



An independent audit covering the period from 12 March 2022 to 7 July 2023 was conducted for Project Approval 07\_0018 MOD10 in July 2023. The actions and timeframes to address non-compliances identified in the audit are addressed in the following tables.

**Non-compliances**

Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
1	PA 07_0018 Sch2 Cond1	<p><b>Obligation to minimise harm to the environment</b></p> <p>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.</p>	<p>The Auditors consider that during the audit period, BHOP has maintained a high standard of environmental management.</p> <p>However, the Auditors consider that as of July 2023, BHOP has not implemented ‘all’ reasonable and feasible measures to prevent and/or minimise material harm (including potential harm) to the environment that may result from the construction, operation or rehabilitation of the Rasp Project. The audit finding against this condition is based on evidence collected regarding the following environmental incidents which occurred during the audit period:</p> <ul style="list-style-type: none"> <li>• an off-site seepage of contaminated water from the S49 Ryan Street Dam which commenced on 10 March 2022 (in the previous audit period) and continued after extreme rainfall events on 16 March 2022 (72.4mm) and 26-27 April 2022 (54.8mm) (INX No. 7687) – see Photos 1 and 2;</li> <li>• off-site seepage of contaminated water from the S14 House Dam on 28 April 2022 which occurred after a heavy overnight rainfall event of 54.8mm on 26-27 April 2022 (INX No. 7846) – see Photo 3;</li> <li>• off-site seepage of contaminated</li> </ul>	<p><b>Non-compliance No. 1</b></p> <p>Despite having implemented measures to prevent and/or minimise any material harm to the environment, the environmental incidents which occurred during the audit period (INX Nos. 7687, 7846, 8036, 8370 and 8536) are evidence that on infrequent occasions, BHOP had not taken ‘all’ reasonable measures to prevent and/or minimise any material harm to the environment (i.e. which the Project Approval defines as including potential harm) that may result from the construction, operation or rehabilitation of the Rasp Project.</p> <p><b>Recommendation No. 1</b></p> <p>BHOP should ensure that all reasonable and feasible corrective and preventative actions in response to the environmental incidents in INX Nos. 7687, 7846, 8036, 8370 and 8536 are tracked and closed out in INX InControl.</p>	<p>BHO will continue to track and complete corrective actions related to non-compliances in INX.</p>	31/07/2024



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			<p>water on 30 July 2022 from a failed join in the discharge pipe for the Mill Overflow Pond (INX No. 8036) – see Photo 4;</p> <ul style="list-style-type: none"> <li>an off-site release of oil-contaminated water from a redundant fuel tank at the Stores lot on 31 October 2022 (INX No. 8370) – see Photo 5; and</li> </ul> <p>an off-site release of tailings from a flow pathway in the TSF2 embankment on 24 December 2022 (INX No. 8536) – see Photos 6 and 7.</p>			
2	PA 07_0018 Sch2 Cond8	<p><b>Structural Adequacy</b></p> <p>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.</p> <p><i>Notes to Condition 8:</i></p> <ul style="list-style-type: none"> <li><i>Under Part 6 of the EP&amp;A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works; and</i></li> </ul> <p><i>Parts 1-9 of the Environmental Planning and Assessment (Development Certification and Fire Safety) Regulation 2021 sets out the requirements for the certification of the project.</i></p>	<p>The Building Information Certificates issued by Broken Hill City Council on 13 March 2023 for the Concrete Batching Plant and the Stores Extension, are evidence that BHOP has rectified the following non-compliance against this condition of consent, as identified in the Official Caution issued by NSW Planning on 3 January 2023.</p>	<p><b>Non-compliance No. 2</b></p> <p>On 3 January 2023, NSW Planning issued an Official Caution to Broken Hill Operations Pty Ltd (BHOP) for failing to obtain construction certificates for the concrete batching plant and warehouse extension at the RASP Mine.</p> <p><b>Recommendation No. 2</b></p> <p>No action is required to rectify this non-compliance (i.e. the required Building Information Certificates were issued by Broken Hill City Council on 13 March 2023). When planning a construction project, BHOP should review whether the requirements of Project Approval Schedule 2, Condition 8 will apply to that project, and if applicable, include the relevant BCA requirements in the project schedule.</p>	<p>BHO has received Building Information Certificates for the Concrete Batching Plant and Stores Extension.</p>	Complete
3	PA 07_0018 Sch2 Cond10	<p><b>Operation of Plant and Equipment</b></p> <p>The Proponent shall ensure that all the plant</p>	<p>The Auditors consider that every incident which occurred during the audit period, except the TSF2 seepage incident of 24</p>	<p><b>Non-compliance No. 3</b></p> <p>BHOP was unable to demonstrate that it</p>	<p>BHO will continue to track and complete corrective actions</p>	31/07/2024



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Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		and equipment used on site, or to transport materials to and from the site, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	December 2022, was at least partly attributable to unreliable or missing plant and equipment, and which BHOP could have reasonably identified in a risk assessment.  The Auditors consider that the TSF2 seepage incident of 24 December 2022 (INX No. 8635) could not have reasonably been prevented by BHOP (e.g. TSF2 had received a Risk Report for Dam Break from TSF2 Blackwood Pit from WSP Golder on 21 December 2022), and hence is not a non-compliance against this condition.	maintained plant and equipment in a proper and efficient condition in relation to the environmental incidents INX Nos. 7687, 7846, 8036, 8370 and 8536 which occurred during the audit period.  <b>Recommendation No. 3</b>  BHOP should ensure that all reasonable and feasible corrective and preventative actions in response to the environmental incidents in INX Nos. 7687, 7846, 8036, 8370 and 8536 are tracked and closed out in INX InControl.	related to non-compliances in INX.	
4	PA 07_0018 Sch3 Cond2	<b>Air Quality and Greenhouse Gas – Greenhouse Gas Emissions</b>  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 <a href="#">Secretary</a> .	Section 6.15 of BHOP’s Air Quality Management Plan (AQMP) states (in part): “The greenhouse gas (Scope 1 and 2) intensity of the Project equates to less than 50 ktCO <sub>2</sub> -e/t and the MOD6 operational scenario is not anticipated to have a material impact upon current GHG emissions compared to the status quo.”  Section 6.15 of the AQMP commits BHOP to undertake the following management measures to minimise energy consumption and greenhouse gas emissions: <ul style="list-style-type: none"><li>• <i>efficiency of all new mobile and fixed equipment will be considered during procurement for both diesel and electric powered equipment;</i></li><li>• <i>within 12 months of commencement of underground mining and annually thereafter,</i></li></ul>	<b>Non-compliance No. 4</b>  BHOP was unable to provide evidence that it has implemented ‘all’ reasonable and feasible measures to minimise the release of greenhouse gas emissions from the site, because BHOP could not provide evidence that it has implemented all management measures described in section 6.15 of the Air Quality Management Plan.  <b>Recommendation No. 4</b>  BHOP should implement the first and fifth management measures described in section 6.15 of the Air Quality Management Plan; i.e. document a procedure or checklist regarding consideration of energy efficiency during procurement for both diesel and electric power equipment; and report on annual emission estimations and abatement strategies within each Annual Review.	BHO will develop a procurement checklist for energy efficiency or new plant and equipment and include reporting on annual emission estimations and abatement strategies in future Annual Reviews.	31/03/2024



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			<p><i>NGER scheme reporting will be conducted to quantify emissions;</i></p> <ul style="list-style-type: none"> <li>• <i>equipment will be maintained to retain high levels of energy efficiency;</i></li> <li>• <i>the inventory of emissions developed for the Environmental Assessment will be updated and maintained annually through the NGERs process; and</i></li> <li>• <i>annual emission estimations and abatement strategies will be reported annually within the Annual Review.</i></li> </ul> <p>During this July 2023 audit, there was evidence that BHOP has implemented the measures described in the above second, third and fourth dot points in section 6.15 of the AQMP.</p> <p>During this July 2023, audit, BHOP was unable to provide evidence that it has considered the efficiency of all new mobile and fixed equipment during procurement for both diesel and electric powered equipment (for example, the new electric pump recently installed at S49 Ryan Street Dam).</p> <p>BHOP's Annual Review 2022 (Revised) did not include any reporting of annual emission estimations and abatement strategies, as referred to in section 6.15 (fifth dot point) of the AQMP.</p>			
5	PA 07_0018	<b>Air Quality and Greenhouse Gas – Air</b>	Despite the above monitoring results, on	<b>Non-compliance No. 5</b>	BHO will continue to	31/07/2024



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	Sch3 Cond3	<p><b>Quality Criteria</b></p> <p>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 cause an exceedance of the criteria listed in Tables 1, 2 or 3 at any residence on privately-owned land.</p> <p><small>Table 1: Long Term Criteria for Particulate Matter</small></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging Period</th> <th>Criterion</th> </tr> </thead> <tbody> <tr> <td>Total solid particles (TSP)</td> <td>Annual</td> <td><sup>a</sup> 90 µg/m<sup>3</sup></td> </tr> <tr> <td>Particulate matter &lt; 10 µm (PM<sub>10</sub>)</td> <td>Annual</td> <td><sup>a</sup> 25 µg/m<sup>3</sup></td> </tr> <tr> <td>Particulate matter &lt; 2.5 µm (PM<sub>2.5</sub>)</td> <td>Annual</td> <td><sup>a</sup> 8 µg/m<sup>3</sup></td> </tr> </tbody> </table> <p><small>Table 2: Short Term Criterion for Particulate Matter</small></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging Period</th> <th>Criterion</th> </tr> </thead> <tbody> <tr> <td>Particulate matter &lt; 10 µm (PM<sub>10</sub>)</td> <td>24 hour</td> <td><sup>a</sup> 50 µg/m<sup>3</sup></td> </tr> <tr> <td>Particulate matter &lt; 2.5 µm (PM<sub>2.5</sub>)</td> <td>24 hour</td> <td><sup>a</sup> 25 µg/m<sup>3</sup></td> </tr> </tbody> </table> <p><small>Table 3: Long Term Criteria for Deposited Dust</small></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging Period</th> <th>Maximum Project Contribution</th> <th>Maximum Total Deposited Dust Level</th> </tr> </thead> <tbody> <tr> <td><sup>c</sup> Deposited dust</td> <td>Annual</td> <td><sup>b</sup> 2 g/m<sup>2</sup>/month</td> <td><sup>a</sup> 4 g/m<sup>2</sup>/month</td> </tr> </tbody> </table> <p><small>Notes to Tables 1-3</small></p> <ul style="list-style-type: none"> <li><sup>a</sup> Total (and if it is incremental increase in concentrations due to the project plus background concentrations due to all other sources).</li> <li><sup>b</sup> Incremental impact (i.e. incremental increase in concentrations due to the project on its own).</li> <li><sup>c</sup> Deposited dust as to be assessed as include solids as defined by Standards Australia, AS/NZS 3500.10 (2003, Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method).</li> <li><sup>d</sup> Excludes extraordinary events such as bushfires, prescribed burning, dust storms, fire incidents, illegal activities or any other activity agreed by the Secretary in consultation with EPA.</li> </ul>	Pollutant	Averaging Period	Criterion	Total solid particles (TSP)	Annual	<sup>a</sup> 90 µg/m <sup>3</sup>	Particulate matter < 10 µm (PM <sub>10</sub> )	Annual	<sup>a</sup> 25 µg/m <sup>3</sup>	Particulate matter < 2.5 µm (PM <sub>2.5</sub> )	Annual	<sup>a</sup> 8 µg/m <sup>3</sup>	Pollutant	Averaging Period	Criterion	Particulate matter < 10 µm (PM <sub>10</sub> )	24 hour	<sup>a</sup> 50 µg/m <sup>3</sup>	Particulate matter < 2.5 µm (PM <sub>2.5</sub> )	24 hour	<sup>a</sup> 25 µg/m <sup>3</sup>	Pollutant	Averaging Period	Maximum Project Contribution	Maximum Total Deposited Dust Level	<sup>c</sup> Deposited dust	Annual	<sup>b</sup> 2 g/m <sup>2</sup> /month	<sup>a</sup> 4 g/m <sup>2</sup> /month	<p>five occasions BHOP did not comply with the required 24-hour averaging period in Table 2 for particulate matter analysis, and on one occasion BHOP did not comply with the monthly monitoring requirement in Table 3 for deposited dust analysis, as listed below:</p> <ul style="list-style-type: none"> <li>• TEOM1 non-operational from approximately 8:20pm to 7:00am on 14-15 March 2022 due to a severe weather event which tripped the safety switch circuit breaker (INX No. 7698);</li> <li>• Damage to lid on DDG7 jar during transit to ALS laboratory in respect of sample collected on 4 April 2022, which prevented analysis of that deposited dust sample (INX No. 7783);</li> <li>• TEOM1 non-operational for much of the period from 8:00am to 4:30pm on 31 May 2022 due to a planned power outage in Broken Hill of which BHOP was not informed (INX No. 7872);</li> <li>• TEOM2 non-operational from approximately 12:20am to 7:00am on 1 October 2022 due to an unidentified person who disconnected power to the unit and stole the data logger and 4G modem (INX No. 8275);</li> <li>• HVAS and HVAS1 failed to capture data from approximately 1:30pm to 4:30pm on 12 October 2022 following power spikes which caused a loss of power to the units (INX No. 8316); and</li> <li>• TEOM2 non-operational from approximately 8:00pm to 8:00am on</li> </ul>	<p>During the audit period, on five occasions BHOP was unable to comply with the 24-hour averaging period in Table 2 for particulate matter analysis (INX Nos. 7698, 7872, 8275, 8316 and 8776) and on one occasion BHOP was unable to comply with the monthly monitoring requirement in Table 3 for deposited dust analysis (INX No. 7783).</p> <p><b>Recommendation No. 5</b></p> <p>BHOP should ensure that all reasonable and feasible corrective and preventative actions in response to the non-compliance events in INX Nos. 7698, 7783, 7872, 8275, 8316 and 8776 are tracked and closed out in INX InControl.</p>	<p>track and complete corrective actions related to non-compliances in INX.</p>	
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			14-15 March 2023 due to a fault in the power supply board at the rail loadout (INX No. 8776).			
6	PA 07_0018 Sch3 Cond11A	<b>Air Quality and Greenhouse Gas – Air Quality Management Plan</b>  The Proponent must implement the Air Quality Management Plan as approved by the Secretary	During this July 2023 audit, there was evidence that BHOP is implementing the AQMP, subject to some isolated examples identified in the non-compliance below. Refer to the ‘Independent Audit Findings and Recommendation’ for Project Approval Schedule 3, Condition 5, for examples of implementation of the AQMP.	<b>Non-compliance No. 6</b>  As of July 2023, BHOP has not implemented some aspects of the Air Quality Management Plan (AQMP), including: <ul style="list-style-type: none"> <li>the water spray system on TSF2 was not installed and tested by the scheduled date of 31 March 2021 referred to in section 10.5.1 of the AQMP; and</li> <li>there is no functional water spray system on the ROM Pad – Table B1 in the AQMP includes the following control action for ‘ROM Stockpile Wind Erosion’: “Water sprays will be mounted on the ROM stockpile wind breaks and directed at stockpiles and haul truck dumping areas.”</li> </ul> <b>Recommendation No. 6</b>  BHOP should review the Air Quality Management Plan to verify that all management measures described in the AQMP have been implemented or assessed as feasible to implement within any specified timeframes	A review of the AQMP will be conducted to verify all management measures have been implemented or a feasible to implement.	01/12/2023
7	PA 07_0018 Sch3 Cond14	<b>Lead Awareness and Public Health – Updated Human Health Risk Assessment</b>  Within one year of the commencement of operation of the project, and every five years thereafter, unless otherwise agreed by the Secretary, the Proponent shall update the human health risk assessment prepared for	<u>2020 Human Health Risk Assessment (HHRA)</u>  A Human Health Risk Assessment (HHRA) report was prepared by Tarah Hagen (MSc, DABT, RACTRA) of SLR Consulting Australia, to support BHOP’s Mod 6 application. The HHRA report is titled: “Human Health Risk	<b>Non-compliance No. 7</b>  In relation to paragraph (a) of this condition, during the audit period BHOP was unable to obtain the Secretary’s endorsement of the preparer of the December 2020 Human Health Risk Assessment report; Tarah Hagen (MSc, DABT, RACTRA), as a suitably qualified	BHO have received retrospective endorsement of Tara Hagan for the 2020 HHRA.	Complete



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		<p>the project and presented in the EA to the satisfaction of the <a href="#">Secretary</a>. The updated risk assessment shall:</p> <p>(a) be prepared by a suitably-qualified expert whose appointment has been endorsed by the <a href="#">Secretary</a>;</p> <p>(b) take into account monitoring data collected under this approval, and such other information as may be relevant to the assessment; and</p> <p>(c) <b>be prepared in consultation with the EPA and the NSW Health (Western NSW Local Health District).</b></p>	<p>Assessment for Rasp Mine, Modification 6” (SLR doc ref: 640.12028-R01-v3.0, dated 14 December 2020).</p> <p>The Overall Conclusions (section 5) of the December 2020 HHRA report were:</p> <ul style="list-style-type: none"> <li>for Lead (Pb): “Overall, BPb [blood lead] concentrations in 1-2 year old children living in Broken Hill are not anticipated to be affected by activities associated with the Proposal.”; and</li> <li>for other metals: “It is concluded the risk of exceeding health-based toxicity reference values as a result of the Proposal is very low, and cancer risks are considered negligible or acceptable. The assessment is conservative.”</li> </ul> <p>BHOP’s Mod 6 application, of which the December 2020 HHRA formed part, was approved on 16 March 2022. The Auditors consider that the Mod 6 approval is evidence of the Secretary’s satisfaction with the 2020 HHRA.</p> <p>On 24 May 2021, SLR issued an Addendum to the December 2020 HHRA (SLR doc no. 640.30198.00000-L01-v1.1-20210524), in response to (page 1): “minor changes to the project description which relate to the location and alignment of the Tails Harvesting Haul Road.”</p> <p>In the Addendum, SLR concluded (page 2): “The minor changes to the project description do not change the HHRA conclusions.”</p> <p>In relation to paragraph (a) of this</p>	<p>expert.</p> <p><b>Recommendation No. 7</b></p> <p>No action is required to rectify this non-compliance (i.e. the required endorsement was issued by the Secretary on 10 July 2023). BHOP should request and obtain the Secretary’s endorsement of the relevant expert prior to preparation of the next updated Human Health Risk Assessment.</p>		



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			<p>condition, as of 7 July 2023 (the end of the audit period), BHOP had not received the Secretary's endorsement of the preparer (Tarah Hagen) of the HHRA.</p> <p>After the end of the audit period, BHOP received an emailed letter dated 10 July 2023 from the nominee of the Planning Secretary, which endorsed the HHRA expert, 'Tanya Hagan' (letter reference: MP07_0018-PA-56).</p>																																										
8	PA 07_0018 Sch3 Cond18	<p><b>Noise and Vibration – Blasting Limits</b></p> <p>The Proponent shall ensure that blasting on the site does not cause exceedances of the criteria in Tables 8 and 9.</p> <p><i>Table 8: Blasting Criteria (excluding Block 7)</i></p> <table border="1"> <thead> <tr> <th>Location</th> <th>Airblast Overpressure (dB(Lin Peak))</th> <th>Ground Vibration (mm/s)</th> <th>* Allowable Exceedance</th> </tr> </thead> <tbody> <tr> <td>Residence on privately owned land</td> <td>115</td> <td>5</td> <td>5% of the total number of blasts over a 12-month period</td> </tr> <tr> <td>Public Infrastructure</td> <td>120</td> <td>10</td> <td>0%</td> </tr> <tr> <td>Public Infrastructure</td> <td>-</td> <td>100</td> <td>0%</td> </tr> </tbody> </table> <p><i>Table 9: Blasting Criteria (Block 7)</i></p> <table border="1"> <thead> <tr> <th>Location</th> <th>Airblast Overpressure (dB(Lin Peak))</th> <th>Ground Vibration (mm/s)</th> <th>* Allowable Exceedance</th> </tr> </thead> <tbody> <tr> <td>Residence on privately owned land</td> <td>115</td> <td>* 3 (interim)</td> <td>5% of the total number of blasts over a 12-month period</td> </tr> <tr> <td>120</td> <td>10</td> <td>0%</td> </tr> <tr> <td>Broken Hill Bowling Club, Balls (Blocks) Club, Heritage Items within CMA 7</td> <td>-</td> <td>50</td> <td>0%</td> </tr> <tr> <td>Henry's Southern Operations</td> <td>-</td> <td>100</td> <td>0%</td> </tr> <tr> <td>* Public Infrastructure</td> <td>-</td> <td>100</td> <td>0%</td> </tr> </tbody> </table> <p>These criteria do not apply if the Proponent has a written agreement with the relevant owner to exceed these criteria, and has advised the Department in writing of the terms of this agreement.</p> <p><small>Notes to Tables 8 and 9:            * The allowable exceedance must be calculated separately for development blasts and production blasts.            * The 95th percentile exceedance does not apply to production blasts until the Proponent has successfully completed a Pollution Reduction Program aimed at achieving this goal, as required by the EPA under the Proponent's LPL (PLU 12589), or an alternative agreed with the EPA.            * The interim criteria applies unless and until such time that the Proponent has written consent from the Secretary to apply site specific criteria in accordance with condition 19 of the approval, and            * The Proponent must close South Road to pedestrians if blasts are expected to exceed a peak particle velocity ground vibration of 85 mm/s at the road reserve surface, while the blast ring occurs</small></p>	Location	Airblast Overpressure (dB(Lin Peak))	Ground Vibration (mm/s)	* Allowable Exceedance	Residence on privately owned land	115	5	5% of the total number of blasts over a 12-month period	Public Infrastructure	120	10	0%	Public Infrastructure	-	100	0%	Location	Airblast Overpressure (dB(Lin Peak))	Ground Vibration (mm/s)	* Allowable Exceedance	Residence on privately owned land	115	* 3 (interim)	5% of the total number of blasts over a 12-month period	120	10	0%	Broken Hill Bowling Club, Balls (Blocks) Club, Heritage Items within CMA 7	-	50	0%	Henry's Southern Operations	-	100	0%	* Public Infrastructure	-	100	0%	<p>Blast monitoring is scheduled and conducted by personnel from BHOP's Environment Department. Personnel from BHOP's Technical Services Department are responsible for reviewing blast vibration data.</p> <p>As of July 2023, BHOP owns and maintains nine regulatory-compliance blast monitors, inclusive of six PA/EPL compliance monitors and three 'Dams Safety NSW' required monitors on the TSF2 embankments. BHOP owns and maintains one spare blast monitor and an additional five roving blast monitors. These monitors are listed in BHOP's Register of Blast Monitors (Excel spreadsheet), including calibration dates (calibration by Saros in Brisbane).</p> <p>As of July 2023, all compliance monitors are within their calibration periods.</p> <p>As evidence of calibration of blast monitors, the Auditors sighted the following calibration records for the</p>	<p><b>Non-compliance No. 8</b></p> <p>On 22 July 2022 the V4 monitor at 123 Eyre Street/Bowls Club returned a reading of 7.75mm/s as a result of blasting in Block 7, and this blast also exceeded criteria for overpressure levels resulting from blasting.</p> <p><b>Recommendation No. 8</b></p> <p>BHOP could consider the feasibility of negotiating written agreements with relevant owners to exceed relevant criteria in Tables 8 and 9 of this condition.</p>	<p>Negotiating written agreements with land owners is not a feasible action to control exceedance of blasting limits in Block 7. BHO will continue to design blasts that will not cause exceedances of PPV or relevant vibration criteria in all area of the mine.</p>	Complete
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Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
			<p>following selected blast monitors:</p> <ul style="list-style-type: none"> <li>• Saros calibration certificate issued on 14 March 2023 for Micromate serial number UM16460; and</li> <li>• Saros calibration certificate issued on 14 March 2023 for Minimate serial number BE11909.</li> </ul> <p>As of July 2023, the newer model of blast monitor, the Micromate, is used at all six compliance monitoring locations (see Photo 25).</p> <p>During the audit period, BHOP placed two additional blast monitors (rented from Saros) on the surface of TSF1 for surface blast monitoring during Mod 6 works.</p> <p>During the audit period there was no identified exceedance of the blast overpressure and vibration criteria in Table 8 of this condition (i.e. excluding Block 7).</p> <p>As reported in section 5.13 of the Annual Review 2022 (Revised), during the reporting period of 1 January 2022 to 31 December 2022:</p> <p>“In the Block 7 mining areas (excluding the Zinc Lodes), 1 production blasts was fired during the reporting period, which exceeded 3 mm/s at one of the compliance monitors. V4 123 Eyre Street/Bowls Club returned a reading of 7.75mm/s on 22 July 2022 as a result of blasting in Block 7, this blast also exceeded criteria for overpressure levels resulting from blasting. This non-compliance was reported to DPE on 5</p>			



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			<p>August 2022.”</p> <p>It was stated that since the above July 2022 blast, no blasting has occurred in Block 7.</p>			
9	PA 07_0018 Sch3 Cond21	<p><b>Soil and Water</b></p> <p>Except as may be expressly provided by an Environment Protection Licence issued under the <i>Protection of the Environment Operations Act 1997</i>, the Proponent shall comply with section 120 of that Act, which prohibits the pollution of waters.</p>	<p>Relevant BHOP personnel were aware that it is an offence under section 120 of the <i>Protection of the Environment Operations Act 1997</i> to pollute waters, except as may be expressly provided by EPL 12559.</p> <p>The <i>Protection of the Environment Operations Act 1997</i> defines “waters” as: “waters” means the whole or any part of--</p> <p>(a) any river, stream, lake, lagoon, swamp, wetlands, unconfined surface water, natural or artificial watercourse, dam or tidal waters (including the sea), or</p> <p>(b) any water stored in artificial works, any water in water mains, water pipes or water channels, or any underground or artesian water.</p> <p>BHOP’s Site Water Management Plan (SWMP) issued on 25 June 2019, acknowledges that a primary objective of the SWMP is to comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i>.</p> <p>It was stated that during rainfall, surface water management at the Rasp Mine involves the diversion of surface runoff into either the S49 Ryan Street Dam or the Horwood Dam.</p> <p>It was stated that the waterway/creek with</p>	<p><b>Non-compliance No. 9</b></p> <p>Four of the environmental incidents which occurred during the audit period (INX Nos. 7687, 7846, 8036 and 8536) are evidence that on infrequent occasions, BHOP has temporarily polluted “waters” as defined in the <i>Protection of the Environment Operations Act 1997</i> (i.e. polluted any water which may have existed in drainage channels in the vicinity of the Rasp Mine during the occurrence of these incidents, prior to BHOP’s clean-up of these channels).</p> <p><b>Recommendation No. 9</b></p> <p>BHOP should implement all reasonable and feasible measures to control and prevent off-site releases of contaminated water.</p>	<p>BHO is working to improve water retention of storages on site and implement controls that would be prevent future off-site releases, including the installation of automatic pumps in some surface water ponds and seepage interception trenches where required.</p> <p>BHO engaged WSP to conduct a review of water storages across site and make recommendations to improve water management. A PRP has been developed for the EPL to monitor progress of water management improvements.</p>	31/07/2024



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			<p>environmental value which is nearest to the Rasp Mine is Stephens Creek (located 18 km to the east of Broken Hill). No surface runoff from the Rasp Mine is known to drain into or reach Stephens Creek.</p> <p>The following off-site releases of contaminated water occurred during the audit period:</p> <ul style="list-style-type: none"> <li>• an off-site seepage of contaminated water from the S49 Ryan Street Dam which commenced on 10 March 2022 (in the previous audit period) and continued after extreme rainfall events on 16 March 2022 (72.4mm) and 26-27 April 2022 (54.8mm) (INX No. 7687);</li> <li>• off-site seepage of contaminated water from the S14 House Dam on 28 April 2022 which occurred after a heavy overnight rainfall event of 54.8mm on 26-27 April 2022 (INX No. 7846);</li> <li>• off-site seepage of contaminated water on 30 July 2022 from a failed join in the discharge pipe for the Mill Overflow Pond (INX No. 8036);</li> <li>• an off-site release of oil-contaminated water from a redundant fuel tank at the Stores lot on 31 October 2022 (INX No. 8370); and</li> <li>• an off-site release of tailings from a flow pathway in the TSF2 embankment on 24 December 2022 (INX No. 8536).</li> </ul> <p>Of the above incidents, BHOP self-reported</p>			



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			<p>incident INX Nos. 8036 and 8536 against this condition (in addition to Schedule 2, Condition 1).</p> <p>Based on an assessment of BHOP's records of the above incidents (refer to Section 4.10 of this audit period for more details), the Auditors consider that incident INX Nos. 7687 and 7846 also resulted in pollution of "waters" because these off-site releases occurred after extreme/heavy rainfall events in Broken Hill.</p>			
10	PA 07_0018 Sch3 Cond23	<p><b>Soil and Water – Water Management Plan</b></p> <p>The Proponent shall prepare and implement a Water Management Plan for the project to the satisfaction of the <a href="#">Secretary</a>. This plan must be consistent with the Stormwater Management Plan presented as Annexure K to the EA, incorporate any changes to reflect the final detailed design of the project, and be prepared in consultation with <a href="#">EPA</a>, <a href="#">DPE Water</a> and <a href="#">RR</a>. The plan must: be submitted to the <a href="#">Secretary</a> for approval by the end of June 2011, and must include:</p> <p>(a) a Site Water Balance, which must:</p> <ul style="list-style-type: none"> <li>• include details of: <ul style="list-style-type: none"> <li>o sources and security of water supply;</li> <li>o <a href="#">methods to monitor, measure and manage reporting on water take (exempt and licensable)</a>;</li> <li>o water use on site;</li> <li>o water management on site;</li> <li>o any off-site water transfers; and</li> </ul> </li> </ul>		<p><b>Non-compliance No. 10</b></p> <p>In relation to paragraph (c) of this condition:</p> <ul style="list-style-type: none"> <li>• The June 2019 Site Water Management Plan (SWMP) does not include the required baseline data on surface water flows and quality in creeks and other waterbodies that could potentially be affected by the project. Section 3.3 presents local temperature and rainfall data, but does not relate this data to the potential quantity or quality of surface water flows at the two off-site monitoring locations (i.e. upstream of Acacia Creek, and within Stephens Creek) referred to in section 8.2 (EPL monitoring points 35 and 36). It is noted that section 12.5 of the previous SWMP (Golder Associates, dated 30 April 2012, report number 097626108-007-R-Rev11) states that "catchment water quality is expected to contain concentrations of lead and other heavy metals above the conventional water quality guideline</li> </ul>	The recommendations related to this condition will be assessed and included in the next review of the Site Water Management Plan.	01/12/2023



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<ul style="list-style-type: none"> <li>• investigate and implement all reasonable and feasible measures to minimise water use by the project;</li> <li>(b) an Erosion and Sediment Control Plan, which must:               <ul style="list-style-type: none"> <li>• identify activities that could cause soil erosion, generate sediment or affect flooding;</li> <li>• describe measures to minimise soil erosion and the potential for transport of sediment to downstream waters, and manage flood risk;</li> <li>• describe the location, function and capacity of erosion and sediment control structures and flood management structures; and</li> <li>• describe what measures would be implemented to maintain the structures over time;</li> </ul> </li> <li>(c) a Surface Water Management Plan, which must include:               <ul style="list-style-type: none"> <li>• detailed baseline data on surface water flows and quality in creeks and other waterbodies that could potentially be affected by the project;</li> <li>• surface water and stream health impact assessment criteria including trigger levels for investigating any potentially adverse surface water impacts;</li> <li>• a program to monitor and assess:                   <ul style="list-style-type: none"> <li>o surface water flows and quality;</li> <li>o impacts on water users;</li> <li>o stream health;</li> </ul> </li> </ul> </li> </ul>		<p>limits...”;</p> <ul style="list-style-type: none"> <li>• The SWMP does not include surface water and stream health impact assessment criteria including trigger levels for investigating any potentially adverse surface water impacts. Section 8.4 describes contingency measures (pumping to lower the water level in Horwood Dam) if the measured water quality in Horwood Dam is considered to be a risk to the receiving environment (such as the downstream creek and Stephens Creek Reservoir), and section 10 includes a surface water quality TARP, with trigger levels referable to groundwater water quality results in August 2011 at Shaft 7. However, sections 8.4 and 10 do not define impact assessment criteria at the two off-site monitoring locations referred to in section 8.2;</li> <li>• The SWMP does not identify whether there are potential impacts of surface water flows from the site, on off-site water users, and if potential impacts are identified, include a program to monitor and assess those potential impacts. It is noted that Section 12.1 of the previous Site Water Management Plan (dated 30 April 2012, Golder Associates, report number 097626108-007-R-Rev11) stated: “It is predicted that overflows during extreme rainfall events greater than the 1 in 100 year storm event, will not directly affect the hydrology of the local catchment.”; and</li> <li>• The SWMP does not include details of</li> </ul>		



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<ul style="list-style-type: none"> <li>o channel stability; and</li> <li>• detail relocated and additional water management infrastructure required by Modification 6 including the boxcut, water storage S37, the TSF3 and “free areas”.</li> </ul> <p>(d) a Groundwater Monitoring Program, which must:</p> <ul style="list-style-type: none"> <li>• provide a program to monitor seepage movement within and adjacent to all tailings storage facilities (the TSF1, TSF2 and TSF3);</li> <li>• include details of parameters and pollutants to be monitored for:               <ul style="list-style-type: none"> <li>o water from mine dewatering;</li> <li>o groundwater locations to the east of TSF1;</li> <li>o surface water represented by Horwood Dam;</li> <li>o water captured by the toe drains of the tailings storage facility;</li> <li>o water seepage from the tailings storage facility; and</li> <li>o the background local groundwater system.</li> </ul> </li> <li>• outline performance parameters against monitoring data will be compared to determine whether seepage is occurring, and whether an unacceptable impact on local groundwater may be occurring;</li> </ul> <p>include details of contingency measures to be implemented in the event that an unacceptable impact is identified.</p>		<p>relocated and additional water management infrastructure required by Modification 6 including the boxcut, water storage S37, the TSF3 and “free areas”.</p> <p><b>Recommendation No. 10</b></p> <p>In the next revision of the Site Water Management Plan, BHOP should include additional content which addresses the requirements in paragraph (c) of this condition.</p>		
11	PA 07_0018	<b>Transport – Traffic Management Plan</b>	The Auditors consider that this condition	<b>Non-compliance No. 11</b>	BHO will revise the	01/03/2024



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Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
	Sch3 Cond29	The Proponent shall prepare and implement a traffic management plan to the satisfaction of the <a href="#">Secretary</a> . The plan shall focus on traffic management during construction of the project, and must be developed in consultation with the <a href="#">TfNSW</a> and Council. The plan must be submitted for the approval of the <a href="#">Secretary</a> prior to the commencement of construction.	<p>relates to original construction and ongoing construction of the Rasp Project (e.g. Mod 6 and Mod 10 works).</p> <p>It was stated that BHOP’s former Traffic Management Plan (TMP) dated 20 July 2011, prepared by service provider, GR Engineering Services, was removed from circulation during the audit period and is no longer in use. As of July 2023, the former TMP is no longer available on the CBH website.</p> <p>It was stated that BHOP’s current Safety Principal Hazard Management Plan – Roads or other Vehicle Operating Areas is the closest substitute for the former TMP. The scope of this Plan is limited to on-site traffic movements.</p> <p>This Plan was not prepared in consultation with TfNSW and Broken Hill City Council, and it was not submitted to the Secretary for approval prior to the commencement of Mod 6 and Mod 10 works which commenced during the audit period.</p>	<p>As of July 2023, BHOP’s Principal Hazard Management Plan – Roads or other Vehicle Operating Areas (BHO-PLN-SAF-004, Revision 5, issued 12 December 2021), has not been prepared in consultation with TfNSW and Broken Hill City Council, and has not been submitted to the Secretary for approval prior to the Mod 6 and Mod 10 works which commenced during the audit period.</p> <p><b>Recommendation No. 11</b></p> <p>In consultation with TfNSW and Broken Hill City Council, BHOP could either:</p> <ul style="list-style-type: none"> <li>• revise the Principal Hazard Management Plan – Roads or other Vehicle Operating Areas (BHO-PLN-SAF-004, Revision 5, issued 12 December 2021) to include measures to manage potential off-site impacts of on-site and off-site traffic movements, and then submit the revised Plan to the Secretary for approval; or</li> <li>• revise the former Traffic Management Plan (GR Engineering Services, 20 July 2011) to reflect current operations and construction activities, and then submit the revised Plan to the Secretary for approval.</li> </ul>	former Traffic Management Plan to describe traffic management controls for construction of the project.	
12	PA 07_0018 Sch3 Cond32	<p><b>Waste</b></p> <p>The Proponent shall:</p> <p>(a) minimise the waste generated by the project; and</p> <p>(b) ensure that the waste generated by the project is appropriately stored, handled, and disposed of,</p>	<p>Section 3.9 (Improvement Opportunities) of the Waste Management Plan refers to relatively minor impact options which BHOP “is investigating” to reduce the amount of waste it is sending to landfill. However, no actions have been implemented as of July 2023.</p> <p>The Annual Review 2022 (Revised) does</p>	<p><b>Non-compliance No. 12</b></p> <p>BHOP has not implemented any formal program during the audit period to minimise the amount of non-mineral waste generated by the Rasp Project.</p> <p><b>Recommendation No. 12</b></p> <p>BHOP could prepare a program (i.e. with</p>	BHO will implement a waste minimisation program.	31/08/2024



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		to the satisfaction of the <a href="#">Secretary</a> .	not report on any waste minimisation measures being implemented at the Rasp Mine. For example, there are no details relating to the types and amounts of non-mineral waste that were recycled.	measures, responsibilities, targets and timeframes) to minimise the amount of non-mineral waste generated by the Rasp Project, and report on the status of implementation of the program in Annual Reviews.		
13	PA 07_0018 Sch3 Cond33	<p><b>Waste</b></p> <p>The Proponent shall prepare and implement a Waste Management Plan for the project to the satisfaction of the <a href="#">Secretary</a>. This plan must:</p> <p>(a) be prepared in consultation with <a href="#">RR</a>, and submitted the <a href="#">Secretary</a> for approval by the end of March 2011; <i>[Auditor’s Note – The word “to” is missing from paragraph (a).]</i></p> <p>(b) identify the various waste streams of the project;</p> <p>(c) estimate the volumes of tailings and other waste material that would be generated by the project;</p> <p>(d) describe and justify the proposed strategy for disposing of this waste material;</p> <p>(e) describe what measures would be implemented to meet the requirements set out above in condition 32; and</p> <p>(f) include a program to monitor the effectiveness of these measures.</p>	<p>As of July 2023, BHOP’s current Waste Management Plan (WMP) (BHO-PLN-ENV-005) is Revision 5, issued 28 April 2023.</p> <p>During the audit period, BHOP also prepared a Waste Rock Management Plan (WRMP) (BHO-PLN-ENV-014), Revision 1, issued 9 February 2023. The WRMP is also called the “Waste Rock Management Strategy (WRMS)” and is required by the Resources Regulator.</p> <p>Section 1.3 of the WRMP states: “The key aim of the WRMS was to adequately address the requirements of the New South Wales Resources Regulator regarding the geochemical characterisation and management of waste material (predominantly waste rock) at Rasp Mine.”</p> <p>The Auditors consider that the WMP and WRMP together constitute the Waste Management Plan required by this condition. As of July 2023, the WRMP is not available on the CBH website.</p> <p>In site inspections during this July 2023 audit, there was evidence that BHOP is implementing the Waste Management Plan required by this condition, including the following measures:</p> <ul style="list-style-type: none"> <li>tailings were being deposited into</li> </ul>	<p><b>Non-compliance No. 13</b></p> <p>In relation to paragraph (e) of this condition, BHOP was unable to provide evidence that it has implemented ‘all’ of the measures described in section 3.6 (Monitoring) and section 3.7 (Audits) of the Waste Management Plan. For example:</p> <ul style="list-style-type: none"> <li>there was no evidence of departmental monthly inspections on waste storage, treatment and disposal (section 3.6); and</li> <li>there was no evidence of waste management inspections (section 3.7) being documented and retained on file.</li> </ul> <p><b>Recommendation No. 13</b></p> <p>BHOP should implement all of the measures described in section 3.6 (Monitoring) and section 3.7 (Audits) of the Waste Management Plan, or revise and reissue the Plan to include feasible measures.</p>	BHO will develop a waste inspection regime across site.	31/01/2024





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			<p>TSF2;</p> <ul style="list-style-type: none"> <li>• bunded areas were in use for the storage of hydrocarbon waste; and</li> <li>• waste was generally well segregated in all observed areas of the site apart from the workshop area.</li> </ul> <p>In relation to the paragraphs of this condition:</p> <p>(a) It is considered that the requirement for submission of the Waste Management Plan to the Secretary for approval by the end of March 2011 does not apply to subsequent revisions of the Waste Management Plan.</p> <p>(b) The WMP identifies the various waste streams of the project (section 3.2 with sub-sections describing streams of mineral waste, and sections 3.3 and 3.4 describing streams of non-mineral waste).</p> <p>(c) The WMP estimates the volumes of tailings and other waste material that would be generated by the project as follows:</p> <ul style="list-style-type: none"> <li>• in section 3.2.3 of the WMP, Table 3-3 summarises proposed (under EA) and actual placement of waste rock and tailings, from 2012 to the most recent period from May – December 2022 – refer to observation below;</li> <li>• section 3.2.2 estimates waste rock volumes; and</li> <li>• section 3.2.10 estimates the</li> </ul>			



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			volume of concrete waste as approximately 1 m <sup>3</sup> per day.			
14	PA 07_0018 Sch4 Cond2	<p><b>Environmental Management – Management Plan Requirements</b></p> <p>The Proponent shall ensure that the management plans required under this approval are prepared in accordance with relevant guidelines, and include:</p> <p>(a) detailed baseline data;</p> <p>(b) a description of:</p> <ul style="list-style-type: none"> <li>• the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li> <li>• any relevant limits or performance measures/criteria; and</li> <li>• 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;</li> </ul> <p>(c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;</p> <p>(d) a program to monitor and report on the:</p> <ul style="list-style-type: none"> <li>• impacts and environmental performance of the project; and</li> <li>• effectiveness of any management measures (see (c) above);</li> </ul> <p>(e) a contingency plan to manage any unpredicted impacts and their consequences;</p> <p>(f) a program to investigate and implement</p>	<p>The Environmental Management Plans (EMPs) required under this Project Approval are as follows:</p> <ul style="list-style-type: none"> <li>• Air Quality Management Plan (AQMP);</li> <li>• Community Lead Management Plan (CLMP);</li> <li>• Noise and Blasting Management Plan, which BHOP has divided into a Noise Management Plan (NMP), and a Technical Blasting Management Plan (TBMP) including a Surface Blasting Management Plan (SBMP);</li> <li>• Site Water Management Plan (SWMP);</li> <li>• Traffic Management Plan (TMP);</li> <li>• Conservation Management Plan (CMP);</li> <li>• Waste Management Plan (WMP);</li> <li>• Rehabilitation Management Plan (RMP).</li> </ul> <p>As of July 2023, the Conservation Management Plan (under Project Approval Schedule 3, Condition 30) has not been formally issued, and hence could not be assessed for compliance against this condition.</p> <p>In relation to paragraph (a) of this condition, it is acknowledged that baseline data may not be applicable to all EMPs.</p> <p>The Auditors consider that baseline data is</p>	<p><b>Non-compliance No. 14</b></p> <p>In relation to paragraphs (a), (e) and (f) of this condition:</p> <p>(a) Not all of the relevant Environmental Management Plans (EMPs) include detailed baseline data. It was noted that the Air Quality Management Plan includes baseline air quality monitoring data updated to include Mod 6 modelling data, and section 7.2 of the Site Water Management Plan (SWMP) includes baseline data of groundwater quality.</p> <p>(e) Not all of the EMPs include a contingency plan (or any reference to a contingency plan) to manage any unpredicted impacts and their consequences. It was noted that section 7 of the Community Lead Management Plan identifies ‘contingency’ measures where air quality trends indicate an increase in lead emissions which can be attributed to the Rasp Mine, and sections 8.4 and 11.3.3 of the Site Water Management Plan include details of contingency measures in relation to water quality in Horwood Dam, and unacceptable impacts to groundwater, respectively.</p> <p>(f) None of the EMPs include information relating to programs to investigate and implement ways to improve the environmental performance of the project over time.</p>	<p>BHO will investigate the feasibility of applying for a waiver to some of the components of this condition.</p>	30/06/2024



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>ways to improve the environmental performance of the project over time;</p> <p>(g) a protocol for managing and reporting any:</p> <ul style="list-style-type: none"> <li>• incidents;</li> <li>• complaints;</li> <li>• non-compliances with the conditions of this approval and statutory requirements; and</li> <li>• exceedances of the impact assessment criteria and/or performance criteria; and</li> </ul> <p>(h) a protocol for periodic review of the plan.</p> <p><i>Note: The Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.</i></p>	<p>applicable to the following EMPs ('relevant EMPs'): Air Quality Management Plan; Community Lead Management Plan; Noise Monitoring Management Plan; Site Water Management Plan; and Conservation Management Plan.</p> <p>The Auditors consider that the EMPs in the above dot point list generally satisfy the requirements in paragraphs (b), (c), (d), (g) and (h) of this condition.</p>	<p><b>Recommendation No. 14</b></p> <p>BHOP could formally apply to the Planning Secretary for a waiver of unnecessary or unwarranted requirements specified in this condition; for example, by submitting a table/matrix of relevant Environmental Management Plans which identifies the unnecessary or unwarranted requirements for which a waiver is sought, and requesting the Secretary to approve the table/matrix.</p>		
15	PA 07_0018 Sch4 Cond4	<p><b>Environmental Management – Revision of Strategies, Plans &amp; Programs</b></p> <p>Within three 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 <b>Conditions 7 – 8A below</b>;</p> <p>(d) any modification of the conditions of this approval (unless the conditions require otherwise), <b>or</b></p> <p>(e) <b>a direction of the Secretary under Condition 2 of Schedule 2.</b></p> <p>the Proponent shall review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the <b>Secretary</b>.</p>		<p><b>Non-compliance No. 15</b></p> <p>BHOP did not comply with the 'within three months' requirement in this condition on several occasions during the audit period. Document control information (i.e. version history) in BHOP's strategies, plans and programs does not indicate whether the document was reviewed after each scenario in paragraphs (a) to (e) of this condition.</p> <p><b>Recommendation No. 15</b></p> <p>On the cover or second page of each strategy, plan and program required under this Project Approval, BHOP could insert a 'Review Table' or 'Document History Table' which includes the following details: a) date of review; b) name of reviewer; c) outcome of the review (i.e. 'revisions required' or 'no revisions required'); and d) in the case of</p>	<p>BHO will review strategies, management plans and strategies as outlined in this condition. Revision history tables have been included in Management Plans and Strategies.</p>	1/12/2023



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		<p>Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted to the Secretary for approval, unless otherwise agreed with the Secretary.</p> <p><i>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the project.</i></p>		<p>revisions being required, the date of submission of the relevant revised document to the Secretary.</p>		
16	PA 07_0018 Sch4 Cond9	<p><b>Access to Information</b></p> <p>From the end of March 2011 until the completion of all rehabilitation required under this approval, the Proponent shall:</p> <p>(a) make copies of the following information and documents (as they are obtained, approved or as otherwise stipulated within the conditions of this approval) publicly available on its website:</p> <ul style="list-style-type: none"> <li>• the documents referred to in Condition 2 of Schedule 2;</li> <li>• all current statutory approvals for the project;</li> <li>• all approved strategies, plans and programs required under the conditions of this approval;</li> <li>• the proposed staging plans for the project if the construction, operation or decommissioning of the project is to be staged;</li> <li>• regular reporting on the environmental performance of the project in accordance with the reporting requirements in any plans or programs approved under</li> </ul>	<p>It was stated that BHOP will upload the Annual Review 2022 (Revised) to the CBH website after the Planning Secretary has approved that document.</p> <p>Section 4 (Operations Summary) of the Annual Review 2022 (Revised) includes a summary of the current phase and progress of the project.</p> <p>As of July 2023, the majority of documents which this condition requires to be publicly available on the CBH website were on the CBH website.</p>	<p><b>Non-compliance No. 16</b></p> <p>As of July 2023, the following documents which this condition requires to be publicly available on the CBH website were not on the CBH website:</p> <ul style="list-style-type: none"> <li>• Surface Blasting Management Plan (BHO-PLN-MIN-016) which forms part of the Technical Blasting Management Plan (BHO-PLN-MIN-002);</li> <li>• Waste Rock Management Plan (BHO-PLN-ENV-014) which relates to Project Approval Schedule 3, Condition 33(d);</li> <li>• Traffic Management Plan (none presently exists); and</li> <li>• Conservation Management Plan (only a draft version issued in September 2015 exists).</li> </ul> <p><b>Recommendation No. 16</b></p> <p>BHOP should upload the Surface Blasting Management Plan and Waste Rock Management Plan to the CBH website, and issue and upload a Traffic Management Plan and Conservation Management Plan to the</p>	<p>Listed Management Plans will be uploaded to the CBH website following review triggered by the issuing of this audit report.</p>	31/12/2023



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>the conditions of this approval;</p> <ul style="list-style-type: none"> <li>• the monitoring results of the project, reported in accordance with the specifications in any conditions of this approval, or any approved plans or programs;</li> <li>• a summary of the current phase and progress of the project;</li> <li>• contact details to enquire about the project or to make a complaint;</li> <li>• a complaints register, updated on a monthly basis;</li> <li>• the annual reviews of the project;</li> <li>• any independent environmental audit of the project, and the Proponent's response to the recommendations in any audit; and</li> <li>• any other matter required by the Secretary;</li> </ul> <p>(b) keep this information up-to-date, to the satisfaction of the Secretary.</p>		<p>CBH website.</p>		



An independent audit covering the period from 12 March 2022 to 7 July 2023 was conducted for Project Approval 07\_0018 MOD10 in July 2023. The actions and timeframes to address observations identified in the audit are addressed in the following tables.

**Non-compliances**

Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
1	PA 07_0018 Sch2 Cond1	<b>Obligation to minimise harm to the environment</b>  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.		<b>Observation No. 1</b>  BHOP should review and update the circa 2010 Environmental Risk Register referenced in Appendix C of the Environmental Management Strategy, to enable BHOP to identify, prioritise and control significant environmental risks under current operations. BHOP's could potentially use its current health and safety risk assessment as a template.	Environmental Risk Register will be reviewed.	31/01/2024
2	PA 07_0018 Sch2 Cond10	<b>Operation of Plant and Equipment</b>  The Proponent shall ensure that all the plant and equipment used on site, or to transport materials to and from the site, is: (a) maintained in a proper and efficient condition; and  (b) operated in a proper and efficient manner.		<b>Observation No. 2</b>  To help ensure effective containment of uncontrolled releases outside of containment structures, BHOP could maintain a suitable inventory of large absorbent booms.	Absorbent socks are available in multiple locations across site, in spill kits. BHO will confirm these items are store stock and available readily. BHO is currently investigating potential inventory of booms.	31/12/2023
3	PA 07_0018 Sch2 Cond10	<b>Operation of Plant and Equipment</b>  The Proponent shall ensure that all the plant and equipment used on site, or to transport materials to and from the site, is: (a) maintained in a proper and efficient condition; and  (b) operated in a proper and efficient	During this July 2023 audit, the only environmental monitoring equipment assets which were retrievable in Pronto were the TEOM1 and TEOM2 units (i.e. unchanged from the March 2022 audit). It was stated that during the audit period, environmental monitoring equipment has been assigned priority '1' (i.e. immediate) in Pronto. However,	<b>Observation No. 3</b>  To facilitate scheduling for maintenance of environmental assets (e.g. monitoring equipment) and assigning priority status for repair and replacement, BHOP could include all relevant environmental assets in Pronto.	Maintenance of environmental monitoring equipment, with exception of air-conditioning units on the TEOMs is performed by external contractors, and managed by the	N/a



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		manner.	<p>during this July 2023 audit, maintenance of the TEOM units was observed to have priority '3' (i.e. within 7 days).</p> <p>The Auditors consider that the TSF2 seepage incident of 24 December 2022 (INX No. 8635) could not have reasonably been prevented by BHOP (e.g. TSF2 had received a Risk Report for Dam Break from TSF2 Blackwood Pit from WSP Golder on 21 December 2022), and hence is not a non-compliance against this condition.</p>		environmental department, independently of the surface maintenance department. Calibration and maintenance records are stored and tracked in INX; BHO will not take any further action related to this observation.	
4	PA 07_0018 Sch2 Cond10	<p><b>Operation of Plant and Equipment</b></p> <p>The Proponent shall ensure that all the plant and equipment used on site, or to transport materials to and from the site, is:</p> <p>(a) maintained in a proper and efficient condition; and</p> <p>(b) operated in a proper and efficient manner.</p>	<p>During this July 2023 audit, the only environmental monitoring equipment assets which were retrievable in Pronto were the TEOM1 and TEOM2 units (i.e. unchanged from the March 2022 audit). It was stated that during the audit period, environmental monitoring equipment has been assigned priority '1' (i.e. immediate) in Pronto. However, during this July 2023 audit, maintenance of the TEOM units was observed to have priority '3' (i.e. within 7 days).</p> <p>The Auditors consider that the TSF2 seepage incident of 24 December 2022 (INX No. 8635) could not have reasonably been prevented by BHOP (e.g. TSF2 had received a Risk Report for Dam Break from TSF2 Blackwood Pit from WSP Golder on 21 December 2022), and hence is not a non-compliance against this condition.</p>	<p><b>Observation No. 4</b></p> <p>To improve the ongoing status of compliance with monitoring requirements of the Project Approval and EPL 12559, the maintenance, repair and replacement of environmental monitoring equipment could be assigned a priority '1' status in Pronto.</p>	Maintenance and repair of environmental monitoring equipment, with exception of air-conditioning units on the TEOMs is performed by external contractors, and managed by the environmental department, independently of the surface maintenance department. Response to events such as power outage at monitoring location is assigned a priority 1 status, second only to matters regarding safety of workers; BHO will not take any further action related to this observation.	N/a



**Broken Hill Operations Pty Ltd - Rasp Mine  
2023 Independent Environmental Audit – Action Plan**

Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
5	PA 07_0018 Sch2 Cond10	<p><b>Operation of Plant and Equipment</b></p> <p>The Proponent shall ensure that all the plant and equipment used on site, or to transport materials to and from the site, is:</p> <p>(a) maintained in a proper and efficient condition; and</p> <p>(b) operated in a proper and efficient manner.</p>	<p>In site inspections during this July 2023 audit, the Auditors observed a high standard of housekeeping (i.e. storage and cleanliness) in all Rasp Mine areas except the workshop area. The observed standard of housekeeping in the workshop area was barely adequate (see Photos 13 and 14). It was stated that as of July 2023, the workshop was short-staffed.</p> <p>It was stated that workshop weekly inspections are completed. However, during this July 2023 audit, BHOP was unable to provide evidence of completed inspection forms or Pronto records for workshop inspections during the audit period.</p> <p>It was stated that there is no requirement in the Pronto system to attach an inspection checklist or refer to a checklist reference number, before recording that an inspection has been completed.</p>	<p><b>Observation No. 5</b></p> <p>BHOP’s management could conduct unannounced inspections of the workshop area, to monitor and help improve the standard of housekeeping including segregation of waste, and proper storage of equipment (e.g. hand tools, harnesses, chains).</p>	<p>BHO Maintenance department will explore ways in which they can improve the housekeeping in the workshop.</p>	31/01/2024
6	PA 07_0018 Sch2 Cond10	<p><b>Operation of Plant and Equipment</b></p> <p>The Proponent shall ensure that all the plant and equipment used on site, or to transport materials to and from the site, is:</p> <p>(a) maintained in a proper and efficient condition; and</p> <p>(b) operated in a proper and efficient manner.</p>	<p>In relation to proper and efficient maintenance of plant and equipment on site, the Auditors sighted completed “Blackwood Pit TSF Daily Inspection Checklist” (BHO-CKL-MET-022, Revision 4, issued 20 January 2023) for selected dates of 1 April 2023 and 7 July 2023.</p> <p>In relation to proper and efficient transportation of concentrate off-site, the Auditors sighted examples of completed “Container Damage Checklist” (BHO-CKL-MET-XXX, Revision 3, issued 1 October 2021) forms dated 17 April 2023 (Pb container 1310) and 1 May 2023 (Pb</p>	<p><b>Observation No. 6</b></p> <p>BHOP could consider the feasibility of recording completed site inspections (including workshop inspections) into Pronto by:</p> <ul style="list-style-type: none"> <li>• using an electronic checklist on a tablet or other device instead of using hard copy checklists; or</li> <li>• requiring hard copy inspection checklists to either be attached or referenced (e.g. by a unique checklist number) in Pronto.</li> </ul>	<p>BHO Maintenance Department will explore the feasibility of digitizing checklists and inspections.</p>	31/01/2024





**Broken Hill Operations Pty Ltd - Rasp Mine  
2023 Independent Environmental Audit – Action Plan**

Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
			containers 7780 and 8527), in relation to inspections of loaded concentrate containers used in transport off-site.			
7	PA 07_0018 Sch2 Cond10	<p><b>Operation of Plant and Equipment</b></p> <p>The Proponent shall ensure that all the plant and equipment used on site, or to transport materials to and from the site, is:</p> <p>(a) maintained in a proper and efficient condition; and</p> <p>(b) operated in a proper and efficient manner.</p>	<p>In relation to proper and efficient maintenance of plant and equipment on site, the Auditors sighted completed “Blackwood Pit TSF Daily Inspection Checklist” (BHO-CKL-MET-022, Revision 4, issued 20 January 2023) for selected dates of 1 April 2023 and 7 July 2023.</p> <p>In relation to proper and efficient transportation of concentrate off-site, the Auditors sighted examples of completed “Container Damage Checklist” (BHO-CKL-MET-XXX, Revision 3, issued 1 October 2021) forms dated 17 April 2023 (Pb container 1310) and 1 May 2023 (Pb containers 7780 and 8527), in relation to inspections of loaded concentrate containers used in transport off-site.</p>	<p><b>Observation No. 7</b> – If BHOP continues to use hard copy site inspection (including workshop inspection) forms, BHOP could investigate the feasibility of scanning and entering completed forms into Pronto:</p> <ul style="list-style-type: none"> <li>to facilitate ease of reference in tracking relevant work orders from the date of inspection (as distinct from date of entry into Pronto) to date of completion; and</li> <li>as a back-up measure in the event that the original completed hard-copy forms are mislaid.</li> </ul>	Following investigation into observation 6 BHO Maintenance Department will assess whether scanning hard copy inspections into Pronto is required.	31/03/2024
8	PA 07_0018 Sch4 Cond2	<p><b>Air Quality and Greenhouse Gas – Greenhouse Gas Emissions</b></p> <p>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 <a href="#">Secretary</a>.</p>	<p>It was stated that the primary consumers of energy at the operation include: a) electricity for the process plant; b) electricity for vent fans; and c) diesel consumed by the mining fleet.</p> <p>Electricity utilised by BHOP at the Rasp Mine is sourced from the state electricity network/grid (the supplier is Essential Energy). As of July 2023, it could not be verified what percentage (if any) of BHOP’s energy consumption on site is derived from renewable sources.</p> <p>As of July 2023, BHOP has no formal ongoing program for the improvement of</p>	<p><b>Observation No. 8</b></p> <p>BHOP could consider the feasibility of implementing site-generated energy sources; for example, solar panels and battery storage to provide backup power in the event of interruptions to externally supplied electricity, which could reduce the risk of non-compliances against the Project Approval due to non-functioning monitoring equipment.</p>	BHO is currently exploring the option of a future site energy efficiency audit; part of this process will include investigation into the feasibility of on-site energy generation.	31/12/2024



**Broken Hill Operations Pty Ltd - Rasp Mine  
2023 Independent Environmental Audit – Action Plan**

Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
			energy efficiency, reduced energy use or greenhouse abatement.			
9	PA 07_0018 Sch3 Cond2	<b>Air Quality and Greenhouse Gas – Greenhouse Gas Emissions</b>  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 <a href="#">Secretary</a> .	Greenhouse emissions for the operation are reported in the annual National Pollutant Inventory (NPI) which is submitted to the EPA and in annual NGERs reports which are submitted to the Australian Government’s Clean Energy Regulator.  The Auditors sighted BHOP’s NPI Report for 21/22 as submitted to the EPA via <i>eConnect EPA</i> on 28 September 2022, and CBH’s NGERs report for the reporting period 2021-2022 as submitted to the Clean Energy Regulator on 26 October 2022.	<b>Observation No. 9</b>  BHOP could consider the feasibility of benchmarking its emissions data (per tonne of concentrate) against other lead/zinc/silver mining operations, to potentially identify industry best practice and realise energy efficiency gains.	BHO will investigate the feasibility as part of the energy efficiency audit.	31/12/2024
10	PA 07_0018 Sch3 Cond2	<b>Air Quality and Greenhouse Gas – Greenhouse Gas Emissions</b>  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 <a href="#">Secretary</a> .	As of July 2023: <ul style="list-style-type: none"> <li>no formal or informal voluntary greenhouse gas emissions reduction program had been developed or implemented at the Rasp Mine;</li> <li>no known energy audits have been completed to identify actual and potential reduction programs and opportunities available to BHOP; and</li> <li>the Secretary had not prescribed any requirements in relation to minimising the release of greenhouse gas emissions from the Rasp Mine.</li> </ul>	<b>Observation No. 10</b>  BHOP could develop and implement a suitable greenhouse gas emissions reduction program, inclusive of formal programs for greenhouse gas reduction and improved energy efficiency.	BHO is currently exploring the option of a future site energy efficiency audit, part of this process will include investigation into the feasibility of on-site energy generation.	31/12/2024
11	PA 07_0018 Sch3 Cond2	<b>Air Quality and Greenhouse Gas – Greenhouse Gas Emissions</b>  The Proponent shall implement all reasonable and feasible measures to	As of July 2023: <ul style="list-style-type: none"> <li>no formal or informal voluntary greenhouse gas emissions reduction program had been developed or</li> </ul>	<b>Observation No. 11</b>  BHOP could commission an independent energy audit of the project to: a) identify opportunities for reductions in greenhouse	BHO is currently exploring the option of a future site energy efficiency audit, part of	31/12/2024



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required																													
		minimise the release of greenhouse gas emissions from the site to the satisfaction of the Secretary.	<p>implemented at the Rasp Mine;</p> <ul style="list-style-type: none"> <li>no known energy audits have been completed to identify actual and potential reduction programs and opportunities available to BHOP; and</li> <li>the Secretary had not prescribed any requirements in relation to minimising the release of greenhouse gas emissions from the Rasp Mine.</li> </ul>	gas emissions; b) identify opportunities for improvement in energy efficiency; c) identify opportunities for energy cost savings; and d) provide information to BHOP's parent company for sustainability reporting purposes	this process will include investigation into the feasibility of on-site energy generation.																														
12	PA 07_0018 Sch3 Cond3	<p><b>Air Quality and Greenhouse Gas – Air Quality Criteria</b></p> <p>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 cause an exceedance of the criteria listed in Tables 1, 2 or 3 at any residence on privately-owned land.</p> <p><small>Table 1: Long Term Criteria for Particulate Matter</small></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging Period</th> <th><sup>a</sup> Criterion</th> </tr> </thead> <tbody> <tr> <td>Total solid particles (TSP)</td> <td>Annual</td> <td>≤ 90 µg/m<sup>3</sup></td> </tr> <tr> <td>Particulate matter &lt; 10 µm (PM<sub>10</sub>)</td> <td>Annual</td> <td>≤ 75 µg/m<sup>3</sup></td> </tr> <tr> <td>Particulate matter &lt; 2.5 µm (PM<sub>2.5</sub>)</td> <td>Annual</td> <td>≤ 9 µg/m<sup>3</sup></td> </tr> </tbody> </table> <p><small>Table 2: Short Term Criterion for Particulate Matter</small></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging Period</th> <th><sup>a</sup> Criterion</th> </tr> </thead> <tbody> <tr> <td>Particulate matter &lt; 10 µm (PM<sub>10</sub>)</td> <td>24 hour</td> <td>≤ 50 µg/m<sup>3</sup></td> </tr> <tr> <td>Particulate matter &lt; 2.5 µm (PM<sub>2.5</sub>)</td> <td>24 hour</td> <td>≤ 75 µg/m<sup>3</sup></td> </tr> </tbody> </table> <p><small>Table 3: Long Term Criteria for Deposited Dust</small></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging Period</th> <th>Maximum Project Contribution</th> <th>Maximum Total Deposited Dust Level</th> </tr> </thead> <tbody> <tr> <td><sup>b</sup> Deposited dust</td> <td>Annual</td> <td>≤ 2 g/m<sup>2</sup>/month</td> <td>≤ 4 g/m<sup>2</sup>/month</td> </tr> </tbody> </table> <p><small>Notes to Tables 1-3:</small></p> <ul style="list-style-type: none"> <li><sup>a</sup> Total impact (i.e. incremental increase in concentrations due to the project plus background concentrations due to all other sources).</li> <li><sup>b</sup> Incremental impact (i.e. incremental increase in concentrations due to the project on its own).</li> <li><sup>c</sup> Deposited dust is to be assessed as moisture solids as defined by Standards Australia, AS/NZS 3566.10.1:2002 Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method.</li> <li><sup>d</sup> Excludes extraordinary events such as bushfires, prescribed burning, dust storms, fire incidents, illegal activities or any other activity agreed by the Secretary in consultation with EPA.</li> </ul>	Pollutant	Averaging Period	<sup>a</sup> Criterion	Total solid particles (TSP)	Annual	≤ 90 µg/m <sup>3</sup>	Particulate matter < 10 µm (PM <sub>10</sub> )	Annual	≤ 75 µg/m <sup>3</sup>	Particulate matter < 2.5 µm (PM <sub>2.5</sub> )	Annual	≤ 9 µg/m <sup>3</sup>	Pollutant	Averaging Period	<sup>a</sup> Criterion	Particulate matter < 10 µm (PM <sub>10</sub> )	24 hour	≤ 50 µg/m <sup>3</sup>	Particulate matter < 2.5 µm (PM <sub>2.5</sub> )	24 hour	≤ 75 µg/m <sup>3</sup>	Pollutant	Averaging Period	Maximum Project Contribution	Maximum Total Deposited Dust Level	<sup>b</sup> Deposited dust	Annual	≤ 2 g/m <sup>2</sup> /month	≤ 4 g/m <sup>2</sup> /month		<p><b>Observation No. 12</b></p> <p>BHOP could add the October 2022 Monthly Environment Monitoring Report to the CBH website. As of July 2023, this Report is missing from the website.</p>	This report has been uploaded to the CBH website.	Complete
Pollutant	Averaging Period	<sup>a</sup> Criterion																																	
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<sup>b</sup> Deposited dust	Annual	≤ 2 g/m <sup>2</sup> /month	≤ 4 g/m <sup>2</sup> /month																																
13	PA 07_0018 Sch3 Cond5	<p><b>Air Quality and Greenhouse Gas – Operating Conditions</b></p> <p>The Proponent shall:</p>	Table 5 in the AQMP is an Air Quality Aspects Register, with Particulate Emission Risk Rankings and Management Strategies/Control Actions. Examples of	<p><b>Observation No. 13</b></p> <p>BHOP should update Table 5 in the Air Quality Management Plan (e.g. Crusher</p>	The aforementioned controls will be added to Table 5 of the AQMP	1/12/2023																													



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		(a) implement best practice dust management, including all reasonable and feasible measures to minimise dust emissions, including point source and fugitive emissions; (b) minimise any visible off-site dust generated by the project or the site; and (c) regularly assess real-time air quality monitoring and meteorological forecasting data and relocate, modify and/ or suspend operations to ensure compliance with the relevant conditions of this approval,  to the satisfaction of the <a href="#">Secretary</a> .	practices implemented by BHOP to comply with paragraphs (a) and (b) of this condition and which are referred to in Table 5 include: <ul style="list-style-type: none"> <li>• application of chemical dust suppressant on 'Free Areas' (see Photo 15);</li> <li>• a street sweeper is used to keep roads clean and limit silt loadings (see Photo 16);</li> <li>• concentrate is loaded into sealed containers within an enclosed structure; and</li> <li>• crushing is carried out in a permanent full enclosure under negative pressure vented to a Baghouse.</li> </ul>	Circuit, to include the Sintrol monitor as a current control) to ensure the table includes all relevant current controls for each aspect.	in the next review.	
14	PA 07_0018 Sch3 Cond5	<b>Air Quality and Greenhouse Gas – Operating Conditions</b>  The Proponent shall: <ul style="list-style-type: none"> <li>(a) implement best practice dust management, including all reasonable and feasible measures to minimise dust emissions, including point source and fugitive emissions;</li> <li>(b) minimise any visible off-site dust generated by the project or the site; and</li> <li>(c) regularly assess real-time air quality monitoring and meteorological forecasting data and relocate, modify and/ or suspend operations to ensure compliance with the relevant conditions of this approval,</li> </ul> to the satisfaction of the <a href="#">Secretary</a> .	Section 11 of the AQMP defines Trigger Action Response Plans (TARPs) for various aspects inclusive of "Wind Speed", "Monitor Failure", "Weather Forecasting", "Fugitive Dust", and "Measured Dust (determined to be from TSF)". These aspects are the same as in the previous 25 June 2019 version of the AQMP.	<b>Observation No. 14</b>  BHOP could review Section 11 of the Air Quality Management Plan to include more specific/additional aspects (e.g. Sintrol monitor failure on the Baghouse Stack) and ensure the described triggers are consistent with BHOP's recently issued Trigger Action Response Plans (e.g. the Extreme Weather TARP, issued 28 June 2023).	Section 11 will be revised to ensure that the AQMP is consistent with new relevant TARPS.	1/12/2023



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required																										
15	PA 07_0018 Sch3 Cond6	<p><b>Air Quality and Greenhouse Gas – Operating Conditions</b></p> <p>The Proponent shall seal and maintain the roads listed in Table 6 to the satisfaction of the <b>Secretary</b>. The roads shall be sealed prior to the commencement of ore extraction, unless otherwise agreed by the <b>Secretary</b>.</p> <p><small>Table 6: Roads to be Sealed and Maintained</small></p> <table border="1"> <thead> <tr> <th>Road Status</th> <th>Road</th> <th>Approximate Length (m)</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Existing</td> <td>Front gate to truck wash</td> <td>292</td> </tr> <tr> <td>'Diamond' intersection to core shed</td> <td>300</td> </tr> <tr> <td>Front gate road to car park</td> <td>132</td> </tr> <tr> <td rowspan="5">New</td> <td>Truck wash to haul road connection from Kintoro Pit</td> <td>690</td> </tr> <tr> <td>Kintoro Pit intersection (truck wash and haul roads) to ROM pad (haul road for ore mine trucks)</td> <td>1,186</td> </tr> <tr> <td>Altered ROM pad to and through mill</td> <td>384</td> </tr> <tr> <td>Mill to rail load out (concentrate trucks)</td> <td>910</td> </tr> <tr> <td>Truck wash road to workshop</td> <td>190</td> </tr> <tr> <td rowspan="2">Modification 6</td> <td>Haul road for transportation of leached tailings from TSF 2 to TSF 3</td> <td>2,200</td> </tr> <tr> <td>Old haul road from the new port (Modification 6) to the Run of Mill Pad</td> <td>325</td> </tr> </tbody> </table>	Road Status	Road	Approximate Length (m)	Existing	Front gate to truck wash	292	'Diamond' intersection to core shed	300	Front gate road to car park	132	New	Truck wash to haul road connection from Kintoro Pit	690	Kintoro Pit intersection (truck wash and haul roads) to ROM pad (haul road for ore mine trucks)	1,186	Altered ROM pad to and through mill	384	Mill to rail load out (concentrate trucks)	910	Truck wash road to workshop	190	Modification 6	Haul road for transportation of leached tailings from TSF 2 to TSF 3	2,200	Old haul road from the new port (Modification 6) to the Run of Mill Pad	325	<p>As of July 2023, the roads described in Table 6 for Modification 6 have not yet been constructed.</p> <p>All of the other roads described in Table 6 of this condition were sealed prior to the commencement of ore extraction in 2012. Other than repairs as required, no resealing of roads occurred during the audit period.</p> <p>In site inspections during this July 2023 audit, the Auditors observed that the general condition of some sections of sealed roads is adequate. However, the sealed road from the mill to the rail load out area showed: a) a thick layer of dirt on parts of the road surface (see Photo 20); and b) heavy vehicle tyre tracks off the narrow sealed surface, on corners (see Photo 21).</p>	<p><b>Observation No. 15</b></p> <p>BHOP should prioritise the repair, resealing and possible widening (as required) of the sealed roads identified in Table 6 of this condition, potentially in conjunction with Mod 6 works, to minimise potential dust emissions from these roads arising from vehicle movements and/or high winds.</p>	<p>A review of road maintenance requirements will be conducted and incorporate requirements of MOD6.</p>	30/06/2024
Road Status	Road	Approximate Length (m)																														
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	Altered ROM pad to and through mill	384																														
	Mill to rail load out (concentrate trucks)	910																														
	Truck wash road to workshop	190																														
Modification 6	Haul road for transportation of leached tailings from TSF 2 to TSF 3	2,200																														
	Old haul road from the new port (Modification 6) to the Run of Mill Pad	325																														
16	PA 07_0018 Sch3 Cond6	<p><b>Air Quality and Greenhouse Gas – Operating Conditions</b></p> <p>The Proponent shall seal and maintain the roads listed in Table 6 to the satisfaction of the <b>Secretary</b>. The roads shall be sealed prior to the commencement of ore extraction, unless otherwise agreed by the <b>Secretary</b>.</p>	<p>As of July 2023, the roads described in Table 6 for Modification 6 have not yet been constructed.</p> <p>All of the other roads described in Table 6 of this condition were sealed prior to the commencement of ore extraction in 2012. Other than repairs as required, no resealing of roads occurred during the audit period.</p> <p>In site inspections during this July 2023 audit, the Auditors observed that the general condition of some sections of sealed roads is adequate. However, the sealed road from the mill to the rail load</p>	<p><b>Observation No. 16</b></p> <p>BHOP could implement a scheduled roads maintenance program to remove dirt and debris from sealed road surfaces.</p>	<p>A street sweeper routinely visits site, operating for 12 hours a week to remove dirt and debris from roads. A review of road maintenance requirements will be conducted and incorporate requirements of MOD6..</p>	30/06/2024																										



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required																														
		<p>Table 6: Roads to be Sealed and Maintained</p> <table border="1"> <thead> <tr> <th>Road Status</th> <th>Road</th> <th>Approximate Length (m)</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Existing</td> <td>Front gate to truck wash</td> <td>292</td> </tr> <tr> <td>'Diamond' intersection to core shed</td> <td>300</td> </tr> <tr> <td>Front gate road to car park</td> <td>132</td> </tr> <tr> <td rowspan="5">New</td> <td>Truck wash to haul road connection from Kintoro Pit</td> <td>890</td> </tr> <tr> <td>Kintoro Pit intersection (truck wash and haul roads) to ROM pad (haul road for ore mine trucks)</td> <td>1,186</td> </tr> <tr> <td>Approved ROM pad to and through mill</td> <td>384</td> </tr> <tr> <td>Mill to rail load out (concentrate trucks)</td> <td>910</td> </tr> <tr> <td>Truck wash road to workshop</td> <td>190</td> </tr> <tr> <td rowspan="2">Modification 6</td> <td>Haul road to backfill plant</td> <td>400</td> </tr> <tr> <td>Haul road for transportation of harvested tailings from TSP2 to TSP3</td> <td>2,203</td> </tr> <tr> <td></td> <td></td> <td>One haul road from the new port (Modification 6) to the Run of Mine Pad</td> <td>325</td> </tr> </tbody> </table>	Road Status	Road	Approximate Length (m)	Existing	Front gate to truck wash	292	'Diamond' intersection to core shed	300	Front gate road to car park	132	New	Truck wash to haul road connection from Kintoro Pit	890	Kintoro Pit intersection (truck wash and haul roads) to ROM pad (haul road for ore mine trucks)	1,186	Approved ROM pad to and through mill	384	Mill to rail load out (concentrate trucks)	910	Truck wash road to workshop	190	Modification 6	Haul road to backfill plant	400	Haul road for transportation of harvested tailings from TSP2 to TSP3	2,203			One haul road from the new port (Modification 6) to the Run of Mine Pad	325	<p>out area showed: a) a thick layer of dirt on parts of the road surface (see Photo 20); and b) heavy vehicle tyre tracks off the narrow sealed surface, on corners (see Photo 21).</p>			
Road Status	Road	Approximate Length (m)																																		
Existing	Front gate to truck wash	292																																		
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17	PA 07_0018 Sch3 Cond7	<p><b>Air Quality and Greenhouse Gas – Operating Conditions</b></p> <p>Ore crushing shall only be undertaken in a fully-enclosed structure that is designed, operated and maintained to ensure internal negative internal air pressure relative to ambient (external) conditions. The enclosure and associated emissions controls must be designed, constructed, operated and maintained to ensure that visible fugitive emissions from the enclosure are minimised.</p>	<p>Ore crushing at the Rasp Mine occurs within a fully-enclosed structure which is designed, operated and maintained to ensure internal negative air pressure is maintained.</p> <p>It was stated that daily inspections are conducted by operators at the mill to ensure that negative air pressure is maintained within this facility. It was stated that these inspections are visual inspections only, and lids to filter bags can be opened for inspection purposes as required.</p> <p>Quarterly point source air emissions testing is conducted by service provider, Assured Environmental, at a dedicated sampling port on the emission point of the Crusher Baghouse.</p> <p>This testing regime aims to ensure that visible fugitive dust emissions from the enclosure are minimised relative to ambient (external) conditions and remain within limits defined within Table 5 in Project Approval Schedule 3, Condition 4.</p> <p>It was stated that a 'Sintrol' real-time particulates monitor was installed in the</p>	<p><b>Observation No. 17</b></p> <p>BHOP could periodically test the Crusher enclosure door to ensure the door provides a complete seal when closed.</p>	<p>BHO Maintenance Department will inspect the personnel access door to the crusher and implement corrective actions as required.</p>	31/10/2023																														



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
			<p>Crusher Baghouse emissions stack in April 2022, and was operational during the audit period.</p> <p>In site inspections during this July 2023 audit, the Auditors observed that the personnel access door to the Crusher enclosure was not fully closed within its frame, which may be evidence of a distorted frame (see Photo 22).</p>			
18	PA 07_0018 Sch3 Cond11	<p><b>Air Quality and Greenhouse Gas – Air Quality Management Plan</b></p> <p>The Proponent <b>must prepare</b> an Air Quality Management Plan for the project to the satisfaction of the <b>Secretary</b>. This plan must:</p> <p>(a) be prepared <b>by a suitably qualified and experienced person/s</b>, in consultation with <b>EPA</b> and submitted to the <b>Secretary</b> for approval prior to the commencement of construction on the site;</p> <p>(b) identify all major sources of particulates and other air pollutants that may be emitted from the project, being both point source and diffuse emissions, including identification of the potential for lead contamination to be carried by these particulates;</p> <p>(c) include an air quality monitoring program that:</p> <ul style="list-style-type: none"> <li>• <b>provides a real-time monitoring system of dust emissions around the perimeter of TSF2 that triggers an automated water spray system prior to adverse meteorological conditions occurring;</b></li> <li>• <b>is capable of measuring lead</b></li> </ul>	<p>As of July 2023, BHOP’s current Air Quality Management Plan (AQMP) (BHO-PLN-ENV-001) is Revision No. 7, issued 4 March 2022.</p> <p>Appendix E of the AQMP comprises an Air Quality Monitoring Program, dated March 2022.</p> <p>In relation to the paragraphs of this condition:</p> <p>(a) Appendix D of the AQMP reproduces email correspondence with the EPA from 3 March 2016 to 1 June 2022. The current version of the AQMP was approved by the Secretary by letter dated 5 August 2022.</p> <p>(b) Section 4.1 of the AQMP identifies pollutants that may be emitted from the project, being both point source and diffuse emissions, including identification of the potential for lead contamination to be carried by these particulates.</p> <p>(c) The Air Quality Monitoring Program (in Appendix E of the AQMP) references a number of Procedures for Air Quality Monitoring (section 8)</p>	<p><b>Observation No. 18</b></p> <p>In the next revision of the Air Quality Management Plan, BHOP could update Section 8 in Appendix E to include the names of Trigger Action Response Plans relevant to the last dot point in paragraph (c) of this condition.</p>	<p>Relevant TARPs and document numbers will be included in the next revision of the AQMP.</p>	1/12/2023



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>concentrations located in the prevailing down wind direction near the perimeter of TSF2;</p> <ul style="list-style-type: none"> <li>• provides for periodic point source monitoring at Point 1 (Ventilation Shaft) and Point 2 (Process Enclosure/ Baghouse Stack);</li> <li>• provides for continuous ambient monitoring across an ambient air quality and dust monitoring network comprising no fewer than ten monitoring locations (Points 3 to 12) for total suspended particulates, PM<sub>10</sub>, lead and dust deposition. Monitoring locations shall be informed by the outcomes of the air quality assessments presented in the EA and PPR and identified in consultation with EPA;</li> <li>• provides for continuous meteorological monitoring using a meteorological monitoring station located on the site;</li> <li>• is consistent with the requirements of <i>Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales (NSW EPA, 2022)</i>, or the latest version, the <i>Protection of the Environment Operations Act 1997</i> and the <i>Protection of the Environment (Clean Air) Regulation 2010</i>; and</li> <li>• details trigger response management protocols in combination with continuous particulate matter monitors and a meteorological monitoring station</li> </ul>	<p>and generally satisfies the dot points in paragraph (c). In relation to the last dot point in paragraph (c), section 11 of the AQMP describes Trigger Action Response Plans with mitigation measures.</p>			





Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>on-site, with clear and specific reactive mitigation measures to be implemented in accordance with the trigger response management protocol; and;</p> <p>(d) pro-active and reactive management and response mechanisms for particulates with specific reference to measures to be implemented and actions to be taken to minimise and prevent potential elevated air quality impacts (including ambient air and deposited dust impacts) on surrounding land uses as a consequence of meteorological conditions, upsets within the project, or the mode of operation of the project at any time;</p> <p>(e) procedures to review and refine the reactive management triggers for wind speed and dust concentrations;</p> <p>(f) procedures and processes for monitoring ambient dust and deposited dust impacts;</p> <p>(g) provision for regular review of dust monitoring data, with comparison of monitoring data with that assumed and predicted in the documents referred to under Condition 2 of Schedule 2;</p> <p>(h) details of measures to be implemented to address any situation in which monitored dust impacts exceed those assumed and predicted in the documents referred to under Condition 2 of Schedule 2;</p> <p>(i) specific complaints management procedures in the event that dust monitoring indicates elevated off-site impacts;</p>				



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		(j) procedures for the minimisation of dust generation on the site <b>and measures to be implemented to ensure compliance with the air quality criteria and operating conditions in this approval;</b> (k) protocols for regular maintenance of plant and equipment to minimise the potential for elevated dust generation, leaks and fugitive emissions; and (l) a contingency plan should an incident, upset or other initiating factor lead to elevated dust impacts, whether above normal operating conditions or above environmental performance goals/ limits.				
19	PA 07_0018 Sch3 Cond11	<p><b>Air Quality and Greenhouse Gas – Air Quality Management Plan</b></p> <p>The Proponent <b>must prepare</b> an Air Quality Management Plan for the project to the satisfaction of the <b>Secretary</b>. This plan must:</p> <p>(a) be prepared <b>by a suitably qualified and experienced person/s</b>, in consultation with <b>EPA</b> and submitted to the <b>Secretary</b> for approval prior to the commencement of construction on the site;</p> <p>(b) identify all major sources of particulates and other air pollutants that may be emitted from the project, being both point source and diffuse emissions, including identification of the potential for lead contamination to be carried by these particulates;</p> <p>(c) include an air quality monitoring program that:</p> <ul style="list-style-type: none"> <li>• <b>provides a real-time monitoring system of dust emissions around</b></li> </ul>	<p>(d) Table 5 (Air Quality Aspects Risk Register) in Section 4.2 of the AQMP describes the current proactive and reactive controls for 14 aspects of operations including: existing free areas, project related free areas, unsealed roads, sealed roads, and TSF wind erosion.</p> <p>Table B1 (Air Quality Controls within Rasp Mine Procedures) in Appendix B of the AQMP includes pro-active and reactive controls to manage air quality impacts from 15 aspects including: existing free areas, unsealed roads, sealed roads, ROM stockpile wind erosion, TSF wind erosion, concentrate handling, and ‘vehicle wash facilities’ (this last aspect is not listed in Table 5 of the AQMP).</p> <p>Section 6 of the AQMP lists management strategies for 15 potential air emission sources,</p>	<p><b>Observation No. 19</b></p> <p>In the next revision of the Air Quality Management Plan, BHOP could compare Table 5 and Table B1, and remove any inconsistencies between the respective ‘aspect’ descriptions and relevant controls.</p>	<p>Inconsistencies between Table 5 and Table B1 will be reviewed in the next revision of the AQMP.</p>	1/12/2023



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>the perimeter of TSF2 that triggers an automated water spray system prior to adverse meteorological conditions occurring;</p> <ul style="list-style-type: none"> <li>is capable of measuring lead concentrations located in the prevailing down wind direction near the perimeter of TSF2;</li> <li>provides for periodic point source monitoring at Point 1 (Ventilation Shaft) and Point 2 (Process Enclosure/ Baghouse Stack);</li> <li>provides for continuous ambient monitoring across an ambient air quality and dust monitoring network comprising no fewer than ten monitoring locations (Points 3 to 12) for total suspended particulates, PM<sub>10</sub>, lead and dust deposition. Monitoring locations shall be informed by the outcomes of the air quality assessments presented in the EA and PPR and identified in consultation with EPA;</li> <li>provides for continuous meteorological monitoring using a meteorological monitoring station located on the site;</li> <li>is consistent with the requirements of <i>Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales</i> (NSW EPA, 2022), or the latest version, the <i>Protection of the Environment Operations Act 1997</i> and the <i>Protection of the Environment (Clean Air) Regulation 2010</i>; and</li> </ul>	<p>including greenhouse gas management (section 6.15).</p>			



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<ul style="list-style-type: none"> <li>• details trigger response management protocols in combination with continuous particulate matter monitors and a meteorological monitoring station on-site, with clear and specific reactive mitigation measures to be implemented in accordance with the trigger response management protocol; and;</li> <li>(d) pro-active and reactive management and response mechanisms for particulates with specific reference to measures to be implemented and actions to be taken to minimise and prevent potential elevated air quality impacts (including ambient air and deposited dust impacts) on surrounding land uses as a consequence of meteorological conditions, upsets within the project, or the mode of operation of the project at any time;</li> <li>(e) procedures to review and refine the reactive management triggers for wind speed and dust concentrations;</li> <li>(f) procedures and processes for monitoring ambient dust and deposited dust impacts;</li> <li>(g) provision for regular review of dust monitoring data, with comparison of monitoring data with that assumed and predicted in the documents referred to under Condition 2 of Schedule 2;</li> <li>(h) details of measures to be implemented to address any situation in which monitored dust impacts exceed those assumed and predicted in the documents referred to under</li> </ul>				



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		Condition 2 of Schedule 2; (i) specific complaints management procedures in the event that dust monitoring indicates elevated off-site impacts; (j) procedures for the minimisation of dust generation on the site <b>and measures to be implemented to ensure compliance with the air quality criteria and operating conditions in this approval</b> ; (k) protocols for regular maintenance of plant and equipment to minimise the potential for elevated dust generation, leaks and fugitive emissions; and (l) a contingency plan should an incident, upset or other initiating factor lead to elevated dust impacts, whether above normal operating conditions or above environmental performance goals/ limits.				
20	PA 07_0018 Sch3 Cond11	<b>Air Quality and Greenhouse Gas – Air Quality Management Plan</b>  The Proponent <b>must prepare</b> an Air Quality Management Plan for the project to the satisfaction of the <b>Secretary</b> . This plan must: (a) be prepared <b>by a suitably qualified and experienced person/s</b> , in consultation with <b>EPA</b> and submitted to the <b>Secretary</b> for approval prior to the commencement of construction on the site; (b) identify all major sources of particulates and other air pollutants that may be emitted from the project, being both point source and diffuse emissions, including identification of the potential for lead contamination to be carried by	(d) Table 5 (Air Quality Aspects Risk Register) in Section 4.2 of the AQMP describes the current proactive and reactive controls for 14 aspects of operations including: existing free areas, project related free areas, unsealed roads, sealed roads, and TSF wind erosion.  Table B1 (Air Quality Controls within Rasp Mine Procedures) in Appendix B of the AQMP includes pro-active and reactive controls to manage air quality impacts from 15 aspects including: existing free areas, unsealed roads, sealed roads, ROM stockpile wind erosion, TSF wind erosion, concentrate handling, and ‘vehicle wash facilities’ (this last aspect is not	<b>Observation No. 20</b>  In the next revision of the Air Quality Management Plan, BHOP should revise Table 5 to identify whether the current controls reduce residual risk to ‘As Low As Reasonably Practicable’ (ALARP).	Table 5 of the AQMP will be revised in the next revision of the AQMP.	1/12/2023



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>these particulates;</p> <p>(c) include an air quality monitoring program that:</p> <ul style="list-style-type: none"> <li>provides a real-time monitoring system of dust emissions around the perimeter of TSF2 that triggers an automated water spray system prior to adverse meteorological conditions occurring;</li> <li>is capable of measuring lead concentrations located in the prevailing down wind direction near the perimeter of TSF2;</li> <li>provides for periodic point source monitoring at Point 1 (Ventilation Shaft) and Point 2 (Process Enclosure/ Baghouse Stack);</li> <li>provides for continuous ambient monitoring across an ambient air quality and dust monitoring network comprising no fewer than ten monitoring locations (Points 3 to 12) for total suspended particulates, PM<sub>10</sub>, lead and dust deposition. Monitoring locations shall be informed by the outcomes of the air quality assessments presented in the EA and PPR and identified in consultation with EPA;</li> <li>provides for continuous meteorological monitoring using a meteorological monitoring station located on the site;</li> <li>is consistent with the requirements of <i>Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales</i> (NSW EPA, 2022), or the latest</li> </ul>	<p>listed in Table 5 of the AQMP).</p> <p>Section 6 of the AQMP lists management strategies for 15 potential air emission sources, including greenhouse gas management (section 6.15).</p>			



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>version, the <i>Protection of the Environment Operations Act 1997</i> and the <i>Protection of the Environment (Clean Air) Regulation 2010</i>; and</p> <ul style="list-style-type: none"> <li>• details trigger response management protocols in combination with continuous particulate matter monitors and a meteorological monitoring station on-site, with clear and specific reactive mitigation measures to be implemented in accordance with the trigger response management protocol; and;</li> </ul> <p>(d) pro-active and reactive management and response mechanisms for particulates with specific reference to measures to be implemented and actions to be taken to minimise and prevent potential elevated air quality impacts (including ambient air and deposited dust impacts) on surrounding land uses as a consequence of meteorological conditions, upsets within the project, or the mode of operation of the project at any time;</p> <p>(e) procedures to review and refine the reactive management triggers for wind speed and dust concentrations;</p> <p>(f) procedures and processes for monitoring ambient dust and deposited dust impacts;</p> <p>(g) provision for regular review of dust monitoring data, with comparison of monitoring data with that assumed and predicted in the documents referred to under Condition 2 of Schedule 2;</p>				



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>(h) details of measures to be implemented to address any situation in which monitored dust impacts exceed those assumed and predicted in the documents referred to under Condition 2 of Schedule 2;</p> <p>(i) specific complaints management procedures in the event that dust monitoring indicates elevated off-site impacts;</p> <p>(j) procedures for the minimisation of dust generation on the site and measures to be implemented to ensure compliance with the air quality criteria and operating conditions in this approval;</p> <p>(k) protocols for regular maintenance of plant and equipment to minimise the potential for elevated dust generation, leaks and fugitive emissions; and</p> <p>(l) a contingency plan should an incident, upset or other initiating factor lead to elevated dust impacts, whether above normal operating conditions or above environmental performance goals/ limits.</p>				
21	PA 07_0018 Sch3 Cond13	<p><b>Lead Awareness and Public Health – Lead Management Plan</b></p> <p>The Proponent shall prepare and implement a Lead Management Plan for the project to the satisfaction of the <a href="#">Secretary</a>. This plan must:</p> <p>(a) be prepared in consultation with the Lead Reference Group, including the NSW Department of Health (<a href="#">Western NSW Local Health District</a>) and Council;</p> <p>(b) be submitted to the <a href="#">Secretary</a> for approval by 30 June 2011;</p>	<p>As of July 2023, the current version of BHOP’s Community Lead Management Plan (CLMP) (BHO-PLN-ENV-015) is Revision 1, issued 28 April 2023.</p> <p>The Auditors consider that the CLMP is the relevant Lead Management Plan for assessment of BHOP’s compliance against this condition.</p> <p>In relation to the paragraphs of this condition:</p> <p>(a) Appendix D of the CLMP refers to</p>	<p><b>Observation No. 21</b></p> <p>BHOP should reproduce consultation correspondence with the Lead Reference Group, including the NSW Department of Health (Western NSW Local Health District) and Broken Hill City Council, in Appendix D of the Community Lead Management Plan as published on the CBH website.</p>	<p>Consultation evidence is provided in the latest revision and additional consultation will be conducted as required. Appendix D of the Community Lead Management Plan has been reinstated in the latest revision.</p>	1/12/2023





Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>(c) outline the proposed commitment towards the cost of:</p> <ul style="list-style-type: none"> <li>• public health monitoring, particularly in relation to child blood lead levels, and tracking of this data over time; and</li> <li>• public education campaigns about the health risks associated with lead, including lead hygiene, lead and children, tank water lead risks and soil lead contamination risks.</li> </ul> <p>(d) identify additional reasonable and feasible measures that could be implemented either on site or in the areas adjoining the site to minimise the potential lead impacts of the project and “free areas”;</p> <p>(e) include a program for the staged implementation of the measures identified in (d) above in the event that dust emissions are higher than predicted or the public health monitoring suggests further action is required to reduce blood lead levels in the environment surrounding the site; and</p> <p>(f) include a detailed communication strategy, that outlines how the relevant dust and blood level monitoring data would be reported on the Proponent’s website along with any relevant public education material.</p>	<p>“Lead Reference Group Consultation Response to Comments”. However, Appendix D is omitted from the version of the CLMP which is on the CBH website as of July 2023. The Auditors noted that the required evidence of consultation was reproduced in Appendix D of the previous version of the CLMP (Final v2, issued August 2016).</p> <p>Section 1.5 in the current version of the CLMP states (in part): “As per the Project Approval the CLMP must be written in consultation with the Broken Hill Lead Reference Group, including the EPA, NSW Health (Western NSW Local Health District) and Council. Evidence of correspondence with the BHLRG is provided in Appendix D. Applicable matters raised have been edited in this version of the management plan.”</p>			
22	PA 07_0018 Sch3 Cond15	<p><b>Noise and Vibration – Hours of Operation</b></p> <p><i>Unless the Secretary agrees otherwise, the Proponent must comply with the operating hours in Table 6.1.</i></p>	<p>Section 5.4 of the Mod 6 Construction Environment Management Plan is consistent with the hours of operation limits in Table 6.1, and states:</p>	<p><b>Observation No. 22</b></p> <p>Following each future Modification approval, the requirements of this condition could be proactively communicated on the CBH</p>	<p>BHO will continue to update this information on the CBH website.</p>	Complete



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		<p><small>Table 6.1: Operating Hours</small></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #cccccc;">Activity</th> <th style="background-color: #cccccc;">Hours</th> </tr> </thead> <tbody> <tr> <td style="font-size: 8px;">Mod 6 construction activities excluding new decline underground activities, and TSF3 tailings preparation works</td> <td style="font-size: 8px;">7 am to 6 pm, Monday to Saturday No activities on Sundays or public holidays</td> </tr> <tr> <td style="font-size: 8px;">Construction, excluding construction of the CCL and Mod 6 construction activities</td> <td style="font-size: 8px;">7 am to 6 pm, Monday to Friday 8 am to 1 pm, Saturday No activities on Sundays or public holidays</td> </tr> <tr> <td style="font-size: 8px;">Capping and rehabilitation of TSF 2</td> <td style="font-size: 8px;"></td> </tr> <tr> <td style="font-size: 8px;">Shunting of concentrate wagons</td> <td style="font-size: 8px;">7 am and 6 pm on any day</td> </tr> <tr> <td style="font-size: 8px;">Production rock blasting</td> <td style="font-size: 8px;">6:45 am and 7:15 pm on any day</td> </tr> <tr> <td style="font-size: 8px;">Transporting cement to the cement silo</td> <td style="font-size: 8px;">7 am to 7 pm on any day</td> </tr> <tr> <td style="font-size: 8px;">Loading the cement silo</td> <td style="font-size: 8px;"></td> </tr> </tbody> </table> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #cccccc;">Activity</th> <th style="background-color: #cccccc;">Hours</th> </tr> </thead> <tbody> <tr> <td style="font-size: 8px;">Tailings harvesting in TSF2, including emplacement in the Temporary Tailings Stockpile</td> <td style="font-size: 8px;">7 am to 7 pm on any day</td> </tr> <tr> <td style="font-size: 8px;">All other activities, including construction of the new decline (underground activities) and TSF3 tailings preparation works</td> <td style="font-size: 8px;">24 hours a day, 7 days a week</td> </tr> </tbody> </table> <p>[Auditor’s Note – The lime green text in Table 6.1 reads as follows: “Activity” – “Tailings harvesting in TSF2, including emplacement in the Temporary Tailings Stockpile”; and “Hours” – “7am to 7 pm on any day”.]</p>	Activity	Hours	Mod 6 construction activities excluding new decline underground activities, and TSF3 tailings preparation works	7 am to 6 pm, Monday to Saturday No activities on Sundays or public holidays	Construction, excluding construction of the CCL and Mod 6 construction activities	7 am to 6 pm, Monday to Friday 8 am to 1 pm, Saturday No activities on Sundays or public holidays	Capping and rehabilitation of TSF 2		Shunting of concentrate wagons	7 am and 6 pm on any day	Production rock blasting	6:45 am and 7:15 pm on any day	Transporting cement to the cement silo	7 am to 7 pm on any day	Loading the cement silo		Activity	Hours	Tailings harvesting in TSF2, including emplacement in the Temporary Tailings Stockpile	7 am to 7 pm on any day	All other activities, including construction of the new decline (underground activities) and TSF3 tailings preparation works	24 hours a day, 7 days a week	<p>“All surface works associated with the Project will be undertaken from Monday to Saturday from 07:00am to 6:00pm, there will be no work on Sundays or Public Holidays. Works inside Kintore Pit (TSF3) may be conducted 7 days per week, 24 hours per day.”</p> <p>Under item ID 2.1 (Noise) in Table 6-2 (Environmental Management Activities &amp; Controls – MOD6 Construction Works) in the Mod 6 CEMP, the persons who are responsible for ensuring compliance with the hours of operation limits are the BHOP Appointed Project Manager and the Construction Contractor.</p> <p>As of July 2023, BHOP has not sought agreement from the Secretary to vary these operating hours.</p> <p>It was noted that crushing of ore (which in Table 6.1 is included as “all other activities”) is authorised to occur 24 hours a day, 7 days a week and is not restricted to daylight hours. During the audit period, processing activities at the Rasp Mine occurred on an ‘8 days on / 6 days off’ cycle.</p> <p>The operating hours defined in Table 6.1 are available to external stakeholders via the availability of consolidated Project Approval 07_0018 on the CBH website.</p>	<p>website, to allow these requirements to be known and understood by the community (i.e. in addition to being available via Table 6.1 in the Project Approval).</p>		
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Construction, excluding construction of the CCL and Mod 6 construction activities	7 am to 6 pm, Monday to Friday 8 am to 1 pm, Saturday No activities on Sundays or public holidays																											
Capping and rehabilitation of TSF 2																												
Shunting of concentrate wagons	7 am and 6 pm on any day																											
Production rock blasting	6:45 am and 7:15 pm on any day																											
Transporting cement to the cement silo	7 am to 7 pm on any day																											
Loading the cement silo																												
Activity	Hours																											
Tailings harvesting in TSF2, including emplacement in the Temporary Tailings Stockpile	7 am to 7 pm on any day																											
All other activities, including construction of the new decline (underground activities) and TSF3 tailings preparation works	24 hours a day, 7 days a week																											
23	PA 07_0018 Sch3 Cond17	<b>Noise and Vibration – Noise Limits</b> The Proponent shall ensure that the noise	<u>Noise monitoring by consultant</u> During the audit period, one	<b>Observation No. 23</b> BHOP could ensure that: a) attended noise	A “constant hum of processing plant” is	31/10/2023																						



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required																																																												
		<p>generated by the project does not exceed the criteria in Table 7 <b>except as otherwise permitted under conditions 17B and 17D below.</b></p> <p style="font-size: small;">Table 7: Operational Noise Criteria</p> <table border="1" style="font-size: x-small;"> <thead> <tr> <th>Location</th> <th>* Day (dB(A))</th> <th>** Evening (dB(A))</th> <th>* Night (dB(A))</th> </tr> </thead> <tbody> <tr><td>A1 – Piper Street North</td><td>40</td><td>37</td><td>35</td></tr> <tr><td>A2 – Piper Street Central</td><td>40</td><td>37</td><td>35</td></tr> <tr><td>A3 – Eyre Street North</td><td>44</td><td>41</td><td>39</td></tr> <tr><td>A4 – Eyre Street Central</td><td>44</td><td>41</td><td>39</td></tr> <tr><td>A5 – Eyre Street South</td><td>44</td><td>41</td><td>39</td></tr> <tr><td>A6 – Henaostra and Cyprium Streets</td><td>48</td><td>41</td><td>39</td></tr> <tr><td>A7 – Carbon Street</td><td>45</td><td>42</td><td>39</td></tr> <tr><td>A8 – South Road</td><td>48</td><td>39</td><td>39</td></tr> <tr><td>A9 – Crystal Street</td><td>46</td><td>39</td><td>39</td></tr> <tr><td>A10 – Banned and Blende Streets</td><td>42</td><td>41</td><td>35</td></tr> <tr><td>A11 – Crystal Street</td><td>46</td><td>39</td><td>39</td></tr> <tr><td>A12 – Crystal Street</td><td>46</td><td>39</td><td>39</td></tr> <tr><td>A13 – Eyre Street North 2</td><td>40</td><td>35</td><td>35</td></tr> <tr><td>A14 – Piper Street North</td><td>40</td><td>35</td><td>35</td></tr> </tbody> </table> <p style="font-size: x-small;">Notes to Condition 17:            • Receiver locations are as identified in the noise assessments presented in the EA and PDR.            • Noise limits are to be measured in accordance with the <i>Noise Policy for Industry (NPII 3/04, 2017)</i>, or its latest version.            • *Day is defined as 7 am to 6 pm Mondays to Saturdays and 8 am to 6 pm on Sundays and public holidays;            • **Evening is defined as 6 pm to 10 pm on any day, and            • *Night is defined as 10 pm to 7 am Mondays to Saturdays and 10 pm to 8 am on Sundays and public holidays.</p>	Location	* Day (dB(A))	** Evening (dB(A))	* Night (dB(A))	A1 – Piper Street North	40	37	35	A2 – Piper Street Central	40	37	35	A3 – Eyre Street North	44	41	39	A4 – Eyre Street Central	44	41	39	A5 – Eyre Street South	44	41	39	A6 – Henaostra and Cyprium Streets	48	41	39	A7 – Carbon Street	45	42	39	A8 – South Road	48	39	39	A9 – Crystal Street	46	39	39	A10 – Banned and Blende Streets	42	41	35	A11 – Crystal Street	46	39	39	A12 – Crystal Street	46	39	39	A13 – Eyre Street North 2	40	35	35	A14 – Piper Street North	40	35	35	<p>environmental noise monitoring survey was conducted over two consecutive night-time periods from 27<sup>th</sup> to 29<sup>th</sup> October 2022, and an annual noise monitoring assessment report dated 5 December 2022 was issued by consultant, EMM Consultants (EMM).</p> <p>It was stated that the next attended noise monitoring survey is scheduled in late 2023.</p> <p>Section 3.1 of the EMM report noted:            “Further, additional day period monitoring was conducted at five assessment locations to address the temporary construction noise limits in accordance with Condition 17D of the site’s PA.”</p> <p>It was not verified whether the October 2022 noise survey occurred when the BHOP mill was in operation (i.e. whether the survey occurred during the “8 days on / 6 days off” schedule, in place since July 2020).</p>	<p>monitoring surveys are conducted when the mill is operational (i.e. when project-generated noise is likely to be higher than when the mill is non-operational); and b) survey reports clearly define the mill’s operational status.</p>	<p>listed as recognised site noise from multiple locations in the results table of the October attended noise monitoring report. BHO will request that the operating status of the mill be included in the main body of the report from future visits.</p>	
Location	* Day (dB(A))	** Evening (dB(A))	* Night (dB(A))																																																															
A1 – Piper Street North	40	37	35																																																															
A2 – Piper Street Central	40	37	35																																																															
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A12 – Crystal Street	46	39	39																																																															
A13 – Eyre Street North 2	40	35	35																																																															
A14 – Piper Street North	40	35	35																																																															
24	PA 07_0018 Sch3 Cond19B	<p><b>Noise and Vibration – Operating Conditions</b></p> <p>The Proponent must:</p> <p>(a) implement best management practice to:</p> <ul style="list-style-type: none"> <li>• protect the safety of people in the surrounding area; and</li> <li>• protect public or private infrastructure/property in the surrounding area from any damage;</li> </ul>	<p>In relation to the paragraphs of this condition:</p> <p>(a) Examples of best management practices implemented by BHOP include requirements described in section 8.2.2 of BHOP’s Technical Blasting Management Plan (TBMP) to meet blasting and overpressure criteria and to minimise blasting impacts on the local community.</p>	<p><b>Observation No. 24</b></p> <p>As evidence of using ‘reasonable endeavours’ to minimise cumulative blasting impacts associated with the operations of nearby mines (Schedule 3, Condition 19B(c)), BHOP could amend section 8.2.1 of the Technical Blasting Management Plan to refer to any agreement between BHOP and Perilya to avoid unnecessary overlaps in production blasting times.</p>	<p>Reference to this agreement will be made in the next review of the Noise and Blast Management Plan which has been developed as described in PA07_0018.</p>	1/12/2023																																																												



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>(b) operate a suitable system to enable the public to get up-to-date information on the proposed blasting schedule on site;</p> <p>(c) use reasonable endeavours to co-ordinate blasting at the site:</p> <ul style="list-style-type: none"> <li>to minimise cumulative blasting impacts associated with the operation of nearby mines; and</li> <li>to avoid disturbing users of nearby recreational facilities, including the Broken Hill Bowling Club and the Italo (Bocce) Club;</li> </ul> <p>(d) minimise the noise impacts of the project during adverse meteorological conditions (stability category F temperature inversion conditions and wind speeds greater than 2 m/s at 10 m above ground level);</p> <p>(e) carry out regular monitoring to determine whether the project is complying with the relevant conditions of this approval; and</p> <p>(f) regularly assess noise monitoring data and modify and/or stop operations on site to ensure compliance with the relevant conditions of this approval;</p> <p>to the satisfaction of the Secretary.</p>	<p>(b) The CBH website includes a Rasp Blasting Schedule page, which as of July 2023 was observed to be up-to-date.</p> <p>It was stated that as of July 2023, BHOP sends text message alerts (via Whispr online software) to local residents and an officer of the EPA and Resources Regulator on the day of a scheduled production blast and scheduled surface blasting for Mod 6 works. It was stated that the Whispr software enables a recipient to reply to the text message alert, if desired.</p> <p>(c) Section 8.2.1 of the TBMP reproduces the wording in paragraph (c) of this condition, without providing specific details. During the audit period, no complaints of blasting-related disturbance were made by users of the Broken Hill Bowling Club or the Italo (Bocce) Club.</p>			
25	PA 07_0018 Sch3 Cond19B	<p><b>Noise and Vibration – Operating Conditions</b></p> <p>The Proponent must:</p> <p>(a) implement best management practice to:</p> <ul style="list-style-type: none"> <li>protect the safety of people in the surrounding area; and</li> <li>protect public or private infrastructure/property in the surrounding area from any</li> </ul>	<p>d) There was no evidence (i.e. complaints) that the Rasp Project had any off-site adverse noise impacts in adverse meteorological conditions. Section 5 (Conclusion) in the annual attended noise monitoring assessment report for November 2022 (EMM, 5 December 2022) stated (in part):</p> <p>“The monitoring assessment found</p>	<p><b>Observation No. 25</b></p> <p>To potentially avoid a repeat of the noise complaint of 9 April 2022 (INX No. 7797), BHOP could conduct noise monitoring while surface drilling activities are in progress, to identify whether the noise emissions from drilling activities exceed the relevant limit at the relevant location.</p>	<p>BHO will undertake attended noise monitoring should surface drilling recommence.</p>	On going



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>damage;</p> <p>(b) operate a suitable system to enable the public to get up-to-date information on the proposed blasting schedule on site;</p> <p>(c) use reasonable endeavours to co-ordinate blasting at the site:</p> <ul style="list-style-type: none"> <li>to minimise cumulative blasting impacts associated with the operation of nearby mines; and</li> <li>to avoid disturbing users of nearby recreational facilities, including the Broken Hill Bowling Club and the Italo (Bocce) Club;</li> </ul> <p>(d) minimise the noise impacts of the project during adverse meteorological conditions (stability category F temperature inversion conditions and wind speeds greater than 2 m/s at 10 m above ground level);</p> <p>(e) carry out regular monitoring to determine whether the project is complying with the relevant conditions of this approval; and</p> <p>(f) regularly assess noise monitoring data and modify and/or stop operations on site to ensure compliance with the relevant conditions of this approval;</p> <p>to the satisfaction of the Secretary</p>	<p>that site <math>L_{Aeq,15min}</math> noise contributions satisfied the relevant limits during the measurements at all assessment locations, including where noise limits were not applicable due to wind speeds greater than 3m/s (at 10m above ground level) or temperature inversion conditions, as measured at the on-site weather station.”</p> <p>(e) The Auditors sighted a sample of completed noise monitoring field sheets, which are in the format specified in Appendix Four of BHOP’s Noise Monitoring Procedure.</p> <p>During the audit period, BHOP received one noise-related complaint on 9 April 2022, from a resident on Carbon Street regarding surface drilling activities near the boundary at Carbon Street (INX No. 7797). Actual noise measurements at the Carbon Street (A7) location were not recorded during these drilling activities.</p>			
26	PA 07_0018 Sch3 Cond19B	<p><b>Noise and Vibration – Operating Conditions</b></p> <p>The Proponent must:</p> <p>(a) implement best management practice to:</p> <ul style="list-style-type: none"> <li>protect the safety of people in the surrounding area; and</li> <li>protect public or private infrastructure/property in the</li> </ul>	<p>(f) Section 6.4 (Action Limits) of the NMP describes the operational responses for the following scenarios at a given receiver: 2dB below operational license limit, between the operational license limit and +2dB, between 2dB and 5dB of the operational license limit, more than 5dB above the operational license limit. The NMP</p>	<p><b>Observation No. 26</b></p> <p>BHOP should include a Trigger Action Response Plan (TARP) in the Noise Management Plan. BHOP could consider whether the action limits in section 6.4 of the Noise Management Plan could form the basis of the TARP.</p>	<p>BHO will consider the development of a Noise Management TARP in the next review of the Noise and Blast Management Plan.</p>	1/12/2023



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>surrounding area from any damage;</p> <p>(b) operate a suitable system to enable the public to get up-to-date information on the proposed blasting schedule on site;</p> <p>(c) use reasonable endeavours to co-ordinate blasting at the site:</p> <ul style="list-style-type: none"> <li>to minimise cumulative blasting impacts associated with the operation of nearby mines; and</li> <li>to avoid disturbing users of nearby recreational facilities, including the Broken Hill Bowling Club and the Italo (Bocce) Club;</li> </ul> <p>(d) minimise the noise impacts of the project during adverse meteorological conditions (stability category F temperature inversion conditions and wind speeds greater than 2 m/s at 10 m above ground level);</p> <p>(e) carry out regular monitoring to determine whether the project is complying with the relevant conditions of this approval; and</p> <p>(f) regularly assess noise monitoring data and modify and/or stop operations on site to ensure compliance with the relevant conditions of this approval;</p> <p>to the satisfaction of the Secretary</p>	does not include a Trigger Action Response Plan (TARP).			
27	PA 07_0018 Sch3 Cond19B	<p><b>Noise and Vibration – Operating Conditions</b></p> <p>The Proponent must:</p> <p>(a) implement best management practice to:</p> <ul style="list-style-type: none"> <li>protect the safety of people in the surrounding area; and</li> <li>protect public or private</li> </ul>		<p><b>Observation No. 27</b></p> <p>BHOP could revise the document header in the Noise Management Plan, which currently refers to “Noise Monitoring Management Plan”.</p>	The document header in the Noise Management Plan will be corrected in the next revision of this management plan.	1/12/2023



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>infrastructure/property in the surrounding area from any damage;</p> <p>(b) operate a suitable system to enable the public to get up-to-date information on the proposed blasting schedule on site;</p> <p>(c) use reasonable endeavours to coordinate blasting at the site:</p> <ul style="list-style-type: none"> <li>to minimise cumulative blasting impacts associated with the operation of nearby mines; and</li> <li>to avoid disturbing users of nearby recreational facilities, including the Broken Hill Bowling Club and the Italo (Bocce) Club;</li> </ul> <p>(d) minimise the noise impacts of the project during adverse meteorological conditions (stability category F temperature inversion conditions and wind speeds greater than 2 m/s at 10 m above ground level);</p> <p>(e) carry out regular monitoring to determine whether the project is complying with the relevant conditions of this approval; and</p> <p>(f) regularly assess noise monitoring data and modify and/or stop operations on site to ensure compliance with the relevant conditions of this approval;</p> <p>to the satisfaction of the Secretary</p>				
28	PA 07_0018 Sch3 Cond23	<p><b>Soil and Water – Water Management Plan</b></p> <p>The Proponent shall prepare and implement a Water Management Plan for the project to the satisfaction of the Secretary. This plan must be consistent with the Stormwater Management Plan presented as Annexure K</p>	As of July 2023, BHOP’s current Site Water Management Plan (SWMP) (BHO-PLN-ENV-004) is Revision No. 2, issued on 25 June 2019.	<p><b>Observation No. 28</b></p> <p>BHOP should rectify the inconsistent Doc ID in the header of the Site Water Management Plan, which changes from “BHO-PLN-ENV-006” in pages 1 to 18, to “BHO-PLN-ENV-</p>	The document control inconsistencies in the Site Water Management Plan will be corrected in the next review.	1/12/2023



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>to the EA, incorporate any changes to reflect the final detailed design of the project, and be prepared in consultation with EPA, DPE Water and RR. The plan must: be submitted to the Secretary for approval by the end of June 2011, and must include:</p> <p>(a) a Site Water Balance, which must:</p> <ul style="list-style-type: none"> <li>• include details of: <ul style="list-style-type: none"> <li>o sources and security of water supply;</li> <li>o methods to monitor, measure and manage reporting on water take (exempt and licensable);</li> <li>o water use on site;</li> <li>o water management on site;</li> <li>o any off-site water transfers; and</li> </ul> </li> <li>• investigate and implement all reasonable and feasible measures to minimise water use by the project;</li> </ul> <p>(b) an Erosion and Sediment Control Plan, which must:</p> <ul style="list-style-type: none"> <li>• identify activities that could cause soil erosion, generate sediment or affect flooding;</li> <li>• describe measures to minimise soil erosion and the potential for transport of sediment to downstream waters, and manage flood risk;</li> <li>• describe the location, function and capacity of erosion and sediment control structures and flood management structures; and</li> <li>• describe what measures would be implemented to maintain the</li> </ul>		004" in pages 19 to 48.		





Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>structures over time;</p> <p>(c) a Surface Water Management Plan, which must include:</p> <ul style="list-style-type: none"> <li>• detailed baseline data on surface water flows and quality in creeks and other waterbodies that could potentially be affected by the project;</li> <li>• surface water and stream health impact assessment criteria including trigger levels for investigating any potentially adverse surface water impacts;</li> <li>• a program to monitor and assess:               <ul style="list-style-type: none"> <li>o surface water flows and quality;</li> <li>o impacts on water users;</li> <li>o stream health;</li> <li>o channel stability; and</li> </ul> </li> <li>• detail relocated and additional water management infrastructure required by Modification 6 including the boxcut, water storage S37, the TSF3 and “free areas”.</li> </ul> <p>(d) a Groundwater Monitoring Program, which must:</p> <ul style="list-style-type: none"> <li>• provide a program to monitor seepage movement within and adjacent to all tailings storage facilities (the TSF1, TSF2 and TSF3);</li> <li>• include details of parameters and pollutants to be monitored for:               <ul style="list-style-type: none"> <li>o water from mine dewatering;</li> <li>o groundwater locations to the east of TSF1;</li> <li>o surface water represented by Horwood Dam;</li> <li>o water captured by the toe</li> </ul> </li> </ul>				



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>drains of the tailings storage facility;</p> <ul style="list-style-type: none"> <li>o water seepage from the tailings storage facility; and</li> <li>o the background local groundwater system.</li> </ul> <ul style="list-style-type: none"> <li>• outline performance parameters against monitoring data will be compared to determine whether seepage is occurring, and whether an unacceptable impact on local groundwater may be occurring;</li> </ul> <p>include details of contingency measures to be implemented in the event that an unacceptable impact is identified.</p>				
29	PA 07_0018 Sch3 Cond23	<p><b>Soil and Water – Water Management Plan</b></p> <p>The Proponent shall prepare and implement a Water Management Plan for the project to the satisfaction of the <a href="#">Secretary</a>. This plan must be consistent with the Stormwater Management Plan presented as Annexure K to the EA, incorporate any changes to reflect the final detailed design of the project, and be prepared in consultation with <a href="#">EPA</a>, <a href="#">DPE Water</a> and <a href="#">RR</a>. The plan must: be submitted to the <a href="#">Secretary</a> for approval by the end of June 2011, and must include:</p> <p>(a) a Site Water Balance, which must:</p> <ul style="list-style-type: none"> <li>• include details of: <ul style="list-style-type: none"> <li>o sources and security of water supply;</li> <li>o <a href="#">methods to monitor, measure and manage reporting on water take (exempt and licensable)</a>;</li> <li>o water use on site;</li> </ul> </li> </ul>	<p>Section 1.5 of the SWMP states that the SWMP was prepared in consultation with the Department of Industry – Water, the EPA and the Resources Regulator. The Auditors consider that the requirement for submission of the SWMP to the Secretary for approval by the end of June 2011 does not apply to subsequent revisions of the SWMP.</p> <p>During this July 2023 audit, there was evidence that BHOP is implementing the SWMP, including the following measures:</p> <ul style="list-style-type: none"> <li>• use of a Site Water Monitoring Procedure (BHO-PRO-ENV-011), referred to in section 1.6 of the SWMP – the Auditors sighted a MonitorPro screenshot record of water sampling conducted at five locations on 11 May 2023;</li> <li>• surface water and groundwater</li> </ul>	<p><b>Observation No. 29</b></p> <p>In the next revision of the Site Water Management Plan, BHOP could include the new stormwater collection pond to the north of TSF2 Embankment 2 which was constructed during the previous audit period, with design storage details and possibly an ARI assigned.</p>	<p>The stormwater pond to the north of TSF2 Embankment 2 will be included in the next review of the Site Water Management Plan.</p>	1/12/2023



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<ul style="list-style-type: none"> <li>o water management on site;</li> <li>o any off-site water transfers; and</li> <li>• investigate and implement all reasonable and feasible measures to minimise water use by the project;</li> </ul> <p>(b) an Erosion and Sediment Control Plan, which must:</p> <ul style="list-style-type: none"> <li>• identify activities that could cause soil erosion, generate sediment or affect flooding;</li> <li>• describe measures to minimise soil erosion and the potential for transport of sediment to downstream waters, and manage flood risk;</li> <li>• describe the location, function and capacity of erosion and sediment control structures and flood management structures; and</li> <li>• describe what measures would be implemented to maintain the structures over time;</li> </ul> <p>(c) a Surface Water Management Plan, which must include:</p> <ul style="list-style-type: none"> <li>• detailed baseline data on surface water flows and quality in creeks and other waterbodies that could potentially be affected by the project;</li> <li>• surface water and stream health impact assessment criteria including trigger levels for investigating any potentially adverse surface water impacts;</li> <li>• a program to monitor and assess:               <ul style="list-style-type: none"> <li>o surface water flows and</li> </ul> </li> </ul>	<p>monitoring results provided in Monthly Environment Monitoring Reports available on the CBH website; and</p> <ul style="list-style-type: none"> <li>• surface water and groundwater monitoring results provided in Annual Reviews).</li> </ul>			



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<ul style="list-style-type: none"> <li>quality;</li> <li>o impacts on water users;</li> <li>o stream health;</li> <li>o channel stability; and</li> <li>• detail relocated and additional water management infrastructure required by Modification 6 including the boxcut, water storage S37, the TSF3 and “free areas”.</li> </ul> <p>(d) a Groundwater Monitoring Program, which must:</p> <ul style="list-style-type: none"> <li>• provide a program to monitor seepage movement within and adjacent to all tailings storage facilities (the TSF1, TSF2 and TSF3);</li> <li>• include details of parameters and pollutants to be monitored for:               <ul style="list-style-type: none"> <li>o water from mine dewatering;</li> <li>o groundwater locations to the east of TSF1;</li> <li>o surface water represented by Horwood Dam;</li> <li>o water captured by the toe drains of the tailings storage facility;</li> <li>o water seepage from the tailings storage facility; and</li> <li>o the background local groundwater system.</li> </ul> </li> <li>• outline performance parameters against monitoring data will be compared to determine whether seepage is occurring, and whether an unacceptable impact on local groundwater may be occurring;</li> </ul> <p>include details of contingency measures to be implemented in the event that an</p>				



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		unacceptable impact is identified.				
30	PA 07_0018 Sch3 Cond23	<p><b>Soil and Water – Water Management Plan</b></p> <p>The Proponent shall prepare and implement a Water Management Plan for the project to the satisfaction of the <b>Secretary</b>. This plan must be consistent with the Stormwater Management Plan presented as Annexure K to the EA, incorporate any changes to reflect the final detailed design of the project, and be prepared in consultation with <b>EPA, DPE Water</b> and <b>RR</b>. The plan must: be submitted to the <b>Secretary</b> for approval by the end of June 2011, and must include:</p> <p>(a) a Site Water Balance, which must:</p> <ul style="list-style-type: none"> <li>• include details of: <ul style="list-style-type: none"> <li>o sources and security of water supply;</li> <li>o <b>methods to monitor, measure and manage reporting on water take (exempt and licensable);</b></li> <li>o water use on site;</li> <li>o water management on site;</li> <li>o any off-site water transfers; and</li> </ul> </li> <li>• investigate and implement all reasonable and feasible measures to minimise water use by the project;</li> </ul> <p>(b) an Erosion and Sediment Control Plan, which must:</p> <ul style="list-style-type: none"> <li>• identify activities that could cause soil erosion, generate sediment or affect flooding;</li> <li>• describe measures to minimise soil erosion and the potential for</li> </ul>	<p>In relation to the paragraphs of this condition:</p> <p>(a) The SWMP includes a ‘Water Balance’ in section 6 and Figure 4. The Site Water Balance:</p> <ul style="list-style-type: none"> <li>• includes details of: <ul style="list-style-type: none"> <li>o sources and security of water supply (sections 5 and 6, and Figure 4);</li> <li>o methods to monitor, measure and manage reporting on water take (exempt and licensable) – section 6 refers to, “Installation of flow metres [sic] to monitor water usage” – refer to observation below;</li> </ul> </li> </ul>	<p><b>Observation No. 30</b></p> <p>In the next revision of the Site Water Management Plan, BHOP should include additional content in the “Water Balance” section which describes methods to monitor, measure and manager reporting on water take (exempt and licensable).</p>	<p>Details of water balance monitoring will be included in the next revision of the Site Water Management Plan</p>	1/12/2023



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>transport of sediment to downstream waters, and manage flood risk;</p> <ul style="list-style-type: none"> <li>• describe the location, function and capacity of erosion and sediment control structures and flood management structures; and</li> <li>• describe what measures would be implemented to maintain the structures over time;</li> </ul> <p>(c) a Surface Water Management Plan, which must include:</p> <ul style="list-style-type: none"> <li>• detailed baseline data on surface water flows and quality in creeks and other waterbodies that could potentially be affected by the project;</li> <li>• surface water and stream health impact assessment criteria including trigger levels for investigating any potentially adverse surface water impacts;</li> <li>• a program to monitor and assess:               <ul style="list-style-type: none"> <li>o surface water flows and quality;</li> <li>o impacts on water users;</li> <li>o stream health;</li> <li>o channel stability; and</li> </ul> </li> <li>• detail relocated and additional water management infrastructure required by Modification 6 including the boxcut, water storage S37, the TSF3 and “free areas”.</li> </ul> <p>(d) a Groundwater Monitoring Program, which must:</p> <ul style="list-style-type: none"> <li>• provide a program to monitor seepage movement within and adjacent to all tailings storage</li> </ul>				



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>facilities (the TSF1, TSF2 and TSF3);</p> <ul style="list-style-type: none"> <li>include details of parameters and pollutants to be monitored for:               <ul style="list-style-type: none"> <li>water from mine dewatering;</li> <li>groundwater locations to the east of TSF1;</li> <li>surface water represented by Horwood Dam;</li> <li>water captured by the toe drains of the tailings storage facility;</li> <li>water seepage from the tailings storage facility; and</li> <li>the background local groundwater system.</li> </ul> </li> <li>outline performance parameters against monitoring data will be compared to determine whether seepage is occurring, and whether an unacceptable impact on local groundwater may be occurring;</li> </ul> <p>include details of contingency measures to be implemented in the event that an unacceptable impact is identified.</p>				
31	PA 07_0018 Sch3 Cond23	<p><b>Soil and Water – Water Management Plan</b></p> <p>The Proponent shall prepare and implement a Water Management Plan for the project to the satisfaction of the <a href="#">Secretary</a>. This plan must be consistent with the Stormwater Management Plan presented as Annexure K to the EA, incorporate any changes to reflect the final detailed design of the project, and be prepared in consultation with <a href="#">EPA</a>, <a href="#">DPE Water</a> and <a href="#">RR</a>. The plan must: be submitted to the <a href="#">Secretary</a> for approval by the end of June 2011, and must include:</p>	<p>(b) The SWMP includes section 9, headed “Erosion and Sediment Control” (which for the purpose of assessing compliance against this condition is considered to be an Erosion and Sediment Control Plan), and which:</p> <ul style="list-style-type: none"> <li>identifies activities that could cause soil erosion, generate sediment or affect flooding (section 9 introduction);</li> <li>describes measures to minimise soil erosion and the potential for</li> </ul>	<p><b>Observation No. 31</b></p> <p>In the next revision of the Site Water Management Plan, BHOP should include additional content in the “Seepage movement monitoring” section regarding a program to monitor seepage movement within and adjacent to TSF3.</p>	<p>Details of seepage monitoring for TSF3 will be reviewed and included in the Site Water Management Plan when Kintore Pit TSF3 is operational.</p>	31/12/2024



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>(a) a Site Water Balance, which must:</p> <ul style="list-style-type: none"> <li>• include details of:               <ul style="list-style-type: none"> <li>o sources and security of water supply;</li> <li>o <b>methods to monitor, measure and manage reporting on water take (exempt and licensable);</b></li> <li>o water use on site;</li> <li>o water management on site;</li> <li>o any off-site water transfers; and</li> </ul> </li> <li>• investigate and implement all reasonable and feasible measures to minimise water use by the project;</li> </ul> <p>(b) an Erosion and Sediment Control Plan, which must:</p> <ul style="list-style-type: none"> <li>• identify activities that could cause soil erosion, generate sediment or affect flooding;</li> <li>• describe measures to minimise soil erosion and the potential for transport of sediment to downstream waters, and manage flood risk;</li> <li>• describe the location, function and capacity of erosion and sediment control structures and flood management structures; and</li> <li>• describe what measures would be implemented to maintain the structures over time;</li> </ul> <p>(c) a Surface Water Management Plan, which must include:</p> <ul style="list-style-type: none"> <li>• detailed baseline data on surface water flows and quality in creeks and other waterbodies that could</li> </ul>	<p>transport of sediment to downstream waters, and manage flood risk (sections 1.4, 9.1, 9.2 and 9.3);</p> <ul style="list-style-type: none"> <li>• describes the location, function and capacity of erosion and sediment control structures and flood management structures (Figure 1, and Tables 5 and 6); and</li> <li>• describes what measures would be implemented to maintain the structures over time (sections 9.1, 9.2 and 9.3).</li> </ul> <p>(c) The SWMP includes section 8, headed “Surface Water Monitoring” (which for the purpose of assessing compliance against this condition is considered to be a Surface Water Management Plan), and which includes:</p> <ul style="list-style-type: none"> <li>• detailed baseline data on surface water flows and quality in creeks and other waterbodies that could potentially be affected by the project – refer to non-compliance below;</li> <li>• surface water and stream health impact assessment criteria including trigger levels for investigating any potentially adverse surface water impacts – refer to non-compliance below;</li> <li>• a program to monitor and assess:               <ul style="list-style-type: none"> <li>o surface water flows and quality (sections 8.1, 8.2 and 8.3);</li> </ul> </li> </ul>			





Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>potentially be affected by the project;</p> <ul style="list-style-type: none"> <li>• surface water and stream health impact assessment criteria including trigger levels for investigating any potentially adverse surface water impacts;</li> <li>• a program to monitor and assess:               <ul style="list-style-type: none"> <li>o surface water flows and quality;</li> <li>o impacts on water users;</li> <li>o stream health;</li> <li>o channel stability; and</li> </ul> </li> <li>• detail relocated and additional water management infrastructure required by Modification 6 including the boxcut, water storage S37, the TSF3 and “free areas”.</li> </ul> <p>(d) a Groundwater Monitoring Program, which must:</p> <ul style="list-style-type: none"> <li>• provide a program to monitor seepage movement within and adjacent to all tailings storage facilities (the TSF1, TSF2 and TSF3);</li> <li>• include details of parameters and pollutants to be monitored for:               <ul style="list-style-type: none"> <li>o water from mine dewatering;</li> <li>o groundwater locations to the east of TSF1;</li> <li>o surface water represented by Horwood Dam;</li> <li>o water captured by the toe drains of the tailings storage facility;</li> <li>o water seepage from the tailings storage facility; and</li> <li>o the background local groundwater system.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>o impacts on water users – refer to non-compliance below;</li> <li>o stream health – (section 8.2); and</li> <li>o channel stability (section 9 – Erosion and Sediment Control).</li> <li>• detail relocated and additional water management infrastructure required by Modification 6 including the boxcut, water storage S37, the TSF3 and “free areas” – section (not included – refer to non-compliance below).</li> </ul> <p>(d) The SWMP includes a Groundwater Monitoring Program which:</p> <ul style="list-style-type: none"> <li>• provides a program to monitor seepage movement within and adjacent to all tailings storage facilities (the TSF1, TSF2 and TSF3) (section 7.1, Table 7 refers to monitoring of seepage from TSF1 and TSF2, but not TSF3 which has not been commissioned as of July 2023 – refer to observation below);</li> </ul>			



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<ul style="list-style-type: none"> <li>outline performance parameters against monitoring data will be compared to determine whether seepage is occurring, and whether an unacceptable impact on local groundwater may be occurring;</li> </ul> <p>include details of contingency measures to be implemented in the event that an unacceptable impact is identified.</p>				
32	PA 07_0018 Sch3 Cond23	<p><b>Soil and Water – Water Management Plan</b></p> <p>The Proponent shall prepare and implement a Water Management Plan for the project to the satisfaction of the <b>Secretary</b>. This plan must be consistent with the Stormwater Management Plan presented as Annexure K to the EA, incorporate any changes to reflect the final detailed design of the project, and be prepared in consultation with <b>EPA, DPE Water</b> and <b>RR</b>. The plan must: be submitted to the <b>Secretary</b> for approval by the end of June 2011, and must include:</p> <p>(a) a Site Water Balance, which must:</p> <ul style="list-style-type: none"> <li>include details of: <ul style="list-style-type: none"> <li>sources and security of water supply;</li> <li>methods to monitor, measure and manage reporting on water take (exempt and licensable);</li> <li>water use on site;</li> <li>water management on site;</li> <li>any off-site water transfers; and</li> </ul> </li> <li>investigate and implement all reasonable and feasible measures to minimise water use by the</li> </ul>	<ul style="list-style-type: none"> <li>includes details of parameters and pollutants to be monitored for: <ul style="list-style-type: none"> <li>water from mine dewatering (section 7.1);</li> <li>groundwater locations to the east of TSF1 (section 7.1);</li> <li>surface water represented by Horwood Dam (section 7.1);</li> <li>water captured by the toe drains of the tailings storage facility (section 7.1);</li> <li>water seepage from the tailings storage facility (section 7.1); and</li> <li>the background local groundwater system (sections 7.2 and 7.3.1).</li> </ul> </li> <li>outlines performance parameters against monitoring data which will be compared to determine whether seepage is occurring, and whether an unacceptable impact on local groundwater may be occurring (section 7.2);</li> <li>includes details of contingency</li> </ul>	<p><b>Observation No. 32</b></p> <p>In the Blackwood’s Pit TSF Operations and Maintenance Plan (BHO-PLN-MET-004), BHOP could review:</p> <ul style="list-style-type: none"> <li>section 6.6.1 which currently does not refer to daily membrane inspections (as referred to in Table 7), and</li> <li>section 6.6.2 which currently refers to ‘weekly’ geomembrane inspections.</li> </ul>	<p>These inconsistencies in the Blackwoods Pit TSF2 Operations and Maintenance Plan will be investigated and review accordingly.</p>	1/12/2023



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>project;</p> <p>(b) an Erosion and Sediment Control Plan, which must:</p> <ul style="list-style-type: none"> <li>• identify activities that could cause soil erosion, generate sediment or affect flooding;</li> <li>• describe measures to minimise soil erosion and the potential for transport of sediment to downstream waters, and manage flood risk;</li> <li>• describe the location, function and capacity of erosion and sediment control structures and flood management structures; and</li> <li>• describe what measures would be implemented to maintain the structures over time;</li> </ul> <p>(c) a Surface Water Management Plan, which must include:</p> <ul style="list-style-type: none"> <li>• detailed baseline data on surface water flows and quality in creeks and other waterbodies that could potentially be affected by the project;</li> <li>• surface water and stream health impact assessment criteria including trigger levels for investigating any potentially adverse surface water impacts;</li> <li>• a program to monitor and assess:               <ul style="list-style-type: none"> <li>o surface water flows and quality;</li> <li>o impacts on water users;</li> <li>o stream health;</li> <li>o channel stability; and</li> </ul> </li> <li>• detail relocated and additional water management infrastructure</li> </ul>	<p>measures to be implemented in the event that an unacceptable impact is identified (sections 7.3 and 10).</p> <p>The Auditors noted differences in terminology between the “Membrane inspection” row in Table 7 of the Blackwood’s Pit TSF Operations and Maintenance Plan (BHO-PLN-MET-004) which refers to a daily visual inspection, and Item 1(i) in the Blackwood Pit TSF Daily Inspection Checklist (BHO-CKL-MET-022) which refers to “Geo-membrane (if present) failure”.</p>			



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>required by Modification 6 including the boxcut, water storage S37, the TSF3 and “free areas”.</p> <p>(d) a Groundwater Monitoring Program, which must:</p> <ul style="list-style-type: none"> <li>• provide a program to monitor seepage movement within and adjacent to all tailings storage facilities (the TSF1, TSF2 and TSF3);</li> <li>• include details of parameters and pollutants to be monitored for:               <ul style="list-style-type: none"> <li>o water from mine dewatering;</li> <li>o groundwater locations to the east of TSF1;</li> <li>o surface water represented by Horwood Dam;</li> <li>o water captured by the toe drains of the tailings storage facility;</li> <li>o water seepage from the tailings storage facility; and</li> <li>o the background local groundwater system.</li> </ul> </li> <li>• outline performance parameters against monitoring data will be compared to determine whether seepage is occurring, and whether an unacceptable impact on local groundwater may be occurring;</li> </ul> <p>include details of contingency measures to be implemented in the event that an unacceptable impact is identified.</p>				
33	PA 07_0018 Sch3 Cond23	<p><b>Soil and Water – Water Management Plan</b></p> <p>The Proponent shall prepare and implement a Water Management Plan for the project to the satisfaction of the <a href="#">Secretary</a>. This plan</p>		<p><b>Observation No. 33</b></p> <p>BHOP could potentially include information in sections 3.1 (Water quality data), 3.2 (Water quality guidelines) and 3.3</p>	<p>Relevant information from the Ryan Street (S49) Water Quality Assessment will be included in the next</p>	1/12/2023



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>must be consistent with the Stormwater Management Plan presented as Annexure K to the EA, incorporate any changes to reflect the final detailed design of the project, and be prepared in consultation with EPA, DPE Water and RR. The plan must: be submitted to the Secretary for approval by the end of June 2011, and must include:</p> <p>(a) a Site Water Balance, which must:</p> <ul style="list-style-type: none"> <li>• include details of:               <ul style="list-style-type: none"> <li>o sources and security of water supply;</li> <li>o methods to monitor, measure and manage reporting on water take (exempt and licensable);</li> <li>o water use on site;</li> <li>o water management on site;</li> <li>o any off-site water transfers; and</li> </ul> </li> <li>• investigate and implement all reasonable and feasible measures to minimise water use by the project;</li> </ul> <p>(b) an Erosion and Sediment Control Plan, which must:</p> <ul style="list-style-type: none"> <li>• identify activities that could cause soil erosion, generate sediment or affect flooding;</li> <li>• describe measures to minimise soil erosion and the potential for transport of sediment to downstream waters, and manage flood risk;</li> <li>• describe the location, function and capacity of erosion and sediment control structures and flood management structures; and</li> </ul>		<p>(Background water quality) of the “Ryan Street Dam (S49) Water Quality Assessment” (Revision 0, issued by WSP on 8 June 2023) as baseline data in the Site Water Management Plan to help satisfy the detailed baseline data requirement in paragraph (c) of this condition.</p>	<p>revision of the Site Water Management Plan.</p>	



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<ul style="list-style-type: none"> <li>• describe what measures would be implemented to maintain the structures over time;</li> <li>(c) a Surface Water Management Plan, which must include:               <ul style="list-style-type: none"> <li>• detailed baseline data on surface water flows and quality in creeks and other waterbodies that could potentially be affected by the project;</li> <li>• surface water and stream health impact assessment criteria including trigger levels for investigating any potentially adverse surface water impacts;</li> <li>• a program to monitor and assess:                   <ul style="list-style-type: none"> <li>o surface water flows and quality;</li> <li>o impacts on water users;</li> <li>o stream health;</li> <li>o channel stability; and</li> </ul> </li> <li>• detail relocated and additional water management infrastructure required by Modification 6 including the boxcut, water storage S37, the TSF3 and “free areas”.</li> </ul> </li> <li>(d) a Groundwater Monitoring Program, which must:               <ul style="list-style-type: none"> <li>• provide a program to monitor seepage movement within and adjacent to all tailings storage facilities (the TSF1, TSF2 and TSF3);</li> <li>• include details of parameters and pollutants to be monitored for:                   <ul style="list-style-type: none"> <li>o water from mine dewatering;</li> <li>o groundwater locations to the east of TSF1;</li> <li>o surface water represented by</li> </ul> </li> </ul> </li> </ul>				



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>Horwood Dam;</p> <ul style="list-style-type: none"> <li>o water captured by the toe drains of the tailings storage facility;</li> <li>o water seepage from the tailings storage facility; and</li> <li>o the background local groundwater system.</li> </ul> <ul style="list-style-type: none"> <li>• outline performance parameters against monitoring data will be compared to determine whether seepage is occurring, and whether an unacceptable impact on local groundwater may be occurring;</li> </ul> <p>include details of contingency measures to be implemented in the event that an unacceptable impact is identified.</p>				
34	PA 07_0018 Sch3 Cond30	<p><b>Heritage</b></p> <p>The Proponent shall prepare and implement a Conservation Management Plan for the site to the satisfaction of the <b>Secretary</b>. This plan must provide a strategic framework for all heritage items located on the Lease, based on the principles of the Burra Charter, and developed in consultation with the <b>Heritage NSW</b> and Council. The plan must be submitted for the approval of the <b>Secretary</b> by December 2011.</p>	<p>The November 2012 audit report of the Rasp Project (issued by Graham A. Brown &amp; Associates) includes the following commentary regarding BHOP’s compliance with this condition:</p> <p style="padding-left: 40px;">“The draft Conservation Management Plan was prepared by Austral Archaeology Pty Ltd in November 2011. It is still in progress and currently in discussions with DoPI. An extension to the end of December 2012 was sought and agreed.”</p> <p>BHOP’s current ‘draft’ Conservation Management Plan (draft CMP) was developed by external consultant, GML Heritage, and issued to BHOP in September 2015. As of July 2023, the draft CMP remains issued as a ‘draft’ version, and is not available on the CBH website.</p>	<p><b>Observation No. 34</b></p> <p>EMM Consultants has prepared a revised Heritage Management Plan, which is in ‘draft’ form as of July 2023. After consultation with Heritage NSW and Broken Hill City Council and when the Heritage Management Plan is finalised, BHOP should submit the Plan to the Secretary for approval.</p>	<p>When the final version of the Heritage Management Plan is issued by EMM, consultation with Heritage NSW and Broken Hill City Council will be conducted. This management plan will then be submitted to the Secretary for approval.</p>	1/12/2023



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
			<p>The Auditors consider that the requirement to submit a Conservation Management Plan for the approval of the Secretary by December 2011 does not apply to this draft CMP, because BHOP submitted a previous Conservation Management Plan to the then DoPI in November 2011 (as noted in the November 2012 audit report referred to above).</p> <p>The Auditors consider that the draft CMP provides a strategic framework for all heritage items located on the lease.</p> <p>In site inspections during this July 2023 audit, the observed building heritage items on site appeared to be unharmed by mining operations and related activities (see Photo 26).</p> <p>It was stated that BHOP maintains a register of all heritage items on the Rasp Mine site.</p> <p>Section 5.16 (Indigenous Heritage) in the Annual Review 2022 (Revised) states:  “There are no known significant indigenous sites within CML7.”</p> <p>Section 5.17 (Natural and Social Heritage) in the Annual Review 2022 (Revised) states:  “The Conservation Management Strategy draft has been developed however cannot be finalised until the Line-of-Lode Interagency Panel provides advice.</p> <p>An Options Analysis Study for mine closure has been developed along with recommendations for</p>			





Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
			rehabilitation methods.”			
35	PA 07_0018 Sch3 Cond32	<p><b>Waste</b></p> <p>The Proponent shall:</p> <p>(a) minimise the waste generated by the project; and</p> <p>(b) ensure that the waste generated by the project is appropriately stored, handled, and disposed of,</p> <p>to the satisfaction of the <a href="#">Secretary</a>.</p>	<p>The largest waste streams (by volume) generated by the Rasp Project are waste rock and tailings.</p> <p>It was stated that some waste rock was used as capping (approximately 1 metre depth) in the TSF2 embankment lifts, and is intended to be used as capping on TSF2 after the end of use of TSF2 for tailings.</p> <p>It was stated that concrete waste is deposited underground.</p> <p>Waste oils, waste grease, hydrocarbon contaminated rags, and waste oil filters, are removed by a contractor, Cleanaway.</p> <p>Waste batteries are temporarily stored on-site and are removed off site for recycling by a contractor, Broken Hill Skip Bins.</p> <p>It was stated that used heavy vehicle tyres are used for demarcation of haul and access roads around the site, or removed off-site. During the audit period, approximately 10 heavy vehicle tyres were removed from site by a contractor, Flatout. Used light vehicle tyres are also removed off site to commercial providers (e.g. Flatout) that manage this waste stream.</p> <p>It was stated that a glass/plastic bottle and aluminum/steel can recycler exists in Broken Hill, which BHOP utilises (Mining Crews 2 and 4).</p> <p>Some waste cardboard and paper is segregated and transported to Broken Hill City Council facilities for recycling.</p>	<p><b>Observation No. 35</b></p> <p>To complement section 3.5 of the Waste Management Plan, BHOP could develop a program to identify and implement measures to increase the quantity of waste that is managed further up the waste hierarchy than the lowest level of ‘disposal’ (Figure 2-1 in the Waste Management Plan).</p>	<p>Through investigation and implementation of a waste minimisation program, BHO will address this observation.</p>	31/08/2024



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
			<p>Septic waste from the site is collected by a contractor (i.e. Silver Sweep) and transported to the Broken Hill City Council Sewerage Treatment Plant.</p> <p>Licensed waste contractors that remove hazardous waste off-site (Cleanaway) utilise the EPA on-line waste tracking process and define the relevant electronic EPA tracking numbers on the submitted service reports/invoices.</p> <p>Non-mineral waste disposal quantities for various waste streams are recorded and reported in Annual Reviews. For example, Table 5-14 (Non-mineral Waste Summary for reporting period) in Section 5.10 of the Annual Review 2022 (Revised), reports that in the 2022 calendar year:</p> <ul style="list-style-type: none"> <li>• 22,000 litres of oil was disposed;</li> <li>• 137.55 tonnes of scrap metal was disposed; and</li> <li>• 228.67 tonnes of waste went to landfill.</li> </ul> <p>As of July 2023, BHOP has not developed a formal program to proactively review, identify and implement programs to minimise waste going to landfill and to measure the volume/quantity of waste being recycled.</p>			
36	PA 07_0018 Sch3 Cond32	<p><b>Waste</b></p> <p>The Proponent shall:</p> <p>(a) minimise the waste generated by the project; and</p> <p>(b) ensure that the waste generated by the</p>	<p>In site inspections during this July 2023 audit, the Auditors observed a small number of used batteries in the laydown area instead of the allocated waste battery IBC next to the workshop (see Photo 27),</p>	<p><b>Observation No. 36</b></p> <p>BHOP workshop personnel could improve waste segregation practices.</p>	<p>BHO Maintenance Department will assess and revise waste segregation practices in the workshop area.</p>	30/06/2024



## Broken Hill Operations Pty Ltd - Rasp Mine 2023 Independent Environmental Audit – Action Plan

Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		project is appropriately stored, handled, and disposed of, to the satisfaction of the <a href="#">Secretary</a> .	and many examples of poor waste segregation practices around the workshop area (see Photos 28, 29 and 30).			
37	PA 07_0018 Sch3 Cond32	<b>Waste</b> The Proponent shall: (a) minimise the waste generated by the project; and (b) ensure that the waste generated by the project is appropriately stored, handled, and disposed of, to the satisfaction of the <a href="#">Secretary</a> .	In site inspections during this July 2023 audit, the Auditors observed a small number of used batteries in the laydown area instead of the allocated waste battery IBC next to the workshop (see Photo 27), and many examples of poor waste segregation practices around the workshop area (see Photos 28, 29 and 30).	<b>Observation No. 37</b> BHOP could ensure that intermediate bulk containers (IBCs) utilised for the storage of hydrocarbon-contaminated waste are full prior to their transport off-site, to prevent contractor fees being incurred for removal of partially filled IBCs.	BHO Maintenance check volumes of IBCs and drums prior to collection and will continue to ensure that hydrocarbon-contaminated waste IBCs are full when put out for removal from site.	On going
38	PA 07_0018 Sch3 Cond33	<b>Waste</b> The Proponent shall prepare and implement a Waste Management Plan for the project to the satisfaction of the <a href="#">Secretary</a> . This plan must: (a) be prepared in consultation with <a href="#">RR</a> , and submitted the <a href="#">Secretary</a> for approval by the end of March 2011; <i>[Auditor’s Note – The word “to” is missing from paragraph (a).]</i> (b) identify the various waste streams of the project; (c) estimate the volumes of tailings and other waste material that would be generated by the project; (d) describe and justify the proposed strategy for disposing of this waste material; (e) describe what measures would be implemented to meet the requirements set out above in condition 32; and	As of July 2023, BHOP’s current Waste Management Plan (WMP) (BHO-PLN-ENV-005) is Revision 5, issued 28 April 2023.  During the audit period, BHOP also prepared a Waste Rock Management Plan (WRMP) (BHO-PLN-ENV-014), Revision 1, issued 9 February 2023. The WRMP is also called the “Waste Rock Management Strategy (WRMS)” and is required by the Resources Regulator.  Section 1.3 of the WRMP states: “The key aim of the WRMS was to adequately address the requirements of the New South Wales Resources Regulator regarding the geochemical characterisation and management of waste material (predominantly waste rock) at Rasp Mine.”  The Auditors consider that the WMP and WRMP together constitute the Waste Management Plan required by this	<b>Observation No. 38</b> BHOP could revise section 3.2.3 of the Waste Management Plan to: <ul style="list-style-type: none"><li>• include predicted “surface tailings volume” and “cumulative tailings volume”, for the remaining life of mine (i.e. which as of March 2022, is until 31 December 2026); and</li><li>• update Table 3-2 with post-2016 data regarding “actual tailings in TSF2”, and “actual total waste rock” and its on-site destination (i.e. in-pit and/or underground).</li></ul>	In the next revisions of the Waste Management Plans and the Waste Rock Management Plan to include the details outlined in this observation.	1/12/2023



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		(f) include a program to monitor the effectiveness of these measures	<p>condition. As of July 2023, the WRMP is not available on the CBH website.</p> <p>In site inspections during this July 2023 audit, there was evidence that BHOP is implementing the Waste Management Plan required by this condition, including the following measures:</p> <ul style="list-style-type: none"> <li>• tailings were being deposited into TSF2;</li> <li>• bunded areas were in use for the storage of hydrocarbon waste; and</li> <li>• waste was generally well segregated in all observed areas of the site apart from the workshop area.</li> </ul> <p>In relation to the paragraphs of this condition:</p> <p>(a) It is considered that the requirement for submission of the Waste Management Plan to the Secretary for approval by the end of March 2011 does not apply to subsequent revisions of the Waste Management Plan.</p> <p>(b) The WMP identifies the various waste streams of the project (section 3.2 with sub-sections describing streams of mineral waste, and sections 3.3 and 3.4 describing streams of non-mineral waste).</p> <p>(c) The WMP estimates the volumes of tailings and other waste material that would be generated by the project as follows:</p> <ul style="list-style-type: none"> <li>• in section 3.2.3 of the WMP, Table 3-3 summarises proposed</li> </ul>			



Broken Hill Operations Pty Ltd - Rasp Mine  
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Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
			<p>(under EA) and actual placement of waste rock and tailings, from 2012 to the most recent period from May – December 2022 – refer to observation below;</p> <ul style="list-style-type: none"> <li>section 3.2.2 estimates waste rock volumes; and</li> </ul> <p>section 3.2.10 estimates the volume of concrete waste as approximately 1 m<sup>3</sup> per day</p>			
39	PA 07_0018 Sch3 Cond33	<p><b>Waste</b></p> <p>The Proponent shall prepare and implement a Waste Management Plan for the project to the satisfaction of the <a href="#">Secretary</a>. This plan must:</p> <ol style="list-style-type: none"> <li>be prepared in consultation with <a href="#">RR</a>, and submitted the <a href="#">Secretary</a> for approval by the end of March 2011; <i>[Auditor’s Note – The word “to” is missing from paragraph (a).]</i></li> <li>identify the various waste streams of the project;</li> <li>estimate the volumes of tailings and other waste material that would be generated by the project;</li> <li>describe and justify the proposed strategy for disposing of this waste material;</li> <li>describe what measures would be implemented to meet the requirements set out above in condition 32; and</li> <li>include a program to monitor the effectiveness of these measures</li> </ol>		<p><b>Observation No. 39</b></p> <p>Section 3.7 (Audits) of the Waste Management Plan could be amended to include a program of on-site waste management audits (conducted either internally or via an external provider) to identify potential improvements in waste management across the site.</p>	Waste auditing onsite will be review and described accordingly in the next revision of the Waste Management Plan.	1/12/2023
40	PA 07_0018	<p><b>Waste</b></p>		<p><b>Observation No. 40</b></p>	BHO receives copies of	N/a



**Broken Hill Operations Pty Ltd - Rasp Mine  
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Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
	Sch3 Cond33	<p>The Proponent shall prepare and implement a Waste Management Plan for the project to the satisfaction of the <b>Secretary</b>. This plan must:</p> <ul style="list-style-type: none"> <li>(a) be prepared in consultation with <b>RR</b>, and submitted the <b>Secretary</b> for approval by the end of March 2011; <i>[Auditor’s Note – The word “to” is missing from paragraph (a).]</i></li> <li>(b) identify the various waste streams of the project;</li> <li>(c) estimate the volumes of tailings and other waste material that would be generated by the project;</li> <li>(d) describe and justify the proposed strategy for disposing of this waste material;</li> <li>(e) describe what measures would be implemented to meet the requirements set out above in condition 32; and</li> <li>(f) include a program to monitor the effectiveness of these measures</li> </ul>		BHOP could confirm that it is receiving accurate waste records from the relevant service provider (i.e. recorded weights/receipts from the BHCC landfill weighbridge) for waste that is removed from site and charged by weight.	the weigh bridge receipts with invoices for waste collection. BHO will take no further action related to this observation.	
41	PA 07_0018 Sch3 Cond33A	<p><b>Waste</b></p> <p>The Proponent must update the Waste Management Plan required by condition 33 of this approval by December 2017, unless the Secretary agrees otherwise. The updated plan must include:</p> <ul style="list-style-type: none"> <li>(a) a long-term waste management strategy; and</li> <li>(b) an action plan for the implementation of the key measures proposed to achieve the strategy.</li> </ul> <p>Following approval, the Proponent must implement the plan.</p>	<p>It was stated that BHOP’s Waste Management Plan (WMP), issued 28 April 2023, was approved by the nominee of the Secretary.</p> <p><u>Mineral waste (waste rock, tailings and concrete waste)</u></p> <p>Table 3-1 (Long-term waste management options being under investigation) in Section 3.1 of the WMP describes aspects (including Tailings, Stockpiled Waste and Waste Rock Utilisation), methods of investigation and current status of the relevant methods.</p>	<p><b>Observation No. 41</b></p> <p>BHOP could review Section 3.2.10 of the Waste Management Plan to include information regarding strategies for the management of concrete waste.</p>	Management of concrete waste will be described in the next review of the Waste Management Plan.	1/12/2023



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
			<p>For example, Table 3-1 states that for the aspect of “Railings”, the method of: “A TSF capping and closure methodology involving the use of inert waste rock”, had the status of: “Developed and approved in MOD6.”</p> <p>Section 3.2.9 of the WMP describes the strategies for TSF rehabilitation as follows:</p> <p>“In accordance with the Rehabilitation Management Plan and Rehabilitation Strategy, at the cessation of tailings disposition in TSF2, a final covering of inert waste rock will be placed over the top of the tailings to avoid the potential for dust generation as the tailings stabilise and consolidate. Storm water will be directed away from the TSF cover to minimise water infiltration.”</p> <p>Section 3.2.10 of the WMP identifies concrete wastes that would be generated by the Concrete Batching Plant.</p>			
42	PA 07_0018 Sch3 Cond33A	<p><b>Waste</b></p> <p>The Proponent must update the Waste Management Plan required by condition 33 of this approval by December 2017, unless the Secretary agrees otherwise. The updated plan must include:</p> <ul style="list-style-type: none"> <li>(a) a long-term waste management strategy; and</li> <li>(b) an action plan for the implementation of the key measures proposed to achieve the strategy.</li> </ul> <p>Following approval, the Proponent must implement the plan.</p>		<p><b>Observation No. 42</b></p> <p>BHOP could review Table 1-1 in Section 1.4 of the Waste Management Plan and consider adding quantifiable Key Performance Indicators (KPIs) to the generally expressed KPIs for relevant Objectives.</p>	<p>BHO will consider developing KPI’s for Waste Management and include in the next revision of the Waste Management Plan accordingly.</p>	30/06/2024



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
43	PA 07_0018 Sch3 Cond33A	<p><b>Rehabilitation – Rehabilitation Strategy</b></p> <p>Within 6 months from approval of Modification 6, the Proponent must prepare a Rehabilitation Strategy for the site to the satisfaction of the Secretary. This strategy must:</p> <ul style="list-style-type: none"> <li>(a) be prepared by a team of suitably qualified and experienced experts whose appointment has been endorsed by the Secretary;</li> <li>(b) be prepared in consultation with relevant stakeholders including the RR, MEG, EPA, NSW Health (Western NSW Local Health District), DPE Water, Heritage NSW, Council and Perilya Broken Hill Limited;</li> <li>(c) define the rehabilitation objectives for and schedule of the mine site and “free areas”, with consideration of heritage values, dust management, water and leachate management, subsidence, visual impacts and public safety;</li> <li>(d) includes a conceptual final landform and rehabilitation plan;</li> <li>(e) include a life of mine rehabilitation and mining schedule which outlines key progressive rehabilitation milestones from the commencement of operations through to decommissioning and mine closure; and</li> <li>(f) managing and minimising any adverse socio-economic effects associated with mine closure.</li> </ul> <p>The Proponent must implement the approved Rehabilitation Strategy for the project.</p>	<p>During the audit period, BHOP engaged EMM Consultants (Newcastle office) to prepare a Rehabilitation Management Plan and Strategy (i.e. the Rehabilitation Strategy required by this condition) for the Rasp Mine site.</p> <p>Modification 6 was approved on 16 March 2022. The Rehabilitation Management Plan and Strategy (RMPS) was submitted to the Secretary on 15 September 2022 (the Auditors sighted an email receipt), which is within the six month time limit under this condition.</p> <p>The issued version of the RMPS is dated 15 September 2022.</p> <p>In relation to paragraphs (a) to (f) of this condition:</p> <ul style="list-style-type: none"> <li>(a) Appendix D of the RMPS reproduces a letter dated 9 September 2022 by a nominee of the Planning Secretary, which endorsed the EMM team of four experts;</li> <li>(b) Table 4.2 (Stakeholder consultation) of the RMPS includes the stakeholders referred to in paragraph (b), and Appendix E of the RMPS reproduces stakeholder correspondence during consultation;</li> <li>(c) Table 4.1 (Rehabilitation objectives and rehabilitation completion criteria) and Appendix B of the RMPS consider heritage values, dust management, water and leachate management, subsidence, visual impacts and public safety;</li> </ul>	<p><b>Observation No. 43</b></p> <p>BHOP should change the title of Table 6.2 in the Rehabilitation Management Plan Strategy to read: “Indicative life of mine mining schedule”, as per the heading and text in Section 6.2 of the Rehabilitation Management Plan Strategy.</p>	<p>BHO will update the title of Table 2 in the Rehabilitation Management Plan to ensure consistency with Section 6.2.</p>	1/12/2023





Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
			<p>(d) Appendix C (Landforms and rehabilitation plans) of the RMPS comprises Final landform features (Plan 1) and Final landform contours (Plan 2);</p> <p>(e) Sections 6.1 and 6.2 of the RMPS respectively include Table 6.1 (Indicative rehabilitation schedule) and Table 6.2 (Indicative life of mining schedule – note: the heading of this table is mislabelled). BHOP’s Forward Program (as submitted to the NSW Resources Regulator) includes a “Rehabilitation Schedule” for the three-year period from 7 October 2022 to 6 October 2025; and</p> <p>(f) Section 3.5.9.i of the RMPS discusses socio-economic constraints, and section 3.5.9.ii of the RMPS states (in part) that: “HillPDA Consulting has commenced a preliminary social and economic impact assessment (SEIA) for BHOP to inform a future detail process. ... The outcomes and recommendations from this process will then be used to develop a detailed post mining socio-economic transition plan for the mine.”</p> <p>As of July 2023, BHOP’s implementation of the RMPS was limited to scheduled works indicated in Table 6.1 including:</p> <ul style="list-style-type: none"> <li>• stockpile waste rock in BHP (use for surface placement and capping) [note: after “BHP”, the word “Pit” should be inserted];</li> <li>• excavate box cut and commence</li> </ul>			



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
			backfill of Little Kintore Pit.			
44	PA 07_0018 Sch4 Cond1	<p><b>Environmental Management – Environmental Management Strategy</b></p> <p>The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the <a href="#">Secretary</a>. This strategy must:</p> <p>(a) be submitted to the <a href="#">Secretary</a> for approval by the end of June 2011;</p> <p>(b) provide the strategic framework for the environmental management of the project;</p> <p>(c) identify the statutory approvals that apply to the project;</p> <p>(d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;</p> <p>(e) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> <li>• keep the local community and relevant agencies informed about the operation and environmental performance of the project;</li> <li>• receive, handle, respond to, and record complaints;</li> <li>• resolve any disputes that may arise during the course of the project;</li> <li>• respond to any non-compliance; and</li> <li>• respond to emergencies; and</li> </ul> <p>(f) include:</p> <ul style="list-style-type: none"> <li>• copies of any strategies, plans and programs approved under the conditions of this approval; and</li> </ul>	<p>As of July 2023, BHOP’s current Environment Management Strategy (EMS) is Version V4, issued 28 April 2023 (BHO-ENV-SYS-001).</p> <p>In relation to the paragraphs of this condition:</p> <p>(a) The Auditors consider that this paragraph only applies to the original version of the EMS (i.e. not the current version).</p> <p>(b) Section 1.1 of the EMS describes the purpose of the EMS as providing the strategic framework for environmental management at the Rasp Mine. The Auditors consider that the EMS as a whole provides a basic strategic framework for the environmental management of the project.</p> <p>(c) Section 4.1 of the EMS identifies statutory approvals that apply to the project, up to Modification 6 of the Project Approval (note: a date error refers to MOD6 of March “2021”). Modification 10, which was approved on 13 December 2022, is not included in this list.</p> <p>(d) Section 6.1 of the EMS describes the environmental management responsibility, authority and accountability for the roles of General Manager, Department Managers, HSET Manager, Senior Environmental</p>	<p><b>Observation No. 44</b></p> <p>Section 2.1 of the Environment Management Strategy refers to the Rasp Mine Environmental Policy (BHO-POL-ENV-001) being referenced in site inductions. BHOP could review and confirm that the Environmental Policy (which is on the CBH website) is referenced in relevant site inductions, including the Rasp Mine General Induction.</p>	<p>BHO Training Department will confirm that the Environmental Policy is correctly referenced in the Rasp Mine General Induction.</p>	31/10/2023



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>a clear plan depicting all the monitoring required to be carried out under the conditions of this approval.</p>	<p>Advisor &amp; Environmental Graduate/Officer, Supervisors, and BHOP Personnel and Contractors. Section 9 of the EMS states that compliance with all approvals, plans and procedures is the responsibility of all personnel and contractors, with the General Manager holding overall accountability.</p> <p>(e) The EMS describes procedures that would be implemented to:</p> <ul style="list-style-type: none"> <li>• keep the local community and relevant agencies informed about the operation and environmental performance of the project (sections 6.3 and 7);</li> <li>• receive, handle, respond to, and record complaints (section 6.4);</li> <li>• resolve any disputes that may arise during the course of the project (final paragraph in section 6.4);</li> <li>• respond to any non-compliance (section 9); and</li> <li>• respond to emergencies (section 8).</li> </ul> <p>(f) The EMS sufficiently references related environmental strategies, plans and programs approved under the conditions of this approval, and lists the environmental monitoring required to be carried out under the conditions of this approval in Appendix B – Summary of Environmental Monitoring Program and Locations.</p>			



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
45	PA 07_0018 Sch4 Cond1	<p><b>Environmental Management – Environmental Management Strategy</b></p> <p>The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the <a href="#">Secretary</a>. This strategy must:</p> <ul style="list-style-type: none"> <li>(a) be submitted to the <a href="#">Secretary</a> for approval by the end of June 2011;</li> <li>(b) provide the strategic framework for the environmental management of the project;</li> <li>(c) identify the statutory approvals that apply to the project;</li> <li>(d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;</li> <li>(e) describe the procedures that would be implemented to:               <ul style="list-style-type: none"> <li>• keep the local community and relevant agencies informed about the operation and environmental performance of the project;</li> <li>• receive, handle, respond to, and record complaints;</li> <li>• resolve any disputes that may arise during the course of the project;</li> <li>• respond to any non-compliance; and</li> <li>• respond to emergencies; and</li> </ul> </li> <li>(f) include:               <ul style="list-style-type: none"> <li>• copies of any strategies, plans and programs approved under the conditions of this approval; and</li> </ul> </li> </ul> <p>a clear plan depicting all the monitoring required to be carried out under the</p>		<p><b>Observation No. 45</b></p> <p>BHOP should update section 4.1 and Appendix A of the Environment Management Strategy to refer to Modification 10 of 13 December 2022</p>	<p>The Environmental Management Strategy will be updated to include details of MOD10 in the next review.</p>	1/12/2023



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		conditions of this approval.				
46	PA 07_0018 Sch4 Cond1	<p><b>Environmental Management – Environmental Management Strategy</b></p> <p>The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the <a href="#">Secretary</a>. This strategy must:</p> <p>(a) be submitted to the <a href="#">Secretary</a> for approval by the end of June 2011;</p> <p>(b) provide the strategic framework for the environmental management of the project;</p> <p>(c) identify the statutory approvals that apply to the project;</p> <p>(d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;</p> <p>(e) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> <li>• keep the local community and relevant agencies informed about the operation and environmental performance of the project;</li> <li>• receive, handle, respond to, and record complaints;</li> <li>• resolve any disputes that may arise during the course of the project;</li> <li>• respond to any non-compliance; and</li> <li>• respond to emergencies; and</li> </ul> <p>(f) include:</p> <ul style="list-style-type: none"> <li>• copies of any strategies, plans and programs approved under the conditions of this approval; and</li> </ul> <p>a clear plan depicting all the monitoring</p>		<p><b>Observation No. 46</b></p> <p>BHOP should review and update section 4.2 of the Environment Management Strategy to refer to the <i>Biodiversity Conservation Act 2016</i> instead of the <i>Threatened Species Conservation Act 1995</i>.</p>	This reference will be updated in the next review of the Environmental Management Strategy.	1/12/2023



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Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		required to be carried out under the conditions of this approval.				
47	PA 07_0018 Sch4 Cond1	<p><b>Environmental Management – Environmental Management Strategy</b></p> <p>The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the <a href="#">Secretary</a>. This strategy must:</p> <p>(a) be submitted to the <a href="#">Secretary</a> for approval by the end of June 2011;</p> <p>(b) provide the strategic framework for the environmental management of the project;</p> <p>(c) identify the statutory approvals that apply to the project;</p> <p>(d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;</p> <p>(e) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> <li>• keep the local community and relevant agencies informed about the operation and environmental performance of the project;</li> <li>• receive, handle, respond to, and record complaints;</li> <li>• resolve any disputes that may arise during the course of the project;</li> <li>• respond to any non-compliance; and</li> <li>• respond to emergencies; and</li> </ul> <p>(f) include:</p> <ul style="list-style-type: none"> <li>• copies of any strategies, plans and programs approved under the conditions of this approval; and</li> </ul>		<p><b>Observation No. 47</b></p> <p>In the next revision of the Environment Management Strategy, BHOP should update Appendices B and C in the Environment Management Strategy to include the two new Beta Attenuation Monitors (BAMs) commissioned in March 2023.</p>	<p>The next revision of the Environmental Management Strategy will include the inclusion of details of the two new Beta Attenuation Monitors (BAMs).</p>	1/12/2023



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		a clear plan depicting all the monitoring required to be carried out under the conditions of this approval.				
48	PA 07_0018 Sch4 Cond1	<p><b>Environmental Management – Environmental Management Strategy</b></p> <p>The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the <a href="#">Secretary</a>. This strategy must:</p> <p>(a) be submitted to the <a href="#">Secretary</a> for approval by the end of June 2011;</p> <p>(b) provide the strategic framework for the environmental management of the project;</p> <p>(c) identify the statutory approvals that apply to the project;</p> <p>(d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;</p> <p>(e) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> <li>• keep the local community and relevant agencies informed about the operation and environmental performance of the project;</li> <li>• receive, handle, respond to, and record complaints;</li> <li>• resolve any disputes that may arise during the course of the project;</li> <li>• respond to any non-compliance; and</li> <li>• respond to emergencies; and</li> </ul> <p>(f) include:</p> <ul style="list-style-type: none"> <li>• copies of any strategies, plans and programs approved under the</li> </ul>		<p><b>Observation No. 48</b></p> <p>BHOP could establish formal processes (i.e. via internal or external audit) to demonstrate ‘implementation’ of the Environment Management Strategy.</p>	BHO will investigate the best way to audit implementation of the Environment Management Strategy.	30/06/2024



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Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		conditions of this approval; and a clear plan depicting all the monitoring required to be carried out under the conditions of this approval.				
49	PA 07_0018 Sch4 Cond3	<p><b>Environmental Management – Annual Review</b></p> <p>By the end of <b>31 March 2023</b>, and annually thereafter, the Proponent <b>must submit a report reviewing</b> the environmental performance of the project to the satisfaction of the <b>Secretary</b>. This review must:</p> <p>(a) describe the <b>project</b> (including any rehabilitation) that was carried out in the past <b>calendar</b> year, and the <b>project</b> that is proposed to be carried out over the next year;</p> <p>(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:</p> <ul style="list-style-type: none"> <li>• relevant statutory requirements, limits or performance measures/criteria;</li> <li>• monitoring results of previous years;</li> <li>• relevant predictions in the documents referred to in Conditions 2 of Schedule 2; <b>and</b></li> <li>• <b>requirements of any plan or program required under this approval;</b></li> </ul> <p>(c) identify any non-compliance over the past year, and describe what actions were (or are being) taken to <b>rectify the</b></p>	<p>Annual Reviews are prepared and submitted to the DPE. During the audit period, BHOP submitted the following Annual Reviews:</p> <ul style="list-style-type: none"> <li>• Annual Review 2021-2022 for the reporting period 1 May 2021 to 30 April 2022; and</li> <li>• Annual Review 2022 for the reporting period 1 January 2022 to 31 December 2022.</li> </ul> <p>The Auditors noted that the reporting period in the Annual Review 2022 overlaps the reporting period in the Annual Review 2021-2022.</p> <p>BHOP resubmitted a revised version of the Annual Review (i.e. the Annual Review 2022 (Revised)) to the DPE on 28 April 2023, following a request from the DPE for revisions to the Annual Review 2022 which BHOP submitted on 31 March 2023. As of July 2023, the Annual Review 2022 (Revised) had not yet been approved/accepted by the Secretary.</p> <p>The Auditors consider that the Annual Review 2022 (Revised) satisfies the requirements in paragraphs (a) to (g) of this condition.</p>	<p><b>Observation No. 49</b></p> <p>To better match the wording in paragraph (f) of this condition, BHOP could revise the ‘section 11’ heading in each Annual Review to read: “Activities to Improve Environmental Performance”.</p>	<p>BHO will review section headings in future Annual Review to create continuity with the Project Approval condition requirement.</p>	31/03/2024





Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p><b>non-compliance and avoid reoccurrence;</b></p> <p>(d) identify any trends in the monitoring data over the life of the project;</p> <p>(e) identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;</p> <p>(f) describe what measure will be implemented over the next year to improve the environmental performance of the project; <b>and</b></p> <p>(g) <b>evaluate and report on compliance with the performance measures, criteria and operating conditions of this approval.</b></p>				
50	PA 07_0018 Sch4 Cond3	<p><b>Environmental Management – Annual Review</b></p> <p>By the end of <b>31 March 2023</b>, and annually thereafter, the Proponent <b>must submit a report reviewing</b> the environmental performance of the project to the satisfaction of the <b>Secretary</b>. This review must:</p> <p>(a) describe the <b>project</b> (including any rehabilitation) that was carried out in the past <b>calendar</b> year, and the <b>project</b> that is proposed to be carried out over the next year;</p> <p>(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:</p> <ul style="list-style-type: none"> <li>• relevant statutory requirements, limits or performance measures/criteria;</li> </ul>		<p><b>Observation No. 50</b></p> <p>BHOP could revise section 2.1 (Introduction) in each Annual Review to include the words used in paragraph (g) of this condition.</p>	<p>BHO will review the Introduction Section of future Annual Reviews to create continuity with the Project Approval condition requirement.</p>	31/03/2024



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<ul style="list-style-type: none"> <li>monitoring results of previous years;</li> <li>relevant predictions in the documents referred to in Conditions 2 of Schedule 2; and</li> <li>requirements of any plan or program required under this approval;</li> </ul> <p>(c) identify any non-compliance over the past year, and describe what actions were (or are being) taken to rectify the non-compliance and avoid reoccurrence;</p> <p>(d) identify any trends in the monitoring data over the life of the project;</p> <p>(e) identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;</p> <p>(f) describe what measure will be implemented over the next year to improve the environmental performance of the project; and</p> <p>(g) evaluate and report on compliance with the performance measures, criteria and operating conditions of this</p>				
51	PA 07_0018 Sch4 Cond3	<p><b>Environmental Management – Annual Review</b></p> <p>By the end of 31 March 2023, and annually thereafter, the Proponent must submit a report reviewing the environmental performance of the project to the satisfaction of the Secretary. This review must:</p> <p>(a) describe the project (including any rehabilitation) that was carried out in</p>		<p><b>Observation No. 51</b></p> <p>BHOP could revise its Annual Review template to include a table which cross-references the relevant section/table of the Annual Review to each requirement in paragraphs (a) to (g) of this condition.</p>	<p>BHO will consider including a table of reference in future submissions of the Annual review.</p>	21/03/2024



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
		<p>the past calendar year, and the project that is proposed to be carried out over the next year;</p> <p>(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:</p> <ul style="list-style-type: none"> <li>• relevant statutory requirements, limits or performance measures/criteria;</li> <li>• monitoring results of previous years;</li> <li>• relevant predictions in the documents referred to in Conditions 2 of Schedule 2; and</li> <li>• requirements of any plan or program required under this approval;</li> </ul> <p>(c) identify any non-compliance over the past year, and describe what actions were (or are being) taken to rectify the non-compliance and avoid reoccurrence;</p> <p>(d) identify any trends in the monitoring data over the life of the project;</p> <p>(e) identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies;</p> <p>(f) describe what measure will be implemented over the next year to improve the environmental performance of the project; and</p> <p>(g) evaluate and report on compliance with the performance measures, criteria and operating conditions of this</p>				



Item No.	Condition	Requirement	Finding	Non-compliances or Recommendations	Action	Date Required
52	PA 07_0018 Sch4 Cond5	<p><b>Reporting – Incident Notification, Reporting and Response</b></p> <p>The Secretary must be notified in writing via the Major Projects website immediately after the Proponent becomes aware of an incident. The notification must identify the project (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 5.</p>	<p>Section 7.2 of BHOP’s Incident Management Procedure refers to the requirements of this condition.</p> <p>It was stated that BHOP has ‘immediately’ (which the Auditors interpret to mean, as soon as possible) notified the Secretary (via the Major Projects Portal) of all five incidents which occurred during the audit period. Refer to Section 4.10 of this audit report for details of the notified incidents</p>	<p><b>Observation No. 52</b></p> <p>BHOP could include the INX number assigned to an incident in relevant incident reports and correspondence with regulators, for audit trail purposes.</p>	BHO will consider including INX event numbers in future external incident reports.	31/12/2023
53	PA 07_0018 Sch4 Cond5	<p><b>Reporting – Incident Notification, Reporting and Response</b></p> <p>The Secretary must be notified in writing via the Major Projects website immediately after the Proponent becomes aware of an incident. The notification must identify the project (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 5.</p>		<p><b>Observation No. 53</b></p> <p>In light of the TSF2 seepage incident of 24 December 2022 (INX No. 8536) in which the affected Perilya employee initially contacted the Perilya Control Room, BHOP could liaise with Perilya and develop a procedure for Perilya employees residing in the Proprietary Square area to initially contact the Rasp Mine Mill Control Room and/or Emergency Services Office in the event of a future TSF2 incident. This procedure could potentially reduce the time taken for BHOP to respond (e.g. shutting down the mill) to a future TSF2 incident.</p>	BHO will include an assessment of best contact for a TSF related incident during the upcoming TSF safety emergency response drill.	31/01/2024