permeability of no less than 1 x 10⁻⁸ m/s to a depth of at least 600 millimetres of clay (or equivalent). Note: An alternative permeability standard may be acceptable following completion of an appropriate risk assessment undertaken in accordance with the Environmental Guidelines – Management of Tailings Storage Facilities (VIC DPI, 2004), to the satisfaction of the EPA and the Secretary.</p>	<p>1. <i>Independent Environmental Audit, Hera Resources Pty Ltd, Hera Project, NUMAGEE NSW</i>, September 2016. The report stated: " <i>Section 4.3 (p5) of the TSF Stage 1 Construction Report (Coffey, 17 June 2014) confirms that the permeability of the TSF basin floor exceeded the required value of 10⁻⁸ m/s over a 600mm depth</i>".</p>		1. Tailings Storage Facility (Refer to Photo #5).	<p>The permeability of the TSF satisfies the 10⁻⁸ m/s standard.</p>	COMPLIANCE	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3.23		The clean water diversion around the tailings storage facility shall be designed, constructed and maintained to prevent the probable maximum flood from the catchment upstream of the facility from entering the facility.	1. Letter from Hera (J Thompson) to DPE (K O'Reilly) titled " <i>Independent Environmental Audit Aug 2013 – Sep 2016 – Action Plan Condition 23, Schedule 3 Design and Permeability of Storages</i> ", dated 21 December 2017. The includes a plan showing the TSF diversion drain construction compliance with the requirements of this Condition. The letter also contained a survey plan that confirms the that the as built structure meets these requirements.		1. TSF Clean Water Diversion (Refer Photo #6)	The clean water diversion meets the design requirements detailed in this Condition.	COMPLIANCE	
S3.24		The process water and raw water dams shall be maintained with a minimum freeboard sufficient to accommodate a 1 in 100-year ARI, 72-hour rainfall event without overtopping at all times.	1. <i>Draft Water Management Plan 2018, Version 6</i> , dated November 2019. Section 4.1.4 discusses contaminated water management, including process water and refers specifically to the 200mm freeboard in the process water pond.		1. The 200 mm free board is indicated by a marker installed in the pond.	A freeboard of at least 200mm is to be achieved as a minimum operational condition allowing capacity to capture the 100 year 72 hour design rainfall event (GHD: July 2016: Water Management Plan). Currently the process water dam height set point is controlled at 80%.	COMPLIANCE	
S3.25	Water Management Plan	The Proponent shall prepare and implement a Water Management Plan for the project to the satisfaction of the Secretary. This plan must be prepared in consultation with EPA and DPI Water	1. <i>Aurelia - Hera Gold WMP Water Management Plan 2016</i> , prepared by GHD. 2. <i>Draft Water Management Plan 2018, Version 6</i> , dated November 2019.			A Water Management appears to have been prepared in 2013 by RW Corkery. A copy of this plan was not available at the time of the audit and no correspondence relating to that version of the plan was sighted. GHD prepared an updated plan in 2016. Correspondence from DPE approving the plan author(s) or approving the plan was not sighted during the audit. The plan has been further revised in 2018, but has yet to be approved by DPE. Correspondence from DPE approving the plan author(s) or approving the plan was not sighted during the audit.	COMPLIANCE	
		The plan must be prepared by suitably qualified and experienced persons whose appointment has been approved by the Secretary,	1. <i>Independent Environmental Audit, Hera Resources Pty Ltd, Hera Project, NUMAGEE NSW</i> , September 2016. The report stated: " <i>A letter was received from the NSW DPI on 31st August 2012 approving the three experts (Mark Passfield, James Morrow and Wayne Russell) that contributed to the development of the site Water Management Plan (WMP), which was coordinated by external consultant RW Corkery and Co Pty Ltd.</i> "			DPI Water endorsed the appointment of three experts to prepare the original plan on 31st August 2012. Correspondence from DPE approving the appointment of the authors of the 2016 or 2018 plan revisions was not sighted during the Audit. Finding: NOT VERIFIED	Non-Compliance	Request approval from DPIE for the appointment of the experts responsible for the (yet to be approved) 2019 Water Management Plan.
		and submitted to the Secretary for approval within six months of this approval, or prior to commencement of mining operations under this approval, whichever is sooner;				Correspondence verifying that the original plan was submitted to DPE / DPI was not sighted during the Audit. Finding: NOT VERIFIED	Non-Compliance	Ensure that the current version of the Water Management Plan is approved by DPIE.

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		<p>In addition to the standard requirements for management plans (see Condition 3 of Schedule 5), this plan must include:</p> <p>(a) a Site Water Balance that includes details of:</p> <ul style="list-style-type: none"> • sources of water supply; • water use on site, including any potable water use; • water management on site; • off-site water discharges, including volume, timing and release point infrastructure requirements; and • reporting procedures including comparisons of the site water balance for each calendar year; and 	<p>1. <i>Draft Water Management Plan 2018</i>, Version 6, dated November 2019. The site water balance is provided in Section 4.5 and Appendix F of the plan.</p>			<p>The water balance model provided in the Draft Plan (the auditor understands that this unapproved version of the plan is currently being implemented) meets the requirements of this Condition.</p>	COMPLIANCE	
		<p>(b) a Surface Water Management Plan, which includes:</p> <ul style="list-style-type: none"> • baseline data on surface water flows and quality in waterbodies that could be affected by the project; • a detailed description of the surface water management system on site, including the:- clean water diversion systems;- erosion and sediment controls; and- water storages, including the tailings storage facility, raw water or process water dams; • design objectives and performance criteria, including trigger levels for investigating any potentially adverse impacts, for the following:- the water management system;- water storages including the tailings storage facility, raw water or process water dams; and- surface water quality in waterbodies that could be affected by the project; • performance criteria for surface water quality attributes relevant to water quality impacts on biological diversity and aquatic ecological integrity, including cyanide, salinity, heavy metals, sediment load, pH, hardness and biological oxygen demand; • a program to monitor:- the effectiveness of the water management system;- surface water flows, quality, and impacts on water users;- potential acid rock drainage;- potential leakage or spillage from tailings, mineral concentrate or effluent pipelines;- post-closure water quality;- impacts on wildlife from exposure to cyanide or other toxic chemicals; and • a plan to respond to any exceedances of the performance criteria, and mitigate and/or offset any adverse surface water impacts of the project, including but not limited to management measures to reduce wildlife exposure to cyanide or other toxic chemicals; • reporting procedures for the results of the monitoring program; and 	<p>1. <i>Draft Water Management Plan 2018</i>, Version 6, dated November 2019. Section 4.1 describes the surface water system; Appendix G provides the Trigger Value Action Plan and Section 6.2 describes the surface water monitoring program.</p>			<p>The required elements of the Surface Water Management Plan are contained in the Draft Water Management Plan.</p>	COMPLIANCE	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(c) a Groundwater Management Plan, which includes: <ul style="list-style-type: none"> • baseline data of all groundwater levels, yield and quality in the region, and any privately-owned groundwater bores that could be affected by the project; • detailed documentation of the operation of the seepage collection and storage system associated with the tailings storage facility and associated maintenance requirements; • groundwater assessment criteria, including trigger levels for investigating any potentially adverse groundwater impacts, including but not limited to leakage from the tailings storage facility; • a program to monitor: <ul style="list-style-type: none"> - impacts on the groundwater supply of potentially affected landowners; - impacts on the volume of groundwater inflow into the underground workings; - regional groundwater levels and quality in all potentially affected aquifers; - potential acid rock drainage; - the effectiveness of the seepage collection and storage system and associated infrastructure in collecting and containing all seepage from the tailings storage facility and all other water storages that receive chemical or salt-laden water; - the quality of groundwater to be re-used on the site; - any post-rehabilitation seepage from the tailings storage facility; and • a plan to respond to any exceedances of the performance criteria, and mitigate and/or offset any adverse groundwater impacts of the project, including but not limited to: <ul style="list-style-type: none"> - procedures to minimise the potential for soil salinity, sodicity and other contaminant issues associated with the reuse of groundwater on site; and - measures to manage and mitigate any leakage from the tailings storage facility, including but not limited to that detected beyond the seepage collection and storage system. 	1. <i>Draft Water Management Plan 2018</i> , Version 6, dated November 2019. Section 4.3 describes the groundwater system; Appendix G provides the Trigger Value Action Plan and Section 6.3 describes the groundwater monitoring program.			The required elements of the Groundwater Management Plan are contained in the Draft Water Management Plan.	COMPLIANCE	
S3.26	Biodiversity Offset Strategy	By 31 July 2016, the Proponent shall prepare a Biodiversity Offset Strategy for the project to the satisfaction of the Secretary.	1. <i>Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hera Mine</i> , prepared by RW Corkery, dated June 2016.	1. J. Thompson 19 November 2019. The Biodiversity Management Plan has not been approved.		A biodiversity management plan was prepared. The draft Biodiversity Management Plan incorporating a Biodiversity Offset Strategy was submitted to DPE by email (sighted) on 15 July 2016. Subsequent delays in relation to the off-set strategy and bio banking agreements resulted in delays in finalisation of the plan.	Non-Compliance	Seek DPE Approvals for the completion and finalisation of the Biodiversity Off-set Strategy and the Biodiversity Off-set Plan.

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		The Strategy must: (a) be prepared in consultation with OEH;	1. Letter from OEH (S Cox) to RW Corkery (M Bland) titled " <i>Hera mine Biodiversity Management Plan</i> ". The letter from OEH provides input into the Biodiversity off-set management plan (that includes the Off-set Strategy).			OEH were consulted during the preparation of the biodiversity management plan.	COMPLIANCE	
		(b) identify the portion of the Chelsea site (WLL 3881) that would be conserved in perpetuity to offset the impacts of the project using the Biobanking Assessment Methodology; and	1. <i>Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hera Mine</i> , prepared by RW Corkery, dated June 2016.			The Biodiversity off-set area is identified in Section 4.2.	COMPLIANCE	
		(c) describe the specific management measures that would be implemented on the Chelsea site to conserve and improve the biodiversity values of the site over time.	1. <i>Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hera Mine</i> , prepared by RW Corkery, dated June 2016.			Section 4.6 of the Biodiversity Management Plan (Section 4 is the Biodiversity Offset Strategy) sets out eight specific management measures e.g. weed and pest management.	COMPLIANCE	
S3.27		Following approval, the Proponent shall implement the Biodiversity Offset Strategy to the satisfaction of the Secretary.		1. J. Thompson 19 November 2019. The Biodiversity Management Plan has not been approved.		Hera has been working on the Chelsea off-set area since 2016. A substantial volume of correspondence was provided to the auditor evidencing the consultation activities undertaken.	Not Triggered	
S3.28	Long Term Security	Within 12 months of the approval of the Biodiversity Offset Strategy, the Proponent shall make suitable arrangements to conserve the offset area identified in the Biodiversity Offset Strategy in perpetuity to the satisfaction of the Secretary.		1. J. Thompson 19 November 2019. The Biodiversity Management Plan has not been approved.			Not Triggered	
S3.29	Biodiversity Management Plan	Within 6 months of approval and prior to the commencement of vegetation clearing on the site under this approval, the Proponent shall submit a Biodiversity Management Plan for the project site to the Secretary for approval. This plan must:	1. <i>Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hera Mine</i> , prepared by RW Corkery, dated June 2016.	1. J. Thompson 19 November 2019. The Biodiversity Management Plan has not been approved.		A biodiversity management plan was prepared. The draft Biodiversity Management Plan incorporating a Biodiversity Offset Strategy was submitted to DPE by email (sighted) on 15 July 2016. Subsequent delays in relation to the off-set strategy and bio banking agreements resulted in continuing delays in the finalisation of the plan.	Non-Compliance	Seek DPE Approval for the completion and finalisation of the Biodiversity Off-set Strategy and the Biodiversity Off-set Plan.
		This plan must: (a) be prepared by a suitably qualified and experienced person(s) whose appointment has been endorsed by the Secretary	1. <i>Independent Environmental Audit, Hera Resources Pty Ltd, Hera Project, NUMAGEE NSW, September 2016.</i> The report stated: "A letter (dated 31/08/12) from the NSW Department of Planning & Infrastructure endorsing Hera's proposed list of experts as being suitably qualified and experienced person(s) was sighted and is appended to the draft BMP."			DPE approved the experts that prepared the Biodiversity Management Plan on 31 August 2012.	COMPLIANCE	
		(b) be prepared in consultation with OEH	1. Letter from OEH (S Cox) to RW Corkery (M Bland) titled " <i>Hera mine Biodiversity Management Plan</i> ". The letter from OEH provides input into the Biodiversity off-set management plan (that includes the Off-set Strategy).			OEH were consulted during the preparation of the biodiversity management plan.	COMPLIANCE	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(c) describe how the implementation of the biodiversity offset strategy would be integrated with the overall rehabilitation of the site;	1. <i>Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hera Mine</i> , prepared by RW Corkery, dated June 2016.			The biodiversity off-set area is remote from the mine, therefore rehabilitation of the mine site cannot be integrated with the implementation of the Off-set strategy.	Not Triggered	
		(d) describe the short, medium, and long term measures that would be implemented to:(i) manage the remnant vegetation and habitat on the site and in the offset area/s (if and when applicable);(ii) minimise the impacts on Cobar Greenhood Orchid (<i>Cryptostylis cobarensis</i>), Lobed Blue-grass (<i>Bothriochloa biloba</i>) and hollow-bearing trees; and(iii) implement the biodiversity offset strategy (if and when applicable), including detailed performance and completion criteria;	1. <i>Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hera Mine</i> , prepared by RW Corkery, dated June 2016.			The Draft BMP addresses the sub-paragraphs of this condition as follows:(i) The short, medium, and long term measures that would be implemented to manage the remnant vegetation and habitat on the site and in the offset area/s (if and when applicable) are described in section 3.5 on Peak and section 4.6 Chelsea.(ii) The short, medium, and long term measures that would be implemented to minimise the impacts on Cobar Greenhood Orchid (<i>Cryptostylis cobarensis</i>), Lobed Blue-grass (<i>Bothriochloa biloba</i>) and hollow-bearing trees are described in section 3.5 on Peak and section 4.6 Chelsea.(iii) The short, medium, and long term measures to implement the biodiversity offset strategy (if and when applicable), including detailed performance and completion criteria are referenced in section 4.5	COMPLIANCE	
		(e) include detailed performance and completion criteria for evaluating the performance of the biodiversity offset strategy, and triggering remedial action (if necessary);	1. <i>Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hera Mine</i> , prepared by RW Corkery, dated June 2016.			The draft BMP discusses trigger levels and monitoring of the mine site in section 4.5, with detailed trigger levels in Table 8.	COMPLIANCE	
		(f) include a detailed description of the procedures to be implemented for: (i) enhancing the quality of existing vegetation and fauna habitat; (ii) restoring native vegetation and fauna habitat on the biodiversity areas and rehabilitation area through focusing on assisted natural regeneration, targeted vegetation establishment and the introduction of naturally scarce fauna habitat features (where necessary); (iii) maximising the salvage of resources within the approved disturbance area - including vegetative, soil and cultural heritage resources – for beneficial reuse in the enhancement of the biodiversity areas or rehabilitation area; (iv) collecting and propagating seed; (v) minimising the impacts on fauna on site, including pre-clearance surveys and minimising the potential exposure to tailings; (vi) controlling weeds and feral pests; (vii) controlling erosion;	1. <i>Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hera Mine</i> , prepared by RW Corkery, dated June 2016.			(i) A detailed description of the procedures to be implemented for enhancing the quality of existing vegetation and fauna habitat are described in sections 3.5.4.1 and 4.6 of the draft BMP. (ii) A detailed description of the procedures to be implemented for restoring native vegetation and fauna habitat on the biodiversity areas and rehabilitation area through focusing on assisted natural regeneration, targeted vegetation establishment and the introduction of naturally scarce fauna habitat features are described in sections 3.5.4.2 (hollow trees), 3.5.3.2 (soil) and 3.5.3.6 (No cultural resources identified) of the draft BMP. (iii) A detailed description of the procedures to be implemented for maximising the salvage of resources within the approved disturbance area including vegetative, soil and cultural heritage resources, for beneficial reuse in the enhancement of the biodiversity areas or rehabilitation area are described in sections 3.5.4.2 (hollow trees), 3.5.3.2 (soil) and 3.5.3.6 (No cultural resources identified) of the draft BMP.	COMPLIANCE	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(viii) managing grazing and agriculture on site; (ix) controlling access; and (x) bushfire management;				v) A detailed description of the procedures to be implemented for collecting and propagating seed is listed in section 3.5.3.3 of the draft BMP. (v) A detailed description of the procedures to be implemented for minimising the impacts on fauna on site (section 5.5.3), including pre-clearance surveys and minimising the potential exposure to tailings is described in sections 3.5.4.3. (TSF – 2 management procedures). (vi) a detailed description of the procedures to be implemented for sections 3.5.7 (weeds) and section 3.5.4.5 (vertebrate pest management – Appendix A). (vii) The procedures to be implemented for controlling erosion are referred to in section 3.5.3.5 of the draft BMP which in turn refers to the Water Management Plan and the MOP. Section 4.2.2.4 of the MOP describes erosion control methods. (viii) A detailed description of the procedures to be implemented for managing grazing and agriculture on site is listed in section 3.5.5 of the draft BMP. (ix) A detailed description of the procedures to be implemented for controlling access is listed in sections 3.5.5 and 3.5.8 of the draft BMP. (x) A detailed description of the procedures to be implemented for bushfire management is listed in section 4.6.8 of the draft BMP.		
		(g) include a seasonally-based program to monitor and report on the effectiveness of these measures, and progress against the detailed performance and completion criteria;	1. <i>Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hera Mine</i> , prepared by RW Corkery, dated June 2016.			A seasonally-based program to monitor and report on the effectiveness of these measures, and progress against the detailed performance and completion criteria is listed in sections 5 (monitoring) and 7 (reporting) of the draft BMP.	COMPLIANCE	
		(h) identify the potential risks to the successful implementation of the biodiversity offset strategy, and include a description of the contingency measures that would be implemented to mitigate against these risks; and	1. <i>Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hera Mine</i> , prepared by RW Corkery, dated June 2016.			A Trigger Action Response Plan (TARP) has been included in the management plan (Section 6). The TARP identifies the risks and includes relevant measures to be implemented to mitigate against these risks.	COMPLIANCE	
		(i) include details of who would be responsible for monitoring, reviewing and implementing the plan.	1. <i>Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hera Mine</i> , prepared by RW Corkery, dated June 2016.			The details of the personnel who would be responsible for monitoring, reviewing and implementing the plan are listed in Table 2 of section 2.1 of the draft BMP.	COMPLIANCE	
S3.30		Within 6 months of the approval of the Biodiversity Offset Strategy, the Proponent shall submit an updated Biodiversity Management Plan to the Secretary for approval.	1. <i>Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hera Mine</i> , prepared by RW Corkery, dated June 2016.	1. J. Thompson 19 November 2019. The Biodiversity Management Plan has not been approved.		The biodiversity management plan has not yet been approved.	Not Triggered	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3.31	Conservation Bond	<p>Within three months of the approval of the Biodiversity Management Plan, the Proponent shall lodge a conservation bond with the Department to ensure that the biodiversity offset is implemented in accordance with the performance and completion criteria of the Biodiversity Management Plan. The sum of the bond shall cover the full cost of implementing the Biodiversity Offset Strategy and be verified by a suitably qualified rehabilitation specialist or quantity surveyor.</p> <p>If the biodiversity offset is implemented to the satisfaction of the Secretary, the Secretary will release the conservation bond. If the offset strategy is not implemented to the satisfaction of the Secretary, the Secretary will call in all or part of the conservation bond, and arrange for the satisfactory implementation of the biodiversity offset.</p>	<p>1. <i>Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hera Mine</i>, prepared by RW Corkery, dated June 2016.</p>	<p>1. J. Thompson 19 November 2019. The conservation bond has not yet been paid as the Biodiversity Management Plan has not been approved.</p>		<p>The biodiversity management plan has not been approved; therefore the payment of the conservation bond is not yet due.</p>	Not Triggered	
S3.32	Heritage	The Proponent shall prepare and implement an Aboriginal Cultural Heritage Management Plan to the satisfaction of the Director-General. This plan must:	<p>1. <i>YTC Resources Ltd, Environmental Management Plan Aboriginal Cultural Heritage</i>, Revision 1.1, dated 19 August 2012.</p> <p>2. <i>Environmental Management Plan Aboriginal Cultural Heritage</i> Version 5.0 / Revision 5, dated 2 May 2015.</p>			<p>The Aboriginal Heritage Management Plan was prepared in 2013. This plan has been approved by DPE. A subsequent version was prepared in 2015. No correspondence verifying that the 2015 version of the plan has been approved by DPE was sighted.</p>	COMPLIANCE	
		(a) be prepared in consultation with OEH and the Aboriginal stakeholders (in relation to the management of Aboriginal heritage values);	<p>1. <i>YTC Resources Ltd, Environmental Management Plan Aboriginal Cultural Heritage</i>, Revision 1.1, dated 19 August 2012. Section 6 of the plan details the consultation processes undertaken during the preparation of the plan.</p>			<p>The 2013 Aboriginal Heritage Management Plan contains details of the consultation undertaken during the preparation of the plan.</p>	COMPLIANCE	
		(b) be submitted to the Secretary for approval within six months of this approval; and	<p>1. Letter from DPE (K Winwood) to YTC Resources (S Haures) titled "<i>Hera Project (MP 10_0191) Heritage Management Plan</i>", dated 5 October 2012. The letter provided DPE approval for the Aboriginal Heritage Management Plan.</p>			<p>The Heritage Management Plan was approved by DPE on 5 October 2012.</p>	COMPLIANCE	
		(c) describe the measures that would be implemented for: <ul style="list-style-type: none"> • monitoring all new surface disturbance on site for unidentified Aboriginal objects; • managing the discovery of any human remains or previously unidentified Aboriginal objects on site; and • ensuring ongoing consultation with Aboriginal stakeholders in the conservation and management of any Aboriginal cultural heritage values on site. 	<p>1. <i>YTC Resources Ltd, Environmental Management Plan Aboriginal Cultural Heritage</i>, Revision 1.1, dated 19 August 2012. Section 6 of the plan details the consultation processes undertaken during the preparation of the plan.</p>			<p>Section 4.5 (Roles and Responsibilities) allocates responsibility to the Environmental Officer to undertake inspections of any area that has not been surveyed, prior to any new surface disturbances. Section 6.2 discusses the process for dealing with unexpected finds and the consultation (with aboriginal groups) to be implemented.</p>	COMPLIANCE	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3.33	Dangerous Goods	Transportation of all dangerous goods to or from the site shall be undertaken in strict accordance with Australian Code for the Transport of Dangerous Goods by Road and Rail.	1. <i>Traffic Management Plan</i> , Revision 3, dated 14 May 2016.			Section 5.4.4 of the Traffic Environmental Management Plan (revision 3 dated 15 August 2012) states that the Environmental Officer will be responsible to ensure that this condition is satisfied, and refers to the Hazardous Material Management Plan (HMMP). Section 5.10 of the HMMP states that "transportation of hazardous materials to Hera will only be undertaken by contractors who are certified to carry dangerous goods and have been trained in the "Australian Code for the Transport of Dangerous Goods by Road and Rail" (the Code).	COMPLIANCE	
S3.34	Road Upgrades	<p>Within 6 months of the date of this approval, the Proponent shall:</p> <p>(a) commission a suitably qualified independent expert, whose appointment has been approved by the Secretary, to undertake a design and pavement condition review for the intersection of Burthong Road and Priory Tank Road, which:</p> <p>(i) identifies any deficiencies in the design or pavement condition of the intersection;</p> <p>(ii) recommends appropriate design upgrades and pavement repairs taking into consideration the type, volume and direction of traffic generated by the mine; and</p> <p>(iii) ensures the recommended design is in accordance with the applicable AUSTROADS standards.</p> <p>(b) undertake intersection design and pavement upgrades in accordance with the recommendations of the review in (a), in consultation with CSC, and to the satisfaction of CSC.</p>	<p>1. <i>Independent Environmental Audit, Hera Resources Pty Ltd, Hera Project, NUMAGEE NSW</i>, September 2016. The report stated: "A suitably qualified independent expert whose appointment was approved by the Secretary (then known as the Director-General), was commissioned to undertake a design and pavement condition review for the intersection of Burthong Road and Priory Tank Road. This was done within 6 months of the date of the Project Approval. A letter (dated 22/1/13) of endorsement from the Director-General referring to Conditions 34 and 35 of the Project Approval was sighted.."</p> <p>2. <i>Intersection Assessments Nymagee and Hermindale Road</i> (plans) prepared by Geolyse.</p> <p>3. Hera Resources Purchase Order PO5-7681-1, dated 13 November 2015.</p>			<p>Hera has commissioned the design of the intersection in accordance with this Condition.</p> <p>The works in paragraph (b) were completed by CSC in January/February 2016 (audit interview). Aurelia purchase order of 13 November 2015 was sighted.</p> <p>These works were undertaken prior to this Audit Period.</p>	Not Triggered	
S3.35		<p>Within 6 months of the date of this approval, the Proponent shall:</p> <p>(a) commission a suitably qualified independent expert, whose appointment has been approved by the Secretary, to undertake a review of the existing traffic control devices on Burthong Road and Priory Tank Road, which:</p> <p>(i) reviews all existing traffic devices, including traffic signs, traffic signals, pavement markings, guide posts, delineators and safety barriers, and identifies any deficiencies; and</p> <p>(ii) recommends appropriate upgrades in accordance with the applicable AUSTROADS standards;</p> <p>(b) install traffic control devices in accordance with the recommendations of the review in (a), to the satisfaction of CSC.</p>	<p>1. <i>Review of Traffic Control Devices Hera Mine to Hermindale Siding</i>, prepared by Geolyse, dated May 2014.</p> <p>2. <i>Independent Environmental Audit, Hera Resources Pty Ltd, Hera Project, NUMAGEE NSW</i>, September 2016. The audit report stated, with respect to Condition S3.35 "A letter (dated 22/1/13) of endorsement from the Director-General referring to Conditions 34 and 35 of the Project Approval was sighted".</p> <p>3. Letter from Hera (D Fredrickson) to CSC (K Page) titled "RE: Hera Resources Amendment to Concentrate Haulage Route", dated 20 June 2014. The letter outlines Hera's commitment to CSC to fund the upgrade works recommended in the Geolyse report.</p>			<p>Hera commissioned the required report and funded the installation of the required traffic controls.</p> <p>Installation of traffic control devices in accordance with the recommendations of the review in paragraph (a) had not been completed within 6 months of the date of the Project Approval.</p>	Non-Compliance	This is an historical non-compliance. The works have been completed. No further action required.

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3.35A		Prior to commencing the transport of concentrate to the Hermidale rail siding via Nymagee-Hermidale Road, or an alternative date nominated by BSC and CSC (with respect to the works within the relevant local government area), the Proponent shall implement, or contribute to the cost of implementing the recommendations in the report titled Visual Review of Traffic Control Devices – Hera Mine to Hermidale Siding prepared by Geolyse Pty Ltd and dated 7 May 2014, to the satisfaction of BSC and CSC.	1. Email from BSC (G Bourke) to Hera (S Haures) titled " <i>Nymagee to Hermindale Road</i> ", dated 5 November 2014. The email refers to the receipt by Council of the Visual Road Pavement Assessment Report and committed to undertaking repairs to the road on an as needs basis. 2. Independent Environmental Audit, Hera Resources Pty Ltd, Hera Project, NUMAGEE NSW, September 2016.			The recommendations in the Geolyse report dated 7 May 2014 had not been implemented prior to commencing the transport of concentrate to the Hermidale rail siding via Nymagee-Hermidale Road in October 2014.	Non-Compliance	This is an historical non-compliance. The works have been completed. No further action required.
S3.35B		Prior to commencing the transport of concentrate to the Hermidale rail siding via Nymagee-Hermidale Road, or an alternative date nominated by CSC, the Proponent shall upgrade the intersection of Hartwood Street and Milford Street in accordance with the recommendations of the report titled Geotechnical Investigation of Hartwood Street and Milford Street on Priory Tank Road, Nymagee NSW, prepared by Envirowest Consulting Pty Ltd dated 23 May 2014 and the relevant AUSTROADS standards, to the satisfaction of CSC.	1. Report titled Geotechnical Investigation of Hartwood Street and Milford Street on Priory Tank Road, Nymagee NSW, prepared by Envirowest Consulting Pty Ltd dated 23 May 2014 2. Email from CSC (A Shepard) to Hera (J Thompson) titled "FW: Nymagee Intersection Works", dated 23 August 2016. The email confirms that the intersection works had been completed.			The works required by this Condition were completed (by Council).	COMPLIANCE	
S3.35C		Every two months during the transport of concentrate to the Hermidale rail siding via Nymagee-Hermidale Road, the Proponent shall (a) inspect the condition of the unsealed section of the transport route in consultation with BSC; and (b) grade the unsealed section of Nymagee-Hermidale Road where required and as identified in the inspection carried out in accordance with condition 35C(a), to the satisfaction of BSC.	1. Records of inspection of the unsealed section of Nymagee - Hermidale Road for the past three years		1. The Nymagee - Hermidale Road is sealed for its entire length (the Auditor travelled to the site via the concentrate transport route.	Records of inspection were sighted by the Auditor. The Nymagee - Hermidale Road is now sealed for its entire length.	COMPLIANCE	
S3.36	Access Road and Intersection Construction	The Proponent shall construct the site access road for heavy vehicles, and associated intersection of this access road and Burthong Road, prior to the commencement of construction of the process plant. The intersection shall be designed and constructed to the satisfaction of CSC and in accordance with the applicable AUSTROADS standards.	1. Letter from CSC approving the design and construction of the Access Road and Intersection		1. The site access roads and intersections have been constructed. Refer to Photo #7.	Hera had constructed the site access road for heavy vehicles, and associated intersection of this access road and Burthong Road prior to the commencement of construction of the process plant (audit interview). It was also visually verified in the July 2013 Audit that road construction had begun prior to the commencement of construction of the process plant.	COMPLIANCE	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3.37	Monitoring of Concentrate Transport	The Proponent shall: (a) keep accurate records of the: (i) amount of lead and zinc concentrate transported from the site (on a monthly basis); and (ii) the date and time of loaded truck movements from the site; and (b) provide the Secretary with a summary of these truck movements in the Annual Review.	1. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017</i> ; dated 14 August 2017 2. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018</i> ; dated 16 August 2018 3. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2019</i> ; dated 14 August 2019.			Hera keeps accurate records of the amount of lead and zinc concentrate transported from the site by calculating the net weight of each truck load. A dedicated weighbridge is located on site for this purpose. Concentrate tonnage records are kept in the metallurgy database (MPX-DS) on a per truck basis (sighted). Monthly tonnage amounts can be calculated and are also available on Aurelia's website (sighted). Hera publish the required information in the Annual Reviews.	COMPLIANCE	
S3.37A	Transport of Concentrate to Hermindale Rail Siding	The Proponent shall restrict the transport of concentrate to the Hermindale rail siding via the Nymagee-Hermindale Road during daylight hours and limit vehicle movements (entering and leaving the site) to 4 per day, averaged over a calendar month, unless otherwise agreed by the Secretary.	1. <i>Traffic Management Plan</i> , Version 3.0, dated 14 May 2016. 2. <i>Drivers Code of Conduct</i> Revision 2.0, dated November 2018. 3. Records of concentrate transport for the past three years (monthly web reports)			Section 5.3 of the Traffic Management Plan refers to the concentrate transport limits. The Drivers Code of Conduct specifies the permitted concentrate transport times. A review of the monthly web reports confirmed compliance with the concentrate load limit of 4 trucks per day average over a year.	COMPLIANCE	
S3.38	Traffic Management Plan	The Proponent shall prepare and implement a Traffic Management Plan to the satisfaction of the Secretary.	1. <i>Traffic Management Plan</i> , Version 3.0, dated 14 May 2016. 2. <i>Traffic Management Plan</i> Version 3.0, dated February 2017. 2. Letter from DPE (C Preshaw) to Hera (J Thompson) titled " <i>Hera Gold Mine (10_0191) Approval of Traffic Management Plan</i> ", dated 14 November 2017.			DPE approved the Traffic Management Plan in November 2017.	COMPLIANCE	
		The plan shall:(a) focus on traffic management along Nymagee-Hermindale Road, Burthong Road and Priory Tank Road, particularly in the vicinity of the villages of Nymagee and Hermindale;	1. <i>Traffic Management Plan</i> , Version 3.0, dated February 2017.			The Traffic Management Plan does not clearly address traffic management along Nymagee-Hermindale Road, Burthong Road and Priory Tank Road, particularly in the vicinity of the villages of Nymagee and Hermindale.	Non-Compliance	Ensure that the latest revision of the Traffic Management Plan addresses traffic management along Nymagee-Hermindale Road, Burthong Road and Priory Tank Road, particularly in the vicinity of the villages of Nymagee and Hermindale.
		(b) describe the measures to minimise conflicts between road users and ensure that trucks from the mine do not travel through surrounding local roads;	1. <i>Traffic Management Plan</i> , Version 3.0, dated February 2017.			The responsibilities of truck drivers in relation to the minimisation of conflicts with other road users in contained in the Drivers Code of Conduct.	COMPLIANCE	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(c) be developed in consultation with both BSC and CSC and submitted for the approval of the Secretary prior to carrying out any development on the site under this approval.	1. Email from CSC (S Poulter) to Hera (J Thompson) titled " <i>Traffic Management Plan - submission for comment</i> ", dated 20 February 2017. The email acknowledges the request for comment on the draft plan. 2. Email from BSC (G Bourke) to Hera (J Thompson) titled " <i>Traffic Management Plan - submission for comment</i> ", dated 20 February 2017. The email acknowledges the request for comment on the draft plan.			Hera consulted with both Councils during the preparation of the Traffic Management Plan.	COMPLIANCE	
S3.39	Visual	The Proponent shall: (a) implement all reasonable and feasible measures to minimise the visual impacts, and particularly the off-site lighting impacts, of the project;			1. External lighting associated with the Mine surface facilities is not visible from neighbouring properties.	The processing plant and related infrastructure is well set back from the public road and is naturally screened due to the topography and trees.	COMPLIANCE	
		(b) ensure that all external lighting associated with project complies with Australian Standard AS4282 (INT) 1995 – Control of Obtrusive Effects of Outdoor Lighting, to the satisfaction of the Secretary.	1. Letter from Light Harmony (R Nixon) to Hera (S Ramsy) titled " <i>Compliance with Control of the Obtrusive Effects of Outdoor Lightings - AS4282</i> " dated 8 February 2017.		1. External lighting associated with the Mine surface facilities is not visible from neighbouring properties.	By letter dated 8 February 2017, Light Harmony (Lighting Engineering & Design Consultants) stated: "Based on the remote location and our assessment of the existing lighting system, we would deem that the Hera process plant and ancillary areas complies with the principles and guidelines of AS4282 Table 2.1 recommended maximum values of light technical parameters for the control of obtrusive light."	COMPLIANCE	
S3.40	Final Hazard Analysis	The Proponent shall prepare a Final Hazards Analysis (FHA) for the project to the satisfaction of the Secretary, in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis.	1. <i>Environmental Management Plan Hazardous Materials</i> , Version 1.0, dated 9 April 2013. 2. Letter from DPE (H Reed) to Hera (S Haures) titled " <i>Hera Gold Mine (10_0191) Hazardous Materials Management Plan</i> ", dated 1 May 2013.	Hera contend this condition should be Compliant. The condition states that this must be prepared to the satisfaction of the Secretary. As the Secretary has approved the plan, this condition has been satisfied. The issues you have identified are separate to this condition and I would suggest a recommendation and not mandated by the condition.		The September 2016 IER found that a Final Hazards Analysis (FHA) had not been completed. The recommendation to complete a final hazard analysis has not been actioned. A Preliminary Hazard Analysis (PHA) was completed by RW Corkery & Co as part of the EA (Nov. 2011) (sighted). Section 5.1 of the Hazardous Materials Management Plan states that "As there are no changes to the design of the Mine, the PHA is considered by Hera Resources to be sufficient to satisfy the requirement of Condition 3(40) of Project Approval whereby a Final Hazards Analysis was to be prepared". The previous audit in July 2013 noted: "As the Hazardous Materials Management Plan has been approved by the Director-General, YTC Hera is compliant with this condition." However, the 2013 audit was conducted prior to the construction and operation of the processing plant; an area where the majority of the hazardous materials are stored or used. At the time of the audit in September 2016, it was observed that there are hazardous goods (e.g. LNG Class 2.1) and processes (e.g. Meta Foundries – gold room) that were not identified in the original PHA.	Non-Compliance	Conduct a Final Hazard Analysis in accordance with Hazardous Industry Planning Advisory Paper No. 5 – Hazard Audit Guidelines

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3.41	Hazardous Materials Management Plan	The Proponent shall prepare and implement a Hazardous Materials Management Plan for the project to the satisfaction of the Secretary. The plan must:	1. <i>Environmental Management Plan Hazardous Materials</i> , Version 1.0, dated 9 April 2013. 2. Letter from DPE (H Reed) to Hera (S Haures) titled " <i>Hera Gold Mine (10_0191) Hazardous Materials Management Plan</i> ", dated 1 May 2013.			A hazardous Materials Management Plan has been prepared by Hera.	COMPLIANCE	
		(a) be prepared in consultation with the relevant government agencies including CSC, RMS, EPA, DPI Water, WorkCover NSW and DRE;				No correspondence was available to verify that the EPA, DPI Water, DRE, CSC, RMS, or Workcover were consulted during preparation of the Plan.	Non-Compliance	Finalise the review and agency consultation for the Hazardous Materials Management Plan.
		(b) be consistent with the International Cyanide Management Code for the Manufacture, Transport and Use of Cyanide in the Production of Gold;			1. Cyanide Storage Facilities (Refer to Photo #8).	Section 5.8 of the HMMP lists the cyanide controls to be used which are consistent with the International Cyanide Management Code for the Manufacture, Transport and Use of Cyanide in the Production of Gold (the Code).	COMPLIANCE	
		(c) be submitted to the Secretary for approval prior to commencing mining operations under this approval;				The current version of the Hazardous Materials Management Plan has been approved by DPE.	COMPLIANCE	
		(d) describe the measures that would be implemented to: (i) ensure sodium cyanide and other toxic chemicals are stored and handled on the site in accordance with AS/NZ 4452 – The Storage and Handling of Toxic Substances; and (ii) ensure the transportation of hazardous materials to or from the site is undertaken in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 11 – Route Selection and the Australian Code for the Transport of Dangerous Goods by Road and Rail – current version; and				The HMMP does not satisfy paragraph (d)(i) in that it does not specify measures in relation to the storing and handling of lead nitrate (and toxic chemical). The plan does not satisfy paragraph (d)(ii) in that it does not describe the route selection for the transportation of cyanide from its point of origin to the mine in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 11 – Route Selection.	Non-Compliance	Finalise the review and agency consultation for the Hazardous Materials Management Plan and ensure it includes the relevant requirements of AS 4452.
		(e) detail the emergency procedures for the Project consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1 – Emergency Planning.				The HMMP does not satisfy paragraph (e) of this condition in that it does not include all of the procedures contained in the Department's Hazardous Industry Planning Advisory Paper No. 1 – Emergency Planning.	Non-Compliance	Finalise the review and agency consultation for the Hazardous Materials Management Plan and ensure it includes the relevant requirements of Department's Hazardous Industry Planning Advisory Paper No. 1 – Emergency Planning.
S3.42	Waste	The Proponent shall: (a) minimise the waste generated by the project;	1. <i>Environmental Management Plan Hazardous Materials</i> , Version 1.0, dated 9 April 2013.		1. Waste recycling including oil and scrap steel at the workshops as well as general waste segregation/recycling in strategically placed bins was sighted	Hera addresses waste minimisation and disposal in section 5.5 of the Hazardous Materials Management Plan (HMMP) .	COMPLIANCE	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
					during the Audit. Refer to Photo #9.			
		(b) ensure that the waste generated by the project is appropriately stored, handled and disposed of; and	1. Waste Disposal Records.		1. Waste bins are strategically located around the site. Suitable bins are available to allow segregation of wastes. Waste storage areas are clearly signposted. Refer to Photo #10.	Appropriate waste collection and storage facilities are provided. Waste records sighted demonstrate that appropriate waste disposal options are in place.	COMPLIANCE	
		(c) manage on-site sewage treatment disposal in accordance with the requirements of CSC, to the satisfaction of the Secretary.	1. Letter from CSC to YTC Resources titled "Approval to Install / Construct a Sewage Management System", dated 18 December 2012. 12 Letter from CSC to YTC Resources titled "Approval to Install / Construct a Sewage Management System", dated 23 September 2013 3. Certificate of Completion, Fuji CE6000 sewage treatment system - by True Water Australia, dated 9 August 2013.		1. Sewage Treatment Plant and irrigation areas.	Sewage treatment systems have been installed and are managed in accordance with Council requirements.	COMPLIANCE	
S3.43	Waste Rock Management Plan	The Proponent shall prepare and implement a Waste Rock Management Plan to the satisfaction of the Secretary.	1. YTC Resources Ltd, <i>Environmental Management Plan Waste Rock</i> , Revision 1.0, dated 15 July 2014.2. <i>Draft Waste Rock Management Plan</i> , Revision 2, dated 24 November 2018.			The 2014 version of the plan has been approved by DPE and is the current version of the plan. A updated plan has been drafted, but not yet finalised or approved.	COMPLIANCE	
		The plan must: (a) be developed in consultation with the EPA and DPI Water;	1. <i>Independent Environmental Audit, Hera Resources Pty Ltd, Hera Project, NUMAGEE NSW</i> , September 2016. The Audit report stated: "The current Waste Rock Management Plan (WRMP) had been developed in consultation with the EPA and NOW. A letter (dated 21st November 2012) was sighted requesting comment from both the EPA and NOW. Letters of response (from NOW dated 21/06/13 and the EPA dated 21/12/12) were sighted."			The 2014 Waste Rock Management Plan (WRMP) was developed in consultation with the EPA and NOW.	COMPLIANCE	
		(b) submitted for the approval of the Secretary within six months of this approval;	1. Letter from DPE (H Reed) to Hera (S Haures) titled " <i>Hera Gold Mine (10_0191) Waste Rock Management Plan</i> ", dated 22 July 2013.			DPE approved the Waste Rock Management Plan in July 2013. The WRMP had not been prepared and submitted for the approval of the Secretary within six months of this Project Approval (audit interview).	Non-Compliance	Finalise the stake holder consultation and review the 2019 Waste Rock Management Plan to ensure it covers all issues required by this Condition, consult with the relevant Authorities and seek DPIE approval for the Plan.
		(c) include a detailed description of the procedures to be implemented to monitor and manage potential acid forming material;	1. YTC Resources Ltd, <i>Environmental Management Plan Waste Rock</i> , Revision 1.0, dated 15 July 2014.			A detailed description of the procedures to be implemented to monitor and manage potential acid forming material is described in section 4.3 of the WRMP	COMPLIANCE	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(d) reflect the groundwater and surface water monitoring programs to monitor potentially acid-forming waste rock and any leachate generated, including appropriately designed detection and response systems for acid generation (covering monitoring methods, trigger levels and proposed management actions);	1. YTC Resources Ltd, <i>Environmental Management Plan Waste Rock</i> , Revision 1.0, dated 15 July 2014.			Section 4.3.2.1 in the WRMP describes the monitoring programs to monitor potentially acid-forming waste rock and any leachate generated, including appropriately designed detection and response systems for acid generation. Specific visual levels trigger proposed management actions such as pumping to the process water dam. Trigger levels for acid detection (e.g. pH levels) have not been included in the WRMP.	Non-Compliance	Finalise the stake holder consultation and review the 2019 Waste Rock Management Plan to ensure it covers all issues required by this Condition, consult with the relevant Authorities and seek DPIE approval for the Plan.
		(e) ensure effective isolation of potential acid forming material in rock dumps;	1. YTC Resources Ltd, <i>Environmental Management Plan Waste Rock</i> , Revision 1.0, dated 15 July 2014.			Measures to effectively isolate potential acid forming material in rock dumps is described in section 4.3.3 of the WRMP. However, it was stated that both PAF and NAF are stockpiled in Cell 1 (PAF) which is contrary to Table 5 and the material handling flowsheet in Figure 3 of the WRMP. Risk is created when using this material as differentiation between NAF and PAF relies on visual inspection. There is a risk where PAF, instead of NAF, is used for other works on site (which has occurred on one occasion when PAF was used to construct a clean water drain; it was retrieved on the same day and self-reported) (audit interview and observation).	Non-Compliance	Finalise the stake holder consultation and review the 2019 Waste Rock Management Plan to ensure it covers all issues required by this Condition, consult with the relevant Authorities and seek DPIE approval for the Plan.
		(f) include procedures for appropriate testing of potentially acid forming waste rock prior to it being brought to the surface;	1. YTC Resources Ltd, <i>Environmental Management Plan Waste Rock</i> , Revision 1.0, dated 15 July 2014.			Section 4.3.1 of the WRMP includes procedures for appropriate testing of potentially acid forming waste rock prior to it being brought to the surface.	COMPLIANCE	
		(g) include procedures for prioritising the relocation of potential acid forming material to a suitable underground location prior to oxidation;	1. YTC Resources Ltd, <i>Environmental Management Plan Waste Rock</i> , Revision 1.0, dated 15 July 2014.			Section 4.3.4 of the WRMP includes procedures for prioritising the relocation of potential acid forming material to suitable underground locations prior to oxidation.	COMPLIANCE	
		(h) include procedures to ensure that material relocated underground does not, to the extent reasonable and feasible, further oxidise or cause impact to groundwater;	1. YTC Resources Ltd, <i>Environmental Management Plan Waste Rock</i> , Revision 1.0, dated 15 July 2014.			Section 4.3.4 of the WRMP includes procedures to ensure that material relocated underground does not, to the extent reasonable and feasible, further oxidise or cause impact to groundwater.	COMPLIANCE	
		(i) notwithstanding (e) above, trigger levels for any material that has oxidised to the extent that it cannot be placed underground without impacting groundwater quality and procedures for adequate capping and sealing of such material at the surface;	1. YTC Resources Ltd, <i>Environmental Management Plan Waste Rock</i> , Revision 1.0, dated 15 July 2014.			Section 4.3.4 of the WRMP describes management plans for material that has oxidised to the extent that it cannot be placed underground without impacting groundwater quality	COMPLIANCE	
		(j) detail proposed neutralising options to be implemented for oxidising material stored or encapsulated aboveground; and	1. YTC Resources Ltd, <i>Environmental Management Plan Waste Rock</i> , Revision 1.0, dated 15 July 2014.			Section 4.3.4 of the WRMP details proposed neutralising options (such as crushed limestone) to be implemented for oxidising material stored or encapsulated aboveground.	COMPLIANCE	
		(k) where there is likely to be an extended time between placement of potential acid forming material underground, details of proposed methods to prevent oxidation of the material underground or to otherwise manage acid drainage to prevent impacts on groundwater.	1. YTC Resources Ltd, <i>Environmental Management Plan Waste Rock</i> , Revision 1.0, dated 15 July 2014.			Section 5 of the WRMP details proposed methods to manage acid drainage to prevent impacts on groundwater where there is likely to be an extended time between placement of potential acid forming material underground.	COMPLIANCE	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S3.44	Rehabilitation Objectives	The Proponent shall rehabilitate the site to the satisfaction of the Executive Director Mineral Resources. This rehabilitation must be generally consistent with the proposed rehabilitation strategy described in the EA (as reproduced in Appendix 4), and comply with the objectives in Table 7:	1. <i>Mining Operations Plan for the Hera Mine PA10_0191</i> , dated January 2017.			The approved MOP describes the rehabilitation plans for the Mine site. Section 4.3 of the MOP describes the Rehabilitation Objectives. Full rehabilitation of the site is not yet required as the mine is still operational.	COMPLIANCE	
S3.45	Progressive Rehabilitation	The Proponent shall carry out rehabilitation of the site progressively, that is, as soon as reasonably practicable after disturbance. All reasonable and feasible measures must be taken to minimise the total area exposed for dust generation at any time. Interim rehabilitation strategies shall be employed when areas prone to dust generation cannot yet be permanently rehabilitated.			1. Previously disturbed areas have been revegetated.	The Auditor inspected all areas of the mine and observed that progressive rehabilitation (of previously cleared areas) has been undertaken.	COMPLIANCE	
S3.46	Rehabilitation Management Plan	The Proponent shall prepare and implement a Rehabilitation Management Plan for the project to the satisfaction of the Executive Director Mineral Resources.	1. Mining Operations Plan for the Hera Mine PA10_0191, dated January 2017. The MOP contains the Rehabilitation Management Plan. 2. Letter from the DRE (to Hera (J Simpson), titled " <i>Application for a Mining Operations Plan (MOP) for Mining Lease (ML) 1686, ML1746, Mining Act 1992, Hera Resources Pty Ltd of DPI approving the MOP</i> ", dated 27 February 2017.			Correspondence verifying that the 2017 version of the MOP was approved by DRE was sighted during the Audit.	COMPLIANCE	
		This plan must: (a) be prepared in consultation with the Department, OEH, EPA, DPI Water and CSC;	1. Letter from the DRE (to Hera (J Simpson), titled " <i>Application for a Mining Operations Plan (MOP) for Mining Lease (ML) 1686, ML1746, Mining Act 1992, Hera Resources Pty Ltd of DPI approving the MOP</i> ", dated 27 February 2017.			CSC has not been consulted during the preparation of the MOP (and therefore the rehabilitation action plan. The most recent version of the MOP / rehab management plan (submitted for approval on 6 Feb 2020) has been prepared in consultation with these agencies.	Non-Compliance	No action required.
		(b) be submitted to the Executive Director Mineral Resources for approval prior to carrying out development on the site under this approval;	1. Letter from NSW Trade and Investment - Resources and Energy (M Young) to Hera Resources titled " <i>Mining Lease No. 1686 - Mining Operations Plan Approval</i> " dated 14 June 2013. The letter approves the MOP versions 3.1 (dated 21 May 2013).			Correspondence verifying that the original MOP was approved by DRE was sighted during the Audit.	COMPLIANCE	
		(c) be prepared in accordance with any relevant DRE guideline;	1. <i>Mining Operations Plan for the Hera Mine PA10_0191</i> , dated January 2017. Appendix 3 provides copies of consultation correspondence with DPI, OEH, DRE and the EPA.			There are no current DRE rehabilitation management plan guidelines	Noted	
		(d) outline the procedures to be implemented to achieve the rehabilitation objectives in condition 44;	1. <i>Mining Operations Plan for the Hera Mine PA10_0191</i> , dated January 2017. Appendix 3 provides copies of consultation correspondence with DPI, OEH, DRE and the EPA.			Section 5 of the MOP describes implementation of the Rehabilitation Strategy.	COMPLIANCE	
		(e) describe how the rehabilitation of the site would be integrated with the implementation of the biodiversity offset strategy;	1. <i>Mining Operations Plan for the Hera Mine PA10_0191</i> , dated January 2017. Appendix 3 provides copies of consultation correspondence with DPI, OEH, DRE and the EPA.			The biodiversity off-set area is remote from the mine; therefore, rehabilitation of the mine site cannot be integrated with the implementation of the rehabilitation actions to be undertaken on the mine site.	Not Triggered	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(f) include detailed performance and completion criteria for evaluating the performance of the rehabilitation of the site, and triggering remedial action (if necessary);	1. <i>Mining Operations Plan for the Hera Mine PA10_0191</i> , dated January 2017. Appendix 3 provides copies of consultation correspondence with DPI, OEH, DRE and the EPA.			Section 6 of the MOP describes the performance and completion criteria of the Rehabilitation Strategy.	COMPLIANCE	
		(g) describe the measures that would be implemented to ensure compliance with the relevant conditions of this approval, and address all aspects of rehabilitation including mine closure, final landform, and final land use;	1. <i>Mining Operations Plan for the Hera Mine PA10_0191</i> , dated January 2017. Appendix 3 provides copies of consultation correspondence with DPI, OEH, DRE and the EPA.			Section 5 of the MOP describes implementation of the Rehabilitation Strategy.	COMPLIANCE	
		(h) include interim rehabilitation where necessary to minimise the area exposed for dust generation;	1. <i>Mining Operations Plan for the Hera Mine PA10_0191</i> , dated January 2017. Appendix 3 provides copies of consultation correspondence with DPI, OEH, DRE and the EPA.			Section 7.2 .6 of the MOP describes the proposed rehabilitation activities that will be implemented over the life of the mine to minimise dust generation.	COMPLIANCE	
		(i) include a program to monitor, independently audit and report on the effectiveness of the measures, and progress against the detailed performance and completion criteria; and	1. <i>Mining Operations Plan for the Hera Mine PA10_0191</i> , dated January 2017. Appendix 3 provides copies of consultation correspondence with DPI, OEH, DRE and the EPA.			Section 8 of the MOP describes the monitoring and reporting that will be undertaken in relation to the Rehabilitation Strategy.	COMPLIANCE	
		(j) build, to the maximum extent practicable, on the other management plans required under this approval.	1. <i>Mining Operations Plan for the Hera Mine PA10_0191</i> , dated January 2017. Appendix 3 provides copies of consultation correspondence with DPI, OEH, DRE and the EPA.				Noted	
S4.1	Notification of Landowners	Within 3 months of the date of project approval, the Proponent shall notify in writing the owners of any privately-owned land within two kilometres of the approved blasting on site that they are entitled to request an inspection to establish the baseline condition of any buildings or structures on their land, or to have a previous property inspection report updated.	1. <i>Independent Environmental Audit, Hera Resources Pty Ltd, Hera Project, NUMAGEE NSW</i> , September 2016.			The 2016 Audit noted that the nearest residential premises is over 2 km from the site and therefore this Condition is not triggered.	Not Triggered	
S4.2		Within two weeks of obtaining monitoring results showing: (1) an exceedance of any relevant noise criteria in Schedule 3, the Proponent shall notify affected landowners and/ or tenants in writing of the exceedance, and provide regular monitoring results to each of these affected parties until the project is again complying with the relevant criteria; and				Noise exceedances have been recorded.	Not Triggered	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(2) an exceedance of any relevant air quality criteria in Schedule 3, the Proponent shall send the affected landowners and/ or tenants a copy of the NSW Health fact sheet entitled "Mine Dust and You" (as may be updated from time to time).	1. Notice of PM10 exceedance and incident report - (18 July 2018) sent to DPE, DRE, EPA, CSC. 2. Notice of PM10 exceedance and incident report - (19 April 2018) sent to DPE, DRE, EPA, CSC. 3. Notice of PM10 exceedance and incident report - (30 March 2018) sent to DPE, DRE, EPA, CSC. 4. Notice of HVAS exceedance and incident report - (25 July 2017) sent to DPE, DRE, EPA, CSC. 5. Notice of PM10 exceedance and incident report - (22 November 2016) sent to DPE, DRE, EPA, CSC. 6. Notice of Dust Deposition exceedance and incident report - (September 2019) sent to DPE, DRE, EPA, CSC. 7. Notice to EPA of visible dust generation on tailings dam - incident report - (16 September 2019) . 8. Notice of Dust Deposition exceedance and incident report - (September 2019) sent to DPE, DRE, EPA, CSC.	J Thompson: As per the incident reports in 2016, 2017 and 2018 copies were not supplied to land holders as no land holders were impacted. The land holders are more than 2km from site and therefore have not be affected by the dust .		No land holders were impacted by dust emissions from the site during the Audit Period.	Not Triggered	
S4.3	Independent Review	If an owner of privately-owned land considers the project to be exceeding the relevant criteria in Schedule 3, then he/she may ask the Secretary in writing for an independent review of the impacts of the project on his/her land. If the Secretary is satisfied that an independent review is warranted, then within two months of the Secretary's decision the Proponent shall: (a) commission a suitably qualified, experienced and independent person, whose appointment has been approved by the Secretary, to: (i) consult with the landowner to determine his/ her concerns; (ii) conduct monitoring to determine whether the project is complying with the relevant criteria in Schedule 3; and (iii) if the project is not complying with these criteria then identify measures that could be implemented to ensure compliance with the relevant criteria. (b) give the Secretary and landowner a copy of the independent review.		1. J. Thompson 19 November 2019. No requests for independent reviews have been received..		No requests for independent reviews have been received.	Not Triggered	
S4.4		If the independent review determines that the project is complying with the relevant criteria in Schedule 3, then the Proponent may discontinue the independent review with the approval of the Secretary.		1. J. Thompson 19 November 2019. No requests for independent reviews have been received.		No requests for independent reviews have been received.	Not Triggered	
S4.5		If the independent review determines that the project is not complying with the relevant criteria in Schedule 3, then the Proponent shall: (a) implement all reasonable and feasible mitigation measures, in consultation with the landowner and		1. J. Thompson 19 November 2019. No requests for independent reviews have been received.		No requests for independent reviews have been received.	Not Triggered	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		appointed independent person, and conduct further monitoring until the project complies with the relevant criteria; or (b) secure a written agreement with the landowner to allow exceedances of the relevant criteria, to the satisfaction of the Secretary.						
S5.1	Environmental Management Strategy	The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Director-General. The strategy must:	1. <i>Environmental Management Strategy</i> , Version 3.0, dated 12 November 2017.			An Environmental Management Strategy has been prepared.	COMPLIANCE	
		(a) be submitted to the Director-General for approval prior to the commencement of Mining activities;				Advise DPIE that the EMS has been reviewed and that no changes have been made to the document, but that the revision number and issue date have been updated.	Non-Compliance	Ensure that the current version of the Environmental Management Strategy is approved by DPIE.
		(b) provide the strategic framework for environmental management of the project;	1. <i>Environmental Management Strategy</i> , Version 3.0, dated 12 November 2017.			The EMS provides a simple framework for the management of the environmental obligations associated with the Project. The framework presented in the EMS is based on ISO 14001. The framework as implemented is not sufficient to adequately manage Hera's compliance obligations under this Approval.	Non-Compliance	Implement the Environmental Management System Recommendations described in Section 7.1 of this report.
		(c) identify the statutory approvals that apply to the project;	1. <i>Environmental Management Strategy</i> , Version 3.0, dated 12 November 2017.			Section 3 of the EMS discusses the Planning Approval applicable to the mining operations.	COMPLIANCE	
		(d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;	1. <i>Environmental Management Strategy</i> , Version 3.0, dated 12 November 2017.			Section 9 of the EMS describes the key roles and responsibilities.	COMPLIANCE	
		(e) describe the procedures that would be implemented to: · keep the local community and relevant agencies informed about the operation and environmental performance of the project; · receive, handle, respond to, and record complaints; · resolve any disputes that may arise during the course of the project; · respond to any non-compliance; and · respond to emergencies; and	1. <i>Environmental Management Strategy</i> , Version 3.0, dated 12 November 2017.			Section 8 of the EMS describes the complaints management and dispute resolution processes.	COMPLIANCE	
		(f) include: · copies of the various strategies, plans and programs that are required under the conditions of this approval once they have been approved; and · a clear plan depicting all the monitoring to be carried out in relation to the project.	1. <i>Environmental Management Strategy</i> , Version 3.0, dated 12 November 2017.			Section 5.2 of the EMS references the management plans required by the Planning Approval.	COMPLIANCE	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S5.2	Adaptive Management	The Proponent shall assess and manage project-related risks to ensure that there are no exceedances of the criteria and/or performance measures in schedule 3. Any exceedance of these criteria and/or performance measures constitutes a breach of this approval and may be subject to penalty or offence provisions under the EP&A Act or EP&A Regulation.					Noted	
		Where any exceedance of these criteria and/or performance measures has occurred, the Proponent shall, at the earliest opportunity:(a) take all reasonable and feasible measures to ensure that the exceedance ceases and does not recur;	1. Notice of PM10 exceedance and incident report - (18 July 2018) sent to DPE, DRE, EPA, CSC.2. Notice of PM10 exceedance and incident report - (19 April 2018) sent to DPE, DRE, EPA, CSC.3. Notice of PM10 exceedance and incident report - (30 March 2018) sent to DPE, DRE, EPA, CSC.4. Notice of HVAS exceedance and incident report - (25 July 2017) sent to DPE, DRE, EPA, CSC.5. Notice of PM10 exceedance and incident report - (22 November 2016) sent to DPE, DRE, EPA, CSC.6. Notice of Dust Deposition exceedance and incident report - (September 2019) sent to DPE, DRE, EPA, CSC..7. Notice of Dust Deposition exceedance and incident report - (September 2019) sent to DPE, DRE, EPA, CSC.8. Notice of Dust Deposition exceedance and incident report - (September 2019) sent to DPE, DRE, EPA, CSC.9. Notice of WAD exceedance and incident report - (20 September 2017) sent to DPE, DRE, EPA.10. EPA Show Cause Notice relating to cyanide contaminated water leaks, EPA Reference 1580504, dated13 June 2019.			The Auditor has reviewed exceedance (WAD and PM10 dust) for the Audit Period. The review of the correspondence provided indicates that all exceedances were reported to DPE, DRE, EPA and where required to Council.	COMPLIANCE	
		(b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing those options and any preferred remediation measures or other course of action; and	1. Notice of WAD exceedance and incident report - (20 September 2017) sent to DPE, DRE, EPA.. The report relates to a failure to collect and analyse Wad samples (due to equipment loss in a laboratory fire and the subsequent detection of a WAD exceedance. 2. Notice of WAD exceedance and incident report - (24, 25 and 26 April 2018) sent to DPE, DRE, EPA.. The report relates to the detection of a WAD exceedances.			The Auditor has reviewed exceedance (WAD and PM10 dust) for the Audit Period. The review of the correspondence provided indicates incident reports were prepared and issued to the relevant Authorities.	COMPLIANCE	
		(c) implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary.				DPE has not instructed Hera to implement and remediation strategies during the Audit Period.	Not Triggered	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S5.3	Management Plan Requirements	The Proponent shall ensure that the Management Plans required under this approval are prepared in accordance with any relevant guidelines, and include: (a) detailed baseline data;	1. YTC Resources Ltd, Environmental Management Plan Noise Management, Revision 5, dated 19 August 2013. 2. YTC Resources Ltd, Environmental Management Plan Blast, Revision 4, dated 30 August 2012. 3. YTC Resources Ltd, Environmental Management Plan Air Quality and Greenhouse Gas, Revision 3, dated 28 August 2012. 4. Draft Water Management Plan 2018, Version 6, dated November 2019. 5. Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hera Mine, prepared by RW Corkery, dated June 2016. Note that this plan incorporates the Biodiversity Off-set Strategy. 6. YTC Resources Ltd, Environmental Management Plan Aboriginal Cultural Heritage, Revision 1.1, dated 19 August 2012. 7. Traffic Management Plan, Version 3.0, dated 14 May 2016. 8. Environmental Management Plan Hazardous Materials, Version 1.0, dated 9 April 2013. 9. YTC Resources Ltd, Environmental Management Plan Waste Rock, Revision 1.0, dated 15 July 2014. 10. Mining Operations Plan for the Hera Mine PA10_0191, dated January 2017. The MOP incorporates the Rehabilitation Management Plan. 11. Environmental Management Strategy, Version 3.0, dated 12 November 2017.			With the exception of the MOP and the TMP, current versions of the Plans (that is those that were approved by DPE) were prepared in 2012/13. The plans were prepared in accordance with the guidelines relevant in 2013 and reference, where applicable baseline data.	COMPLIANCE	
		(b) a description of: · the relevant statutory requirements (including any relevant approval, licence or lease conditions); · any relevant limits or performance measures/criteria; and · the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the project or any management measures;				With the exception of the MOP, EMS and TMP, current versions of the Plans (that is those that were approved by DPE and uploaded to the mine website at the time of the audit) were prepared in 2012/13. Variations to the Project Approval had been approved during that time and those modifications are in general not fully reflected in most of the plans. The Auditor has been advised that those plans have now been revised the consultation / approval of those plans has commenced.	Non-Compliance	All management plans required under this Approval (including the Environmental Management Strategy) should be thoroughly reviewed and revised to reflect changes in the approval, legislative changes and developments in environmental management standards applicable to gold mining operations.
		(c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;				each plan contains a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures.	COMPLIANCE	
		(d) a program to monitor and report on the: · impacts and environmental performance of the project; and · effectiveness of any management measures (see (c) above);				Each plan contains a program to monitor and report on the: · impacts and environmental performance of the project; and · effectiveness of any management measures.;	COMPLIANCE	
		(e) a contingency plan to manage any unpredicted impacts and their consequences;				Each plan contains a contingency plan to manage any unpredicted impacts and their consequences.	COMPLIANCE	
		(f) a program to investigate and implement ways to improve the environmental performance of the project over time;				The plans in general do not provide a program to investigate and implement ways to improve the environmental performance of the project over time.	Non-Compliance	During the review and revision of each plan required under this Approval, develop a program to investigate and implement ways to improve the environmental performance of the project over time.
		(g) a protocol for managing and reporting any: · incidents; · complaints; · non-compliances with statutory requirements; and · exceedances of the impact assessment criteria and/or performance criteria; and				Each plan describes a protocol for managing and reporting any: · incidents; · complaints; · non-compliances with statutory requirements; and · exceedances of the impact assessment criteria and/or performance criteria.	COMPLIANCE	
		(h) a protocol for periodic review of the plan.				Each plan describes a protocol for periodic review of the plan.	COMPLIANCE	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S5.4	Annual Review	By the end of December each year, the Proponent shall review the environmental performance of the project to the satisfaction of the Director-General.	<p>1. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017; dated 14 August 2017</p> <p>2. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018; dated 16 August 2018</p> <p>3. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2019; dated 14 August 2019.</p> <p>4. Letter from DPE K O'Reilly) to Hera (J Thompson) titled "Hera Mine - PA 10_0191 (MOD 4) Annual Environmental Review Report 16 May 2016 to 15 May 2017", dated 26 September 2017.</p>			Letters approving each of the Annual Reviews from DPE were sighted.	COMPLIANCE	
		This review must: (a) describe the works (including rehabilitation) that were carried out in the previous year, and the works that are proposed to be carried out over current year;				The Annual Reviews submitted for 2016, 2017 and 2018 described the works undertaken during the respective reporting years, and a statement regarding the work proposed for the coming year, including rehabilitation works.	COMPLIANCE	
		(b) include a comprehensive review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against: · the relevant statutory requirements, limits or performance measures/criteria; · the monitoring results of previous years; and · the relevant predictions in the EA;				The Annual Reviews submitted for 2016, 2017 and 2018 included reviews of the monitoring results against the emission / performance criteria specified in the Project Approval and the Environment Protection Licence.	COMPLIANCE	
		(c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;				The Annual Reviews submitted for 2016, 2017 and 2018 did not clearly identify all non-compliances against the emission / performance criteria specified in the Project Approval and the Environment Protection Licence. For example Section 4.3 of the 2017/18 Environmental Review states "There were several WAD Cyanide incidents during the reporting period". The non-compliances were not specifically identified, nor was there any discussion of actions taken by Hera in response to the non-compliances.	Non-Compliance	Provide full details of all non-compliances against both the Planning Approval and EPL in the Annual Review. Provide details of actions taken in relation to each non-compliance.
		(d) identify any trends in the monitoring data over the life of the project;				The Annual Reviews submitted for 2016, 2017 and 2018 identified general trends in emission / performance monitoring.	COMPLIANCE	
		(e) identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies; and				Section 4 of the Annual Reviews provide an assessment of actual against predicted impacts (as presented in the EIS).	COMPLIANCE	
		(f) describe what measures will be implemented over the next year to improve the environmental performance of the project.				The Annual Reviews submitted for 2016, 2017 and 2018 identified what measures will be implemented over the next year to improve the environmental performance of the project.	COMPLIANCE	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S5.5	Revision of Strategies Plans and Programs	<p>Within 3 months of:</p> <p>(a) the submission of an annual review under condition 3 above;</p> <p>(b) the submission of an incident report under condition 5 below;</p> <p>(c) the submission of an audit report under condition 8 below; and</p> <p>(d) any modifications to this approval, the Proponent shall review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the Director-General.</p> <p>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the project.</p>	1. Details (list) of all plans updated and reissued during the Audit period			<p>The management plans that were uploaded to the mine website at the time of the audit) were prepared in 2012/13. Variations to the Project Approval had been approved during that time and those modifications are in general not fully reflected in most of the plans.</p> <p>The Auditor has been advised that those plans have now been revised the consultation / approval of those plans has commenced.</p>	Non-Compliance	All management plans required under this Approval (including the Environmental Management Strategy) should be thoroughly reviewed and revised to reflect changes in the approval, legislative changes and developments in environmental management standards applicable to gold mining operations.
S5.6	Community Consultative Committee	The Proponent shall establish and operate a Community Consultative Committee (CCC) for the project in general accordance with the Guidelines for Establishing and Operating Community Consultative Committees for Mining Projects (Department of Planning, 2007, or its latest version), and to the satisfaction of the Secretary. This CCC must be operating within six months of this approval.	1. Minutes of all CCC meetings held during the Audit Period			<p>Quarterly meetings of the Community Consultative Committee (CCC) are hosted by Hera. Minutes of CCC meetings were sighted .</p> <p>It was stated the CCC operates in general accordance with the Guidelines for Establishing and Operating Community Consultative Committees for Mining Projects.</p>	COMPLIANCE	
S5.7	Incident Reporting	The Proponent shall notify the Director-General and any other relevant agencies of any incident associated with the project as soon as practicable after the Proponent becomes aware of the incident. Within 7 days of the date of the incident, the Proponent shall provide the Director-General and any relevant agencies with a detailed report on the incident.					COMPLIANCE	
S5.8	Regular Reporting	The Proponent shall provide regular reporting on the environmental performance of the project on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this approval, and to the satisfaction of the Director-General.	1. http://aureliametals.com/projects/hera-nymagee/reports			The Hera Mine website contains copies of Annual Reviews for 2016, 2017, 2018 and 2019. The website also contains copies of monthly environmental monitoring reports from March 2015 to August 2019.	COMPLIANCE	

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
S5.9	Independent Environmental Audit	Within one year of commencement of development on the site under this approval, and every three years thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. The audit must: (a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary; (b) include consultation with the relevant agencies; (c) assess the environmental performance of the project and assess whether it is complying with the requirements in this approval and any relevant EPL or Mining Lease (including any assessment, plan or program required under these approvals); (d) review the adequacy of strategies, plans or programs required under the abovementioned approvals; and (e) recommend appropriate measures or actions to improve the environmental performance of the project, and/ or any assessment, plan or program required under the abovementioned approvals.	1. http://aureliametals.com/projects/hera-nymagee/audits 2. Independent Environmental Audit, Hera Resources Pty Ltd, Hera Project, NUMAGEE NSW, September 2016.			Copies of the 2013 and 2016 Independent Environmental Audits are available on the Hera Mine Website. The site based elements of the 2016 Independent Environmental Audit were undertaken between 5 and 8 September 2016. The Audit report was finalised and issued to Hera on 13 April 2017. The audit report satisfies the requirements of this Condition.	COMPLIANCE	
S5.10		Within 6 weeks of the completing of this audit, or as otherwise agreed by the Director-General, the Proponent shall submit a copy of the audit report to the Director-General, together with its response to any recommendations contained in the audit report.	1. Email from Hera (J Thompson) to DPE submitting the 2016 IER	J Thompson : the final 2016 Audit Report was submitted to Hera on 14 March 2017 (start of the 6 week period as this was the date the audit was completed) and it was submitted to DPIE on 18 Apr 2016		The previous IEA Report was submitted within 6 weeks of completion of the audit.	COMPLIANCE	
S5.11	Access to Information	Prior to the commencement of construction on the site, the Proponent shall: (a) make copies of the following publicly available on its website: (i) the documents referred to in condition 2 of Schedule 2; (ii) all relevant statutory approvals for the project; (iii) all approved strategies, plans and programs required under the conditions of this approval; (iv) a comprehensive summary of the monitoring results of the project, reported in accordance with the specifications in any approved plans or programs required under the conditions of this or any other approval; (v) a complaints register, which is to be updated on a monthly basis; (vi) minutes of CCC meetings; (vii) the annual reviews required under this approval; (viii) any independent environmental audit of the project, and the Proponent's response to the	1. http://aureliametals.com/projects/hera-nymagee/			The documents and records required by this Condition have been uploaded to the Hera website, except for the Mining Operations Plan (note that the appendices to that plan have been uploaded.	Non-Compliance	Ensure that all required plans (including the current version of the MOP) are loaded on the corporate website.

Project Approval 10_0191								
Condition	Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		recommendations in any audit; (ix) any other matter required by the Secretary; and (b) keep this information up-to-date, to the satisfaction of the Secretary.						

Environment Protection Licence 20179								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
A1.1	Administrative Conditions	This licence authorises the carrying out of the scheduled development work listed below at the premises listed in A2: Construction of an underground gold mine, processing plant, tailings storage facility, and ancillary infrastructure in accordance with Department of Planning project approval 10_0191.					Noted	
A1.2		This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation. Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition. Scheduled Activity Fee Based Activity Scale > 100000 - 500000 T extracted, processed or stored		1. J. Thompson 20 November 2019. The mine has not exceeded the ore processing or concentrate transport limits during the audit period.		The corporate annual reports and Annual Reviews provide a summary of production data for each year. These were: 2017 Financial Year: 368,086 tonnes of ore processed, 32,308 tonnes of concentrate transported from site. 2018 Year: 407,131 tonnes of ore processed, 40,756 tonnes of concentrate transported from site. 2019 Year: 468, 358 tonnes of ore processed, 31,206 tonnes of concentrate transported from site.	COMPLIANCE	
A1.3							Not Used	
A2.0		The licence applies to the following premises: Hera Mine Site					Noted	
A3.0	Administrative Conditions	This licence applies to all other activities carried on at the premises, including: Chemical Storage, Electricity Generation and Sewage Treatment					Noted	

Environment Protection Licence 20179								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
A4.1	Administrative Conditions	<p>Works and 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.</p> <p>In this condition the reference to "the licence application" includes a reference to:</p> <p>a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and</p> <p>b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</p>					Noted	
P1.1	Utilisation Areas	The following points referred to in the table (*see Table in EPL on pg 7*) are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.					Noted	
P1.2		The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids of liquids to the utilisation area.					Noted	
P1.3		The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.					Noted	
L2.1	Pollution of Waters	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	1. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017; dated 14 August 20172. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018; dated 16 August 20183. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2019; dated 14 August 2019,			The 2016/7 Annual review reported that discharges from Licence Point 3 exceeded a number of water quality parameters identified in EPL 20179. The discharge occurred on 16 December 2016 and were reported to the DPE, EPA and DRE.	Non-Compliance	Investigate the cause of any discharge from site that exceeds any discharge criterion and identify and implement appropriate mitigation strategies.
L2.2	Concentration Limits	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.					Noted	
L2.3		To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table/s.					Noted	

Environment Protection Licence 20179								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
L2.4		Water and/or Land Concentration Limits (refer to Tables in Condition L2.4)	<p>1. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017</i>; dated 14 August 2017</p> <p>2. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018</i>; dated 16 August 2018</p> <p>3. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2019</i>; dated 14 August 2019.</p>		1. Water monitoring results covering the Audit Period for Licenced Monitoring Points 1,2 ,3 and 4	<p>During the 2019 reporting year on 3 occasions the cyanide destruction circuit failed and cyanide exceeding the licence limit of 10mg/l was discharged to the process water ponds.</p> <p>During the 2018 reporting year concentrations of weak acid dissociable (WAD) cyanide in discharges from Licence Point 1 and Licence Point 2 exceeded limits on a number of occasions.</p> <p>During the 2017 reporting year there were two non-complaint discharges from Point 3. Water quality concentration limit exceedances following heavy storm event. Pumps were set up to empty the sediment basin to reduce the amount of water discharged.</p>	Non-Compliance	Review the investigations relating to the WAD Cyanide non-compliances to determine if there are systemic issues in relation to cyanide level management in the process water system.
L3.1	Waste	<p>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 under the Protection of the Environment Operations Act 1997.</p> <p>This condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the premises if it requires an environmental protection licence under the Protection of the Environment Operations Act 1997.</p>	1. <i>Environmental Management Plan Hazardous Materials</i> , Version 1.0, dated 9 April 2013.		<p>1. No evidence of off-site waste receipt was sighted during the Audit.</p> <p>2. The mine is remote and not a practical destination for waste disposal.</p>	1. No evidence of off-site waste receipt was sighted during the Audit.	COMPLIANCE	
L4.1	Noise Limits	<p>Noise generated at the premises must not exceed the noise limits presented in the table below. Locations R1 to R4 in the table L4.1 are those described in the Noise and Vibration Assessment, September 2011, prepared by Spectrum Acoustics Pty Ltd for the Hera Project, via Nymagee, Environmental Assessment.</p> <p>NOTE: Noise generated by the project is to be measured in accordance with conditions L4.2 to L4.6 below.</p>	<p>1. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017</i>; dated 14 August 2017</p> <p>2. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018</i>; dated 16 August 2018</p> <p>3. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2019</i>; dated 14 August 2019.</p>			<p>No noise exceedances were detected over the 2018/9 reporting period.</p> <p>No noise exceedances were detected over the 2017/8 reporting period.</p> <p>No noise exceedances were detected over the 2016/7 reporting period.</p>	COMPLIANCE	

Environment Protection Licence 20179								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
L4.2		<p>For the purposes of the conditions of this licence:</p> <ul style="list-style-type: none"> • Day is defined as the period from 7am to 6pm; and • Evening is defined as the period 6pm to 10pm. <p>Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays.</p> <ul style="list-style-type: none"> • LAeq(15 minute) is defined as the continuous 'A' weighted sound pressure level-the energy average of the noise measured over a 15 minute period; and • LA1(1 minute) is defined as the sound pressure level exceeded for one percent of a 1 minute measurement period. 					Noted	
L4.3		The noise limits set out in condition L4.1 apply under all meteorological conditions except for any one of the following: a) Wind speeds greater than 3 metres/second at 10 metres above ground level; or b) Stability category G conditions and wind speeds greater than 2 metres/second at 10 metres above ground level;	<p>1. Plan showing location of all Noise Monitoring Locations</p> <p>2. Noise monitoring reports for the past three years</p>				Noted	
L4.4		<p>For the purposes of condition L4.3:</p> <p>a) The meteorological data to be used for determining meteorological conditions is the data recorded by the on-site meteorological weather station at the Hera project site at Nymagee.</p> <p>b) Temperature inversion will be assessed by use of the sigma-theta process as outlined in Appendix E4 of the NSW Industrial Noise Policy (INP).</p>	<p>1. Excel Spreadsheet titled "<i>Daily Summary (22).csv</i>". The spreadsheet contained the weather station outputs from 9 September 2016 to 9 November 2019.</p>			Weather station monitoring results for the Audit Period were sighted by the Auditor. The weather station satisfies the requirements of the Approved Methods for Sampling Air Pollutants in New South Wales Guidelines.	COMPLIANCE	
L4.5		For the purposes of determining the noise generated at the premises Class 1 or 2 noise monitoring equipment as defined by AS IEC61672.1-2004 and AS IEC61672.2-2004, or other noise monitoring equipment accepted by the EPA in writing, must be used.	<p>1. <i>Hera Gold Mine EPL attended noise monitoring</i> (various reports covering 2017, 2018 and 2019), prepared by EMM Consultants.</p>			The noise monitoring equipment used by Hera's consultants complies with AS IEC61672.1-2004 and AS IEC61672.2-2004 (and current EPA guidelines)	COMPLIANCE	

Environment Protection Licence 20179								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
L4.6		To determine compliance: a) With the LAeq(15 minute) noise limits in condition L4.1, the noise monitoring equipment must be located: <ul style="list-style-type: none"> • within 30 metres of a dwelling façade but not closer than 3 metres where any dwelling on the property is situated more than 30 metres from the property boundary that is closest to the premises; • approximately on the boundary where any dwelling is situated 30 metres or less from the property boundary that is closest to the premises; • within approximately 50 metres of the boundary of a National Park or a Nature Reserve. b) With the LA1(1minute) noise limit in ConditionL4.1;the noise monitoring equipment must be located within 1 metre of the dwelling facade. c) The noise monitoring equipment must be located in a position that is: <ul style="list-style-type: none"> • at the most affected point at a location where there is no dwelling at the location; or • at the most affected point within an area at a location prescribed by conditions L4.6(a)or L4.6(b). 	1. <i>Hera Gold Mine EPL attended noise monitoring</i> (various reports covering 2017, 2018 and 2019), prepared by EMM Consultants.			The sampling locations and sampling procedures used by Hera's noise consultants meet the requirements of the EPL.	COMPLIANCE	
L4.7		A breach of this Environment Protection Licence will still occur where noise generated from the premises in excess of the appropriate limit specified in the condition L4.1 is detected: <ul style="list-style-type: none"> • at a location other than an area prescribed by Conditions L4.6(a) or L4.6(b);and/or • at a point other than the most affected point at a location. 					Noted	
L4.8		For the purposes of determining the noise generated at the premises the modification factors in Section 4 of the NSW Industrial Noise Policy must be applied, as appropriate, to the noise levels measured by the noise monitoring equipment.	1. <i>Hera Gold Mine EPL attended noise monitoring</i> (various reports covering 2017, 2018 and 2019), prepared by EMM Consultants.			The sampling locations and sampling procedures used by Hera's noise consultants meet the requirements of the EPL.	COMPLIANCE	
L5.1	Blasting	Blasting condition L5.1 applies to all receiver locations.Blasting overpressure and ground vibration.The proponent must ensure that the blasting on site does not cause exceedances of the criteria in the Table L5.1.Note: Error margins associated with any monitoring equipment used to measure this are not to be taken into account in determining whether or not the limit has been exceeded.	1. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017</i> ; dated 14 August 20172. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018</i> ; dated 16 August 20183. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2019</i> ; dated 14 August 2019.			868 blasts were initiated during the 2016/7 reporting year. No vibration exceedances were detected at any privately owned properties. 868 blasts were initiated during the 2017/8 reporting year. No vibration exceedances were detected at any privately owned properties. 738 blasts were initiated during the 2018/9 reporting year. No vibration exceedances were detected at any privately owned properties.	COMPLIANCE	

Environment Protection Licence 20179								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
L5.2		For the purpose of Condition L5.1: <ul style="list-style-type: none"> Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and Public Holidays; Evening is defined as the period from 6pm to 10pm; and Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays. 					Noted	
L5.3		Surface Blasting operations at the premises may only take place between 9:00am-5:00pm Monday to Saturday. Surface Blasting is not permitted on Sundays or public holidays. Surface Blasting outside the hours specified can only take place with the written approval of the Environment Protection Authority. Underground Blasting may be undertaken at any time subject to Condition L5.1.		1. Audit interview (J Thompson): no above ground blasting has been undertaken during the Audit Period.		No above ground blasting has been undertaken during the Audit Period.	Not Triggered	
L5.4		A breach of the licence will still occur where air blast overpressure or ground vibration levels from the blasting operations at the premises exceeds the limit specified in Condition L5.1 at any "noise sensitive locations" other than the locations identified in the above conditions.					Noted	
L5.5		The Proponent may exceed the limits in Condition L5.1 if it has a written negotiated blasting agreement with any landowner for higher blasting overpressure and vibration limits, and a copy of the agreement has been forwarded to the EPA.					Noted	
L5.6		Air blast overpressure or ground vibration as a result of blasting at the premises must not exceed levels that cause cosmetic or other damage, and in relation to Condition L5.5 only if specifically allowed for in the written agreement between the proponent and the landholder.					Noted	
L6.1	Odour	<p>The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises.</p> <p>Note: Section 120 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.</p> <p>No condition of this licence identifies a potentially offensive odour for the</p>	1. Complaints Register (http://aureliametals.com/projects/hera-nymagee/complaints-register)		1. No offensive odours at or near the site boundaries were detected by the Auditor during the site inspection.	No odour complaints have been received by Hera during the Audit Period.	COMPLIANCE	

Environment Protection Licence 20179								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		purposes of Section 120 of the Protection of the Environment Operations Act 1997.						
O1.1	Operating Conditions	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; andb) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.			1. At the time of the Audit inspection, all elements of the plant were operational, waste storage areas, chemical and fuel storage areas appeared to be well organised and operated.	During the audit, the Auditor did not identify any areas of concern in relation to the general operations and management of the mine.	COMPLIANCE	
O2.0	Maintenance	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.		Interview T. Cox Maintenance Supervisor: 1. Pronto (asset and facility management software) is used to plan and track routine maintenance of fixed and moving plant. 2. Hera takes steps to ensure that all the plant and equipment used at the site is maintained in a proper and efficient condition. These steps include: • The mining contractor (PYBAR) is contracted to perform all mining vehicle plant maintenance functions on site and Hera maintains surface plant and equipment; • All equipment on site has to be MDG15 compliant (audit interview); • An equipment maintenance register (sighted for both Hera and PYBAR). • A maintenance schedule system is in place and current for plant (see above). • The concentrate transporter's (KPC Bulk) trucks are under a Maintenance Management	1. Demonstration of Pronto software. The auditor witnessed the processes used to setup, manage and monitor fixed and mobile plant maintenance. 2. Fixed and mobile plant sighted during the audit was operational and appropriately maintained.	The mine operates a popular maintenance management system. Maintenance records sighted (on the Pronto System) demonstrated that a comprehensive proactive maintenance program is in place.	COMPLIANCE	

Environment Protection Licence 20179								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
				system with the NHVR (National Heavy Vehicle Register) which requires them to be audited every twelve months.				
O3.0	Dust	<p>All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.</p> <p>All dust control equipment must be operable at all times with the exception of shutdowns required for maintenance.</p> <p>Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading.</p>	<p>1. YTC Resources Ltd, <i>Environmental Management Plan Air Quality and Greenhouse Gas</i>, Revision 3, dated 28 August 2012.</p> <p>2. <i>Air Quality and Greenhouse Gas Management Plan</i> Version 2.0 / Revision 4, dated May 2015.</p> <p>3. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017</i>; dated 14 August 2017</p> <p>4. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018</i>; dated 16 August 2018</p> <p>5. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2019</i>; dated 14 August 2019.</p>		<p>1. During the site inspection, the Auditor observed:</p> <ul style="list-style-type: none"> - Water trucks operating on the mine access road - that application of molasses (sealant) on site access roads and roads in an around the process plant. - the use of water sprays on stockpiles and transfer conveyors. - rehabilitation of formerly disturbed areas. 	<p>The Air Quality and Greenhouse Gas Management Plan is being implemented. Appropriate dust controls are being used. However, dust deposition and PM10 measurements from the Audit Period showed elevated dust levels. It is likely that these exceedances were a result of the drought conditions being experienced and are not indicative of the impact of the mine operations.</p>	Non-Compliance	It is recommended that Hera consider placement of additional dust deposition gauges outside the site boundaries to provide more data on background dust levels.
O4.1	Bunding	<p>All above ground storage facilities containing flammable and combustible liquids must be banded in accordance with Australian Standard AS 1940-2004. Sodium Cyanide and other Toxic Chemicals must be stored in accordance with the requirements of AS/NZS 4452 - The Storage and Handling of Toxic Substances.</p>	<p>1. <i>Environmental Management Plan Hazardous Materials</i>, Version 1.0, dated 9 April 2013.</p> <p>2. Letter from DPE (H Reed) to Hera (S Haures) titled "<i>Hera Gold Mine (10_0191) Hazardous Materials Management Plan</i>", dated 1 May 2013.</p>		<p>1. All above ground storage bunds facilities inspected during the Audit meet the requirements of AS 1940. Photo #11 shows an example of a chemical storage tank and bund.</p>	<p>Section 5.8 of the HMMP lists the cyanide controls to be used which are consistent with the International Cyanide Management Code for the Manufacture, Transport and Use of Cyanide in the Production of Gold (the Code).</p>	COMPLIANCE	
O4.2	Stormwater - Construction Phase	<p>A stormwater management scheme must be prepared for all aspects of the construction phase of the development and must be implemented. Implementation of the scheme must mitigate the impacts of stormwater runoff from and within the premises during construction. The scheme should be consistent with the Stormwater Management Plan for the catchment. Where a Stormwater Management Plan has not yet been prepared the scheme should be consistent with the guidance</p>				<p>No construction works were undertaken during the Audit Period.</p>	Noted	

Environment Protection Licence 20179								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		contained in Managing Urban Stormwater: Council Handbook.						
O4.3	Stormwater - Operations Phase	A stormwater management scheme must be prepared for the development and must be implemented. Implementation of the scheme must mitigate the impacts of stormwater runoff from and within the premises following the completion of construction activities. The scheme should be consistent with the Stormwater Management Plan for the catchment. Where a Stormwater Management Plan has not yet been prepared the scheme should be consistent with the guidance contained in Managing Urban Stormwater: Council Handbook (available from the EPA).	1. Aurelia - Hera Gold WMP Water Management Plan 2016, prepared by GHD. 2. Draft Water Management Plan 2018, Version 6, dated November 2019.			A water management plan has been prepared and implemented at the site. The plan meets the requirements of this Condition.	COMPLIANCE	
M1.1	Monitoring Records	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.					COMPLIANCE	
M1.2		All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form;	1. Hera Gold Mine EPL attended noise monitoring (various reports covering 2017, 2018 and 2019), prepared by EMM Consultants. 2. Water monitoring records for 217, 2018 and 2019, including sampling sheets, chain of custody documentation and laboratory test reports. 3. Dust deposition monitoring records for 2017, 2018 and 2019. The records included chain of custody records, sampling records and laboratory test reports.			Noise, surface water, groundwater and air quality monitoring results satisfying the requirements of the Condition were sighted.	COMPLIANCE	
		b) kept for at least 4 years after the monitoring or event to which they relate took place; and	1. Hera Gold Mine EPL attended noise monitoring (various reports covering 2017, 2018 and 2019), prepared by EMM Consultants. 2. Water monitoring records for 217, 2018 and 2019, including sampling sheets, chain of custody documentation and laboratory test reports. 3. Dust deposition monitoring records for 2017, 2018 and 2019. The records included chain of custody records, sampling records and laboratory test reports.			Noise, surface water, groundwater and air quality monitoring results satisfying the requirements of the Condition were sighted.	COMPLIANCE	
		c) produced in a legible form to any authorised officer of the EPA who asks to see them.	1. Hera Gold Mine EPL attended noise monitoring (various reports covering 2017, 2018 and 2019), prepared by EMM Consultants. 2. Water monitoring records for 217, 2018 and 2019, including sampling sheets, chain of custody documentation and laboratory test reports. 3. Dust deposition monitoring records for 2017, 2018 and 2019. The records included chain of custody records, sampling records and laboratory test reports.				Noted	

Environment Protection Licence 20179								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
M1.3		The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	1. Hera Gold Mine EPL attended noise monitoring (various reports covering 2017, 2018 and 2019), prepared by EMM Consultants. 2. Water monitoring records for 217, 2018 and 2019, including sampling sheets, chain of custody documentation and laboratory test reports. 3. Dust deposition monitoring records for 2017, 2018 and 2019. The records included chain of custody records, sampling records and laboratory test reports.			Noise, surface water, groundwater and air quality monitoring results satisfying the requirements of the Condition were sighted.	COMPLIANCE	
M2.1	Monitoring Requirements	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: (table on page 10).	1. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017; dated 14 August 2017 2. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018; dated 16 August 2018 3. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2019; dated 14 August 2019. 4. 1. EPA Public Register https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?id=20179&periodid=55091&searchrange=licence&option=noncompliance&range=POEO%20licence			Refer to Conditions M2.2 and M2.3 below.	Non-Compliance	Refer to Condition M2.3 below.
M2.2	Air Monitoring Requirements	Point 24 Nitric Oxide, Yearly Method TM-11 Point 39 Nitric Oxide, Yearly Method TM-11	1. Nitric Oxide monitoring results covering the Audit Period: Ektimo Emission Test Reports, Numbers R002251 (January 2016), R003726 (March 2017), R004870 (October 2017) and R006532 (October 2018).	1. J Thompson: The stack monitoring must be conducted once per reporting period. Reporting Period is 18 Mar to 17 Mar hence why two lots of sampling were completed in 2017 calendar year.		The required stack emissions monitoring was undertaken,	COMPLIANCE	
M2.3	Water Monitoring Requirements	Refer to Tables in Condition M2.3	1. EPA Public Register https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?id=20179&periodid=55091&searchrange=licence&option=noncompliance&range=POEO%20licence			2018/19: On 5 occasions testing for Weak Acid Dissociable (WAD) Cyanide within the detox circuit when discharging to the tailings storage facility, was not undertaken.	Non-Compliance	Prepare a document that details all environmental monitoring required (for compliance purposes) include details of sampling location, sample type, identify person (or organisation) responsible for sampling and analysis. Set up a system to automatically notify the Environmental Manager of up-coming sampling events.

Environment Protection Licence 20179								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
M3.1	Testing Methods	Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with:a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; orb) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; orc) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.	1. Nitric Oxide monitoring results covering the Audit Period: Ektimo Emission Teste Reports, Numbers R002251 (January 2016), R003726 (March 2017), R004870 (October 2017) and R006532 (October 2018).			All laboratory analysis is undertaken by NATA registered laboratories using appropriate test methods.	COMPLIANCE	
M3.2		Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area 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.	1. Hera Gold Mine EPL attended noise monitoring (various reports covering 2017, 2018 and 2019), prepared by EMM Consultants. 2. Water monitoring records for 217, 2018 and 2019, including sampling sheets, chain of custody documentation and laboratory test reports. 3. Dust deposition monitoring records for 2017, 2018 and 2019. The records included chain of custody records, sampling records and laboratory test reports.			All laboratory analysis is undertaken by NATA registered laboratories using appropriate test methods.	COMPLIANCE	
M4.1	Weather Monitoring	The meteorological weather station must be maintained so as to be capable of continuously monitoring the parameters specified in the condition below.	1. Excel Spreadsheet titled " <i>Daily Summary (22).csv</i> ". The spreadsheet contained the weather station outputs from 9 September 2016 to 9 November 2019. 2. Envirodata Field Calibration Report for the weather station (dated 21/2/2108).			Weather station monitoring results for the Audit Period were sighted by the Auditor.	COMPLIANCE	
M4.2		For monitoring point 43 the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1. The licensee must use the sampling method, units of measure, averaging period and sample at the frequency, specified opposite in the other columns.	1. Excel Spreadsheet titled " <i>Daily Summary (22).csv</i> ". The spreadsheet contained the weather station outputs from 9 September 2016 to 9 November 2019.			Weather station calibration reports were sighted by the Auditor. Weather station monitoring results for the Audit Period were sighted by the Auditor.	COMPLIANCE	
M5.1	Complaints	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	1. Complaints Register (internal version) in excel format - the Register contains full details of all complaints received.			A detailed complaints register is maintained. Note that summary version that does not identify complainant details is located on the complaint website.	COMPLIANCE	

Environment Protection Licence 20179								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
M5.2		The record must include details of the following:a) the date and time 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 complaint, including any follow-up contact with the complainant; andf) if no action was taken by the licensee, the reasons why no action was taken.	1. Complaints Register (internal version) in excel format - the Register contains full details of all complaints received.			A detailed complaints register is maintained. Note that summary version that does not identify complainant details is located on the complaint website. a) The register includes the date and time of the complaint.b) The method by which the complaint was made is recorded e.g. email, telephone, in person.c) The personal details of the complainant such as full name, address and phone number are recorded if provided by the complainant.d) The nature of the complaint is recorded.e) A "Corrective Action" column records the action taken by the licensee in relation to the complaint. Additional columns record the name and position of the person responsible for the corrective actions as well as the date of the corrective action. Follow-up contact is recorded in the "comments" column.f) All complaints sighted (except the test call made as part of the July 2013 compliance audit) have required corrective actions.	COMPLIANCE	
M5.3		The record of a complaint must be kept for at least 4 years after the complaint was made.	1. Complaints Register (internal version) in excel format - the Register contains full details of all complaints received.			The records of complaints date back to 2011.	COMPLIANCE	
M5.4		The record must be produced to any authorised officer of the EPA who asks to see them.					Noted	
M6.1	Telephone Complaints Line	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.			1. The telephone complaint line number is listed at the site gate and on the site website.	A complaints telephone line was operational at the time of the audit.	COMPLIANCE	
M6.2		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.	http://aureliametals.com/projects/hera-nymagee/		1. Mine site signage provides details of the complaints telephone number. Refer to Photo #12.	Details of the complaints phone line number are provided on the company website and is advertised on the signage at the entrance to the mine.	COMPLIANCE	
M6.3		The preceding two conditions do not apply until 3 months after the date of the issue of this licence					Noted	

Environment Protection Licence 20179								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
R1.1	Annual Returns	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices.	1. EPA Public Register https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?id=20179&periodid=55091&searchchange=licence&option=noncompliance&range=POEO%20licence			Annual Returns have been sent to the EPA for each year covered by the Audit Period.	COMPLIANCE	
R1.2		An Annual Return must be prepared in respect of each reporting period, except as provided in the below conditions.	1. EPA Public Register https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?id=20179&periodid=55091&searchchange=licence&option=noncompliance&range=POEO%20licence			Annual Returns have been sent to the EPA for each year covered by the Audit Period.	COMPLIANCE	
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 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.					Noted	
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: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.					Noted	
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').	1. EPA Public Register https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?id=20179&periodid=55091&searchchange=licence&option=noncompliance&range=POEO%20licence			The 2016/7 Annual Return was received by the EPA on 17 May 2019 (61 days after the end of the reporting period). The 2017/8 and 2018/9 Annual Returns were received within 60 days of the end of the reporting periods.	Non-Compliance	Ensure that the Annual Returns are received by the EPA within the 60 day period required by the EPL.

Environment Protection Licence 20179								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
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.	1. 2016 Annual Return 2. 2017 Annual Return 3. 2018 Annual Return.			Copies of the annual returns are kept on file at Hera.	COMPLIANCE	
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.				The Annual Returns are prepared by the Environment Manager and signed by an appropriate officer of the company.	COMPLIANCE	
R2.1	Notification of Environmental Harm	Notifications of Environmental Harm must be made by telephoning the Environment Line service on 131 555.	1. Incident Report to EPA dated 4 January 2017. 2. Email from EPA (Customer Feedback line) to Hera (J Thompson) titled "04-Jan-2017 Customer Feedback for Call C00136-2017", dated 22 November 2016. The email acknowledges the telephone report to the Pollution Line. 3. Email from Hera (J Thompson) to the EPA (D Stokes) titled "Environmental Incident - 26 October 2016", dated 22 November 2016. The email refers to the telephone report to the Pollution Line.			A review of incidents over the audit period by the Auditor confirmed that relevant incidents have been reported to the EPA Pollution Line. Written reports have subsequently been provided to the EPA.	COMPLIANCE	
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. Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.	1. Incident Report to EPA dated 4 January 2017. 2. Email from EPA (Customer Feedback line) to Hera (J Thompson) titled "04-Jan-2017 Customer Feedback for Call C00136-2017", dated 22 November 2016. The email acknowledges the telephone report to the Pollution Line. 3. Email from Hera (J Thompson) to the EPA (D Stokes) titled "Environmental Incident - 26 October 2016", dated 22 November 2016. The email refers to the telephone report to the Pollution Line.			A review of incidents over the audit period by the Auditor confirmed that relevant incidents have been reported to the EPA Pollution Line. Written reports have subsequently been provided to the EPA. Notifications (incident reports) were provided to the EPA on:- 4 January 2017 (incident 16 December 2016) sediment laden discharge during storm event from Point 3. The incident was reported on 4 January 2017. The delay in reporting related to the time required for off-site sample analysis.	Non-Compliance	Hera has submitted the required incident reports to the EPA, however due to delays, usually associated with lab testing, the 7 day reporting requirement has not been met. It is recommended that Hera request a modification to this EPL condition to modify the 7 day written report requirement to provide sufficient time for lab analysis to be completed.
R3.1	Written Report	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or				No requests for reports have been received from the EPA in relation to mobile plant.	Not Triggered	
		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.				No requests for reports have been received from the EPA in relation to mobile plant.	Not Triggered	
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.				No requests for reports have been received from the EPA in relation to mobile plant.	Not Triggered	

Environment Protection Licence 20179								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
R3.3		The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; 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; 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; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters					Noted	
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.				No requests for reports have been received from the EPA during the Audit Period.	Not Triggered	
R4.1	Fauna Injury or death	The licensee must report any incident of death or injury (including bogging or miring) of fauna (avian and terrestrial) associated with the tailings impoundments or tailings runoff dams by telephoning the EPA's Pollution line on 13 15 55 as soon as the licensee becomes aware of the incident. The licensee must provide written details of the notification with respect of the above condition to the EPA within 7 days of the date which the incident occurred.	1. Incident Report issued to the EPA in relation to a dead goat and a dead kangaroo found in the TSF, dated 17 September 2017.			The EPA was advised following the death of a kangaroo in the TSF in 2017.	COMPLIANCE	
G1.1	Copy of Licence	A copy of this licence must be kept at the premises to which the licence applies.				Electronic copy of the licence is maintained by Hera.	COMPLIANCE	
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.				Electronic copy of the licence is maintained by Hera and a copy of the licence has been uploaded to the company website.	COMPLIANCE	
G2.1	Signage	Each monitoring and discharge point must be marked by a sign that indicates the EPA point identification number.			1. The Auditor inspected all monitoring points. All licenced points were appropriately sign posted. Refer to Photo #13.		COMPLIANCE	

Environment Protection Licence 20179								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
E1.1	Construction of Contaminated Storage Pond	The licensee must construct the proposed contaminated storage pond consistent with the presentation provided to the EPA and dated 26 August 2016, to meet the proposed design capacity for a contaminated structure of a 1 in 100, 72 hour storm event.	<p>1. Letter from Hera (J Thompson) to EPA titled "<i>Environment Protection Licence 20179 - 8 Special Conditions, E1 Construction of Proposed Contaminated Storage Pond</i>", dated 9 June 2017. The letter confirms to the EPA that the contaminated storage pond construction has been completed and included details of the works (including design specifications) completed.</p> <p>2. Letter from GHD (D Scott) to Hera (J Thompson) titled "Hera Mine Sediment Basin Response to EPA)" dated 19 May 2016. The letter details the pond design specifications.</p>		1. Inspection of the surface water management system, including the contaminated water storage pond.	The contaminated water storage pond has been completed. The pond was sighted by the Auditor	COMPLIANCE	
E1.2		The proposed storage pond referred to in Condition E1.1 must be lined to meet the EPA's permeability requirement of 1 x 10 ⁻⁹ m/s or less with a recompacted clay liner of at least 900 mm in thickness (or alternatively geosynthetic liner of equivalence). Where the proposed liner will not meet the required permeability or thickness of at least 900 mm, and the natural geology of the site in conjunction with constructed clay liners is considered sufficient in meeting this requirement, an appropriately qualified person must be engaged to provide sufficient evidence in support of this to demonstrate the construction will meet the requirements outlined above and be adequate to prevent pollution of groundwater.	<p>1. Letter from Hera (J Thompson) to EPA titled "<i>Environment Protection Licence 20179 - 8 Special Conditions, E1 Construction of Proposed Contaminated Storage Pond</i>", dated 9 June 2017. The letter confirms to the EPA that the contaminated storage pond construction has been completed and included details of the works (including design specifications) completed.</p> <p>2. Letter from GHD (D Scott) to Hera (J Thompson) titled "Hera Mine Sediment Basin Response to EPA)" dated 19 May 2016. The letter details the pond design specifications.</p>		1. Inspection of the surface water management system, including the contaminated water storage pond.	The contaminated water storage pond has been completed. The pond was sighted by the Auditor	COMPLIANCE	
E1.3		The licensee must complete the works required by Conditions E1.1 and E1.2 by 30 June 2017 and notify the EPA in writing upon completion of the works.	<p>1. Letter from Hera (J Thompson) to EPA titled "<i>Environment Protection Licence 20179 - 8 Special Conditions, E1 Construction of Proposed Contaminated Storage Pond</i>", dated 9 June 2017. The letter confirms to the EPA that the contaminated storage pond construction has been completed and included details of the works (including design specifications) completed.</p> <p>2. Letter from GHD (D Scott) to Hera (J Thompson) titled "Hera Mine Sediment Basin Response to EPA)" dated 19 May 2016. The letter details the pond design specifications.</p>		1. Inspection of the surface water management system, including the contaminated water storage pond.	The pond construction was completed within the required timeline.	COMPLIANCE	
E1.4		The licensee must submit a report completed by an appropriately qualified person to certify that the contaminated storage pond has been constructed to meet the design specifications referred to in Conditions E1.1 and E1.2. The report must be submitted to the EPA by 11 August 2017.	1. Letter from Hera (J Thompson) to EPA titled " <i>Environment Protection Licence 20179 - 8 Special Conditions, E1 Construction of Proposed Contaminated Storage Pond</i> ", dated 9 June 2017. The letter confirms to the EPA that the contaminated storage pond construction has been completed and included details of the works (including design specifications) completed.		1. Inspection of the surface water management system, including the contaminated water storage pond.	The report was provided to the EPA on 9 June 2017.	COMPLIANCE	

Environment Protection Licence 20179								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
			2. Letter from GHD (D Scott) to Hera (J Thompson) titled "Hera Mine Sediment Basin Response to EPA)" dated 19 May 2016. The letter details the pond design specifications.					

Mining Lease 1686								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
1 (a)	Notice to Landholders	Within a period of three months from the date of grant/renewal of this lease or within such further 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. An adequate plan and description of the lease area must accompany the notice.	1. <i>Independent Environmental Audit, Hera Resources Pty Ltd</i> , Hera Project, NUMAGEE NSW, September 2016.			The 2016 Audit noted that the nearest residential premises is over 2 km from the site and therefore this Condition is not triggered.	Not Triggered	
1 (b)		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 lease area.	1. <i>Independent Environmental Audit, Hera Resources Pty Ltd</i> , Hera Project, NUMAGEE NSW, September 2016.			The 2016 Audit noted that the nearest residential premises is over 2 km from the site and therefore this Condition is not triggered.	Not Triggered	
2(a)	Environmental Harm	The lease holder must implement all practicable measures to prevent and/or minimise any harm to the environment that may result from the construction, operation or rehabilitation of any activities under this lease.	1. EPA Show Cause Notice relating to cyanide contaminated water leaks, EPA Reference 1580504, dated 13 June 2019. 2. EPA Clean-up Notice 157818.			As a result of two (self-reported by Hera) leaks of contaminated water, the EPA issue a Clean Up Notice and subsequently in response to their assessment that these incidents evidenced potential or actual Material Harm and were therefore potential breaches of Sections 64, 12 and 142A of the POEO Act.	Non-Compliance	The clean-up actions relating to the incidents have been completed - there are no further actions required.

Mining Lease 1686								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
2(b)		For the purposes of this condition: (i) environment means components of the earth, including: (A) land, air and water, and (B) any layer of the atmosphere, and (C) any organic or inorganic matter and any living organism, and (D) human-made or modified structures and areas, and includes interacting natural ecosystems that include components referred to in paragraphs (A)-(C). (ii) harm to the environment includes any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above, includes any act or omission that results in pollution, contributes to the extinction or degradation of any threatened species, populations or ecological communities and their habitats and causes impacts to places, objects and features of significance to Aboriginal people.					Noted	
3(a)	Mining Operations Plan	Mining operations must not be carried out otherwise than in accordance with a Mining Operations Plan (MOP) which has been approved by the Director-General	1. <i>Mining Operations Plan for the Hera Mine PA10_0191</i> , dated January 2017. 2. Letter from the DRE (to Hera (J Simpson), titled " <i>Application for a Mining Operations Plan (MOP) for Mining Lease (ML) 1686, ML1746, Mining Act 1992, Hera Resources Pty Ltd of DPI approving the MOP</i> ", dated 27 February 2017.			The MOP has been prepared and approved by DRE.	COMPLIANCE	
3(b)		The MOP must: (i) identify areas that will be disturbed by mining operations;	1. <i>Mining Operations Plan for the Hera Mine PA10_0191</i> , dated January 2017.			Section 2.2 (Asset Register) describes the mine in terms of "Domains". Each of the Domains describe the areas of the site that are likely to be disturbed and therefore would be subject to rehabilitation in the future.	COMPLIANCE	
		(ii) detail the staging of specific mining operations;	1. <i>Mining Operations Plan for the Hera Mine PA10_0191</i> , dated January 2017.			Section 2 of the MOP describes the proposed mining activities and includes descriptions of the exploration, construction and mining phases of the project.	COMPLIANCE	
		(iii) identify how the mine will be managed to allow mine closure;	1. <i>Mining Operations Plan for the Hera Mine PA10_0191</i> , dated January 2017.			Section 2.3.9 of the MOP describes the progressive rehabilitation and closure of the site.	COMPLIANCE	
		(iv) identify how mining operations will be carried out in order to prevent and or minimise harm to the environment;	1. <i>Mining Operations Plan for the Hera Mine PA10_0191</i> , dated January 2017.			Section 3 of the MOP describes the environmental risks associated with the project and Section 3.2 describes how those risks will me mitigated.	COMPLIANCE	
		(v) reflect the conditions of approval under: • the Environmental Planning and Assessment Act 1979 • the Protection of the Environment Operations Act 1997 • and any other approvals relevant to the development including the conditions of this lease: and	1. <i>Mining Operations Plan for the Hera Mine PA10_0191</i> , dated January 2017.			The MOP is consistent with the Planning Approval and this Mining Lease.	COMPLIANCE	

Mining Lease 1686								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		• have regard to any relevant guidelines adopted by the Director-General.						
3(c)		The leaseholder may apply to the Director-General to amend an approved MOP at anytime					Noted	
3(d)		It is not a breach of this condition if: (i) the operations constituting the breach were necessary to comply with a lawful order or direction given under the Mining Act 1992, the Environmental Planning and Assessment Act 1979, Protection of the Environment Operations Act 1997, Mine Health and Safety Act 2004 I Coal Mine Health and Safety Act 2002 and Mine Health and Safety Regulation 2007 I Coal Mine Health and Safety Regulation 2006 or the Occupational Health and Safety Act 2000; and (ii) the Director-General had been notified in writing of the terms of the order or direction prior to the operations constituting the breach being carried out.					Noted	
3(e)		A MOP ceases to have effect 7 years after date of approval or other such period as identified by the Director-General					Not Triggered	
4(a)	Environmental Management Report	The lease holder must lodge Environmental Management Reports (EMR) with the Director-General annually or at dates otherwise directed by the Director-General	1. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017</i> ; dated 14 August 2017 2. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018</i> ; dated 16 August 2018 3. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2019</i> ; dated 14 August 2019.			The Annual Reviews (prescribed in the Planning Approval) are accepted as fulfilling the requirements of this Condition for the preparation of Annual Environmental Management Reports (AEMR). Annual Reports have been prepared and submitted each year covered by the Audit Period.	COMPLIANCE	
4(b)		The EMR must: (i) report against compliance with the MOP;	1. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017</i> ; dated 14 August 2017 2. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018</i> ; dated 16 August 2018 3. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2019</i> ; dated 14 August 2019.			All Annual Reviews refer back to statements made in the MOP and state if they were in accordance with MOP and if not, why not.	COMPLIANCE	

Mining Lease 1686								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(ii) report on progress in respect of rehabilitation completion criteria;	1. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017</i> ; dated 14 August 2017 2. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018</i> ; dated 16 August 2018 3. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2019</i> ; dated 14 August 2019.			The progress of rehabilitation against the plans in the MOP are reported in each of the Annual Reviews. See for example Section 8 of the 2018/19 AR.	COMPLIANCE	
		(iii) report on the extent of compliance with regulatory requirements; and	1. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017</i> ; dated 14 August 2017 2. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018</i> ; dated 16 August 2018 3. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2019</i> ; dated 14 August 2019.			Section 6 of the (2018/19) Annual Review detailed performance against the environmental compliance obligations established under the Planning Approval and EPL.	COMPLIANCE	
		(iv) have regard to any relevant guidelines adopted by the Director-General	1. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017</i> ; dated 14 August 2017. 2. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018</i> ; dated 16 August 2018. 3. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2019</i> ; dated 14 August 2019.				Noted	

Mining Lease 1686								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
5(a)	Environmental Incident Report	The lease holder must report any environmental incidents. The report must: (i) be prepared according to any relevant Departmental guidelines; (ii) be submitted within 24 hours of the environmental incident occurring	1. Notice of PM10 exceedance and incident report - (18 July 2018) sent to DPE, DRE, EPA, CSC. 2. Notice of PM10 exceedance and incident report - (19 April 2018) sent to DPE, DRE, EPA, CSC. 3. Notice of PM10 exceedance and incident report - (30 March 2018) sent to DPE, DRE, EPA, CSC. 4. Notice of HVAS exceedance and incident report - (25 July 2017) sent to DPE, DRE, EPA, CSC. 5. Notice of PM10 exceedance and incident report - (22 November 2016) sent to DPE, DRE, EPA, CSC. 6. Notice of Dust Deposition exceedance and incident report - (September 2019) sent to DPE, DRE, EPA, CSC.. 7. Notice of Dust Deposition exceedance and incident report - (September 2019) sent to DPE, DRE, EPA, CSC. 8. Notice of Dust Deposition exceedance and incident report - (September 2019) sent to DPE, DRE, EPA, CSC. 9. Notice of WAD exceedance and incident report - (20 September 2017) sent to DPE, DRE, EPA..			The Auditor has reviewed the reported environmental incidents and licence exceedances (WAD and PM10 dust) for the Audit Period. The review of the correspondence provided indicates that all exceedances were reported to DPE, DRE, EPA and where required to Council.	COMPLIANCE	
5(b)		For the purposes of this condition, environmental incident includes: (i) any incident causing or threatening material harm to the environment (ii) any breach of Conditions 1 to 9 and 11 to 24; (iii) any breach of environment protection legislation; or, (iv) a serious complaint from landholders or the public.					Noted	
5(c)		For the purposes of this condition, harm to the environment is material if: (i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or (ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000, where loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.					Noted	
6	Additional Environmental Reports	Additional environmental reports may be required from time to time as directed in writing by the Director-General and must be lodged as instructed.		J Thompson: no reports have been required by DRE over the Audit Period.		DRE did not request any reports over the Audit Period.	Not Triggered	

Mining Lease 1686								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
7	Rehabilitation	Any disturbance as a result of activities under this lease must be rehabilitated to the satisfaction of the Director-General.	1. <i>Mining Operations Plan for the Hera Mine PA10_0191</i> , dated January 2017. 2. Letter from the DRE (to Hera (J Simpson)), titled " <i>Application for a Mining Operations Plan (MOP) for Mining Lease (ML) 1686, ML1746, Mining Act 1992, Hera Resources Pty Ltd of DPI approving the MOP</i> ", dated 27 February 2017.			The MOP (and therefore the Rehabilitation Management Plan has been reviewed and approved by DRE. Progressive rehabilitation has commenced on the mine site.	COMPLIANCE	
8		Not Used					Not Used	
9	Working Requirement	The lease holder must:(a) ensure that at least 52 competent people are efficiently employed in relation to the mining process or mining operations on the lease areaOR(b) expend on operations carried out in the course of prospecting or mining the lease area, an amount of not less than \$910,000.00 per annum whilst the lease is in force.The Minister may at any time or times, by instrument in writing served on the lease holder, increase or decrease the expenditure required or the number of people to be employed	1. Aurelia Metals Limited 2017 Annual Report2. Aurelia Metals Limited 2018 Annual Report			The Annual (Board) Reports published by Aurelia Resources confirm that the annual expenditure at the mine is in excess of \$910,000 per annum.	COMPLIANCE	
10(a)	Blasting	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 a period of 12 months at any dwelling or occupied premises as the case may be, unless determined otherwise by the Department of Environment, Climate Change and Water.	1. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017</i> ; dated 14 August 2017 2. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018</i> ; dated 16 August 2018 3. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2019</i> ; dated 14 August 2019.			868 blasts were initiated during the 2016/7 reporting year. No vibration exceedances were detected at any privately owned properties. 868 blasts were initiated during the 2017/8 reporting year. No vibration exceedances were detected at any privately owned properties. 738 blasts were initiated during the 2018/9 reporting year. No vibration exceedances were detected at any privately owned properties.	COMPLIANCE	
10(b)		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 a period of 12 months, at any dwelling or occupied premises, as the case may be, unless determined otherwise by the Department of Environment, Climate Change and Water.	1. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017</i> ; dated 14 August 2017 2. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018</i> ; dated 16 August 2018 3. <i>Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2019</i> ; dated 14 August 2019.			868 blasts were initiated during the 2016/7 reporting year. No vibration exceedances were detected at any privately owned properties. 868 blasts were initiated during the 2017/8 reporting year. No vibration exceedances were detected at any privately owned properties. 738 blasts were initiated during the 2018/9 reporting year. No vibration exceedances were detected at any privately owned properties.	COMPLIANCE	
11	Safety	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	1. Incident Register	1. Audit interview (J Thompson): no damage to private property or livestock has occurred as		No damage to private property or livestock has occurred as a result of the blasting undertaken.	COMPLIANCE	

Mining Lease 1686								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		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 notified in writing to the Department and filled in or otherwise rendered safe to a standard acceptable to the Director-General.		a result of the blasting undertaken.				
12	Prevention of soil erosion and pollution	Prospecting operations must be carried out in a manner that does not cause or aggravate air pollution, water (including groundwater) pollution, soil contamination or erosion, unless otherwise authorised by a relevant approval, and in accordance with an accepted Mining Operations Plan	1. <i>Aurelia - Hera Gold WMP Water Management Plan 2016</i> , prepared by GHD. 2. <i>Draft Water Management Plan 2018</i> , Version 6, dated November 2019.		1. No areas of soil erosion were observed during the Audit.	A surface water management plan has been prepared and implemented at the Mine. There was no evidence of erosion problems observed by the auditor.	COMPLIANCE	
13	Transmission Lines (etc)	Operations must not interfere with or impair the stability or efficiency of any transmission line, communication line, pipeline or any other utility on the lease area without the prior written approval of the Director-General and subject to any conditions stipulated	1. incident Register	1. Interview J Thompson, 19 November 2019. No requests have been received requesting repairs be made to any public infrastructure.		No instances of damage to public infrastructure have been identified for the Audit Period.	Not Triggered	
14(a)	Roads and Tracks	The lease holder must pay to the relevant roads authority in control of the road or track the reasonable costs incurred by the roads authority in making good any damage to roads or tracks caused by operations carried out under this lease less any amount paid or payable from the Mine Subsidence Compensation Fund	1. Council accounts database extracts: 31/7/2015 - \$10,000 14/06/2018 - \$82,500 18/1/2018 - \$22,000 13/10/2017 - \$43,500	1. Interview L Richards. The road related payments made to Council consist of: \$82,500 – Hera's contribution to the Hermidale-Nymagee sealing road project in 2018 \$22,000 – Maintenance grading of unsealed Hermidale-Nymagee Road (2017/18 annual contribution) \$43,500 – Maintenance grading of unsealed Hermidale-Nymagee Road (2015/16 & 2016/17 annual contributions) \$10,000 – Maintenance grading of unsealed Hermidale-Nymagee Road (2015/16 & 2016/17 annual contributions once grading was completed)	1. The Nymagee - Hermidale Road is sealed for its entire length (the Auditor travelled to the site via the concentrate transport route.	Payments have been made to BSC during the audit period totalling \$158,000 for road maintenance.	COMPLIANCE	
14(b)		During wet weather the use of any road or track must be restricted so as to prevent damage to the road or track.	1. <i>Aurelia - Hera Gold WMP Water Management Plan 2016</i> , prepared by GHD. 2. <i>Draft Water Management Plan 2018</i> , Version 6, dated November 2019.	1. Interview L. Richards, 19 November 2019. Where required tracks around the site are closed during wet weather.		Drought conditions experienced over the Audit Period have resulted in no erosion issues being experienced.	COMPLIANCE	
14(c)		Existing access tracks should be used for all operations where reasonably practicable. New access tracks must be kept to a minimum and be positioned in order to minimise damage to the land, watercourses or vegetation					Noted	

Mining Lease 1686								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
14(d)		Temporary access tracks must be rehabilitated and revegetated to the satisfaction of the Director-General as soon as reasonably practicable after they are no longer required under this lease.	1. Mining Operations Plan for the Hera Mine PA10_0191, dated January 2017. 2. Letter from the DRE (to Hera (J Simpson), titled "Application for a Mining Operations Plan (MOP) for Mining Lease (ML) 1686, ML1746, Mining Act 1992, Hera Resources Pty Ltd of DPI approving the MOP", dated 27 February 2017.			The MOP (and therefore the Rehabilitation Management Plan has been reviewed and approved by DRE. Progressive rehabilitation has commenced on the mine site.	COMPLIANCE	
15(a)	Trees and Vegetation	The lease holder must not fell trees, strip bark or cut timber on any land subject of this lease without the consent of the landholder who is entitled to the use of the timber.		1. Interview L. Richards, 19 November 2019. No works have been required on any neighbours properties.		No works have been undertaken on neighbouring properties during the Audit Period.	Not Triggered	
15(b)		The lease holder must contact Forests NSW and obtain any required permit, licence or approval before taking timber from any Crown land within the lease area.		1. J Thompson: No timber has been taken from lease areas		No timber has been taken from lease areas.	Not Triggered	
16		Not Used					Not Used	
17(a)	Resource Recovery	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, notice in writing to the lease holder may be given requiring the holder to recover such minerals.	1. Notices from DPI relating to any aspect of the mining operations				Noted	
17(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	1. Notices from DPI relating to any aspect of the mining operations				Noted	
17(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		1. J Thompson: DRE has not served any notices relating to the mining operations (requiring the provision of a report)		DRE has not served any notices on or required any reports from Hera over the Audit Period.	Not Triggered	

Mining Lease 1686								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
18	Indemnity	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 licensed or compelled to do	Noted				Noted	
19(a)	Security	This authorisation is subject to a condition that the holder of the authorisation is required to provide and maintain a security deposit to secure funding for the fulfilment of obligations of all or any kind under the authorisation, including obligations of all or any kind under the authorisation that may arise in the future	Noted				Noted	
19(b)		The amount of the security deposit to be provided has been assessed by the Director General of the Department of Trade and Investment, Regional Infrastructure and Services at \$2,470,000.00	1. Deed of Security Bond (Westpac) for the sum of \$2,933,000 in favour of the Department of Industry, Skills, and Regional Development.			The required bond has been established.	COMPLIANCE	
19(c)		The security deposit is to be provided by way of a cash deposit (with no entitlement to any interest thereon) or in such other form as may be approved by the Director General (or their delegate).	1. Deed of Security Bond (Westpac) for the sum of \$2,933,000 in favour of the Department of Industry, Skills, and Regional Development.			The required bond has been established.	COMPLIANCE	
20		Not Used					Not Used	
21		Not Used					Not Used	
22(a)	Prescribed Dam	Notwithstanding any Mining Operations Plan, the lease holder must not mine within any part of the lease area which is within the notification area of the proposed tailings storage area without the prior written approval of the Minister and subject to any conditions stipulated			1. No evidence of mining outside of the lease area was observed by the Auditor.	All mining is being undertaken within the lease area.	COMPLIANCE	
22(b)		Where the lease holder desires to mine within the notification area he or she must: (i) at least twelve (12) months before mining is to commence or such lesser time as the Minister may permit, notify the Minister of the desire to do so. A plan of the mining system to be implemented must accompany the notice; and (ii) provide such information as the Minister may direct	1. Correspondence requesting approval to mine within the notification area.				Noted	

Mining Lease 1686								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
22(c)		The Minister must not, except in the circumstances set out in sub-paragraph (ii), grant approval unless sub-paragraph (i) of this paragraph has been complied with. This sub-paragraph is complied with if: (i) the Dams Safety Committee as constituted by Section 7 of the Dams Safety Act 1978 and the owner of the dam have been notified in writing of the desire to mine referred to in paragraph (b); (ii) the notifications referred to in clause (a) are accompanied by a description or plan of the area to be mined; (iii) the Director-General has complied with any reasonable request made by the Dams Safety Committee or the owner of the dam for further information in connection with the mining proposal; (iv) the Dams Safety Committee has made its recommendations concerning the mining proposal or has informed the Minister in writing that it does not propose to make any such recommendations; and (v) where the Dams Safety Committee has made recommendations the approval is in terms that are in accordance with those recommendations; or where the Minister does not accept those recommendations or any of them - in accordance with a determination under subparagraph (ii) of this paragraph; (vi) Where the Minister does not accept the recommendations of the Dams Safety Committee or where the Dams Safety Committee has failed to make any recommendations and has not informed the Minister in writing that it does not propose to make any recommendations, the approval shall be in terms that are, in relation to matters dealing with the safety of the dam: as determined by agreement between the Minister and the Minister administering the Dams Safety Act 1978; or in the event of failure to reach such agreement - as determined by the Premier.	Noted				Noted	
22(d)		The Minister, on notice from the Dams Safety Committee, may at any time or times: (i) cancel any approval given where a notice pursuant to Section 18 of the Dams Safety Act 1978 is given. (ii) suspend for a period of time, alter, omit from or add to any approval given or conditions imposed	Noted				Noted	
23	Suspension of Mining Operations	The holder of a mining lease may not suspend mining operations in the mining area other than in accordance with the consent of the Minister	Not Triggered				Noted	

Mining Lease 1686								
Condition	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
24	Cooperation Agreement	<p>The lease holder must make every reasonable attempt, and be able to demonstrate their attempts, to enter into a cooperation agreement with the holder(s) of any overlapping title(s). The cooperation agreement should address but not be limited to issues such as:</p> <ul style="list-style-type: none"> • access arrangements • operational interaction procedures • dispute resolution • information exchange • well location • timing of drilling • potential resource extraction conflicts and • rehabilitation issues. 				There are no overlapping mining titles related to this Project.	Not Triggered	

Audit Photos

Appendix B



Photo # 1- Molasses Spray Truck



Photo # 2- HVAS Sampler



Photo # 3 - Meteorological Station



Photo # 4 - Process Water Management System



Photo # 6 - Tailings Storage Facility



Photo # 5 - TSF Clean Water Diversion



Photo # 7 - Light Vehicle Access Intersection



Photo # 8 - Cyanide Unloading and Storage Facility



Photo # 10 - Waste Oil Storage



Photo # 9 - Waste Storage Area Signage

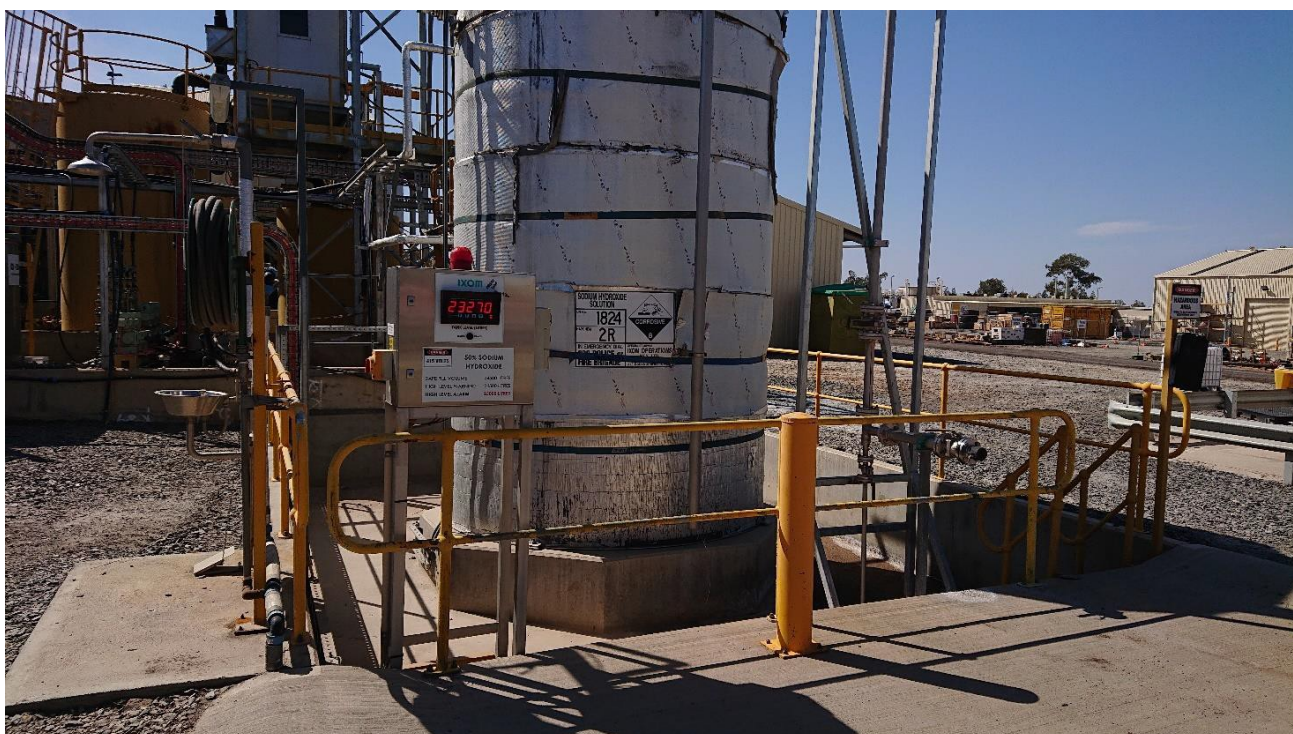


Photo # 11 - Sodium Hydroxide Storage Tank and Bund



Photo # 12 - Signage at site entrance



Photo # 13 - EPL Monitoring Point Signage

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DPIE Auditor Approval

Appendix C



Mark Williams
Senior Environment Advisor
Hera Mine
Aurelia Metals Ltd
PO Box 8626
ORANGE NSW 2800

Email: mark.williams@aureliametals.com.au

19 September 2019

Dear Mark,

**Hera Mine PA 10_0191
Independent Environmental Audit**

I refer to your letters dated 20 August 2019 and 14 September 2019 seeking the Secretary's endorsement for the audit team to undertake the Independent Environmental Audit (audit) as required under Condition 9 of Schedule 5 of Project Approval 10_0191 as modified (the approval) for the Hera Mine.

Having considered the qualifications and experience of the audit team, namely;

- Dr Ken Holmes (Barnett & May) as Lead Auditor;
- Mr Adam Bishop (Pitt and Sherry) as technical specialist (surface water management);
- Mr Martin Jacobs (Pitt and Sherry) as technical specialist (hydrology and water modelling)

the Secretary endorses the appointment of this team to undertake the audit in accordance with Condition 9 of Schedule 5 of the approval. This approval is conditional on the audit team being independent of the development.

The audit is to be conducted in accordance with the approval condition, AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems. Auditors may wish to have regard the IAPAR. A copy of the requirements can be located at <https://www.planning.nsw.gov.au/Assess-and-Regulate/About-compliance/Compliance-policy-and-guidelines/Independent-audit-post-approval-requirements>.

The audit report is to:

- Include consultation with relevant agencies;
- include a compliance table indicating the compliance status of each condition of approval and any relevant EPL;

- not use the term “partial compliance”;
- recommend actions in response to non-compliances;
- review the adequacy of plans and programs required under this approval; and
- identify opportunities for improved environmental management and performance.

Within 6 weeks of completing the audit, or otherwise as agreed by the Secretary, in accordance with Condition 10 Schedule 5, Hera Mine is to submit a copy of the audit report to the Secretary together with its response to any recommendations contained in the audit report and a timetable to implement the recommendations.

Prior to submitting the audit report to the Secretary, it is recommended that Hera Mine review the report to ensure it complies with the relevant approval condition.

Should you wish to discuss this matter please contact myself on the details above.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K. O'Reilly', enclosed within a rectangular box.

Katrina O'Reilly
Team Leader Compliance
as nominee for the Secretary

Short Title	Condition	Document Review	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation	Hera Resources Action Plan	Hera Action Due Date
S2.1		The Proponent shall implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation or rehabilitation of the project.	1. EPA Shire Clean Notice relating to cyanide contaminated water leaks, EPA Reference 1580504, dated 3 June 2015. 2. EPA Cleanup Notice 157816.		As a result of two (self reported by Hera) leaks of contaminated water, the EPA issue a Clean Up Notice and subsequently in response to their assessment that these incidents evidenced potential or actual Material Harm and were therefore potential breaches of Sections 64, 12 and 142A of the POEO Act.	Non-Compliance	The cleanup actions relating to the incidents have been completed - there are no further actions required.	PA Observation 1 - Noted.	Complete.
S2.2	Terms of Approval	The Proponent shall carry out the project generally in accordance with the: (a) EA; and (b) conditions of this approval.	1. Email from S Heinrich (Senior Surveyor) to M Williams (Senior Environmental Advisor) titled "Waste Pile Ore Heaps", dated 3 May 2019. The email notified the Environmental Advisor that the survey of the stockpile had confirmed that the stockpile height had been exceeded.	1. J. Thompson 29 November 2019: An exceedance in stockpile height occurred in May 2019.	1. The stockpile is not visible from any adjacent properties or public roads.	Non-Compliance	Ensure that the waste rock dump height is maintained below the approved height.	1. The new approved WRE height has been increased to 15m above ground level and was approved in MCCO, which was approved on 6 December 2019. 2. The current height of the WRE continues to be reduced as water rock is used to build empty slopes.	Complete.
S2.3		If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this approval shall prevail to the extent of any inconsistency.				Noted			
S2.4		The Proponent shall comply with any reasonable requirements of the Director General arising from the Department's assessment of: (a) any reports, plans, programs or correspondence that are submitted in accordance with this approval; and (b) the implementation of any actions or measures contained in these reports, plans, programs or correspondence.	1. Correspondence related to an exceedance of the bench heights of the tailing storage facility (in early 2016) and subsequent correspondence with DPE indicating that the issue had been dealt with. This correspondence related to an incident in 2016. No further records of directions from DPE were identified.	1. J. Thompson 29 November 2019: No directions were received from DPE during the audit period.	No directions for action (to be taken) were found relating to directions from DPE	Not Triggered			
S2.5	Mining Operations	The Proponent may carry out Mining operations on the site until 31 December 2022.			Administrative Statement	Noted			
S2.6	Ore Extraction and Processing	The Proponent shall not: (a) process more than 55,000 tonnes of ore from the site in any calendar year; (b) transport more than 50,000 tonnes of concentrate from the site in any calendar year.	1. Aurilio Metals Limited 2017 Annual Report 2. Aurilio Metals Limited 2018 Annual Report 3. Hera Annual Review 2019	1. J. Thompson 20 November 2019: The mine has not exceeded the ore processing or concentrate transport limits during the audit period.	The corporate annual reports and Annual Reviews provide a summary of production data for each year. These were: 2017 Financial Year: 368,086 tonnes of ore processed, 32,308 tonnes of concentrate transported from site. 2018 Financial Year: 407,131 tonnes of ore processed, 40,756 tonnes of concentrate transported from site. 2019 Year: 468,358 tonnes of ore processed, 31,206 tonnes of concentrate transported from site.	COMPLIANCE			
S2.7	Hours of Operation	The Proponent shall comply with the operating hours: (a) Vegetation Clearing: 7am to 6pm, 7 days a week (b) Construction: 24 hours, 7 days a week (c) Mining, maintenance and processing: 24 hours, 7 days a week (d) Rehabilitation: Day (Evening) (e) Transportation of Concentrate and Gold Ore: 7am to 10pm, 7 days a week.	1. Letter to DPE from J Thompson, dated 7 December 2017 notifying DPE of two non-compliances: a) 28 September 2017 concentrate truck departed site at 0600 b) 28 November 2017 weak acid discollocat (WAD) cyanide discharge to the SF exceeded licence conditions 2. Driver Training and / or Induction Materials 3. Complaints Register (uploaded to the Hera website).	1. Interview J Thompson, 19 November 2019: Hera has complied with the operating hours specified in the Approval except for one instance where a concentrate truck departed the site prior to 7am. Specifically: - No significant vegetation clearing has occurred during the Audit Period. - No construction works have been undertaken during the Audit Period. - No rehabilitation works have been undertaken on any area of the site. - Transportation of concentrate has been confined to daylight hours.	One non-compliance (concentrate truck departure at 0600) occurred during the Audit Period. No complaints relating to out of hours works (including truck movements to and from site) are recorded on the complaints register that has been updated to the Hera website. The Drivers Code of Conduct includes the requirement that no concentrate transport should occur outside of daylight hours (specifically 0700 to 1900).	Non-Compliance	No action required, the drivers code of conduct is up to date.	PA Observation 2 - Noted.	Complete.
S2.8	Structural Adequacy	The Proponent shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.	Plant and associated facilities Construction Certificates CC: 3782013 issued 16 April 2013 CC: 20130148 issued 2 October 2013 CC: 1732014 issued 20 March 2014 CC: 1732014 issued 4 April 2014 Plant and associated facilities Occupation Certificates OC: 20130148 issued 28 January 2014 OC: 37812003 issued 13 March 2014 OC: 1720014 issued 6 July 2017 OC: 38820017 issued 23 August 2017 Tailing Storage Facility - Tailings Storage Facility Design Report (MWP0076BAALC Design Rep FS Revd) - Dam Safety Committee TSP Surveillance Report issued 14 April 2016 - Letter from Dam Safety Committee dated 16 July 2014 confirming acceptance of the Stage 1 Construction report for the TSP. Other - Johnson Explosives letter dated 27 August 2012 confirming compliance of the Explosives Magazine with AS2187.1 - Structural Condition Assessment (transportable Buildings) prepared by Geosolve, dated December 2017 - Building Certificate issued by CSC (related to office building and abutment blocks) dated 21 February 2018.	1. J. Thompson 20 November 2019: no new construction works have been undertaken during the audit period.	The present processing plant, workshops and associated office facilities were constructed prior to this Project Approval and were approved by the DPI in 2008 under Part 5 of the EPAA Act 1979. No new construction works were undertaken during the audit period. However the previous audit failed to cover approval of the TSP and therefore the Auditor has reassessed the compliance against this condition covering the current and previous Audit Periods. Note that the previous audit recorded a Non-Compliance against this condition. The review of the construction documentation undertaken during the audit has found that sufficient documentation has been retained by Hera to demonstrate that appropriate quality assurance measures were implemented during construction works and the required CSCs and CCs have been obtained. Approval under the Dams Safety Act for the TSP have been obtained.	COMPLIANCE			
S2.9	Demolition	The Proponent shall ensure that all demolition work is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version.	1. Records of demolition 2. Contracts / specifications for demolition works	1. Interview L. Richards, 19 November 2019: No demolition works were undertaken during the Audit Period. A decommissioned crusher is awaiting demolition.	No demolition works have been undertaken during the audit period.	Not Triggered			
S2.10	Protection of Public Infrastructure	The Proponent shall: (a) repair, or pay the full costs associated with repairing, any public infrastructure damaged by the project; and (b) replace, or pay the full costs associated with replacing, any public infrastructure.	1. Incident Register	1. Interview J Thompson, 19 November 2019: No requests have been received requesting repairs be made to any public infrastructure.	No instances of damage to public infrastructure have been identified for the Audit Period.	Not Triggered			
S2.11	Operation of Plant and Equipment	The Proponent shall ensure that all plant and equipment used at the site, or to transport extractive materials from the site, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.		Interview T. Cox Maintenance Supervisor: 1. Pronto (asset and facility management software) is used to plan and track routine maintenance of fixed and moving plant. 2. Hera takes steps to ensure that all the plant and equipment used at the site is maintained in a proper and efficient condition. These steps include: - The mining contractor (PYBARR) is contracted to perform all mining vehicle plant maintenance functions on site and Hera maintains surface plant and equipment. - All equipment on site has to be MD15 compliant (audit interview). - An equipment maintenance register (signed for both Hera and PYBARR). - A maintenance schedule system is in place and current for plant (see above). - The concentrate transporters (JPC Bulk) trucks are under a Maintenance Management system with the MARR (National Heavy Vehicle Register) which requires them to be audited every twelve months.	1. Demonstration of Pronto software. The auditor witnessed the processes used to setup, manage and monitor fixed and mobile plant maintenance. 2. Fixed and mobile plant signed during the audit was operational and appropriately maintained.	The mine operates a popular maintenance management system. Maintenance records signed (on the Pronto System) demonstrated that a comprehensive proactive maintenance program is in place.	COMPLIANCE		
S2.12		With the approval of the Director General, the Proponent may submit any strategy, plan or program required by this approval on a progressive basis.	Correspondence from DPE approving staging of any plans or programs	1. Interview L. Richards: There are no plans to submit any strategy, plan or program required by this approval on a progressive basis at this stage.	This condition has not been triggered.	Not Triggered			
S2.13	Staged Submission of Plans and Programs	Until they are replaced by an equivalent strategy, plan or program approved under this approval, the Proponent shall implement the existing strategies, plans or programs for the site that have been approved under the approved exploration activities described in Review of Environmental Effects entitled "Exploration Decline at the Hera Deposit within Exploration Licence 6162".	1. Review of Environmental Effects entitled "Exploration Decline at the Hera Deposit within Exploration Licence 6162".	The Environmental Management Strategy has been approved. The only plans that have not been approved since project inception are the Water Management Plan and Biosecurity Management Plan. The draft plans are substantially the same as the documents included in the REF. Therefore, Hera is operating in general accordance with the Review of Environmental Factors (REF) for the Exploration Decline.	The Environmental Management Strategy and related sub-plans required by this Approval have been drafted. All of the plans are not up to date and / or approved (by DPE). The unapproved plans are being implemented as opposed to the plans provided in the REF. The management plans that are loaded onto the company website are assumed to be those that are current and being implemented. The majority of those plans were prepared in 2012/13 and may no longer provide up to date process information or mitigation measures relevant to the current operations. Each of the Plans has been reviewed by the Auditor and while generally technically sufficient contain some inaccurate information, for example regulatory references.	Non-Compliance	Review and update all plans required under the EMS, consult with the relevant authorities and then seek DPE approval for the revised plans.	Consultation and submission of all Management Plans is on schedule and if an update is required, they will be submitted within three months of this EA.	4 July 2020.
S2.14	Planning Agreement	By 31 July 2016 unless otherwise agreed by the Secretary, the Proponent shall amend the planning agreement with CSC, in accordance with Division 6 of Part 4 of the EPRA Act, which provides for contributions to CSC. The terms of the planning agreement shall be consistent with the general terms of agreement between CSC and Hera Resources Pty Limited outlined in Appendix 2.	1. Deed of Variation of Original Planning Agreement between Cobarr Shire Council and Hera Resources Pty Ltd 10 April 2013. 2. Email from Cobarr Shire Council (S Poulsen) to DPE (E Donnellan) titled "Modification of Planning Agreement - Condition No. 14 of the draft modified consent", dated 22 September 2016. The email confirms the execution of the deed of variation and compliance with Condition 52 C14 of the Approval. 3. Tax Invoice issued by Cobarr Shire Council on 3 May 2018 for the voluntary Planning Agreement Contributions of \$32,872 and \$61,280.		Hera entered into a planning agreement with Cobarr Shire Council (CSC) in accordance with Division 6 of Part 4 of the EPRA Act, Schedule 1 in the original planning agreement. The terms of the planning agreement are consistent with the general terms of agreement between CSC and Hera outlined in Appendix 2. The total contributions of \$60,000 for road repair and maintenance contribution and \$32,000 for the community fund contribution listed in Appendix 2 are the same as the total contributions listed in Schedule A of the planning agreement.	COMPLIANCE			
S2.15	Road Maintenance Contribution	By 30 September 2015, and annually thereafter until the cessation of transport operations, the Proponent shall make annual contributions of \$20,000 to BSC for the maintenance of the unsealed sections of Nyngane-Hermidale Road.	1. Council accounts database extracts: 31/10/2015 - \$10,000 14/09/2016 - \$62,500 18/10/2016 - \$22,000 13/10/2017 - \$43,500	1. Interview L. Richards: The road related payments made to Council consist of: \$82,500 - Hera's contribution to the Hermidale-Nyngane sealing road project in 2019 \$22,000 - Maintenance grading of unsealed Hermidale-Nyngane Road (2017/18 annual contribution) \$43,500 - Maintenance grading of unsealed Hermidale-Nyngane Road (2015/16 & 2016/17 annual contributions) \$10,000 - Maintenance grading of unsealed Hermidale-Nyngane Road (2015/16 & 2016/17 annual contributions once grading was completed)	1. The Nyngane - Hermidale Road is sealed for its entire length the Auditor travelled to the site via the concentrate transport route.	Payments have been made to BSC during the audit period totalling \$158,000 for road maintenance.	COMPLIANCE		
S3.1	Noise Criteria	The Proponent shall ensure that the noise generated by the project does not exceed the criteria in Table 2 at any residence on privately-owned land or on more than 25 per cent of any privately-owned land. Table 2: Noise Criteria dB(A) Receivers: All residential receivers Day (LAeq15-minute) - 35 Evening (LAeq15-minute) - 35 Night (LAeq15-minute) - 35 / (LA1max) - 45 Note: Noise generated by the project is to be measured in accordance with the relevant requirements and exemptions (including certain meteorological conditions) of the NEW Industrial Noise Policy. However, these criteria do not apply if the Proponent has an agreement with the relevant council to exceed the criteria.	1. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017, dated 14 August 2017 2. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018, dated 14 August 2018 3. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2019, dated 14 August 2019.		No noise exceedances were detected over the 2019/20 reporting period. No noise exceedances were detected over the 2017/18 reporting period. No noise exceedances were detected over the 2016/17 reporting period.	COMPLIANCE			

S3.2	Operating Conditions	(a) implement best practice noise management to minimise the construction, operational and traffic noise of the project.	1. Complaints Register (http://neulandataals.com/projects/here-nymag/consultants-register) 2. Here Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017, dated 14 August 2017 3. Here Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018, dated 16 August 2018 4. Here Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019, dated 14 August 2019.	1. Interview T Cox Maintenance Supervisor: Here manage maintenance requests through the Pronto system. Routine maintenance program is managed using a manual spreadsheet based system.	1. The Auditor did not identify any maintenance issues during the site inspection. All equipment signed appeared to be operational and appropriately maintained.	Two noise complaints were received over the Audit Period relating noise from the same complainant, one via the EPA. The complaints were investigated by Here and responses provided to the complainant.	COMPLIANCE			
		(b) maintain the effectiveness of any noise suppression equipment on site at all times and ensure defective equipment is not used operationally until fully repaired, and			An effective maintenance system has been developed and implemented.	No noise exceedances were detected over the Audit Period.	COMPLIANCE			
		(c) minimise the noise impacts of the project during meteorological conditions when the noise limits in this approval do not apply.	1. Complaints Register (http://neulandataals.com/projects/here-nymag/consultants-register) 2. Here Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017, dated 14 August 2017 3. Here Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018, dated 16 August 2018 4. Here Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019, dated 14 August 2019.			Two noise complaints were received over the Audit Period relating noise from the same complainant, one via the EPA. The complaints were investigated by Here and responses provided to the complainant.	COMPLIANCE			
S3.3	Noise Management Plan	The Proponent shall prepare and implement a Noise Management Plan for the project to the satisfaction of the Secretary. The plan must: (a) be prepared in consultation with the EPA, and submitted to the Secretary for approval within six months of this approval.	1. YTC Resources Ltd, Environmental Management Plan Noise Management, Revision 5, dated 19 August 2013. 2. Draft Noise Management Plan Version 1.0 / Revision 6, dated 24/11/2017. 3. Email from DPE (S Sheenfield) to Here (J Thompson) dated 17/11/17: Here Noise Management Plan, dated 28 June 2018. The email provided three (minor) comments on the contents of the plan. 4. Letter from DPE (H Read) to YTC Resources (S Haines) dated 14/08/2018: Here Project (MP 10, 0191) Management Plan Approvals, dated 28 August 2012. The letter provided DPE approval for the Noise Management Plan, the Noise Management Plan and the Air Quality and Greenhouse gas Management Plans. NOTE this approval predates the current version of the Noise Management Plan.	2. Thompson: Please note, the approval letter is dated the 28/8/12. The Document Control table on the first page of the Noise Management Plan that a review of the document was completed in 2013 and no changes were made. Therefore, the 2013 version is the same as the 2012 version and was approved by DPE. Unfortunately I am unable to locate the correspondence documentation between EPA and Here in 2012. However, as this was approved by DPE this correspondence must have been provided to DPE at the time of approval.	A noise management plan has been prepared, the version on the Here website is the 2013 update. No correspondence was available to verify that this plan was approved by DPE or that the EPA was consulted during preparation of the Plan. Finding NOT VERIFIED NOTE: the Auditor assumes that the 2013 version of the NMP is the current version. Email correspondence from 2017/18 indicates that an updated to that plan was prepared and sent to DPE for review in 2017. DPE provided comment on the plan, however the plan has not been approved by DPE. No correspondence was signed the confirmed that the EPA was consulted during the preparation of the 2017 Noise Management Plan update.	Review the 2017 revision of the NMP to ensure it up to date then, consult with DPE and EPA and then seek DPE approval for the revised plan.	COMPLIANCE			
		(b) describe the measures that would be implemented to ensure compliance with conditions 1 and 2 of this schedule, and	1. YTC Resources Ltd, Environmental Management Plan Noise Management, Revision 5, dated 19 August 2013.	2. Thompson: Four properties have been identified in the Management Plan. Refer to Figure 3. The reason only 3 monitoring locations have been identified is that R1 and R2 are monitored from the same location. This is in accordance with advice we have received from noise specialists (report attached outlining this advice).	Section 5 of the NMP describes the measures to be implemented to ensure compliance.	No noise exceedances were detected over the Audit Period.	COMPLIANCE			
		(c) include a monitoring program that: (i) adequately supports the noise management system on site; (ii) includes a protocol for determining/exceedences of the criteria identified in Table 2; and (iii) evaluates and reports on the effectiveness of the noise management system on site.	1. YTC Resources Ltd, Environmental Management Plan Noise Management, Revision 5, dated 19 August 2013.		Section 6 of the NMP describes the monitoring that will be undertaken to assess compliance. Section 6.1.2 (Table 6) lists the noise monitoring locations at which quarterly monitoring will be undertaken. Four properties are identified.	No noise exceedances were detected over the Audit Period.	COMPLIANCE			
S3.4	Blasting Criteria	The Proponent shall ensure that blasting on the site does not cause exceedances of the criteria in Table 3.	1. Here Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017, dated 14 August 2017 2. Here Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018, dated 16 August 2018 3. Here Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019, dated 14 August 2019.			868 blasts were initiated during the 2016/17 reporting year. No vibration exceedances were detected at any privately owned properties.	COMPLIANCE			
		The Proponent shall only carry out above ground blasting on site between 9.00am and 5.00pm Monday to Saturday, inclusive. No above ground blasting is allowed on Sundays, public holidays or at any other time without the written approval of the Secretary.				868 blasts were initiated during the 2017/18 reporting year. No vibration exceedances were detected at any privately owned properties.	COMPLIANCE			
		Underground blasting may be undertaken at any time, subject to compliance with the conditions of this approval.				738 blasts were initiated during the 2016/18 reporting year. No vibration exceedances were detected at any privately owned properties.	COMPLIANCE			
S3.5	Blasting Hours	The Proponent shall ensure that blasting on the site does not cause exceedances of the criteria in Table 3.					COMPLIANCE			
S3.6	Blasting Frequency	The Proponent shall ensure that blasting on the site does not cause exceedances of the criteria in Table 3.					COMPLIANCE			
S3.7	Blasting Frequency	The Proponent shall ensure that blasting on the site does not cause exceedances of the criteria in Table 3.					COMPLIANCE			
S3.8	Operating Conditions	The Proponent shall ensure that blasting on the site does not cause exceedances of the criteria in Table 3.					COMPLIANCE			
S3.9	Blast Management Plan	The Proponent shall ensure that blasting on the site does not cause exceedances of the criteria in Table 3.					COMPLIANCE			
S3.10	Odour	The Proponent shall ensure that blasting on the site does not cause exceedances of the criteria in Table 3.					COMPLIANCE			
S3.11	Greenhouse Gas Emissions	The Proponent shall ensure that blasting on the site does not cause exceedances of the criteria in Table 3.					COMPLIANCE			
S3.12	Dust	The Proponent shall ensure that blasting on the site does not cause exceedances of the criteria in Table 3.					COMPLIANCE			
S3.13	Dust	The Proponent shall ensure that blasting on the site does not cause exceedances of the criteria in Table 3.					COMPLIANCE			
S3.14	Operating Conditions	The Proponent shall ensure that blasting on the site does not cause exceedances of the criteria in Table 3.					COMPLIANCE			

S3.15	Air Quality and Greenhouse Gas Management Plan	(b) describe the measures that would be implemented to ensure compliance conditions 10-14 of this schedule;	1. YTC Resources Ltd, Environmental Management Plan Air Quality and Greenhouse Gas, Revision 3, dated 28 August 2012.		1. During the site inspection, the Auditor observed: - Water trucks operating on the mine access road - that application of roadseals (sealers) on site access roads and roads in and around the process plant; - the use of water sprays on stockpiles and transfer conveyors; - rehabilitation of formerly disturbed areas.	The management measures to be implemented to control air emissions are provided in Section 5 of the plan. Note that the currently approved version of the AGQMP does not cover all of the current dust mitigation strategies (for example the use of roadseals as a road sealer).	COMPLIANCE				
		(c) describe the proposed air quality management system;	2. YTC Resources Ltd, Environmental Management Plan Air Quality and Greenhouse Gas, Revision 3, dated 28 August 2012.		1. HVAC Sampler (refer to Photo #2) and Dust Deposition Gauges	The AGQMP adequately describes the air quality management system that is being implemented at the site.	COMPLIANCE				
		(d) include an air quality monitoring program that: (i) uses a combination of high volumes samplers and dust deposition gauges to evaluate the performance of the project; and (ii) includes a protocol for determining exceedances of the relevant conditions of this approval; and (e) describe the measures that would be implemented to minimise the release of greenhouse gas emissions from the site.	1. YTC Resources Ltd, Environmental Management Plan Air Quality and Greenhouse Gas, Revision 3, dated 28 August 2012.	No where is this approval does it state that the Gold Room Stack must be monitored only that it should be designed to ensure compliance to air quality regulations. The requirement to monitor the gold room stack is a condition of the EPL and does not relate to this approval.	1. HVAC Sampler (refer to Photo #2) and Dust Deposition Gauges	Section 6 of the plan addresses air quality monitoring. Dust deposition monitoring and HVAC sampling (including PM10 monitoring) is covered in the plan, however the monitoring of the Gold room stacks is not covered in the plan, this is a requirement of the EPL.	Non-Compliance	Review and update the 2015 version of the WMP then, consult with DPE and EPA and then seek DPE approval for the revised plan. Ensure that the revised plan details all monitoring and compliance assessment actions required by this Approval and the EPL.	The 2019 AGQMP details all monitoring and compliance assessment actions required by the PA and the EPL. The AGQMP was prepared in consultation with the EPA and was submitted to the Secretary for approval on 14 March 2020.	Completed.	
S3.16	Metecological Monitoring	For the life of the project, the Proponent shall ensure that there is a suitable meteorological station (comprising in the vicinity of the site that complies with the requirements in the Approved Methods for Sampling of Air Pollutants in New South Wales guidelines.	1. YTC Resources Ltd, Environmental Management Plan Air Quality and Greenhouse Gas, Revision 3, dated 28 August 2012.		1. Met Station (refer Photo #3).	Dustsuppression management strategy has been prepared for the Hiera operation (Section 5.8 of the AGQMP).	COMPLIANCE				
S3.17	Water Supply	The Proponent shall ensure that it has sufficient water for all stages of the project, and if necessary, adjust the scale of mining operations to match its available water supply, to the satisfaction of the Secretary.	1. YTC Resources Ltd, Environmental Management Plan Air Quality and Greenhouse Gas, Revision 3, dated 28 August 2012.		1. Site Water Balance	Hiera has prepared an appropriate water balance with the option has has identified sources of water to ensure that there is adequate supply for the site operations.	COMPLIANCE				
S3.18		The Proponent shall ensure that all surface water discharges from the site comply with: (a) section 150 of the PPCO Act; or (b) the discharge limits (both volume and quality) set for the project in any applicable EPL.				The 2018/7 Annual review reported that two discharges from Licence Point 3 exceeded a number of water quality parameters identified in EPL 2019. The discharges occurred on 20 July 2016 and 16 December 2016 and were reported to the DPE, EPA and DRE.	Non-Compliance	Investigate the cause of any discharge from site that exceeds any discharge condition and identify and implement appropriate mitigation strategies.	All discharges from site that exceed licence conditions are reported and investigated. Appropriate mitigating strategies are implemented to prevent recurrence.	Completed.	
S3.19	Water Discharges	The concentration of Weak Acid Dissociable (WAD) cyanide in tailings discharged from the discharge point to the tailings storage facility shall not exceed 10 mg/L.	1. Hiera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 15 May 2016 to 15 May 2017, dated 14 August 2017. 2. Hiera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 15 May 2017 to 15 May 2018, dated 16 August 2018 3. Hiera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 15 May 2019 to 15 May 2019, dated 14 August 2019			The 2018/8 Annual Review reported that there were several WAD cyanide incidents during this reporting period.	Non-Compliance	Investigate the cause of any discharge from site that exceeds any discharge condition and identify and implement appropriate mitigation strategies.	All discharges from site that exceed licence conditions are reported and investigated. Appropriate mitigating strategies are implemented to prevent recurrence.	Completed.	
S3.20		The concentration of Weak Acid Dissociable (WAD) cyanide at the discharge point to the process water dam shall not exceed 20 mg/L (20th percentile) or 30 mg/L (maximum).				The 2018/8 Annual Review reported that During the reporting period there were no discharges from the sediment basin and no flows recorded in the clean water by pass drain through site. There were also no flows in any creeks or drainage courses across site as a result of the extended drought. Therefore no surface water monitoring of creeks or drainage lines was able to be undertaken.	Non-Compliance	Investigate the cause of any discharge from site that exceeds any discharge condition and identify and implement appropriate mitigation strategies.	All discharges from site that exceed licence conditions are reported and investigated. Appropriate mitigating strategies are implemented to prevent recurrence.	Completed.	
S3.21	Compensatory Water Supply	The Proponent shall provide a compensatory water supply to any owner on privately-owned land whose water supply is adversely impacted (other than an impact that is negligible) as a result of the project, in consultation with DPI Water, and to the satisfaction of the Secretary.	1. Email from Hiera (J Thompson) to DPI Water (T Baker) and DPE (K O'Reilly) titled "Standing water level WBS18", dated 23 November 2018. The email states that Hiera had commenced negotiations with a landholder in regards to a reduction in groundwater levels (at the landholders property).			Negotiations have commenced with one impacted (groundwater) landowner.	COMPLIANCE				
S3.22	Design and Permeability of Storage	The Proponent shall ensure that the floor and walls of: (a) the leachate management pond, seepage collection pond (associated with the tailings storage facility), process water dam and raw water dam are lined to achieve a permeability of no less than 1 x 10 ⁻¹⁰ m/s to a depth of at least 600 millimetres of clay (or equivalent); and (b) the tailings storage facility (except for the seepage collection pond) is lined to achieve a permeability of no less than 1 x 10 ⁻¹⁰ m/s to a depth of at least 600 millimetres of clay (or equivalent).	1. Email (and attachments) from Total Lining Systems (B Short) to YTC Resources (B Pearce) titled "Sediment Pond Lining", dated 7 August 2017. The email provides copies of the leachate pond design and construction O&G&C report.		1. Process Water Management System (refer Photo #4).	The leachate management system ponds are lined with 2 mm HDPE. The QA reports associated with the construction of the ponds does not certify the permeability of the liners.	Non-Compliance	Obtain a copy of the relevant engineering report certifying the permeability of the pond liners.	Engage consultant to conduct HDPE Weld Quality Control and confirm the effectiveness of the Process Water Dam and leachate pond leachate Pond.	Completed.	
S3.23		Note: An alternative permeability standard may be acceptable following completion of an appropriate risk assessment undertaken in accordance with the Environmental Guidelines – Management of Tailings Storage Facilities (VIC DPI, 2004), to the satisfaction of the EPA and the Secretary.	1. Independent Environmental Audit, Hiera Resources Pty Ltd, Hiera Project, NURAGEE NSW, September 2016. The report states: "Section 4.2 gill of the TSF Stage 1 Construction Report (Conley, 17 June 2014) confirms that the permeability of the TSF basin floor exceeded the required value of 10 ⁻¹⁰ m/s over a 600mm depth".		1. Tailings Storage Facility (Refer to Photo #5).	The permeability of the TSF satisfies the 10 ⁻¹⁰ m/s standard.	COMPLIANCE				
S3.24		The clean water diversion around the tailings storage facility shall be designed, constructed and maintained to prevent the probable maximum flood from the catchment upstream of the facility from entering the facility.	1. Letter from Hiera (J Thompson) to DPE (K O'Reilly) titled "Independent Environmental Audit Aug 2017 - Sep 2016 - Action Plan Condition 23, Schedule 3 Design and Permeability of Storage", dated 21 December 2017. The includes a plan showing the TSF diversion drain construction compliance with the requirements of this Condition. The water also contained a survey plan that confirms the that the as built structure meets these requirements.		1. TSF Clean Water Diversion (Refer Photo #6).	The clean water diversion meets the design requirements detailed in this Condition.	COMPLIANCE				
		The process water and raw water dams shall be maintained with a minimum freeboard sufficient to accommodate a 1 in 100-year ARI, 72-hour rainfall event without overtopping at all times.	1. Draft Water Management Plan 2016, Version 6, dated November 2019, Section 4.1.4 discusses contaminated water management, including process water and refers specifically to the 200mm freeboard in the process water pond.			A freeboard of at least 200mm is to be achieved as a minimum operational condition allowing capacity to capture the 100 year 72-hour design rainfall event (CH2D, July 2016, Water Management Plan). Currently the process water dam height set point is controlled at 80%.	COMPLIANCE				
		The Proponent shall prepare and implement a Water Management Plan for the project to the satisfaction of the Secretary. The plan must be prepared in consultation with EPA and DPI Water.	1. Aurelia - Hiera Gold WMP Water Management Plan 2016, prepared by GHD.			A Water Management appears to have been prepared in 2013 by RW Conkey. A copy of this plan was not available at the time of the audit and no correspondence relating to that version of the plan was sighted.	COMPLIANCE				
		The plan must be prepared by suitably qualified and experienced persons whose appointment has been approved by the Secretary.	2. Draft Water Management Plan 2016, Version 6, dated November 2019.			GHD prepared an updated plan in 2016. Correspondence from DPE approving the plan author(s) or approving the plan was not sighted during the audit.	COMPLIANCE				
		and submitted to the Secretary for approval within six months of this approval, or prior to commencement of mining operations under this approval, whichever is sooner;	1. Independent Environmental Audit, Hiera Resources Pty Ltd, Hiera Project, NURAGEE NSW, September 2016. The report states: "A later was reviewed from the NSW DPI on 31st August 2012 approving the three experts (Mark Pissfeld, James Morrow and Wayne Russell) that contributed to the development of the site Water Management Plan (WMP), which was coordinated by external consultant RW Conkey and C&P Pty Ltd.			The plan has been further revised in 2016, but has yet to be approved by DPE. Correspondence from DPE approving the plan author(s) or approving the plan was not sighted during the audit.	Non-Compliance	Request approval from DPE for the appointment of the experts responsible for the (yet to be approved) 2019 Water Management Plan.	DPE approved the appointment of expert for the Water Management Plan on 3 March 2020.	Completed.	
						DPI Water endorsed the appointment of three experts to prepare the original plan on 31 of August 2012. Correspondence from DPE approving the appointment of the authors of the 2016 or 2019 plan revisions was not sighted during the Audit.	Non-Compliance	Ensures that the current version of the Water Management Plan is approved by DPE.	Consultation and submission of all Management Plans is on schedule and if an update is required, they will be submitted within three months of this EA.	4 July 2020.	
						Compendence verified that the original plan was submitted to DPE (DPI was not sighted during the audit)	Non-Compliance				
						Finding: Not verified					
		In addition to the standard requirements for management plans (see Condition 3 of Schedule 5), this plan must include: (a) a Site Water Balance that includes details of: - sources of water supply; - water use on site, including any potable water use; - water management on site; - off-site water discharges, including volume, timing and release point infrastructure requirements; and - reporting procedures including comparisons of the site water balance for each calendar year; and (b) a Surface Water Management Plan, which includes: - baseline data on surface water flow and quality in waterbodies that could be affected by the project; - a detailed description of the surface water management system on site, including the: - clean water diversion systems; - erosion and sediment controls; and - water storages, including the tailings storage facility, raw water or process water dams; - design objectives and performance criteria, including trigger levels for investigating any potentially adverse impacts, for the following: - the water management system; - water storages including the tailings storage facility, raw water or process water dams; and - surface water quality in waterbodies that could be affected by the project; - performance criteria for surface water quality attributes relevant to water quality impacts on biological diversity and aquatic ecological integrity, including cyanide, salinity, heavy metals, sediment load, pH, hardness and biological oxygen demand; - a program to monitor: - the effectiveness of the water management system; - surface water flow, quality, and impacts on water users; - potential acid rock drainage; - potential leakage or spillage from tailings, mineral concentrate or effluent pipelines; - post-closure water quality; - impacts on wildlife from exposure to cyanide or other toxic chemicals; and - a plan to respond to any exceedances of the performance criteria, and mitigate and/or offset any adverse surface water impacts of the project, including but not limited to management measures to reduce wildlife exposure to cyanide or other toxic chemicals; - reporting procedures for the results of the monitoring program; and (c) a Groundwater Management Plan, which includes: - baseline data of all groundwater levels, yield and quality in the region, and any privately-owned groundwater bores that could be affected by the project; - detailed documentation of the operation of the seepage collection and storage system associated with the tailings storage facility and associated maintenance requirements; - groundwater assessment criteria, including trigger levels for investigating any potentially adverse groundwater impacts, including but not limited to leakage from the tailings storage facility; - a program to monitor: - impacts on the groundwater supply of potentially affected landowners; - impacts on the volume of groundwater inflow into the underground workings; - regional groundwater levels and quality in all potentially affected areas; - potential acid rock drainage; - the effectiveness of the seepage collection and storage system and associated infrastructure in collecting and containing all seepage from the tailings storage facility and all other water storages that receive chemical or salt-laden water; - the quality of groundwater to be re-used on the site; - any post-rehabilitation seepage from the tailings storage facility; and - a plan to respond to any exceedances of the performance criteria, and mitigate and/or offset any adverse groundwater impacts of the project, including but not limited to: - procedures to minimise the potential for soil salinity, sodicity and other contaminant issues associated with the reuse of groundwater on site; and - measures to manage and mitigate any leakage from the tailings storage facility, including but not limited to that detected beyond the seepage collection and storage system.	1. Draft Water Management Plan 2016, Version 6, dated November 2019. The site water balance is provided in Section 4.5 and Appendix F of the plan.		The water balance model provided in the Draft Plan (the auditor understands that this unapproved version of the plan is currently being implemented) meets the requirements of this Condition.	COMPLIANCE					
S3.25	Water Management Plan				1. Draft Water Management Plan 2016, Version 6, dated November 2019, Section 4.1 describes the surface water system. Appendix G provides the "Trigger Value Action Plan" and Section 4.2 describes the surface water monitoring program.	The required elements of the Surface Water Management Plan are contained in the Draft Water Management Plan.	COMPLIANCE				
					1. Draft Water Management Plan 2016, Version 6, dated November 2019, Section 4.3 describes the groundwater system. Appendix G provides the "Trigger Value Action Plan" and Section 4.3 describes the groundwater monitoring program.	The required elements of the Groundwater Management Plan are contained in the Draft Water Management Plan.	COMPLIANCE				

S3.26	Biodiversity Off-set Strategy	By 31 July 2016, the Proponent shall prepare a Biodiversity Off-set Strategy for the project to the satisfaction of the Secretary.	1. Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hesa Mine, prepared by RW Corkery, dated June 2016.	1. J. Thompson 10 November 2019. The Biodiversity Management Plan has not been approved.		A biodiversity management plan was prepared. The draft Biodiversity Management Plan incorporating a Biodiversity Off-set Strategy was submitted to DPE by email (signed) on 15 July 2016. Subsequent delays in relation to the off-set strategy and no banking agreements resulted in delays in finalisation of the plan.	Non-Compliance	Seek DPE Approvals for the completion and finalisation of the Biodiversity Off-set Strategy and the Biodiversity Off-set Plan.	Consultation and submission of all Management Plans (non-vehicle and if an update is required, they will be submitted within three months of this EA.	4 July 2020.
		The Strategy must: (a) be prepared in consultation with OEH; (b) identify the portion of the Chelusa site (WALL 9881) that would be conserved in perpetuity to offset the impacts of the project using the Biodiversity Assessment Methodology; and (c) describe the specific management measures that would be implemented on the Chelusa site to conserve and improve the biodiversity values of the site over time.	1. Letter from OEH (S Cook) to RW Corkery (M Bland) titled "Hesa mine Biodiversity Management Plan". The letter from OEH provides input into the Biodiversity Off-set management plan that includes the Off-set Strategy. 1. Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hesa Mine, prepared by RW Corkery, dated June 2016. 1. Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hesa Mine, prepared by RW Corkery, dated June 2016.			OEH were consulted during the preparation of the biodiversity management plan. The Biodiversity Off-set area is identified in Section 4.2. Section 4.4 of the Biodiversity Management Plan (Section 4 is the Biodiversity Off-set Strategy) sets out specific management measures to be implemented on the Chelusa site.	COMPLIANCE COMPLIANCE COMPLIANCE			
		Following approval, the Proponent shall implement the Biodiversity Off-set Strategy to the satisfaction of the Secretary.		1. J. Thompson 10 November 2019. The Biodiversity Management Plan has not been approved.		Hesa has been working on the Chelusa Off-set area since 2016. A substantial volume of correspondence was provided to the auditor evidencing the consultation activities undertaken.	Not Triggered			
S3.28	Long Term Security	Within 12 months of the approval of the Biodiversity Off-set Strategy, the Proponent shall make suitable arrangements to conserve the off-set area identified in the Biodiversity Off-set Strategy in perpetuity to the satisfaction of the Secretary.		1. J. Thompson 10 November 2019. The Biodiversity Management Plan has not been approved.			Not Triggered			
S3.29	Biodiversity Management Plan	Within 6 months of approval and prior to the commencement of vegetation clearing on the site under this approval, the Proponent shall submit a Biodiversity Management Plan for the project site to the Secretary for approval. This plan must:	1. Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hesa Mine, prepared by RW Corkery, dated June 2016.	1. J. Thompson 10 November 2019. The Biodiversity Management Plan has not been approved.		A biodiversity management plan was prepared. The draft Biodiversity Management Plan incorporating a Biodiversity Off-set Strategy was submitted to DPE by email (signed) on 15 July 2016. Subsequent delays in relation to the off-set strategy and no banking agreements resulted in continuing delays in the finalisation of the plan.	Non-Compliance	Seek DPE Approval for the completion and finalisation of the Biodiversity Off-set Strategy and the Biodiversity Off-set Plan.	Consultation and submission of all Management Plans (non-vehicle and if an update is required, they will be submitted within three months of this EA.	4 July 2020.
		This plan must: (a) be prepared by a suitably qualified and experienced person(s) whose appointment has been endorsed by the Secretary; (b) be prepared in consultation with OEH; (c) describe how the implementation of the biodiversity off-set strategy would be integrated with the overall rehabilitation of the site;	1. Independent Environmental Audit, Hesa Resources Pty Ltd, Hesa Project, NUMAGEE NSW, September 2016. The report stated: "A letter (dated 31/09/12) from the NSW Department of Planning & Infrastructure endorsing Hesa's proposed list of experts as being suitably qualified and experienced person(s) was signed and is appended to the draft BMP." 1. Letter from OEH (S Cook) to RW Corkery (M Bland) titled "Hesa mine Biodiversity Management Plan". The letter from OEH provides input into the Biodiversity Off-set management plan that includes the Off-set Strategy. 1. Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hesa Mine, prepared by RW Corkery, dated June 2016.			DPE approved the experts that prepared the Biodiversity Management Plan on 31 August 2012. OEH were consulted during the preparation of the biodiversity management plan.	COMPLIANCE COMPLIANCE			
		(d) describe the short, medium, and long term measures that would be implemented to: (i) manage the permanent vegetation and fauna habitat on the site and in the off-set areas (if and when applicable); (ii) minimise the impacts on Cobarr Greenhood Orchid (<i>Cryptotylas cotabensis</i>), Lubed Blue-grass (<i>Boutchozia lobata</i>) and hollow-bearing trees; and (iii) implement the biodiversity off-set strategy (if and when applicable), including detailed performance and completion criteria;	1. Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hesa Mine, prepared by RW Corkery, dated June 2016.			The Biodiversity Off-set area is remote from the mine, therefore rehabilitation of the mine site cannot be integrated with the implementation of the Off-set strategy.	Not Triggered			
		(e) include detailed performance and completion criteria for evaluating the performance of the biodiversity off-set strategy, and triggering remedial action (if necessary).	1. Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hesa Mine, prepared by RW Corkery, dated June 2016.			The Draft BMP addresses the sub-paragraphs of this condition as follows: (i) The short, medium, and long term measures that would be implemented to manage the permanent vegetation and fauna habitat on the site and in the off-set areas (if and when applicable) are described in section 3.5.1 on Fauna and section 4.0 Chelusa. (ii) The short, medium, and long term measures that would be implemented to minimise the impacts on Cobarr Greenhood Orchid (<i>Cryptotylas cotabensis</i>), Lubed Blue-grass (<i>Boutchozia lobata</i>) and hollow-bearing trees are described in section 3.5.1 on Fauna and section 4.0 Chelusa. (iii) The short, medium, and long term measures to implement the biodiversity off-set strategy (if and when applicable), including detailed performance and completion criteria are referenced in section 4.6.	COMPLIANCE			
		(f) include a detailed description of the procedures to be implemented for: (i) enhancing the quality of existing vegetation and fauna habitat; (ii) restoring native vegetation and fauna habitat on the biodiversity areas and rehabilitation area through focusing on assisted natural regeneration, targeted vegetation establishment and the introduction of naturally scarce fauna habitat (where necessary); (iii) minimising the salvage of resources within the approved disturbance area - including vegetative, soil and cultural heritage resources - for beneficial reuse in the enhancement of the biodiversity areas or rehabilitation area; (iv) collecting and propagating seed; (v) minimising the impacts on fauna on site, including pre-clearance surveys and minimising the potential exposure to salinity; (vi) controlling weeds and feral plants; (vii) controlling erosion; (viii) managing grazing and agriculture onsite; (ix) controlling access; and (x) bushfire management;	1. Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hesa Mine, prepared by RW Corkery, dated June 2016.			The draft BMP discusses trigger levels and monitoring of the mine site in section 4.6, with detailed trigger levels in Table 8. (i) A detailed description of the procedures to be implemented for enhancing the quality of existing vegetation and fauna habitat are described in sections 3.5.1 and 4.0 of the draft BMP. (ii) A detailed description of the procedures to be implemented for restoring native vegetation and fauna habitat on the biodiversity areas, and rehabilitation area through focusing on assisted natural regeneration, targeted vegetation establishment and the introduction of naturally scarce fauna habitat resources are described in sections 3.5.4.2 (Positive trees), 3.5.3.2 (soil) and 3.5.3.6 (No cultural resources identified) of the draft BMP. (iii) A detailed description of the procedures to be implemented for minimising the salvage of resources within the approved disturbance area including vegetative, soil and cultural heritage resources, for beneficial reuse in the enhancement of the biodiversity areas or rehabilitation area are described in sections 3.5.4.2 (Positive trees), 3.5.3.2 (soil) and 3.5.3.6 (No cultural resources identified) of the draft BMP. (iv) A detailed description of the procedures to be implemented for collecting and propagating seed is listed in section 3.5.3.3 of the draft BMP. (v) A detailed description of the procedures to be implemented for minimising the impacts on fauna on site (section 3.5.3), including pre-clearance surveys and minimising the potential exposure to salinity is described in sections 3.5.4.3 (TSF - 2 management procedures). (vi) A detailed description of the procedures to be implemented for controlling erosion are referred to in section 3.5.3.5 of the draft BMP which in turn refers to the Water Management Plan and the MOP. Section 4.2.2.4 of the MOP describes erosion control measures. (vii) A detailed description of the procedures to be implemented for managing grazing and agriculture on site is listed in section 3.5.5 of the draft BMP. (viii) A detailed description of the procedures to be implemented for controlling access is listed in sections 3.5.5 and 3.5.6 of the draft BMP. (ix) A detailed description of the procedures to be implemented for bushfire management is listed in section 4.6 of the draft BMP.	COMPLIANCE COMPLIANCE COMPLIANCE COMPLIANCE COMPLIANCE COMPLIANCE COMPLIANCE COMPLIANCE COMPLIANCE COMPLIANCE COMPLIANCE COMPLIANCE			
		(g) include a seasonally-based program to monitor and report on the effectiveness of these measures, and progress against the detailed performance and completion criteria.	1. Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hesa Mine, prepared by RW Corkery, dated June 2016.			(i) A seasonally-based program to monitor and report on the effectiveness of these measures, and progress against the detailed performance and completion criteria is listed in section 5 (Monitoring) and 7 (Reporting) of the draft BMP.	COMPLIANCE			
		(h) identify the potential risks to the successful implementation of the biodiversity off-set strategy, and include a description of the contingency measures that would be implemented to mitigate against those risks; and	1. Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hesa Mine, prepared by RW Corkery, dated June 2016.			The Trigger Action Response Plan (TARAP) has been included in the management plan (Section 6). The TARAP identifies the risks and includes relevant measures to be implemented to mitigate against those risks.	COMPLIANCE			
		(i) include details of who would be responsible for monitoring, reviewing and implementing the plan.	1. Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hesa Mine, prepared by RW Corkery, dated June 2016.			The details of the personnel who would be responsible for monitoring, reviewing and implementing the plan are listed in Table 2 of section 2 of the draft BMP.	COMPLIANCE			
		Within 6 months of the approval of the Biodiversity Off-set Strategy, the Proponent shall submit an updated Biodiversity Management Plan to the Secretary for approval.	1. Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hesa Mine, prepared by RW Corkery, dated June 2016.	1. J. Thompson 10 November 2019. The Biodiversity Management Plan has not been approved.		The biodiversity management plan has not yet been approved.	Not Triggered			
		Within three months of the approval of the Biodiversity Management Plan, the Proponent shall lodge a conservation bond with the Department to ensure that the Biodiversity off-set is implemented in accordance with the performance and completion criteria of the Biodiversity Management Plan. The sum of the bond shall cover the full cost of implementing the Biodiversity Off-set Strategy and be verified by a suitably qualified rehabilitation specialist or quantity surveyor.	1. Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hesa Mine, prepared by RW Corkery, dated June 2016.	1. J. Thompson 10 November 2019. The conservation bond has not yet been paid as the Biodiversity Management Plan has not been approved.		The biodiversity management plan has not been approved, therefore the payment of the conservation bond is not yet due.	Not Triggered			
		If the biodiversity off-set is implemented to the satisfaction of the Secretary, the Secretary will release the conservation bond. If the off-set strategy is not implemented to the satisfaction of the Secretary, the Secretary will call in all or part of the conservation bond, and arrange for the satisfactory implementation of the biodiversity off-set.								
S3.32	Heritage	The Proponent shall prepare and implement an Aboriginal Cultural Heritage Management Plan to the satisfaction of the Director-General. This plan must:	1. YTC Resources Ltd, Environmental Management Plan Aboriginal Cultural Heritage, Revision 1, dated 19 August 2012. 2. Environmental Management Plan Aboriginal Cultural Heritage Version 5.0 / Revision 5, dated 2 May 2015.			The Aboriginal Heritage Management Plan was prepared in 2013. This plan has been approved by DPE. A subsequent version was prepared in 2015. No correspondence verifying that the 2015 version of the plan has been approved by DPE was signed.	COMPLIANCE			
		(a) be prepared in consultation with OEH and the Aboriginal stakeholders (in relation to the management of Aboriginal heritage values);	1. YTC Resources Ltd, Environmental Management Plan Aboriginal Cultural Heritage, Revision 1, dated 19 August 2012. Section 6 of the plan details the consultation processes undertaken during the preparation of the plan.			The 2013 Aboriginal Heritage Management Plan contains details of the consultation undertaken during the preparation of the plan.	COMPLIANCE			
		(b) be submitted to the Secretary for approval within six months of this approval; and	1. Letter from DPE (N Wines) to YTC Resources (S Haines) titled "Hesa Project (HMP 10, 0191) Heritage Management Plan", dated 5 October 2012. The letter provided DPE approval for the Aboriginal Heritage Management Plan.			The Heritage Management Plan was approved by DPE on 5 October 2012.	COMPLIANCE			
S3.33	Dangerous Goods	(c) describe the measures that would be implemented for: • monitoring of new surface disturbance on site for unidentified Aboriginal objects; • managing the discovery of any human remains or previously unidentified Aboriginal objects on site; and • ensuring ongoing consultation with Aboriginal stakeholders in the conservation and management of any Aboriginal cultural heritage values on site.	1. YTC Resources Ltd, Environmental Management Plan Aboriginal Cultural Heritage, Revision 1, dated 19 August 2012. Section 6 of the plan details the consultation processes undertaken during the preparation of the plan.			Section 4.5 (Risks and Responsibilities) allocates responsibility to the Environmental Officer to undertake inspections of any area that has not been surveyed, prior to any new surface disturbances. Section 6.2 discusses the process for dealing with unexpected finds and the consultation (with aboriginal groups) to be implemented. Section 6.4.4 of the Traffic Environmental Management Plan (revision 3 dated 15 August 2012) states that the Environmental Officer will be responsible to ensure that this condition is satisfied, and refers to the Hazardous Material Management Plan (HMPMP). Section 5.1 of the HMPMP states that "transportation of hazardous materials to Hesa will only be undertaken by contractors who are certified to carry dangerous goods and have been trained in the 'Australian Code for the Transport of Dangerous Goods by Road and Rail' (the Code)".	COMPLIANCE COMPLIANCE COMPLIANCE			
		Transportation of all dangerous goods to and from the site shall be undertaken in strict accordance with Australian Code for the Transport of Dangerous Goods by Road and Rail.	1. Traffic Management Plan, Revision 3, dated 14 May 2016.				COMPLIANCE			
		Within 6 months of the date of this approval, the Proponent shall: (a) commission a suitably qualified independent expert, whose appointment has been approved by the Secretary, to undertake a design and pavement condition review for the intersection of Buffurong Road and Priory Tank Road, which: (i) identifies any deficiencies in the design or pavement condition of the intersection; (ii) recommends appropriate design upgrades and pavement repair taking into consideration the type, volume and condition of traffic generated by the mine; and (iii) ensures the recommended design is in accordance with the applicable AUSTROADS standards.	1. Independent Environmental Audit, Hesa Resources Pty Ltd, Hesa Project, NUMAGEE NSW, September 2016. The report stated: "A suitably qualified independent expert whose appointment was approved by the Secretary (then known as the Director-General), was commissioned to undertake a design and pavement condition review for the intersection of Buffurong Road and Priory Tank Road. This was done within 6 months of the date of the Project Approval. A letter (dated 22/11/13) of endorsement from the Director-General referring to Conditions 34 and 35 of the Project Approval was signed."			Hesa has commissioned the design of the intersection in accordance with this Condition.	Not Triggered			
S3.34	Road Upgrades	(b) undertake intersection design and pavement upgrades in accordance with the recommendations of the review in (a), in consultation with CSC, and to the satisfaction of CSC.	2. Intersection Assessments Nymagee and Hemmelsdale Road (plans) prepared by Geosys. 3. Hesa Resources Purchase Order PO57681-1, dated 13 November 2015.			The works in paragraph (b) were completed by CSC in January/February 2016 (audit interview). Auslets purchase order of 13 November 2015 was signed.	Not Triggered			
		Within 6 months of the date of this approval, the Proponent shall: (a) commission a suitably qualified independent expert, whose appointment has been approved by the Secretary, to undertake a review of the existing traffic control devices on Buffurong Road and Priory Tank Road, which: (i) identifies any deficiencies in the design or pavement condition of the intersection; (ii) recommends appropriate design upgrades and pavement repair taking into consideration the type, volume and condition of traffic generated by the mine; and (iii) ensures the recommended design is in accordance with the applicable AUSTROADS standards.	1. Independent Environmental Audit, Hesa Resources Pty Ltd, Hesa Project, NUMAGEE NSW, September 2016. The report stated: "A suitably qualified independent expert whose appointment was approved by the Secretary (then known as the Director-General), was commissioned to undertake a design and pavement condition review for the intersection of Buffurong Road and Priory Tank Road. This was done within 6 months of the date of the Project Approval. A letter (dated 22/11/13) of endorsement from the Director-General referring to Conditions 34 and 35 of the Project Approval was signed."			Hesa has commissioned the required report and funded the installation of the required traffic controls.	Not Triggered			
		(b) install traffic control devices in accordance with the recommendations of the review in (a), to the satisfaction of CSC.	1. Review of Traffic Control Devices Hesa Mine at Hemmelsdale, prepared by Geosys, dated May 2014. 2. Independent Environmental Audit, Hesa Resources Pty Ltd, Hesa Project, NUMAGEE NSW, September 2016. The audit report, with respect to Condition 34.35 "A letter (dated 22/11/13) of endorsement from the Director-General referring to Conditions 34 and 35 of the Project Approval was signed."			Installation of traffic control devices in accordance with the recommendations of the review in paragraph (a) had not been completed within 6 months of the date of the Project Approval.	Non-Compliance	This is an historical non-compliance. The works have been completed. No further action required.	PA Observation 3 - Noted.	Completed.

S3.35A	Prior to commencing the transport of concentrate to the Hemideale rail siding via Nymagee-Hemideale Road, or an alternative date nominated by BSC and CSC (with respect to the works within the relevant local government area), the Proponent shall implement, or contribute to the cost of implementing the recommendations in the report titled Visual Review of Traffic Control Devices - Hera Mine to Hemideale Siding prepared by Geolysa Pty Ltd and dated 7 May 2014, to the satisfaction of BSC and CSC.	1. Email from BSC (G Bourke) to Hera (S Haures) titled "Nymagee to Hemideale Road", dated 6 November 2014. The email refers to the receipt by Council of the Visual Road Pavement Assessment Report and committed to undertaking repairs to the road on an as needs basis. 2. Independent Environmental Audit, Hera Resources Pty Ltd, Hera Project, NUNAGEE NSW, September 2016.		The recommendations in the Geolysa report dated 7 May 2014 had not been implemented prior to commencing the transport of concentrate to the Hemideale rail siding via Nymagee-Hemideale Road in October 2014.	Non-Compliance	This is an historical non-compliance. The works have been completed. No further action required.	PA Observation 4 - Noted.	Completed.
S3.35B	Prior to commencing the transport of concentrate to the Hemideale rail siding via Nymagee-Hemideale Road, or an alternative date nominated by BSC, the Proponent shall upgrade the intersection of Harwood Street and Milford Street in accordance with the recommendations of the report titled Geotechnical Investigation of Harwood Street and Milford Street on Priority Tank Road, Nymagee NSW, prepared by Envirotest Consulting Pty Ltd dated 23 May 2014 and the relevant AUSTRROADS standards, to the satisfaction of CSC.	1. Report titled Geotechnical Investigation of Harwood Street and Milford Street on Priority Tank Road, Nymagee NSW, prepared by Envirotest Consulting Pty Ltd dated 23 May 2014. 2. Email from CSC (A Sheppard) to Hera (J Thompson) titled "P/T - Nymagee Intersection Works", dated 23 August 2016. The email confirms that the intersection works had been completed.		The works required by this Condition were completed (by Council).	COMPLIANCE			
S3.35C	Every two months during the transport of concentrate to the Hemideale rail siding via Nymagee-Hemideale Road, the Proponent shall: (a) inspect the condition of the unsealed section of the transport route in consultation with BSC; and (b) grade the unsealed section of Nymagee-Hemideale Road where required and as identified in the inspection carried out in accordance with condition 35C(1), to the satisfaction of BSC.	1. Records of inspection of the unsealed section of Nymagee - Hemideale Road for the past three years	1. The Nymagee - Hemideale Road is sealed for its entire length. The site via the concrete transport route.	Records of inspection were signed by the Auditor. The Nymagee - Hemideale Road is now sealed for its entire length.	COMPLIANCE			
S3.36	Access Road and Intersection Construction	The Proponent shall construct the site access road for heavy vehicles, and associated intersection of this access road and Burthog Road, prior to the commencement of construction of the process plant. The intersection shall be designed and constructed to the satisfaction of CSC and in accordance with the applicable AUSTRROADS standards.	1. Letter from CSC approving the design and construction of the Access Road and Intersection	Hera had constructed the site access road for heavy vehicles, and associated intersection of this access road and Burthog Road prior to the commencement of construction of the process plant (as required). It was also visually verified in the July 2013 Audit that road construction had begun prior to the commencement of construction of the process plant.	COMPLIANCE			
S3.37	Monitoring of Concentrate Transport	The Proponent shall: (a) keep accurate records of the: (i) amount of lead and zinc concentrate transported from the site (on a monthly basis); and (ii) the date and time of loaded truck movements from the site; and (b) provide the Secretary with a summary of these truck movements in the Annual Review.	1. Hera Mine Annual Review Project Approval 10, 0199 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017, dated 14 August 2017. 2. Hera Mine Annual Review Project Approval 10, 0199 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018, dated 16 August 2018. 3. Hera Mine Annual Review Project Approval 10, 0199 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2019 to 15 May 2019, dated 14 August 2019.	Hera keeps accurate records of the amount of lead and zinc concentrate transported from the site by calculating the net weight of each truck load. A dedicated weighbridge is located on site for this purpose. Concrete storage records are kept in the regulatory database (MPA-CIS) on a per truck basis (signed). Monthly storage amounts can be calculated and are also available on Aurelia's website (signed). Hera publish the required information in the Annual Review.	COMPLIANCE			
S3.37A	Transport of Concentrate to Hemideale Rail Siding	The Proponent shall restrict the transport of concentrate to the Hemideale rail siding via the Nymagee-Hemideale Road during daylight hours and limit vehicle movements entering and leaving the site to 4 per day, averaged over a calendar month, unless otherwise agreed by the Secretary.	1. Traffic Management Plan - Version 3.0, dated 14 May 2016. 2. Drivers Code of Conduct Revision 2.0, dated November 2016. 3. Records of concentrate transport for the past three years (monthly web reports)	Section 5.3 of the Traffic Management Plan refers to the concentrate transport limits. The Drivers Code of Conduct specifies the permitted concentrate transport times. A review of the monthly web reports confirmed compliance with the concentrate load limit of 4 trucks per day averaged over a year.	COMPLIANCE			
S3.38	Traffic Management Plan	The Proponent shall prepare and implement a Traffic Management Plan to the satisfaction of the Secretary. The plan shall: (a) focus on traffic management along Nymagee-Hemideale Road, Burthog Road and Priority Tank Road, particularly in the vicinity of the villages of Nymagee and Hemideale; (b) describe the measures to minimise conflicts between road users and ensure that trucks from the mine do not travel through surrounding local roads; (c) be developed in consultation with both BSC and CSC and submitted for the approval of the Secretary prior to carrying out any development on the site under this approval.	1. Traffic Management Plan, Version 3.0, dated 14 May 2016. 2. Traffic Management Plan Version 3.0, dated February 2017. 2. Letter from DPE (C Pridmore) to Hera (J Thompson) titled "Hera Gold Mine (10,0191) Approval of Traffic Management Plan", dated 14 November 2017.	DPE approved the Traffic Management Plan in November 2017. The Traffic Management Plan does not clearly address traffic management along Nymagee-Hemideale Road, Burthog Road and Priority Tank Road, particularly in the vicinity of the villages of Nymagee and Hemideale. The responsibilities of truck drivers in relation to the minimisation of conflicts with other road users is contained in the Drivers Code of Conduct.	COMPLIANCE	Revise the Traffic Management Plan to address traffic management along Nymagee-Hemideale Road, Burthog Road and Priority Tank Road, particularly in the vicinity of the villages of Nymagee and Hemideale.	Consultation and submission of all Management Plans is on schedule and if an update is required, they will be submitted within three months of this EA.	4 July 2020.
S3.39	Visual	The Proponent shall: (a) implement all reasonable and feasible measures to minimise the visual impacts, and particularly the off-site lighting impacts, of the project; (b) ensure that all external lighting associated with project complies with Australian Standard AS4282 (NLT) 1995 - Control of Obtrusive Effects of Outdoor Lighting, to the satisfaction of the Secretary.	1. External lighting associated with the Mine surface facilities is not visible from neighbouring properties. 1. External lighting associated with the Mine surface facilities is not visible from neighbouring properties.	The processing plant and related infrastructure is well set back from the public road and is naturally screened due to the topography and trees. By letter dated 8 February 2017, Light Harmony (Lighting Engineering & Design Consultants) stated: "Based on the remote location and our assessment of the existing lighting system, we would deem that the Hera process plant and ancillary areas comply with the principles and guidelines of AS4282 Table 2.1 recommended maximum values of light technical parameters for the control of obtrusive light."	COMPLIANCE			
S3.40	Final Hazard Analysis	The Proponent shall prepare a Final Hazard Analysis (PHA) for the project to the satisfaction of the Secretary, in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 6 - Guidelines for Hazard Analysis.	1. Environmental Management Plan Hazardous Materials, Version 1.0, dated 9 April 2013. 2. Letter from DPE (H Reed) to Hera (S Haures) titled "Hera Gold Mine (10,0191) Hazardous Materials Management Plan", dated 1 May 2013. Hera contend this condition should be Compliant. The condition states that the must be prepared to the satisfaction of the Secretary. As the Secretary has approved the plan, this condition has been satisfied. The issues you have identified are separate to this condition and I would suggest a recommendation and not mandated by the condition.	The September 2016 IER found that a Final Hazard Analysis (PHA) had not been completed. The recommendation to complete a final hazard analysis has not been adopted. A Preliminary Hazard Analysis (PHA) was completed by RW Conkey & Co as part of the EA (Nov. 2011) (signed). Section 5.1 of the Hazardous Materials Management Plan states that "As there are no changes to the design of the Mine, the PHA is considered by Hera Resources to be sufficient to satisfy the requirement of Condition 34(3) of Project Approval whereby a Final Hazard Analysis was to be prepared". The previous audit in July 2013 noted "As the Hazardous Materials Management Plan has been approved by the Director-General, YTC Hera is compliant with this condition". However, the 2013 audit was conducted prior to the construction and operation of the processing plant, an area where the majority of the hazardous materials are stored or used. At the time of the audit in September 2016, it was observed that there are hazardous goods (e.g. LDC Class 3, 1 and processes (e.g. Meta Foundries - gold room) that were not identified in the original PHA."	Non-Compliance	Conduct a Final Hazard Analysis in accordance with Hazardous Industry Planning Advisory Paper No. 6 - Hazard Audit Guidelines	Conduct a Final Hazard Analysis in accordance with Hazardous Industry Planning Advisory Paper No. 6 - Hazard Audit Guidelines.	30 September 2020.
S3.41	Hazardous Materials Management Plan	The Proponent shall prepare and implement a Hazardous Materials Management Plan for the project to the satisfaction of the Secretary. The plan must: (a) be prepared in consultation with the relevant government agencies including CSC, RMS, EPA, DPI Water, WorkCover NSW and DPE; (b) be consistent with the International Cyanide Management Code for the Manufacture, Transport and Use of Cyanide in the Production of Gold; (c) be submitted to the Secretary for approval prior to commencing mining operations under this approval; (d) describe the measures that would be implemented to: (i) ensure sodium cyanide and other toxic chemicals are stored and handled on the site in accordance with AS/NZS 4452 - Storage and Handling of Toxic Substances; and (ii) ensure the transportation of hazardous materials to or from the site is undertaken in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 11 - Route Selection and the Australian Code for the Transport of Dangerous Goods by Road and Rail - current version; and (e) detail the emergency procedures for the Project consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1 - Emergency Planning.	1. Environmental Management Plan Hazardous Materials, Version 1.0, dated 9 April 2013. 2. Letter from DPE (H Reed) to Hera (S Haures) titled "Hera Gold Mine (10,0191) Hazardous Materials Management Plan", dated 1 May 2013. 1. Cyanide Storage Facilities (Refer to Photo #8). 1. The HAMP does not satisfy paragraph (d)(i) in that it does not specify measures in relation to the storing and handling of lead nitrate (and toxic chemical). The plan does not satisfy paragraph (d)(ii) in that it does not describe the route selection for the transportation of cyanide from its point of origin to the mine in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 11 - Route Selection. The HAMP does not satisfy paragraph (e) of this condition in that it does not include all of the procedures contained in the Department's Hazardous Industry Planning Advisory Paper No. 1 - Emergency Planning.	No correspondence was available to verify that the EPA, DPI Water, DRE, CSC, RMS, or Workcover were consulted during preparation of the Plan. Section 5.8 of the HAMP lists the cyanide controls to be used which are consistent with the International Cyanide Management Code for the Manufacture, Transport and Use of Cyanide in the Production of Gold (the Code). The current version of the Hazardous Materials Management Plan has been approved by DPE. The HAMP does not satisfy paragraph (d)(i) in that it does not specify measures in relation to the storing and handling of lead nitrate (and toxic chemical). The plan does not satisfy paragraph (d)(ii) in that it does not describe the route selection for the transportation of cyanide from its point of origin to the mine in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 11 - Route Selection.	Non-Compliance	Review and update the Hazardous Materials Management Plan to include the relevant requirements of AS/NZS 4452. Consultation and submission of all Management Plans is on schedule and if an update is required, they will be submitted within three months of this EA.	4 July 2020.	
S3.42	Waste	The Proponent shall: (a) minimise the waste generated by the project; (b) ensure that the waste generated by the project is appropriately stored, handled and disposed of; and (c) manage on-site sewage treatment disposal in accordance with the requirements of CSC, to the satisfaction of the Secretary. The Proponent shall prepare and implement a Waste Rock Management Plan to the satisfaction of the Secretary. The plan must: (a) be developed in consultation with the EPA and DPI Water;	1. Environmental Management Plan Hazardous Materials, Version 1.0, dated 9 April 2013. 1. Waste Disposal Records. 1. Letter from CSC to YTC Resources titled "Approval to Install / Construct a Sewage Management System", dated 18 December 2012. 12 Letter from CSC to YTC Resources titled "Approval to Install / Construct a Sewage Management System", dated 23 September 2013 13. Certificate of Completion, F41 CE0000 sewage treatment system - by True Water Australia, dated 9 August 2015. 1. YTC Resources Ltd. Environmental Management Plan Waste Rock, Revision 1.0, dated 15 July 2014. 2. 1989 Waste Rock Management Plan, Revision 2, dated 24 November 2016. 1. Independent Environmental Audit, Hera Resources Pty Ltd, Hera Project, NUNAGEE NSW, September 2016. The Audit report stated "The current Waste Rock Management Plan (WRMP) had been developed in consultation with the EPA and NSW. A letter (dated 21st November 2012) was signed requesting comment from both the EPA and NSW. Letters of response (from NSW dated 21/06/13 and the EPA dated 21/12/12) were signed."	1. Waste recycling including oil and scrap steel at the workshop as well as general waste segregation/recycling in strategically placed bins was signed during the Audit. Refer to Photo #9. 1. Waste bins are strategically located around the site. Suitable bins are available to allow segregation of wastes. Waste storage areas are clearly signposted. Refer to Photo #10. 1. Sewage Treatment Plant and irrigation areas. The 2014 version of the plan has been approved by DPE and is the current version of the plan. A updated plan has been drafted, but not yet finalised or approved. The 2014 Waste Rock Management Plan (WRMP) was developed in consultation with the EPA and NSW.	COMPLIANCE	Hera addresses waste minimisation and disposal in section 5.5 of the Hazardous Materials Management Plan (HAMP) . Appropriate waste collection and storage facilities are provided. Waste records signed demonstrate that appropriate waste disposal options are in place. Sewage treatment systems have been installed and are managed in accordance with Council requirements.		

S3.33	Waste Rock Management Plan	(b) submitted for the approval of the Secretary within six months of this approval;	1. Letter from DPE (H Reed) to Hera (S Hauns) titled "Hera Gold Mine (10_0191) Waste Rock Management Plan", dated 22 July 2013.			DPE approved the Waste Rock Management Plan in July 2013. The WRMP had not been prepared and submitted for the approval of the Secretary within six months of this Project Approval (audit interview).	Non-Compliance	Review the 2018 Draft Waste Rock Management Plan to ensure it covers all issues required by this Condition, consult with the relevant Authorities and seek DPE approval for the Plan.	Consultation and submission of all Management Plans is on schedule and if an update is required, they will be submitted within three months of this EA.	4 July 2020.
		(c) include a detailed description of the procedures to be implemented to monitor and manage potential acid forming material;	1. YTC Resources Ltd. Environmental Management Plan Waste Rock - Revision 1.0, dated 15 July 2014.			A detailed description of the procedures to be implemented to monitor and manage potential acid forming material is described in section 4.3 of the WRMP.	Compliance			
		(d) reflect the groundwater and surface water monitoring programs to monitor potentially acid-forming waste rock and any leachate generated, including appropriately designed detection and response systems for acid generation (covering monitoring methods, trigger levels and proposed management actions);	1. YTC Resources Ltd. Environmental Management Plan Waste Rock - Revision 1.0, dated 15 July 2014.			Section 4.3.2.1 in the WRMP describes the monitoring programs to monitor potentially acid-forming waste rock and any leachate generated, including appropriately designed detection and response systems for acid generation. Specific visual levels trigger proposed management actions such as pumping to the process water dam. Trigger levels for acid detection (e.g. pH levels) have not been included in the WRMP.	Non-Compliance	Review the 2018 Draft Waste Rock Management Plan to ensure it covers all issues required by this Condition, consult with the relevant Authorities and seek DPE approval for the Plan.	Consultation and submission of all Management Plans is on schedule and if an update is required, they will be submitted within three months of this EA.	4 July 2020.
		(e) ensure effective isolation of potential acid forming material in rock dumps;	1. YTC Resources Ltd. Environmental Management Plan Waste Rock - Revision 1.0, dated 15 July 2014.			Measures to effectively isolate potential acid forming material in rock dumps is described in section 4.3.3 of the WRMP. However, it was stated that both PAF and NAF are stockpiled in Cat 1 (PAF) which is contrary to Table 5 and the material handling flowchart in Figure 3 of the WRMP. Risk is created when using this material as differentiation between NAF and PAF relies on visual inspection. There is a risk where PAF instead of NAF, is used for other works on site (which has occurred on one occasion when PAF was used to construct a clean water drain; it was retrieved on the same day and self-reported) (audit interview and observation).	Non-Compliance	Review the 2018 Draft Waste Rock Management Plan to ensure it covers all issues required by this Condition, consult with the relevant Authorities and seek DPE approval for the Plan.	Consultation and submission of all Management Plans is on schedule and if an update is required, they will be submitted within three months of this EA.	4 July 2020.
		(f) include procedures for appropriate testing of potentially acid-forming waste rock prior to it being brought to the surface;	1. YTC Resources Ltd. Environmental Management Plan Waste Rock - Revision 1.0, dated 15 July 2014.			Section 4.3.1 of the WRMP includes procedures for appropriate testing of potentially acid-forming waste rock prior to it being brought to the surface.	Compliance			
		(g) include procedures for prioritising the relocation of potential acid-forming material to a suitable underground locations prior to oxidation;	1. YTC Resources Ltd. Environmental Management Plan Waste Rock - Revision 1.0, dated 15 July 2014.			Section 4.3.4 of the WRMP includes procedures for prioritising the relocation of potential acid-forming material to suitable underground locations prior to oxidation.	Compliance			
		(h) include procedures to ensure that material relocated underground does not, to the extent reasonable and feasible, further oxidise or cause impact to groundwater;	1. YTC Resources Ltd. Environmental Management Plan Waste Rock - Revision 1.0, dated 15 July 2014.			Section 4.3.4 of the WRMP includes procedures to ensure that material relocated underground does not, to the extent reasonable and feasible, further oxidise or cause impact to groundwater.	Compliance			
		(i) notwithstanding (a) above, trigger levels for any material that has oxidised to the extent that it cannot be placed underground without impacting groundwater quality and procedures for adequate capping and sealing of such material at the surface;	1. YTC Resources Ltd. Environmental Management Plan Waste Rock - Revision 1.0, dated 15 July 2014.			Section 4.3.4 of the WRMP describes management plans for material that has oxidised to the extent that it cannot be placed underground without impacting groundwater quality.	Compliance			
		(j) detail proposed neutralising options to be implemented for oxidising material stored or encapsulated aboveground; and	1. YTC Resources Ltd. Environmental Management Plan Waste Rock - Revision 1.0, dated 15 July 2014.			Section 4.3.4 of the WRMP describes neutralising options (such as crushed limestone) to be implemented for oxidising material (stored or encapsulated aboveground).	Compliance			
		(k) where there is likely to be an extraordinary time between placement of potential acid-forming material underground, details of proposed methods to prevent oxidation of the material underground or to otherwise manage acid drainage to prevent impacts on groundwater;	1. YTC Resources Ltd. Environmental Management Plan Waste Rock - Revision 1.0, dated 15 July 2014.			Section 5 of the WRMP details proposed methods to manage acid drainage to prevent impacts on groundwater where there is likely to be an extended time between placement of potential acid-forming material underground.	Compliance			
S3.44	Rehabilitation Objective	This Project shall rehabilitate the site to the satisfaction of the Executive Director Mineral Resources. This rehabilitation must be generally consistent with the proposed rehabilitation strategy described in the EA (as reproduced in Appendix 4), and comply with the objectives in Table 7.	1. Mining Operations Plan for the Hera Mine PA10_0191 - dated January 2017.			The approved MCP describes the rehabilitation plans for the Mine site. Section 4.3 of the MCP describes the Rehabilitation Objectives.	Compliance			
S3.45	Progressive Rehabilitation	The Proponent shall carry out rehabilitation of the site progressively, that is, as soon as reasonably practicable after disturbance. All reasonable and feasible measures must be taken to minimise the total area exposed for dust generation at any time. Interim rehabilitation strategies shall be employed where areas prone to dust generation cannot yet be permanently rehabilitated.	1. Previously disturbed areas have been revegetated.			Full rehabilitation of the site is not yet required as the mine is still operational. The Auditor inspected all areas of the mine and observed that progressive rehabilitation (of previously disturbed areas) has been undertaken.	Compliance			
S3.46	Rehabilitation Management Plan	The Proponent shall prepare and implement a Rehabilitation Management Plan for the project to the satisfaction of the Executive Director Mineral Resources.	1. Mining Operations Plan for the Hera Mine PA10_0191 - dated January 2017. The MCP contains the Rehabilitation Management Plan. 2. Letter from the DRE (S Hauns) to J Thompson, titled "Application for a Mining Operations Plan (MOP) for Mining Lease (ML) 11686, ML 1746, Mining Act 1992, Hera Resources Pty Ltd of DPI approving the MCP", dated 27 February 2017.			Correspondence verifying that the 2017 version of the MOP was approved by DRE was sighted during the Audit.	Compliance			
		This plan must: (a) be prepared in consultation with the Department, DEH, EPA, DPI, Water and CSC;	1. Letter from the DRE (S Hauns) to J Thompson, titled "Application for a Mining Operations Plan (MOP) for Mining Lease (ML) 11686, ML 1746, Mining Act 1992, Hera Resources Pty Ltd of DPI approving the MCP", dated 27 February 2017.			CSC has not been consulted during the preparation of the MOP (and therefore the rehabilitation action plan). The most recent version of the MCP rehab management plan (submitted for approval on 8 Feb 2020) has been prepared in consultation with these agencies.	Non-Compliance	Ensure that all relevant agencies are consulted during the preparation of the MOP.	The 2019 MCP was submitted to BCD, DPE, Compliance, Resource Regulator, EPA, Natural Resources Access Regulator and Collier Shire Council for consultation. The MCP was approved by the Resources Regulator on 28 Feb 2020.	Completed.
		(b) be submitted to the Executive Director Mineral Resources for approval prior to carrying out development on the site under this approval;	1. Letter from NEW Trade and Investment - Resources and Energy (M Young) to Hera Resources titled "Mining Lease (ML) 11686 - Mining Operations Plan Approval" dated 14 June 2013. The latter approves the MCP versions 3.1 (dated 21 May 2015).			Correspondence verifying that the original MCP was approved by DRE was sighted during the Audit.	Compliance			
		(c) be prepared in accordance with any relevant DRE guideline;	1. Mining Operations Plan for the Hera Mine PA10_0191 - dated January 2017. Appendix 3 provides copies of consultation correspondence with DPI, DEH, DRE and the EPA.			There are no current DRE rehabilitation management plan guidelines.	Noted			
		(d) outline the procedures to be implemented to achieve the rehabilitation objectives in condition 44;	1. Mining Operations Plan for the Hera Mine PA10_0191 - dated January 2017. Appendix 3 provides copies of consultation correspondence with DPI, DEH, DRE and the EPA.			Section 5 of the MOP describes implementation of the Rehabilitation Strategy.	Compliance			
		(e) describe how the rehabilitation of the site would be integrated with the implementation of the biodiversity offset strategy;	1. Mining Operations Plan for the Hera Mine PA10_0191 - dated January 2017. Appendix 3 provides copies of consultation correspondence with DPI, DEH, DRE and the EPA.			The biodiversity off-set area is remote from the mine, therefore rehabilitation of the mine site cannot be integrated with the implementation of the rehabilitation actions to be undertaken on the mine site.	Not Triggered			
		(f) include detailed performance and completion criteria for evaluating the performance of the rehabilitation of the site, and triggering remedial action (if necessary);	1. Mining Operations Plan for the Hera Mine PA10_0191 - dated January 2017. Appendix 3 provides copies of consultation correspondence with DPI, DEH, DRE and the EPA.			Section 6 of the MOP describes the performance and completion criteria of the Rehabilitation Strategy.	Compliance			
		(g) describe the measures that would be implemented to ensure compliance with the relevant conditions of this approval, and address all aspects of rehabilitation including mine closure, final landform, and final land use;	1. Mining Operations Plan for the Hera Mine PA10_0191 - dated January 2017. Appendix 3 provides copies of consultation correspondence with DPI, DEH, DRE and the EPA.			Section 5 of the MOP describes implementation of the Rehabilitation Strategy.	Compliance			
		(h) include interim rehabilitation where necessary to minimise the area exposed for dust generation;	1. Mining Operations Plan for the Hera Mine PA10_0191 - dated January 2017. Appendix 3 provides copies of consultation correspondence with DPI, DEH, DRE and the EPA.			Section 7.2.8 of the MOP describes the proposed rehabilitation activities that will be implemented over the life of the mine to minimise dust generation.	Compliance			
		(i) include a program to monitor, independently audit and report on the effectiveness of the measures, and progress against the detailed performance and completion criteria; and	1. Mining Operations Plan for the Hera Mine PA10_0191 - dated January 2017. Appendix 3 provides copies of consultation correspondence with DPI, DEH, DRE and the EPA.			Section 8 of the MOP describes the monitoring and reporting that will be undertaken in relation to the Rehabilitation Strategy.	Compliance			
		(j) build, to the maximum extent practicable, on the other management plans required under this approval.	1. Mining Operations Plan for the Hera Mine PA10_0191 - dated January 2017. Appendix 3 provides copies of consultation correspondence with DPI, DEH, DRE and the EPA.				Noted			
S4.1	Notification of Landowners	Within 3 months of the date of project approval, the Proponent shall notify in writing the owners of any privately-owned land within two kilometres of the approved blasting on site that they are entitled to request an inspection to establish the baseline condition of any buildings or structures on their land, or to have a previous property inspection report updated.	1. Independent Environmental Audit, Hera Resources Pty Ltd - Hera Project, NMAJEE NEW, September 2016.			The 2016 Audit noted that the nearest residential premises is over 2 km from the site and therefore this Condition is not triggered.	Not Triggered			
		Within two weeks of obtaining monitoring results otherwise: (1) an exceedance of any relevant noise criteria in Schedule 3, the Proponent shall notify affected landowners and/or tenants in writing of the exceedance, and provide regular monitoring results to each of these affected parties until the project is again complying with the relevant criteria; and	1. Notice of PM10 exceedance and incident report - (18 July 2018) sent to DPE, DRE, EPA, CSC. 2. Notice of PM10 exceedance and incident report - (19 April 2018) sent to DPE, DRE, EPA, CSC. 3. Notice of PM10 exceedance and incident report - (30 March 2018) sent to DPE, DRE, EPA, CSC. 4. Notice of HANS exceedance and incident report - (25 July 2017) sent to DPE, DRE, EPA, CSC. 5. Notice of PM10 exceedance and incident report - (22 November 2016) sent to DPE, DRE, EPA, CSC. 6. Notice of Dust Deposition exceedance and incident report - (September 2018) sent to DPE, DRE, EPA, CSC. 7. Notice to EPA of visible dust generation on tailings dam - incident report - (16 September 2019). 8. Notice of Dust Deposition exceedance and incident report - (September 2018) sent to DPE, DRE, EPA, CSC.	J Thompson: As per the incident reports in 2016, 2017 and 2018 copies were not supplied to landholders as no landholders were impacted. The landholders are more than 2km from site and therefore have not been affected by the dust.		No land holders were impacted by dust emissions from the site during the Audit Period.	Not Triggered			
S4.2		(2) an exceedance of any relevant air quality criteria in Schedule 3, the Proponent shall send the affected landowners and/or tenants a copy of the NEW Health fact sheet entitled "Mine Dust and You" (as may be updated from time to time).								
S4.3		If an owner of privately-owned land considers the project to be exceeding the relevant criteria in Schedule 3, then he/she may ask the Secretary in writing for an independent review of the impacts of the project on his/her land. If the Secretary is satisfied that an independent review is warranted, then within two months of the Secretary's decision the Proponent shall: (a) commission a suitably qualified, experienced and independent person, whose appointment has been approved by the Secretary, to: (i) consult with the landowner to determine his/her concerns; (ii) conduct monitoring to determine whether the project is complying with the relevant criteria in Schedule 3; and (iii) if the project is not complying with these criteria then identify measures that could be implemented to ensure compliance with the relevant criteria; (b) give the Secretary and landowner a copy of the independent review.	1. J. Thompson 10 November 2019. No requests for independent reviews have been received.			No requests for independent reviews have been received.	Not Triggered			
S4.4	Independent Review	If the independent review determines that the project is complying with the relevant criteria in Schedule 3, then the Proponent may discontinue the independent review with the approval of the Secretary.	1. J. Thompson 10 November 2019. No requests for independent reviews have been received.			No requests for independent reviews have been received.	Not Triggered			
S4.5		If the independent review determines that the project is not complying with the relevant criteria in Schedule 3, then the Proponent shall: (a) implement all reasonable and feasible mitigation measures, in consultation with the landowner and appointed independent person, and conduct further monitoring until the project complies with the relevant criteria; or (b) secure a written agreement with the landowner to allow exceedance of the relevant criteria, to the satisfaction of the Secretary.	1. J. Thompson 10 November 2019. No requests for independent reviews have been received.			No requests for independent reviews have been received.	Not Triggered			

S5.1	Environmental Management Strategy	The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Director-General. The strategy must:	1. Environmental Management Strategy, Version 3.0, dated 12 November 2017.			An Environmental Management Strategy has been prepared.	COMPLIANCE			
		(a) be submitted to the Director-General for approval prior to the commencement of Mining activities;				While the first version of the EMS was approved by DPE, the current version has not been reviewed and approved by the Department.	Non-Compliance	Ensure that the current version of the Environmental Management Strategy is approved by DPE.	Consultation and submission of all Management Plans is on schedule and if an update is required, they will be submitted within three months of this IEA.	4 July 2020.
		(b) provide the strategic framework for environmental management of the project;	1. Environmental Management Strategy, Version 3.0, dated 12 November 2017.			The EMS provides a simple framework for the management of the environmental obligations associated with the Project. The framework presented in the EMS is based on ISO 14001. The framework as implemented is not sufficient to adequately manage Hera's compliance obligations under this Approval.	Non-Compliance	Implement the Environmental Management System Recommendations described in Section 7.1 of this report.	Hera will commit to implementing the EMS as described in the IEA.	4 April 2021.
		(c) identify the statutory approvals that apply to the project;	1. Environmental Management Strategy, Version 3.0, dated 12 November 2017.			Section 3 of the EMS discusses the Planning Approval applicable to the mining operations.	COMPLIANCE			
		(d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;	1. Environmental Management Strategy, Version 3.0, dated 12 November 2017.			Section 9 of the EMS describes the key roles and responsibilities.	COMPLIANCE			
		(e) describe the procedures that would be implemented to: - keep the local community and relevant agencies informed about the operation and environmental performance of the project; - receive, handle, respond to, and record complaints; - resolve any disputes that may arise during the course of the project; - respond to any non-compliance; and - respond to emergencies; and	1. Environmental Management Strategy, Version 3.0, dated 12 November 2017.			Section 8 of the EMS describes the complaints management and dispute resolution processes.	COMPLIANCE			
		(f) include: - copies of the various strategies, plans and programs that are required under the conditions of this approval once they have been approved; and - a clear plan depicting all the monitoring to be carried out in relation to the project.	1. Environmental Management Strategy, Version 3.0, dated 12 November 2017.			Section 5.2 of the EMS references the management plans required by the Planning Approval.	COMPLIANCE			
		The Proponent shall assess and manage project-related risks to ensure that there are no exceedances of the criteria and/or performance measures in schedule 3. Any exceedance of these criteria and/or performance measures constitutes a breach of this approval and may be subject to penalty or offence provisions under the EPA Act or EPA Regulations.					Noted			
		Where any exceedance of these criteria and/or performance measures has occurred, the Proponent shall, at the earliest opportunity: (a) take all reasonable and feasible measures to ensure that the exceedance ceases and does not recur;	1. Notice of PM10 exceedance and incident report - (18 July 2018) sent to DPE, DRE, EPA, CDC. 2. Notice of PM10 exceedance and incident report - (19 April 2018) sent to DPE, DRE, EPA, CDC. 3. Notice of PM10 exceedance and incident report - (30 March 2018) sent to DPE, DRE, EPA, CDC. 4. Notice of HWS exceedance and incident report - (25 July 2017) sent to DPE, DRE, EPA, CDC. 5. Notice of PM10 exceedance and incident report - (22 November 2016) sent to DPE, DRE, EPA, CDC. 6. Notice of Dust Deposition exceedance and incident report - (September 2019) sent to DPE, DRE, EPA, CDC. 7. Notice of Dust Deposition exceedance and incident report - (September 2019) sent to DPE, DRE, EPA, CDC. 8. Notice of Dust Deposition exceedance and incident report - (September 2019) sent to DPE, DRE, EPA, CDC. 9. Notice of WAD exceedance and incident report - (20 September 2017) sent to DPE, DRE, EPA. 10. EPA Show Cause Notice relating to cyanide contaminated water leaks, EPA Reference 1580504, dated 3 June 2019.			The Auditor has reviewed exceedance (WAD and PM10 dust) for the Audit Period. The review of the correspondence provided indicates incident reports were prepared and issued to the relevant Authorities.	COMPLIANCE			
		(b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing those options and any preferred remediation measures or other course of action; and	1. Notice of WAD exceedance and incident report - (20 September 2017) sent to DPE, DRE, EPA, CDC. 2. Notice of WAD exceedance and incident report - (24, 25 and 26 April 2018) sent to DPE, DRE, EPA, CDC. The report relates to the detection of a WAD exceedance.			The Auditor has reviewed exceedance (WAD and PM10 dust) for the Audit Period. The review of the correspondence provided indicates incident reports were prepared and issued to the relevant Authorities.	COMPLIANCE			
S5.2	Adaptive Management	(c) implement remediation measures as directed by the Secretary, in consultation with the Secretary.				DPE has not instructed Hera to implement and remediation strategies during the Audit Period.	Not Triggered			
		The Proponent shall ensure that the Management Plans required under this approval are prepared in accordance with any relevant guidelines, and include: (a) detailed baseline data;				With the exception of the MCP and the TMP, current versions of the Plans (that is those that were approved by DPE) were prepared in 2012/13. The plans were prepared in accordance with the guidelines relevant in 2013 and therefore, where applicable baseline data.	COMPLIANCE			
		(b) a description of: - the relevant statutory requirements (including any relevant approval, licence or lease conditions); - any relevant limits or performance measures; and - the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the project or any management measures;	1. YTC Resources Ltd. Environmental Management Plan Noise Management, Revision 5, dated 19 August 2015. 2. YTC Resources Ltd. Environmental Management Plan Blast, Revision 4, dated 30 August 2012. 3. YTC Resources Ltd. Environmental Management Plan Air Quality and Greenhouse Gas, Revision 3, dated 28 August 2012. 4. Draft Waste Management Plan 2018, Version 6, dated November 2019. 5. Biodiversity Management Plan (incorporating the Biodiversity Off-set Strategy) for the Hera Mine, prepared by RNT Corkey, dated June 2016. Note that this plan incorporates the Biodiversity Off-set Strategy. 6. YTC Resources Ltd. Environmental Management Plan Aboriginal Cultural Heritage, Revision 1.1, dated 19 August 2012. 7. YTC Resources Ltd. Environmental Management Plan, Version 3.0, dated 14 May 2016. 8. Environmental Management Plan Hazardous Materials, Version 1.0, dated 9 April 2013. 9. YTC Resources Ltd. Environmental Management Plan Waste Rock, Revision 1.0, dated 15 July 2014. 10. Mining Operations Plan for the Hera Mine PA10, 0191, dated January 2017. The MCP incorporates the Rehabilitation Management Plan. 11. Environmental Management Strategy, Version 3.0, dated 12 November 2017.			With the exception of the MCP and the TMP, current versions of the Plans (that is those that were approved by DPE) were prepared in 2012/13. Variations to the Project Approval have been approved during that time. Those modifications are in general not fully reflected in most of the plans.	Non-Compliance	All management plans required under this Approval (including the Environmental Management Strategy) should be thoroughly reviewed and revised to reflect changes in the approval, legislative changes and developments in environmental management standards applicable to gold mining operations.	Consultation and submission of all Management Plans is on schedule and if an update is required, they will be submitted within three months of this IEA.	4 July 2020.
		(c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures;				Each plan contains a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures.	COMPLIANCE			
		(d) a program to monitor and report on the: - impacts and environmental performance of the project and - effectiveness of any management measures (see (c) above);				Each plan contains a program to monitor and report on the impacts and environmental performance of the project and effectiveness of any management measures.	COMPLIANCE			
		(e) a contingency plan to manage any unpredicted impacts and their consequences;				Each plan contains a contingency plan to manage any unpredicted impacts and their consequences.	COMPLIANCE			
		(f) a program to investigate and implement ways to improve the environmental performance of the project over time;				The plans in general do not provide a program to investigate and implement ways to improve the environmental performance of the project over time.	Non-Compliance	During the review and revision of each plan required under this Approval, develop a program to investigate and implement ways to improve the environmental performance of the project over time.	This will be addressed via the EMS.	4 April 2021.
		(g) a protocol for managing and reporting any: - incidents; - complaints; - non-compliance with statutory requirements; and - exceedances of the impact assessment criteria and/or performance criteria; and				Each plan describes a protocol for managing and reporting any: - incidents; - complaints; - non-compliance with statutory requirements; and - exceedances of the impact assessment criteria and/or performance criteria.	COMPLIANCE			
		(h) a protocol for periodic review of the plan.				Letters approving each of the Annual Reviews from DPE were signed.	COMPLIANCE			
		By the end of December each year, the Proponent shall review the environmental performance of the project to the satisfaction of the Director-General.				The Annual Reviews submitted for 2016, 2017 and 2018 included reviews of the monitoring results against the emission / performance criteria specified in the Project Approval and the Environment Protection Licence.	COMPLIANCE			
S5.3	Management Plan Requirements	This review must: (a) describe the works (including rehabilitation) that were carried out in the previous year, and the works that are proposed to be carried out over current year; (b) include a comprehensive review of the monitoring results and compliance records of the project over the past year, which includes a comparison of these results against: - the relevant statutory requirements, limits or performance measures/criteria; - the monitoring results of previous years; and - the relevant predictions in the IEA.	1. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017, dated 14 August 2017. 2. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018, dated 14 August 2018. 3. Hera Mine Annual Review Project Approval 10_0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019, dated 14 August 2019. 4. Letter from DPE K O'Reilly to Hera (J Thompson) titled "Hera Mine - PA 10_0191 (MOC 4) Annual Environmental Review Report 16 May 2016 to 15 May 2017", dated 26 September 2017.			The Annual Reviews submitted for 2016, 2017 and 2018 did not clearly identify all non-compliance against the emission / performance criteria specified in the Project Approval and the Environment Protection Licence. For example Section 4.3 of the 2017/18 Environmental Review states: "There were several WAD Cyanide incidents during the reporting period". The non-compliance was not specifically identified, nor was there any discussion of actions taken by Hera in response to the non-compliance.	Non-Compliance	Provide full details of all non-compliance against both the Planning Approval and EPA in the Annual Review. Provide details of actions taken in relation to each non-compliance.	Noted - In the future, Hera will ensure the Annual Review provides full details of non-compliance. Hera will identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance.	Completed.
		(c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance.				The Annual Reviews submitted for 2016, 2017 and 2018 identified general trends in emission / performance monitoring.	COMPLIANCE			
		(d) identify any trends in the monitoring data over the life of the project;				Section 4.4 of the Annual Reviews provide an assessment of actual against predicted impacts (as predicted in the IEA).	COMPLIANCE			
		(e) identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies; and				The Annual Reviews submitted for 2016, 2017 and 2018 identified what measures will be implemented over the next year to improve the environmental performance of the project.	COMPLIANCE			
		(f) describe what measures will be implemented over the next year to improve the environmental performance of the project.					COMPLIANCE			
		Within 3 months of: (a) the submission of an annual review under condition 3 above; (b) the submission of an incident report under condition 5 below; (c) the submission of an audit report under condition 8 below; and (d) any modifications to this approval, the Proponent shall review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the Director-General.	1. Details (list) of all plans updated and reissued during the Audit period			While there are a number of draft management plans, it appears that, generally, the 2012 / 13 plans are the current version in use. The review and revision of all management plans required under this Approval is overdue.	Non-Compliance	All management plans required under this Approval (including the Environmental Management Strategy) should be thoroughly reviewed and revised to reflect changes in the approval, legislative changes and developments in environmental management standards applicable to gold mining operations.	Consultation and submission of all Management Plans is on schedule and if an update is required, they will be submitted within three months of this IEA.	4 July 2020.
		Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the project.					COMPLIANCE			
		The Proponent shall establish and operate a Community Consultative Committee (CCC) for the project in general accordance with the Guidelines for Establishing and Operating Community Consultative Committees for Mining Projects (Department of Planning, 2007, or its latest version), and to the satisfaction of the Secretary. This CCC must be operating within six months of this approval.	1. Minutes of all CCC meetings held during the Audit Period			Quarterly meetings of the Community Consultative Committee (CCC) are hosted by Hera. Minutes of CCC meetings were signed.	COMPLIANCE			
		It was stated the CCC operates in general accordance with the Guidelines for Establishing and Operating Community Consultative Committees for Mining Projects.					COMPLIANCE			
		The Proponent shall notify the Director-General and any other relevant agencies of any incident associated with the project as soon as practicable after the Proponent becomes aware of the incident. Within 7 days of the date of the incident, the Proponent shall provide the Director-General and any relevant agencies with a detailed report on the incident.					COMPLIANCE			
The Proponent shall provide regular reporting on the environmental performance of the project on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this approval, and to the satisfaction of the Director-General.	1. http://lauraleanetals.com/projects/hera-nyrnagapareports			The Hera Mine website contains copies of Annual Reviews for 2016, 2017, 2018 and 2019. The website also contains copies of monthly environmental monitoring reports from March 2015 to August 2019.	COMPLIANCE					

BS.9	Independent Environmental Audit	<p>Within one year of commencement of development on the site under this approval, and every three years thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. The audit must:</p> <p>(a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;</p> <p>(b) include consultation with the relevant agencies;</p> <p>(c) assess the environmental performance of the project and assess whether it is complying with the requirements in this approval and any relevant EPL or Mining Lease (including any assessment, plan or program required under these approvals);</p> <p>(d) review the adequacy of strategies, plans or programs required under the above-mentioned approvals; and</p> <p>(e) recommend appropriate measures or actions to improve the environmental performance of the project, and/or any assessment, plan or program required under the above-mentioned approvals.</p> <p>Within 6 weeks of the completion of this audit, or as otherwise agreed by the Director-General, the Proponent shall submit a copy of the audit report to the Director-General, together with its responses to any recommendations contained in the audit report.</p>	<p>1. http://nrm.senats.gov.au/projects/hera-nymgaee/audits</p> <p>2. Independent Environmental Audit, Hera Resources Pty Ltd, Hera Project, NEMAGEE ND19, September 2016.</p>			<p>Copies of the 2013 and 2016 Independent Environmental Audits are available on the Hera Mine Website.</p> <p>The site based elements of the 2016 Independent Environmental Audit were undertaken between 5 and 8 September 2016. The Audit report was finalised and issued to Hera on 13 April 2017.</p> <p>The audit report satisfies the requirements of this Condition.</p>	COMPLIANCE				
BS.10				<p>1. Email from Hera (J Thompson) to DPE submitting the 2016 IER</p>	<p>J Thompson: the final 2016 Audit Report was submitted to Hera on 14 March 2017 (start of the 6 week period as this was the date the audit was completed) and it was submitted to DPE on 18 Apr 2016</p>	<p>The previous IEA Report was submitted within 6 weeks of completion of the audit.</p>	COMPLIANCE				
BS.11	Access to information	<p>Prior to the commencement of construction on the site, the Proponent shall:</p> <p>(a) make copies of the following publicly available on its website:</p> <p>(i) the documents referred to in condition 2 of Schedule 2;</p> <p>(ii) all relevant statutory approvals for the project;</p> <p>(iii) all approved strategies, plans and programs required under the conditions of this approval;</p> <p>(iv) a comprehensive summary of the monitoring results of the project, reported in accordance with the specifications in any approved plans or programs required under the conditions of this or any other approval;</p> <p>(v) a complaints register, which is to be updated on a monthly basis;</p> <p>(vi) minutes of CEC meetings;</p> <p>(vii) the annual review required under this approval;</p> <p>(viii) any independent environmental audit of the project, and the Proponent's responses to the recommendations in any audit;</p> <p>(ix) any other matter required by the Secretary; and</p> <p>(x) keep this information up-to-date, to the satisfaction of the Secretary.</p>	<p>1. http://nrm.senats.gov.au/projects/hera-nymgaee/</p>			<p>The documents and records required by this Condition have been uploaded to the Hera website, except for the Mining Operations Plan (note that the appendices to that plan have been uploaded).</p>	Non-Compliance	<p>Ensure that all required plans (including the current version of the MOP) are loaded on the corporate website.</p> <p>The only document missing at the time of the audit was the approved MOP. This was uploaded to the website on 7 Feb 2020. In the future, Hera will ensure all required documentation is uploaded to the website without delay.</p>	Completed		
Condition Subheader	Short Site	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation	Hera Resources Action Plan	Hera Action Due Date	
A1.1	Administrative Conditions	<p>This licence authorises the carrying out of the scheduled development work listed below at the premises listed in A2:</p> <p>(a) construction of an underground gold mine, processing plant, tailings storage facility, and ancillary infrastructure in accordance with Department of Planning project approval 10/329;</p>					Noted				
A1.2		<p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.</p> <p>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition. Scheduled Activity Fee Based Activity Scale > 100000 - 500000 T extracted, processed or stored</p>		<p>1. Thompson 20 November 2019: The mine has not exceeded the ore processing or concentrate transport limits during the audit period.</p>		<p>The corporate annual reports and Annual Reviews provide a summary of production data for each year. These were:</p> <p>2017 Financial Year: 368,086 tonnes of ore processed, 32,308 tonnes of concentrate transported from site.</p> <p>2018 Year: 427,123 tonnes of ore processed, 40,756 tonnes of concentrate transported from site.</p> <p>2019 Year: 468, 358 tonnes of ore processed, 31,206 tonnes of concentrate transported from site.</p>	COMPLIANCE				
A1.3							Not Used				
A1.4		Administrative Conditions	<p>This licence applies to all other activities carried on at the premises, including Chemical Storage, Electricity Generation and Sewage Treatment</p>					Noted			
A4.1	Administrative Conditions	<p>Works and 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.</p> <p>In this condition the reference to "the licence application" includes a reference to:</p> <p>(a) the applications for any licence (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Storage and Transfer) Regulation 1998; and</p> <p>(b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</p>					Noted				
F1.1	Effluent Areas	<p>The following points referred to in the table (see Table in EPL on pg 77) are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharge of pollutants to water from the point.</p>					Noted				
F1.2		<p>The following effluent areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.</p>					Noted				
F1.3	Pollution of Waters	<p>The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharge of pollutants to water from the point.</p>					Noted				
F1.4		<p>Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997:</p>	<p>1. Hera Mine Annual Review Project Approval 10/331 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017; dated 14 August 2017</p> <p>2. Hera Mine Annual Review Project Approval 10/331 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018; dated 14 August 2018</p> <p>3. Hera Mine Annual Review Project Approval 10/331 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019; dated 14 August 2019.</p>		<p>The 2016/7 Annual review reported that two discharges from Licence Point 3 exceeded a number of water quality parameters identified in EPL 2019. The discharges occurred on 20 July 2016 and 18 December 2016 and were reported to the DPE, EPA and DRE.</p>	Non-Compliance	<p>Investigate the cause of any discharge from site that exceeds any discharge criterion and identify and implement appropriate mitigation strategies.</p>	<p>All non-compliances have been reported to the EPA and will continue to be reported. All non-compliances are investigated and solutions implemented as required.</p>	Completed.		
L2.2	Concentration Limits	<p>Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified range.</p>					Noted				
L2.3		<p>To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table.</p>					Noted				
L2.4	Water and/or Land Concentration Limits (refer to Table in Condition L2.4)		<p>1. Hera Mine Annual Review Project Approval 10/339 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017; dated 14 August 2017</p> <p>2. Hera Mine Annual Review Project Approval 10/339 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018; dated 14 August 2018</p> <p>3. Hera Mine Annual Review Project Approval 10/339 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019; dated 14 August 2019.</p>	<p>1. Water monitoring results covering the Audit Period for Licensed Monitoring Points 1, 2, 3 and 4</p>	<p>During the 2019 reporting year on 3 occasions the cyanide destruction circuit failed and cyanide exceeding the licence limit of 20mg/l was discharged to the process water ponds.</p> <p>During the 2018 reporting year concentrations of weak acid dissociable (WAD) cyanide in discharges from Licence Point 1 and Licence Point 2 exceeded limits on a number of occasions.</p> <p>During the 2017 reporting year there were two non-compliant discharges from Point 3. Water quality concentration limit exceedances following heavy storm event. Pumps were set up to empty the sediment basin to reduce the amount of water discharged.</p>	Non-Compliance	<p>Review the investigations relating to the WAD Cyanide non-compliances to determine if there are systemic issues in relation to cyanide level management in the process water system.</p>	<p>A review of cyanide management in the Process Plant will be conducted.</p>	4 April 2021.		
L3.1	Waste	<p>The licensee must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, representation or disposal or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by the licence under the Protection of the Environment Operations Act 1997.</p>	<p>1. Environmental Management Plan Hazardous Materials, Version 1.0, dated 9 April 2023.</p>	<p>1. No evidence of off-site waste removal was sighted during the Audit.</p> <p>2. The mine is remote and not a practical destination for waste disposal.</p>			COMPLIANCE				
L4.1		<p>This condition only applies to the storage, treatment, processing, representation or disposal of waste at the premises if it requires an environmental protection licence under the Protection of the Environment Operations Act 1997.</p> <p>Noise generated at the premises must not exceed the noise limits presented in the table below. Locations R1 to R6 in the table L4.1 are those described in the Noise and Vibration Assessment, September 2013, prepared by Spectrum Acoustics Pty Ltd for the Hera Project, via Nymgaee, Environmental Assessment.</p> <p>NOTE: Noise generated by the project is to be measured in accordance with conditions L4.2 to L4.6 below.</p>	<p>1. Hera Mine Annual Review Project Approval 10/331 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017; dated 14 August 2017</p> <p>2. Hera Mine Annual Review Project Approval 10/331 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018; dated 14 August 2018</p> <p>3. Hera Mine Annual Review Project Approval 10/331 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019; dated 14 August 2019.</p>			<p>No noise exceedances were detected over the 2018/9 reporting period.</p> <p>No noise exceedances were detected over the 2017/8 reporting period.</p> <p>No noise exceedances were detected over the 2016/7 reporting period.</p>	COMPLIANCE				
L4.2		<p>For the purposes of the conditions of this licence:</p> <ul style="list-style-type: none">• Day is defined as the period from 7am to 6pm; and• Evening is defined as the period from 6pm to 10pm. <p>Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 6am Sundays and Public Holidays.</p> <ul style="list-style-type: none">• LAeq(25 minutes) is defined as the continuous "A" weighted sound pressure level - the energy average of the noise measured over a 25 minute period; and• LA(15 minute) is defined as the sound pressure level exceeded for one percent of a 1 minute measurement period.					Noted				
L4.3		<p>The noise limits set out in condition L4.1 apply under all meteorological conditions except for any one of the following:</p> <ul style="list-style-type: none">a) Wind speeds greater than 3 metres/second at 50 metres above ground level; orb) Stability category G conditions and wind speeds greater than 2 metres/second at 30 metres above ground level.	<p>1. Plan showing location of all Noise Monitoring Locations</p> <p>2. Noise monitoring reports for the past three years</p>				Noted				
L4.4	Noise Limits	<p>For the purposes of condition L4.1:</p> <ul style="list-style-type: none">a) The meteorological data to be used for determining meteorological conditions is the data recorded by the on-site meteorological weather station at the Hera project site at Nymgaee;b) Temperature inversion will be assessed by use of the sigma-theta process as outlined in Appendix 04 of the NSW Industrial Noise Policy (INP);	<p>1. Exact Spreadsheet titled "Daily Summary (22) csv". The spreadsheet contained the weather station outputs from 9 September 2016 to 9 November 2019.</p>			<p>Weather station monitoring results for the Audit Period were sighted by the Auditor. The weather station satisfies the requirements of the Approved Methods for Sampling Air Pollutants in New South Wales Guidelines.</p>	COMPLIANCE				
L4.5		<p>For the purposes of determining the noise generated at the premises, Class 1 or 2 noise monitoring equipment as defined by AS 1025.1:2004 and AS 1025.2:2006, or other noise monitoring equipment accepted by the EPA in writing, must be used.</p>	<p>1. Hera Gold Mine EPL attended noise monitoring between periods covering 2017, 2018 and 2019, prepared by BMM Consultants.</p>			<p>The noise monitoring equipment used by Hera's consultants complies with AS 1025.1:2004 and AS 1025.2:2004 (and current EPA guidelines).</p>	COMPLIANCE				
L4.6		<p>To determine compliance:</p> <ul style="list-style-type: none">a) With the LAeq(15 minute) noise limits in condition L4.1, the noise monitoring equipment must be located:<ul style="list-style-type: none">• within 30 metres of a dwelling facade but not closer than 3 metres where any dwelling on the property is situated more than 30 metres from the property boundary that is closest to the premises;• approximately on the boundary where any dwelling is situated 30 metres or less from the property boundary that is closest to the premises;• within approximately 50 metres of the boundary of a National Park or a Nature Reserve;b) With the LA(15 minute) noise limit in Condition L4.1, the noise monitoring equipment must be located within 1 metre of the dwelling facade.c) The noise monitoring equipment must be located in a position facing:<ul style="list-style-type: none">• at the most affected point at a location where there is no dwelling at the location; or• at the most affected point within an area at a location prescribed by conditions L4.6(a) and/or <p>A breach of this Environmental Protection Licence will still occur where noise generated from the premises in excess of the appropriate limit specified in the condition L4.1 is detected:</p> <ul style="list-style-type: none">• at a location other than an area prescribed by Conditions L4.6(a) or L4.6(b); and/or• at a point other than the most affected point at a location.	<p>1. Hera Gold Mine EPL attended noise monitoring between periods covering 2017, 2018 and 2019, prepared by BMM Consultants.</p>			<p>The sampling locations and sampling procedures used by Hera's noise consultants meet the requirements of the EPL.</p>	COMPLIANCE				
L4.7		<p>For the purposes of determining the noise generated at the premises, the modification factors in Section 4 of the NSW Industrial Noise Policy must be applied, as appropriate, to the noise levels measured by the noise monitoring equipment.</p>	<p>1. Hera Gold Mine EPL attended noise monitoring between periods covering 2017, 2018 and 2019, prepared by BMM Consultants.</p>				Noted				
L5.1		<p>Blasting condition L5.1 applies to all receiver locations.</p> <p>Blasting, overpressure and ground vibration.</p> <p>The proponent must ensure that the blasting on the site does not cause exceedance of the criteria in the Table L5.1.</p> <p>Note: A Error margin associated with any monitoring equipment used to measure this are not to be taken into account in determining whether or not the limit has been exceeded.</p>	<p>1. Hera Mine Annual Review Project Approval 10/331 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017; dated 14 August 2017</p> <p>2. Hera Mine Annual Review Project Approval 10/331 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018; dated 14 August 2018</p> <p>3. Hera Mine Annual Review Project Approval 10/331 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019; dated 14 August 2019.</p>	<p>1. Hera Mine Annual Review Project Approval 10/331 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017; dated 14 August 2017</p> <p>2. Hera Mine Annual Review Project Approval 10/331 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018; dated 14 August 2018</p> <p>3. Hera Mine Annual Review Project Approval 10/331 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019; dated 14 August 2019.</p>	<p>868 blatts were installed during the 2016/7 reporting year. No vibration exceedances were detected at any privately owned properties.</p> <p>868 blatts were installed during the 2017/8 reporting year. No vibration exceedances were detected at any privately owned properties.</p> <p>738 blatts were installed during the 2018/9 reporting year. No vibration exceedances were detected at any privately owned properties.</p>	COMPLIANCE					

Weather Monitoring	The meteorological weather station must be maintained so as to be capable of continuously monitoring the parameters specified in the condition below.	1. Excel Spreadsheet titled "Daily Summary (22) (v)". The spreadsheet contained the weather station outputs from 9 September 2016 to 9 November 2019. 2. Error/omitted Field Calibration Report for the weather station (dated 21/2/2018).		Weather station monitoring results for the Audit Period were signed by the Auditor.	COMPLIANCE			
M4.2	For monitoring point 43 the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1. The licensee must use the sampling method, units of measure, averaging period and sample at the frequency, specified appropriate in the other columns.	1. Excel Spreadsheet titled "Daily Summary (22) (v)". The spreadsheet contained the weather station outputs from 9 September 2016 to 9 November 2019.		Weather station calibration reports were signed by the Auditor.	COMPLIANCE			
M5.1	The licensee must keep a register record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this license applies.	1. Complaints Register (internal version) in excel format - The Register contains full details of all complaints received.		A detailed complaints register is maintained. Note that summary version that does not identify complainant details is located on the complaint website.	COMPLIANCE			
M5.2	The record must include details of the following: a) the date and time 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 complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	1. Complaints Register (internal version) in excel format - The Register contains full details of all complaints received.		A detailed complaints register is maintained. Note that summary version that does not identify complainant details is located on the complaint website. a) The register includes the date and time of the complaint. b) The method by which the complaint was made is recorded e.g. email, telephone, in person. c) The personal details of the complainant such as full name, address and phone number are recorded if provided by the complainant. d) The nature of the complaint is recorded. e & f "Complaints Action" column records the action taken by the licensee in relation to the complaint. Additional columns record the name and position of the person responsible for the corrective actions as well as the date of the corrective action. Follow-up contact is recorded in the "Comments" column. f: 60 complaints signed (except the text call made as part of the July 2013 compliance audit) have required corrective actions.	COMPLIANCE			
M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	1. Complaints Register (internal version) in excel format - The Register contains full details of all complaints received.		The records of complaints date back to 2011.	COMPLIANCE			
M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.				Noted			
M6.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.			1. The telephone complaint line number is listed at the site gate and on the site website.	COMPLIANCE			
M6.2	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.	http://www.epa.gov.au/compliance-how-to-complain/		1. Mine site signage provides details of the complaints telephone number. Refer to Photo #62.	COMPLIANCE			
M6.3	The preceding two conditions do not apply until 3 months after the date of the issue of this licence				Noted			
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Science/Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data, and 7. a Statement of Compliance - Environmental Management Systems and Practices.	1. EPA Public Register https://open.epa.nsw.gov.au/gpswappsg/Data/api/v4/201798periodid-45091/issuechange/recordslog-for-noncompliance/ange/POC2020/issue		Annual Returns have been sent to the EPA for each year covered by the Audit Period.	COMPLIANCE			
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided in the below conditions.	1. EPA Public Register https://open.epa.nsw.gov.au/gpswappsg/Data/api/v4/201798periodid-45091/issuechange/recordslog-for-noncompliance/ange/POC2020/issue		Annual Returns have been sent to the EPA for each year covered by the Audit Period.	COMPLIANCE			
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 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.				Noted			
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: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.				Noted			
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 or later than 60 days after the date the transfer was granted (the "due date").	1. EPA Public Register https://open.epa.nsw.gov.au/gpswappsg/Data/api/v4/201798periodid-45091/issuechange/recordslog-for-noncompliance/ange/POC2020/issue		The 2016/7 Annual Return was received by the EPA on 17 May 2019 81 days after the end of the reporting period. The 2017/8 and 2018/9 Annual Returns were received within 60 days of the end of the reporting periods.	Non-Compliance	Issue that the Annual Returns are received by the EPA within the 60 day period required by the EPA.	During the audit period, one Annual Return was submitted one day late. Future Annual Returns will be submitted by eConnect EPA or registered post slips recorded and within 60 days of reporting period ending.	Completed.
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.	1. 2016 Annual Return 2. 2017 Annual Return 3. 2018 Annual Return.		Copies of the annual returns are kept on file at Hera.	COMPLIANCE			
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 licensee holder; or b) by a person approved in writing by the EPA to sign on behalf of the licenseeholder.			The Annual Returns are prepared by the Environment Manager and signed by an appropriate officer of the company.	COMPLIANCE			
R2.1	Notifications of Environmental harm must be made by telephoning the Environment Line service on 131 555.	1. Incident Report to EPA dated 4 January 2017 2. Email from EPA Customer Feedback (see) to Hera (J Thompson) titled "1st Jan 2017 Customer Feedback for Call C002B-2017", dated 22 November 2016. The email acknowledges the telephone report to the Pollution Line. 3. Email from Hera (J Thompson) to the EPA (D Stokke) titled "Environmental Incident - 26 October 2016", dated 22 November 2016. The email refers to the telephone report to the Pollution Line.		A review of incidents over the audit period by the Auditor confirmed that relevant incidents have been reported to the EPA Pollution Line. Written reports have subsequently been provided to the EPA.	COMPLIANCE			
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. Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 3.7 of the Act.	1. Incident Report to EPA dated 4 January 2017 2. Email from EPA Customer Feedback (see) to Hera (J Thompson) titled "1st Jan 2017 Customer Feedback for Call C002B-2017", dated 22 November 2016. The email acknowledges the telephone report to the Pollution Line. 3. Email from Hera (J Thompson) to the EPA (D Stokke) titled "Environmental Incident - 26 October 2016", dated 22 November 2016. The email refers to the telephone report to the Pollution Line.		A review of incidents over the audit period by the Auditor confirmed that relevant incidents have been reported to the EPA Pollution Line. Written reports have subsequently been provided to the EPA. Notifications (incident reports) were provided to the EPA on: 4 January 2017 (incident 16 December 2016) sediment laden discharge during storm event from Point 3. The incident was reported on 4 January 2017. The delay in reporting related to the time required for off-site sample analysis.	Non-Compliance	Hera has submitted the required incident reports to the EPA, however due to delays, usually associated with lab testing, the 7 day reporting requirement has not been met. It is recommended that Hera request a modification to this EPA condition to modify the 7 day written report requirement to provide sufficient time for lab analysis to be completed.	The EPL will be amended to reflect Schedule 5, Condition 7 of the PA.	4 April 2021.
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicle 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.			No requests for reports have been received from the EPA in relation to mobile plant.	Not Triggered			
R3.2				No requests for reports have been received from the EPA in relation to mobile plant.	Not Triggered			
R3.3	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 report. The report may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of any pollutant discharged as a result of the event; 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; d) the name, address and business hours telephone number of every other person (if whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measures taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.			No requests for reports have been received from the EPA in relation to mobile plant.	Not Triggered			
R4.1	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.			No requests for reports have been received from the EPA during the Audit Period.	Not Triggered			
R4.1	The licensee must report any incident of death or injury (including logging or mining) of fauna (avian and terrestrial) associated with the tailing impoundment or tailings spill/dam to telephoning the EPA Pollution Line on 13 13 55 as soon as the licensee becomes aware of the incident.	1. Incident Report issued to the EPA in relation to a dead goat and a dead kangaroo found in the TSP, dated 12 September 2017.		The EPA was advised following the death of a kangaroo in the TSP in 2017.	COMPLIANCE			
R5.1	The licensee must provide written details of the notification with respect of the above condition to the EPA within 7 days of the date which the incident occurred.				COMPLIANCE			
G1.1	A copy of this licence must be kept at the premises to which the licence applies.			Electronic copy of the licence is maintained by Hera.	Noted			
G1.2	The licensee must be produced to any authorised officer of the EPA who asks to see it.				COMPLIANCE			
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.			Electronic copy of the licence is maintained by Hera and a copy of the licence has been uploaded to the company website.	COMPLIANCE			
G1.3	Each monitoring and discharge point must be marked by a sign that indicates the EPA point identification number.			1. The Auditor inspected all monitoring points. All licensed points were appropriately sign posted. Refer to Photo #63.	COMPLIANCE			
E1.1	The licensee must construct the proposed contaminated storage pond consistent with the presentation provided to the EPA and dated 28 August 2016, to meet the proposed design capacity for a contaminated structure of a 1 in 100, 72 hour storm event.	1. Letter from Hera (J Thompson) to EPA titled "Environment Protection Licence 2017 - 8 Special Conditions, C1 Construction of Proposed Contaminated Storage Pond", dated 9 June 2017. The letter confirms to the EPA that the contaminated storage pond construction has been completed and included details of the works (including design specifications) completed. 2. Letter from GHD (D Scott) to Hera (J Thompson) titled "Hera Mine Sediment Basins Response to EPA?" dated 19 May 2016. The letter details the pond design specifications.		1. Inspection of the surface water management system, including the contaminated water storage pond.	COMPLIANCE			
E1.2	The proposed design pond referred to in Condition E1.1 must be fitted to meet the EPA's permeability requirement of 1 a 150 m/s or less with a uncompacted clay liner of at least 900 mm in thickness (or alternatively geosynthetic liner of equivalent). Where the proposed liner will not meet the required permeability or thickness of at least 900 mm, and the natural geology of the site in conjunction with constructed clay liner is considered sufficient in meeting this requirement, an appropriately qualified person must be engaged to provide sufficient evidence in support of this to demonstrate the construction will meet the requirements outlined above and be adequate to prevent pollution of groundwater.	1. Letter from Hera (J Thompson) to EPA titled "Environment Protection Licence 2017 - 8 Special Conditions, C2 Construction of Proposed Contaminated Storage Pond", dated 9 June 2017. The letter confirms to the EPA that the contaminated storage pond construction has been completed and included details of the works (including design specifications) completed. 2. Letter from GHD (D Scott) to Hera (J Thompson) titled "Hera Mine Sediment Basins Response to EPA?" dated 19 May 2016. The letter details the pond design specifications.		3. Inspection of the surface water management system, including the contaminated water storage pond.	COMPLIANCE			
E1.3	The licensee must complete the works required by Conditions E1.1 and E1.2 by 30 June 2017 and notify the EPA in writing upon completion of the works.	1. Letter from Hera (J Thompson) to EPA titled "Environment Protection Licence 2017 - 8 Special Conditions, C2 Construction of Proposed Contaminated Storage Pond", dated 9 June 2017. The letter confirms to the EPA that the contaminated storage pond construction has been completed and included details of the works (including design specifications) completed. 2. Letter from GHD (D Scott) to Hera (J Thompson) titled "Hera Mine Sediment Basins Response to EPA?" dated 19 May 2016. The letter details the pond design specifications.		3. Inspection of the surface water management system, including the contaminated water storage pond.	COMPLIANCE			
E1.4	The licensee must submit a report completed by an appropriately qualified person to verify that the contaminated storage pond has been constructed to meet the design specifications referred to in Conditions E1.1 and E1.2. The report must be submitted to the EPA by 31 August 2017.	1. Letter from Hera (J Thompson) to EPA titled "Environment Protection Licence 2017 - 8 Special Conditions, C2 Construction of Proposed Contaminated Storage Pond", dated 9 June 2017. The letter confirms to the EPA that the contaminated storage pond construction has been completed and included details of the works (including design specifications) completed. 2. Letter from GHD (D Scott) to Hera (J Thompson) titled "Hera Mine Sediment Basins Response to EPA?" dated 19 May 2016. The letter details the pond design specifications.		3. Inspection of the surface water management system, including the contaminated water storage pond.	COMPLIANCE			

Condition	Must Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation	Hera Resources Action Plan
1 (a)	Notice to Landholders	Within a period of three months from the date of grant/renewal of this lease or within such further 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. An adequate plan and description of the lease area must accompany the notice.	1. Independent Environmental Audit, Hera Resources Pty Ltd - Hera Project, NMAAGEE NSW, September 2016.			The 2016 Audit noted that the nearest residential premises is over 2 km from the site and therefore this Condition is not triggered.	Not Triggered		
1 (b)		If there are ten or more individuals 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 lease area.	1. Independent Environmental Audit, Hera Resources Pty Ltd - Hera Project, NMAAGEE NSW, September 2016.			The 2016 Audit noted that the nearest residential premises is over 2 km from the site and therefore this Condition is not triggered.	Not Triggered		
2(a)		The lease holder must implement all practicable measures to prevent and/or minimise any harm to the environment that may result from the construction, operation or rehabilitation of any activities under this lease.	1. EPA Show Cause Notice relating to cyanide contaminated water leaks, EPA Reference 1585204, dated 3 June 2016 2. EPA Clearance Notice 157818.			As a result of two spill reported by Hera's leaks of contaminated water, the EPA issue a Clean Up Notice and subsequently in response to their assessment that these incidents evidenced potential or actual Material Harm and were therefore potential breaches of Sections 64, 12 and 142A of the POEO Act.	Not Compliance	The clean-up actions relating to the incidents have been completed - there are no further actions required.	Completed.
2(b)	Environmental Harm	For the purposes of this condition, environmental means components of the earth, including: (A) land, air and water; and (B) any type of the atmosphere; and (C) any organic or inorganic matter and any living organism; and (D) human-made or modified structures and areas; and includes interacting natural ecosystems that include components referred to in paragraphs (A) to (C). (e) harm to the environment includes any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above, includes any act or omission that results in pollution, contributes to the extinction or degradation of any threatened species, populations or ecological communities and their habitats and causes impacts to places, objects and features of significance to Aboriginal people.					Noted		
3(a)		Mining operations must not be carried out otherwise than in accordance with a Mining Operations Plan (MOP) which has been approved by the Director-General	1. Mining Operations Plan for the Hera Mine PA10, 0191, dated January 2017. 2. Letter from the DRE (13 Hera (3 Simpson), titled "Application for a Mining Operations Plan (MOP) for Mining Lease (ML) 1686, ML 1746, Mining Act 1992, Hera Resources Pty Ltd of DPI approving the MOP", dated 27 February 2017.			The MOP has been prepared and approved by DRE.	COMPLIANCE		
3(b)		The MOP must: (i) identify areas that will be disturbed by mining operations; (ii) detail the staging of specific mining operations; (iii) identify how the mine will be managed to allow mine closure; (iv) identify how mining operations will be carried out in order to prevent and/or minimise harm to the environment;	1. Mining Operations Plan for the Hera Mine PA10, 0191, dated January 2017. 1. Mining Operations Plan for the Hera Mine PA10, 0191, dated January 2017. 1. Mining Operations Plan for the Hera Mine PA10, 0191, dated January 2017.			Section 2.2 (Asset Register) describes the mine in terms of "Domains". Each of the Domains describe the areas of the site that are likely to be disturbed and therefore would be subject to rehabilitation in the future. Section 2 of the MOP describes the proposed mining activities and includes descriptions of the exploration, construction and mining phases of the project. Section 2.3.9 of the MOP describes the progressive rehabilitation and closure of the site.	COMPLIANCE COMPLIANCE COMPLIANCE		
3(c)	Mining Operations Plan	(v) reflect the conditions of approval under: + the Environmental Planning and Assessment Act 1979 + the Protection of the Environment Operations Act 1997 + any other approvals relevant to the development (including the conditions of this lease; and + have regard to any relevant guidelines adopted by the Director-General	1. Mining Operations Plan for the Hera Mine PA10, 0191, dated January 2017.			Section 3 of the MOP describes the environmental risks associated with the project and Section 3.2 describes how those risks will be managed.	COMPLIANCE		
3(d)		The leaseholder may apply to the Director-General to amend an approved MOP at anytime.				The MOP is consistent with the Planning Approval and this Mining Lease.	COMPLIANCE		
3(e)		It is not a breach of this condition if: (i) the operations constituting the breach were necessary to comply with a lawful order or direction given under the Mining Act 1992, the Environmental Planning and Assessment Act 1979, Protection of the Environment Operations Act 1997, New South Wales Health and Safety Act 2004, Coal Mine Health and Safety Act 2002 and Mine Health and Safety Regulation 2001 (ii) the Director-General had been notified in writing of the terms of the order or direction prior to the operations constituting the breach being carried out.					Noted		
3(f)		The MOP relates to how effect of particular risks of approval or other each period as identified by the Director-General					Not Triggered		
4(a)		The lease holder must lodge Environmental Management Reports (EMRs) with the Director-General annually or at a date otherwise directed by the Director-General	1. Hera Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017, dated 14 August 2017. 2. Hera Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018, dated 16 August 2018. 3. Hera Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019, dated 14 August 2019.			The Annual Reviews (as described in the Planning Approval) are accepted as fulfilling the requirements of this Condition for the preparation of Annual Environmental Management Reports (AEMR). Annual Reports have been prepared and submitted each year covered by the Audit Period.	COMPLIANCE		
4(b)	Environmental Management Report	The EMR must: (i) report against compliance with the MOP; (ii) report on progress in respect of rehabilitation completion criteria; (iii) report on the extent of compliance with regulatory requirements; and (iv) have regard to any relevant guidelines adopted by the Director-General	1. Hera Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017, dated 14 August 2017. 2. Hera Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018, dated 16 August 2018. 3. Hera Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019, dated 14 August 2019.			All Annual Reviews refer back to statements made in the MOP and state if they were in accordance with MOP and if not, why not. The progress of rehabilitation against the plans in the MOP are reported in each of the Annual Reviews. See for example Section 6 of the 2016/17 AER.	COMPLIANCE COMPLIANCE		
5(a)	Environmental Incident Report	The lease holder must report any environmental incidents. The report must: (i) be prepared according to any relevant Departmental guidelines; (ii) be submitted within 24 hours of the environmental incident occurring	1. Hera Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017, dated 14 August 2017. 2. Hera Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018, dated 16 August 2018. 3. Hera Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019, dated 14 August 2019.			Section 6 of the (2016/17) Annual Review detailed performance against the environmental compliance obligations established under the Planning Approval and EPA.	COMPLIANCE		
5(b)		For the purposes of this condition, environmental incident includes: (i) any incident causing or threatening material harm to the environment; (ii) any breach of Conditions 1 to 5 and 11 to 24; (iii) any breach of environmental protection legislation; or (iv) a nuisance complaint from landholders or the public. For the purposes of this condition, harm to the environment is material if: (i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or (ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000, where loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.	1. Hera Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017, dated 14 August 2017. 2. Hera Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018, dated 16 August 2018. 3. Hera Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019, dated 14 August 2019.				Noted		
6	Additional Environmental Reports	Additional environmental reports may be required from time to time as directed in writing by the Director-General and must be lodged as instructed.					Not Triggered		
7	Rehabilitation	Any disturbance as a result of activities under this lease must be rehabilitated to the satisfaction of the Director-General.	1. Mining Operations Plan for the Hera Mine PA10, 0191, dated January 2017. 2. Letter from the DRE (13 Hera (3 Simpson), titled "Application for a Mining Operations Plan (MOP) for Mining Lease (ML) 1686, ML 1746, Mining Act 1992, Hera Resources Pty Ltd of DPI approving the MOP", dated 27 February 2017.			The MOP (and therefore the Rehabilitation Management Plan) has been reviewed and approved by DRE. Progressive rehabilitation has commenced on the mine site.	COMPLIANCE		
8		Not Used					Not Used		
9	Working Requirement	The lease holder must: (a) ensure that at least 52 competent people are efficiently employed in relation to the mining process or mining OR (b) expend on operations carried out in the course of prospecting or mining the lease area, an amount of not less than \$910,000.00 per annum whilst the lease is in force. The Minister may at any time or times, by instrument in writing served on the lease holder, increase or decrease the expenditure required or the number of people to be employed	1. Aurelia Metals Limited 2017 Annual Report 2. Aurelia Metals Limited 2016 Annual Report			The Annual (Biodiversity) Reports published by Aurelia Resources confirm that the annual expenditure at the mine is in excess of \$910,000 per annum.	COMPLIANCE		
10(a)	Blasting	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/sec and does not exceed 5 mm/sec in more than 5% of the total number of blasts over a period of 12 months at any dwelling or occupied premises as the case may be, unless determined otherwise by the Department of Environment, Climate Change and Water.	1. Hera Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017, dated 14 August 2017. 2. Hera Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018, dated 16 August 2018. 3. Hera Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019, dated 14 August 2019.			868 blasts were initiated during the 2016/17 reporting year. No vibration exceedances were detected at any privately owned properties. 868 blasts were initiated during the 2017/8 reporting year. No vibration exceedances were detected at any privately owned properties.	COMPLIANCE		
10(b)		The lease holder must ensure that the blast overpressure noise level generated by any blasting within the lease area does not exceed 120 dB (blast) and does not exceed 115 dB (blast) in more than 5% of the total number of blasts over a period of 12 months, at any dwelling or occupied premises, as the case may be, unless determined otherwise by the Department of Environment, Climate Change and Water.	1. Hera Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2016 to 15 May 2017, dated 14 August 2017. 2. Hera Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2017 to 15 May 2018, dated 16 August 2018. 3. Hera Mine Annual Review Project Approval 10, 0191 Mining Lease 1686 Mining Lease 1746, For the Period 16 May 2018 to 15 May 2019, dated 14 August 2019.			738 blasts were initiated during the 2016/8 reporting year. No vibration exceedances were detected at any privately owned properties. 868 blasts were initiated during the 2016/17 reporting year. No vibration exceedances were detected at any privately owned properties. 868 blasts were initiated during the 2017/8 reporting year. No vibration exceedances were detected at any privately owned properties.	COMPLIANCE		

11	Safety	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 suitably venting to the Department and filled in or otherwise rendered safe to a standard acceptable to the Director-General.	1. Incident Register	1. Audit interview (J Thompson): no damage to private property or livestock has occurred as a result of the blasting undertaken.	COMPLIANCE	
12	Prevention of soil erosion and pollution	Prospecting operations must be carried out in a manner that does not cause or aggravate air pollution, water (including groundwater) pollution, soil contamination or erosion, unless otherwise authorised by a relevant approval, and in accordance with an accepted Mining Operations Plan.	1. Aurelia - Hera Gold WMP Water Management Plan 2018 - prepared by GHD. 2. DRI Water Management Plan 2018, Version 1, dated November 2018.	1. No areas of soil erosion were observed during the Audit.	COMPLIANCE	A surface water management plan has been prepared and implemented at the Mine. There was no evidence of erosion problems observed by the Auditor.
13	Transmission Lines (etc)	Operations must not involve with or impact the stability or efficiency of any transmission line, communication line, pipeline or any other utility on the lease area without the prior written approval of the Director-General and subject to any conditions imposed.	1. Incident Register	1. Interview J Thompson, 10 November 2019. No requests have been received requesting repairs be made to any public infrastructure.	Not Triggered	No instances of damage to public infrastructure have been identified for the Audit Period.
14(a)	Roads and Tracks	The lease holder must pay to the relevant roads authority in control of the road or track the reasonable costs incurred by the roads authority in making good any damage to roads or tracks caused by operations carried out under this lease less any amount paid or payable from the Mine Subsidence Compensation Fund	1. Council accounts database extracts: 31/7/2015 - \$10,000 14/9/2015 - \$82,500 18/1/2016 - \$22,000 13/10/2017 - \$43,500	1. Interview L Richards. The road related payments made to Council consist of: \$82,500 - Hera's contribution to the Hermsdale-Nymagee sealing road project in 2016 \$17,000 - Maintenance grading of unsealed Hermsdale-Nymagee Road (2017/18 annual contribution) \$43,500 - Maintenance grading of unsealed Hermsdale-Nymagee Road (2015/16 & 2016/17 annual contributions) \$10,000 - Maintenance grading of unsealed Hermsdale-Nymagee Road (2015/16 & 2016/17 annual contributions once grading was completed)	COMPLIANCE	1. The Nymagee - Hermsdale Road is sealed for its entire length (the Auditor travelled to the site via the concrete transport route). Payments have been made to BSC during the audit period totalling \$158,000 for road maintenance.
14(b)		During wet weather the use of any road or track must be restricted so as to prevent damage to the road or track.	1. Aurelia - Hera Gold WMP Water Management Plan 2018 - prepared by GHD.	1. Interview L Richards, 19 November 2019. Where required works should be done as soon as drying wet weather.	COMPLIANCE	Drought conditions experienced over the Audit Period have resulted in no erosion issues being experienced.
14(c)		Existing access tracks should be used for all operations where reasonably practicable. New access tracks must be kept to a minimum and be positioned in order to minimise damage to the land, subsoil/cropland or vegetation.			Noted	
14(d)		Temporary access tracks must be rehabilitated and revegetated to the satisfaction of the Director-General as soon as reasonably practicable after they are no longer required under this lease.	1. Mining Operations Plan for the Hera Mine PATO, 0191, dated January 2017. 2. Letter from the DRE (to Hera, J Thompson), dated 'Application for a Mining Operations Plan (MOP) for Mining Lease (ML) 1686, ML748, Mining Act 1992, Hera Resources Pty Ltd of DPI approving the MOP', dated 27 February 2017.		COMPLIANCE	The MOP (and therefore the Rehabilitation Management Plan) has been reviewed and approved by DRE. Progressive rehabilitation has commenced on the mine site.
15(a)	Trees and Vegetation	The lease holder must not fell trees, strip bark or cut timber on any land subject of this lease without the consent of the landowner who is entitled to the use of the timber.		1. Interview L Richards, 19 November 2019. No works have been required on any neighbours properties.	Not Triggered	No works have been undertaken on neighbouring properties during the Audit Period.
15(b)		The lease holder must contact Forests NSW and obtain any required permit, licence or approval before taking timber from any Crown land within the lease area.		1. J Thompson: No timber has been taken from lease areas.	Not Triggered	No timber has been taken from lease areas.
16		Not Used			Not Used	
17(a)	Resource Recovery	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, which the lease holder is not being recovered from the lease area, or that any such materials 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, notice in writing to the lease holder may be given requiring the holder to recover such materials.	1. Notices from DPI relating to any aspect of the mining operations.		Noted	
17(b)		The notice shall specify the materials 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.	1. Notices from DPI relating to any aspect of the mining operations.		Noted	
17(c)		The lease holder must, when requested by the Director-General, provide such information as the Director-General may require about the recovery of the mineral resources of this lease area.	1. J Thompson: DRE has not served any notices relating to the mining operations (requiring the provision of a report).		Not Triggered	DRE has not served any notices on or required any reports from Hera over the Audit Period.
18	Indemnity	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 indemnified by the lease holder or that any such accident or injury shall arise from any act or thing which the lease holder may be licensed or compelled to do.	Noted		Noted	
19(a)	Security	This authorisation is subject to a condition that the holder of the authorisation is required to provide and maintain a security deposit to secure funding for the fulfilment of obligations of all or any land under the authorisation, including obligations of all or any land under the authorisation that may arise in the future.	Noted		Noted	
19(b)		The amount of the security deposit to be provided has been assessed by the Director-General of the Department of Trade and Investment, Regional Infrastructure and Services at \$2,470,000.00.	1. Deed of Security Bond (Westpac) for the sum of \$2,933,000 in favour of the Department of Industry, Skills, and Regional Development.		COMPLIANCE	The required bond has been established.
19(c)		The security deposit is to be provided by way of a cash deposit with entitlement to any interest thereon) or in such other form as may be approved by the Director-General (or their delegates).	1. Deed of Security Bond (Thompson) for the sum of \$2,933,000 in favour of the Department of Industry, Skills, and Regional Development.		COMPLIANCE	The required bond has been established.
20		Not Used			Not Used	
21		Not Used			Not Used	
22(a)		Notwithstanding any Mining Operations Plan, the lease holder must not mine within any part of the lease area which is within the notification area of the proposed tailings storage area without the prior written approval of the Minister and subject to any conditions stipulated.		1. No evidence of mining outside of the lease area was observed by the Auditor.	COMPLIANCE	All mining is being undertaken within the lease area.
22(b)		Where the lease holder desires to mine within the notification area he or she must: (i) at least twelve (12) months before mining is to commence or such lesser time as the Minister may permit, notify the Minister of the desire to do so. A copy of the mining proposal to be implemented must accompany the notice; and (ii) provide such information as the Minister may direct.	1. Correspondence requesting approval to mine within the notification area.		Noted	
22(c)	Prescribed Dam	The Minister must not, except in the circumstances set out in sub-paragraph (ii), grant approval unless sub-paragraph (i) of this paragraph has been complied with. The sub-paragraph is complied with if: (i) the Dams Safety Committee as constituted by Section 7 of the Dams Safety Act 1978 and the owner of the dam have been notified in writing of the desire to mine referred to in paragraph (i); (ii) the notification referred to in clause (i) is accompanied by a description or plan of the area to be mined; (iii) the Director-General has complied with any reasonable request made by the Dams Safety Committee or the owner of the dam for further information in connection with the mining proposal; (iv) the Dams Safety Committee has made its recommendations concerning the mining proposal or has informed the Minister in writing that it does not propose to make any such recommendations; and (v) where the Dams Safety Committee has made recommendations the approval is in terms that are in accordance with those recommendations; or where the Minister does not accept those recommendations or any of them - in accordance with a determination under sub-paragraph (i) of this paragraph. (vi) Where the Minister does not accept the recommendations of the Dams Safety Committee or where the Dams Safety Committee has failed to make any recommendations and has not informed the Minister in writing that it does not propose to make any recommendations, the approval shall be in terms that are, in relation to matters dealing with the safety of the dam, as determined by agreement between the Minister and the Minister administering the Dams Safety Act 1978, or in the event of failure to reach such agreement - as determined by the Premier.	Noted		Noted	
22(d)		The Minister, on notice from the Dams Safety Committee, may at any time or times: (i) cancel any approval given where a notice pursuant to Section 18 of the Dams Safety Act 1978 is given; (ii) suspend for a period of time, alter, omit from or add to any approval given or conditions imposed.	Noted		Noted	
23	Suspension of Mining Operations	The holder of a mining lease may not suspend mining operations in the mining area other than in accordance with the consent of the Minister.	Not Triggered		Noted	
24	Cooperation Agreement	The lease holder must make every reasonable attempt, and be able to demonstrate their attempts, to enter into a cooperation agreement with the holder(s) of any overlapping title(s). The cooperation agreement should address but not be limited to issues such as: • access arrangements • operational interaction procedures • dispute resolution • information exchange • well location • timing of drilling • potential resource extraction conflicts and • rehabilitation issues.			Not Triggered	There are no overlapping mining titles related to this Project.

Mr Liam Richards
Environmental Advisor

"The Peak" 353 Burthong Road NYMAGEE,
NSW, 2831

24/04/2020

Dear Mr Richards

**Hera Gold Mine (SSD 10_0191)
Independent Environmental Audit Report 25 September 2016 to 30 September 2019**

I refer to the Independent Environmental Audit Report (Audit Report), for the reporting period from 25 September 2016 to 30 September 2019, for Hera Gold Mine (the development) submitted for the Secretary's consideration, as required under Schedule 5, Conditions 9 and 10 of the development consent SSD 10_0191, as modified (the consent).

The Department considers that the Audit Report, generally satisfied Condition 9 of the consent. Please note that approval of this Audit Report is not endorsement of the compliance status of the development.

The Department notes that you have made a request through the Department's Major Projects Portal for the Secretary's approval of updated Hazardous Materials Management Plan under Schedule 3, Condition 41 and the Waste Rock Management Plan under Schedule 3, Condition 43, however you have not lodged the Management Plans with the request. Consequently, the Department requests that you lodge these Management Plans through the Portal within three weeks from the date of this letter.

The Department also notes that the Audit Report recommended Traffic Management Plan under Schedule 3, Condition 38 be updated. Consequently, you are requested to review the Traffic Management Plan and if necessary, revise and submit for the Secretary's approval in accordance with Schedule 5, Condition 5 of the consent.

Lastly, the Department notes that you will submit the Final Hazards Analysis under Schedule 3, Condition 40, for the Secretary approval by 30 September 2020.

Should you need to discuss the above, please contact Georgia Dragicevic, Senior Compliance Officer, on (02) 4247 1852 or by email to Georgia.Dragicevic@planning.nsw.gov.au.

Yours sincerely



Katrina O'Reilly
Team Leader - Compliance
Compliance

As nominee of the Planning Secretary