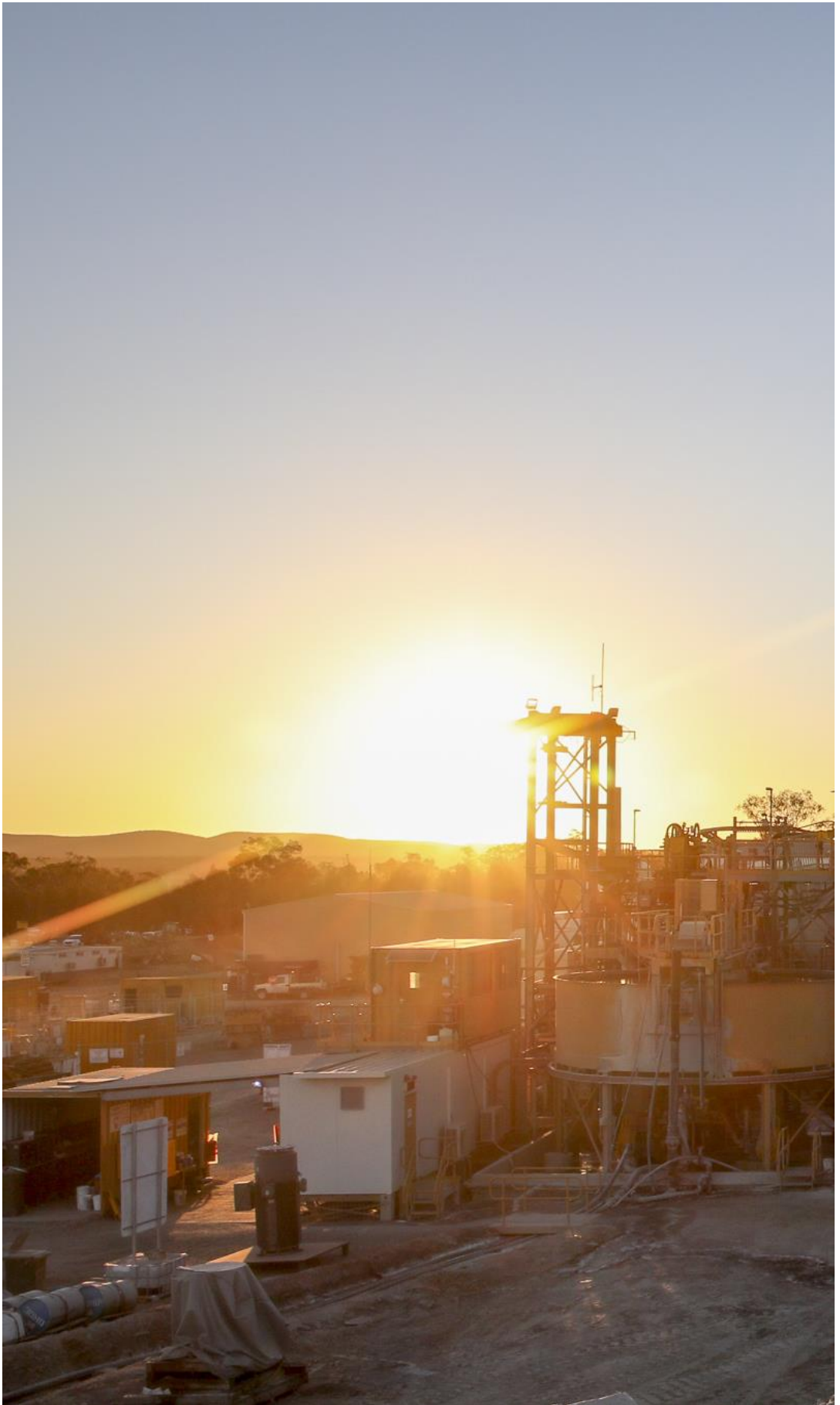


ENVIRONMENTAL  
MANAGEMENT  
STRATEGY

HERA MINE AND  
FEDERATION MINE

8/05/2024



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## Appendices

### Appendix A – Environmental Monitoring Plans

Version	Date	Description	Author
V0.2	15/01/2023	For DPE Submission	IEMA and Aurelia Metals
V0.3	29/02/2024	For DPFI Re-submission	IEMA and Aurelia Metals
V0.4	08/04/2024	For DPFI Re-submission	IEMA and Aurelia Metals

# 1. INTRODUCTION

## 1.1. Background

Hera Resources Pty Ltd (Hera Resources), a wholly owned subsidiary of Aurelia Metals Limited (Aurelia), owns and maintains Hera Mine, an underground metalliferous mine, approximately 100km southeast of Cobar and 4km south of Nymagee in the central west of New South Wales (NSW). Hera Resources operated Hera Mine from 2014 until it entered care and maintenance in early 2023.

Hera Mine is a State Significant Development (SSD) and commenced operations in 2012 under the former *Environmental Planning and Assessment Act 1979* (EP&A Act) Part 3A Major Project Approval development consent MP10\_0191, which has been modified six times.

The Federation Project (the Project) is the proposed development of an underground metalliferous mine located in central-western NSW, approximately 15 kilometres (km) south of the Nymagee township and 10km south of Hera Mine. High grade mineral deposits were discovered at the Federation site in 2019 with subsequent drilling operations identifying a substantial gold-lead-zinc-copper-silver mineral resource. The Project is an SSD for which an Environmental Impact Statement (EIS) was prepared under the EP&A Act. Hera Resources submitted an EIS in February 2022, an EIS Amendment Report in October 2022 and a Response to Submissions Report (responding to submission on the EIS) in October 2022.

Mining of the Federation deposit will allow for a transition of mining operations from Hera Mine to Federation, as ore from the Federation deposit replaces ore from the Hera Mine. As part of the Project, it was intended to rescind/surrender Hera Mine's development consent MP10\_0191 with activities at Hera Mine incorporated into the SSD approval for the Project.

Development consent ('the consent') for the Project (SSD 24319456) was granted on 2 March 2023. The consent requires that 'within 12 months of the date of physical commencement of development under this consent, or other timeframe agreed by the Planning Secretary, the Applicant must surrender development consent MP10\_0191 for the Hera Gold Mine', Hera Resources will surrender MP10\_0191 within 12 months of commencement under the consent. The Project's consent includes the amalgamation of Hera Mine's development consent conditions with the consent conditions for the Project into a single consolidated consent for both Hera Mine and Federation Mine as well as connecting infrastructure, herein referred to as the Site. Within the Site, the consent authorises activities within the 'approved disturbance area'.

Following the mineral discovery, an Exploration Decline Program was approved for a bulk sample and supporting infrastructure at the Federation Site in August 2021 by the Resources Regulator under Part 5 of the EP&A Act and section 23A(4) of the *Mining Act 1992*.

Key infrastructure approved via the consent for the Site is outlined in **Table 1**.

Table 1: Key Site Infrastructure

Project Element	Description
Mining Method	Underground mining via longitudinal retreat long hole stopping method.
Management of Waste Rock	During operations, waste rock is stored on designated pads or utilised for backfilling underground stopes. Post mining, potentially acid forming waste rock will be returned underground, and non-acid forming waste rock will be returned underground, used for backfilling the box cut or used for other rehabilitation purposes.
Processing Plant	<p>The existing processing plant includes a Run of Mine (RoM) pad, Waste Rock Emplacement (WRE), crushing, grinding and screening operations, gravity separation, and flotation circuits capable of processing up to 505 ktpa of ore.</p> <p>The new processing plant is anticipated to be commissioned early to mid-2024 at Hera Mine capable of processing 750 ktpa of ore once at full operational capacity. Key elements of the proposed processing plant include:</p> <ul style="list-style-type: none"> <li>• three stages of crushing followed by ball milling with hydrocyclone classification;</li> <li>• gravity separation to recover gold from the milling circuit recirculating load, followed by cyanide leaching of the gravity concentrate;</li> <li>• sequential flotation to produce separate copper, lead and zinc concentrates; and</li> <li>• concentrate thickening and filtration.</li> </ul> <p>Tailings thickening and filtration, and disposal by both underground paste backfill at Federation Mine and surface storage in the approved Hera Mine TSF.</p>
Management of Tailings	<p>Tailings will be either placed into the approved Tailings Storage Facility at Hera Mine or returned to Federation Mine for placement underground as paste backfill.</p> <p>The preferred backfill method at Federation Mine is cemented paste fill using tailings. The tailings paste plant will be located adjacent to the stoping footprint to allow gravity reticulation of tailings paste fill down dedicated boreholes and laterally through an underground paste distribution system.</p> <p>The shotcrete batch plant will be co-located with the tailings paste fill plant. This plant will provide an ongoing supply of shotcrete for ground support requirements underground and concrete for miscellaneous construction works.</p>
Power Generation	<p>The preferred option for power generation at Federation Mine will be by a gas plant at Hera Mine with power transferred by overhead powerlines. A proposed solar farm to be constructed at Hera Mine will offset gas requirements. An option for a solar farm and gas generators at Federation Mine is also being considered if separate power generation is the preferred option in which case transmission lines will not be required.</p> <p>The Federation Mine will initially be powered by diesel generators while new power generation capacity is constructed.</p>
General Infrastructure	Internal roads, ablutions block, administration buildings, workshop and stores, sewage treatment and treated effluent irrigation, diesel storage tanks, potable water treatment, waste rock storage, underground vents, sub station, paste plant, laydown area, topsoil stockpiles, ROM pad, box cut, magazines, haul roads, telecommunications tower, surface extraction areas, ventilation rises, access roads, heavy vehicle corridors, overhead transmission lines and concentrate stores.
Transport	Ore will be transported from Federation Mine to Hera Mine via Burthong Road. Tailings will be transported from Hera Mine to Federation Mine via Burthong Road. At the peak of mining, ore and tailings transport is estimated to be an average of 75 vehicle trips (one-way movements) per day. Concentrate will be transported via road from Hera Mine to Hermidale Siding with an average of approximately 12 vehicle trips per day at the peak of concentrate transport.

Project Element	Description
Water Management	<p>The processing plants generate the majority of Site's water demand. Water will primarily be sourced from underground workings and pumped to the surface. A network of production bores will also be established which will supplement the existing production bores.</p> <p>The maximum groundwater extraction forecast by the site water balance model is 530 megalitres per year (ML/year), which is within the existing licenced volume of 543 ML/year.</p> <p><b>Hera Mine</b></p> <p>The water management system at the Hera Site includes the diversion of clean water runoff around upslope areas of the site, the collection of water from disturbed areas and the discharge of water to Box Creek. The key elements of the Hera water management system include:</p> <ul style="list-style-type: none"> <li>• clean water runoff from undisturbed catchment areas within and upslope of the site. These flows may be diverted and discharged off site without treatment or licensing;</li> <li>• the dirty water management system which consists of a series of dirty water drains. Sediment Basin 1 and Sediment Basin 2 were used as dirty water storages during construction and have since been combined into a larger contaminated water storage which collects runoff from the processing plant area; and</li> <li>• raw water system supplied from production bores around the site. The production bores transfer water to the Back Tank (located beside Back Dam). Water from the Back Tank is transferred to the Feed Water Tank. The House Dam receives surface water from the clean water catchment and the House Bore (production bore).</li> </ul> <p><b>Federation Mine</b></p> <p>A water management system will be implemented at the Federation Mine. Key elements include the diversion of clean water runoff around the mine, and the collection of water from disturbed areas and the underground. Dirty (sediment) water is captured in catch drains and collected in the sediment basin within the footprint of the Stormwater Retention Pond. Runoff from the PAF pads will drain to Lined Leach Ponds. Runoff from the box cut will report down the decline and be dewatered as part of the underground dewatering system to the Dewatering Pond. Water contained in the Lined Leach Ponds, Stormwater Retention Pond and Dewatering Pond will be recirculated for reuse within the Hera Mine water management system by the water pipeline between Federation Mine and Hera Mine.</p>
Services Corridor	<p>Linear infrastructure in the 23 m wide, 14.3 km long services corridor (see <b>Figure 2</b>) includes:</p> <ul style="list-style-type: none"> <li>• Electricity transmission lines (if required)</li> <li>• Water pipeline</li> <li>• Access track</li> <li>• Tailings pipeline and return water line (potentially)</li> <li>• Communication infrastructure (potentially).</li> </ul>

Infrastructure at Hera Mine will be developed to support the Project, primarily the new processing plant and solar farm.

The majority of ore from Federation Mine will be trucked to Hera Mine for processing. However, over the first four years of Project up to 750,000 tonnes (up to 200,000 tpa) will be transported to Peak Mine for processing while the new processing plant is constructed and brought to operational capacity. Federation Mine is expected to produce up to 6.95 million tonnes of ore over a 12 to 14 year period.

The regional locality of Site is shown in **Figure 1** and a general site layout is in **Figure 2**. Detailed site layouts of Hera Mine and Federation Mine are shown in **Figure 3** and **Figure 4** respectively.

## 1.2. Purpose and Scope

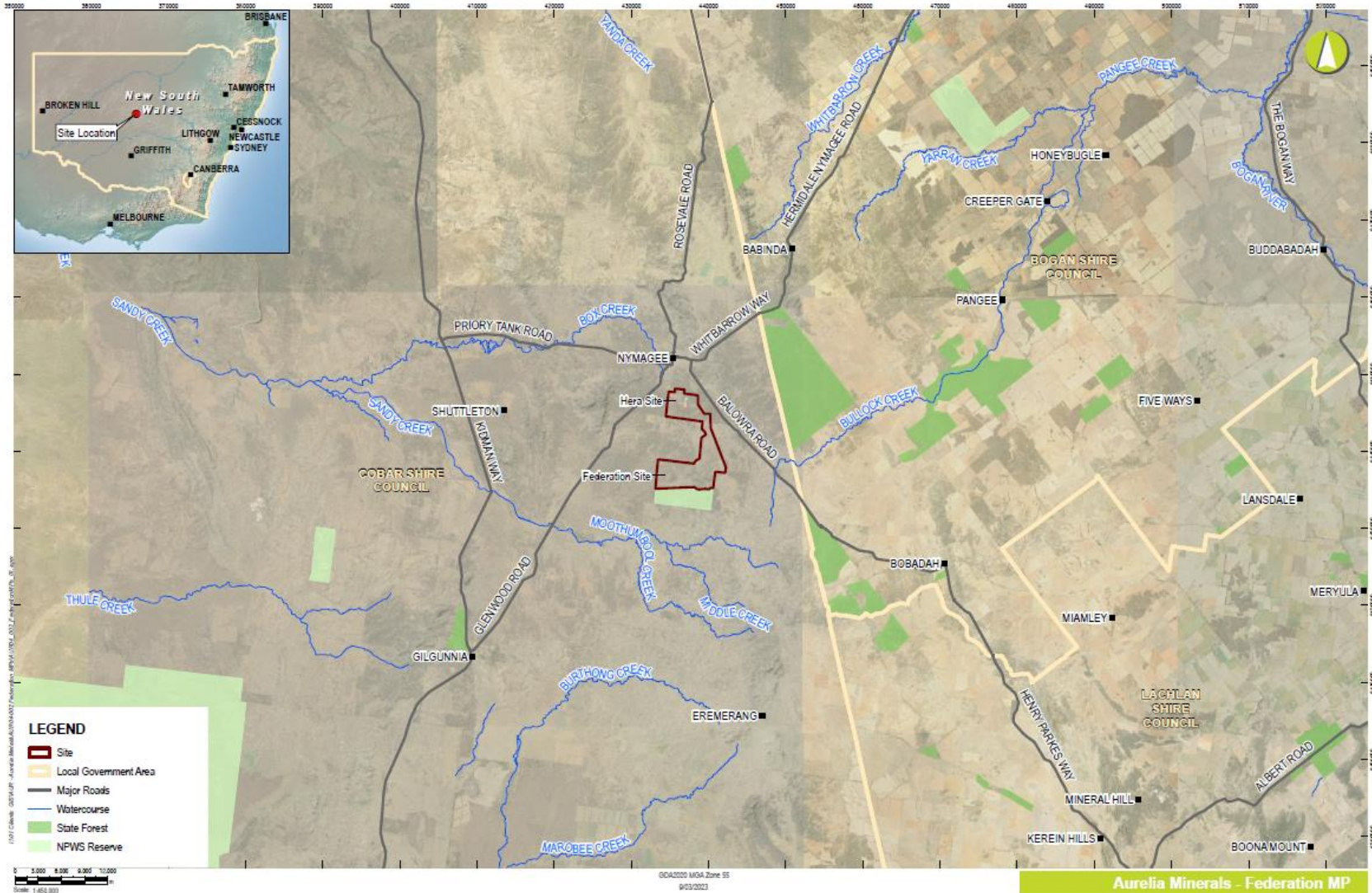
This Environmental Management Strategy (EMS) has been prepared in accordance with condition C1 of the consent to provide a strategic framework for the environmental management of the Site.

The objectives of this EMS are as follows:

- Provide a strategic framework for environmental management for the operation.
- Identify legislative requirements which are applicable to the operation.
- Identify how to communicate environmental performance to the local community, stakeholders, government agencies and internal employees and contractors.
- Identify how to resolve any disputes, non-compliances and emergencies which may occur at the Site.



Figure 1: Regional Locality



Regional Locality

FIGURE 1



Figure 2: Site Layout

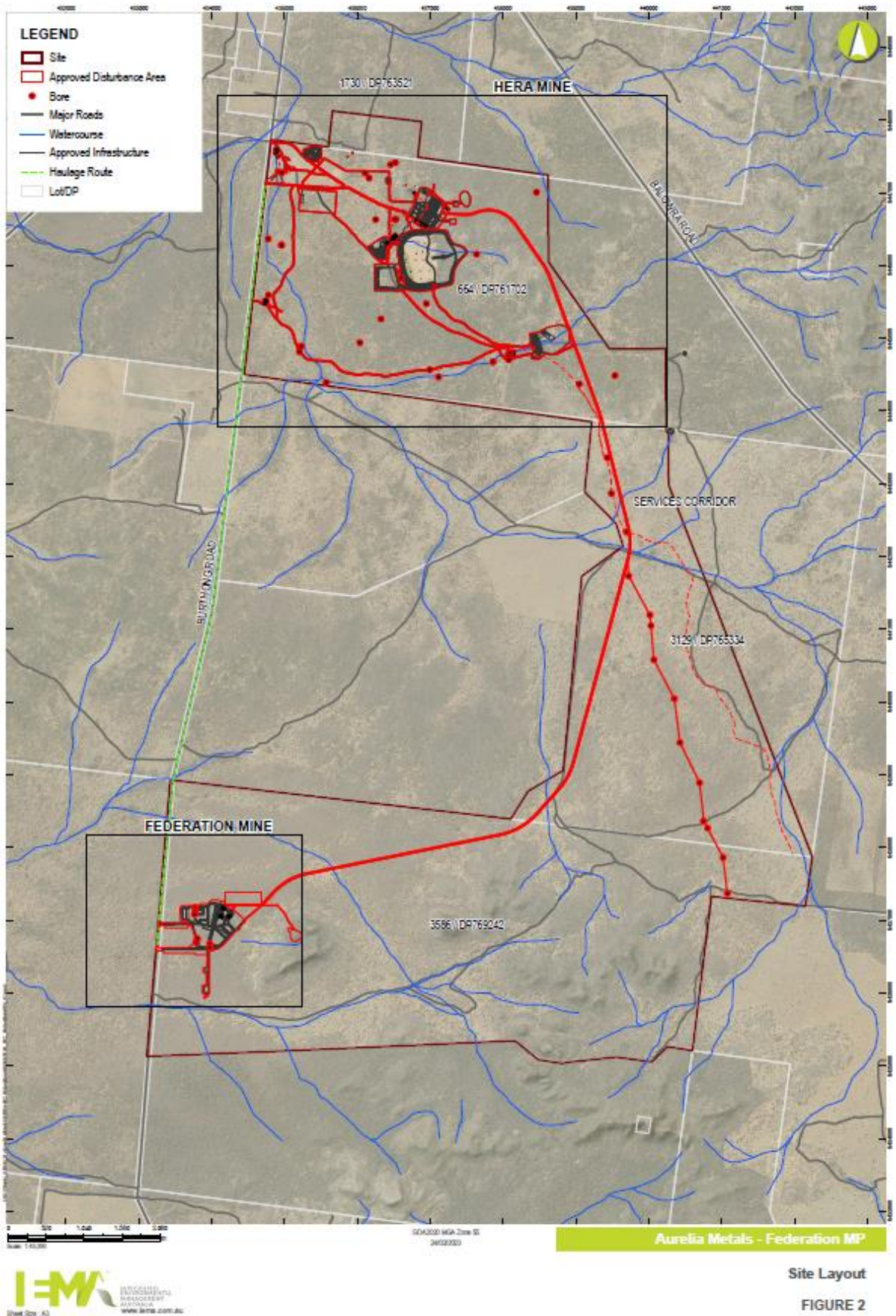




Figure 3: Hera Mine Layout

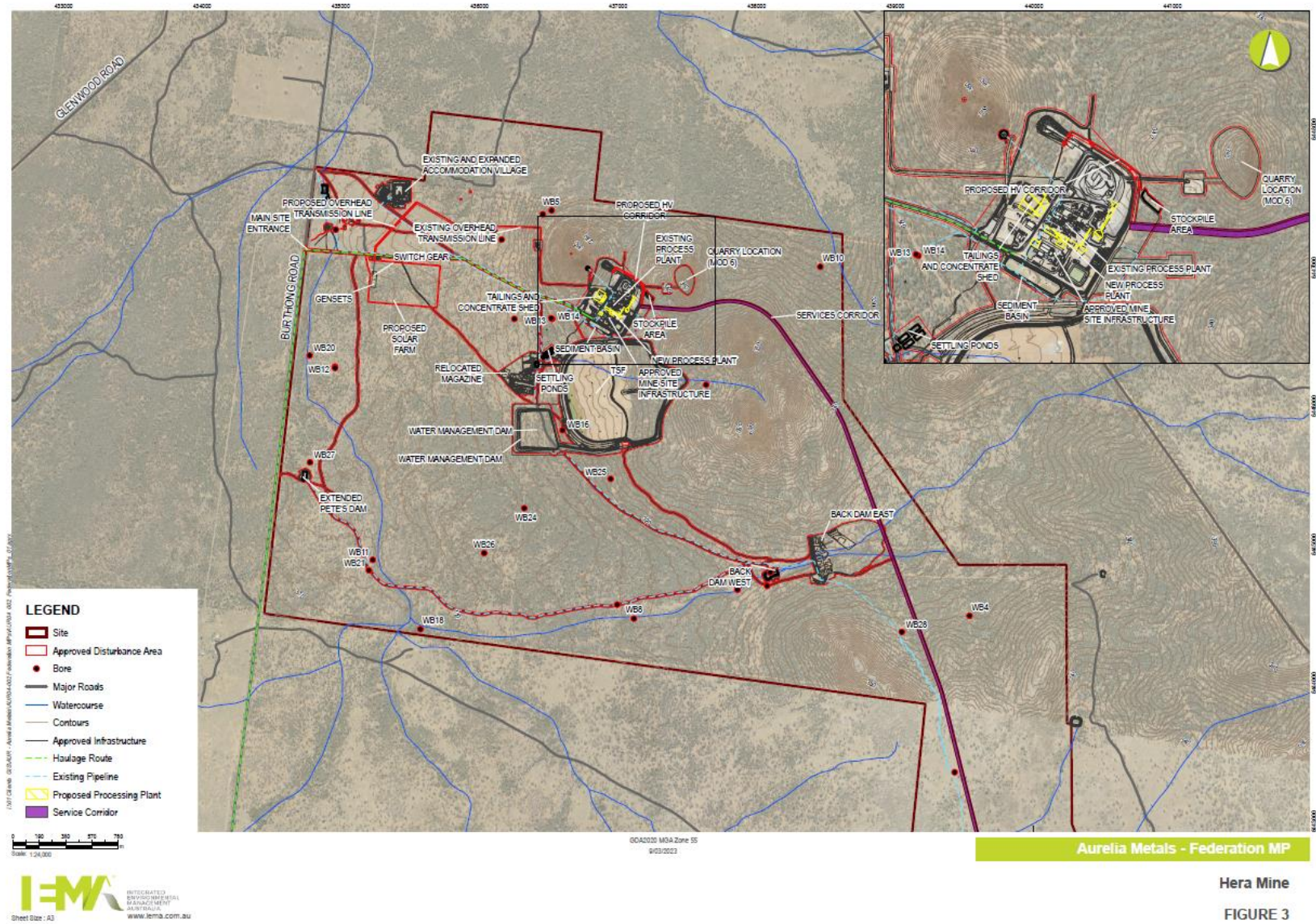
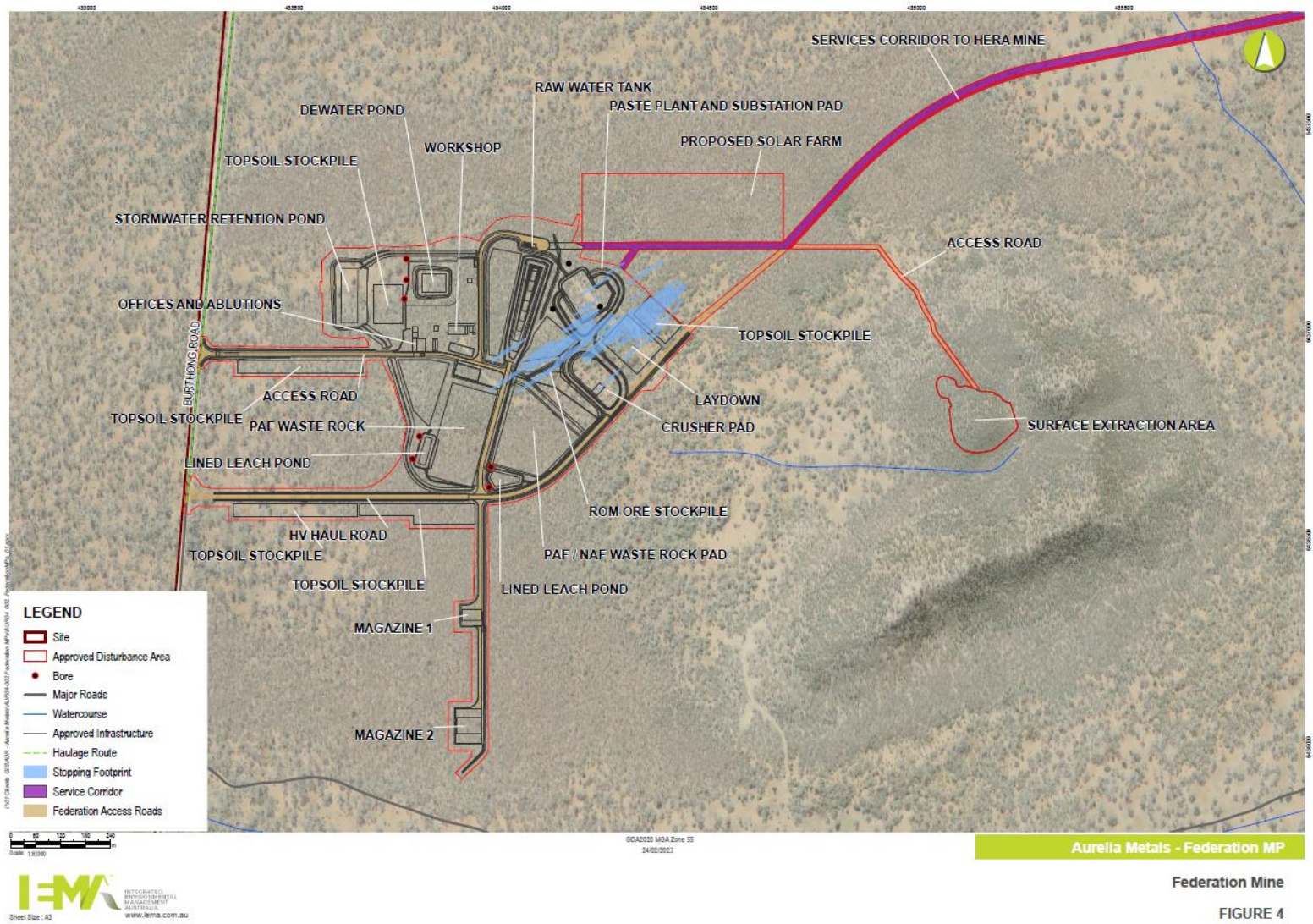




Figure 4: Federation Mine Layout



## 2. LEGAL AND OTHER REQUIREMENTS

### 2.1. SSD 24319456

SSD 24319456 stipulates the required criteria that the construction and operational activities that Hera Resources must comply with and sets out the core requirements of this EMS. Relevant conditions associated with this approval and where they have been addressed in this document are reproduced in **Table 2**.

Hera Resources will comply with the conditions of the consent (including all conditions listed in **Table 2**) as well as manage the Site in accordance with the EIS, all written directions of the Planning Secretary, and the Development Layout.

Table 2: Relevant SSD 24319456 Conditions relating to the EMS

Condition No.	Condition	Where Addressed
<b>OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT</b>		
A1	In addition to meeting the specific performance measures and criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction and operation of the development, and any rehabilitation required under this consent.	Noted
<b>TERMS OF CONSENT</b>		
	The development may only be carried out:	
	(a) in compliance with the conditions of this consent;	
A2	(b) in accordance with all written directions of the Planning Secretary;	Noted
	(c) generally in accordance with the EIS; and	
	(d) generally in accordance with the Development Layout.	
A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and the document/s listed in condition A2(c). In the event of an inconsistency, ambiguity or conflict between any of the document/s listed in condition A2(c), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	Noted
<b>NOTIFICATION OF COMMENCEMENT</b>		
	The Applicant must notify the Department in writing of the date of commencement of each of the following phases of development, at least two weeks before that date:	
	(a) physical commencement of development under this consent;	
A5	(b) commencement of construction under this consent;	Section 5.3
	(c) commencement of mining operations under this consent;	
	(d) cessation of mining operations (i.e. mine closure); and	
	(e) any period of suspension of mining operations (i.e. care and maintenance).	
A6	If the development is to be further staged, the Department must be notified in writing at least two weeks prior to the commencement of each stage, of the date of commencement and the development to be carried out in that stage.	Section 5.3

Condition No.	Condition	Where Addressed
<b>MERGE OF EXISTING CONSENT OR APPROVALS</b>		
A7	Within 12 months of the date of physical commencement of development under this consent, or other timeframe agreed by the Planning Secretary, the Applicant must surrender development consent MP10_0191 for the Hera Gold Mine in accordance with the EP&A Regulation.	Noted
A8	Upon the physical commencement of development under this consent, and before the surrender of existing development consents or project approvals required under condition A7, the conditions of this consent prevail to the extent of any inconsistency with the conditions of those consents or approvals. <i>Note: This requirement does not extend to the surrender of construction and occupation certificates for existing and proposed building works under the former Part 4A of the EP&amp;A Act or Part 6 of the EP&amp;A Act as applies from 1 September 2018. The surrender should not be understood as implying that works legally constructed under a valid consent or approval can no longer be legally maintained or used.</i>	Noted
<b>LIMITS OF CONSENT</b>		
<b>Mining Operations</b>		
A9	Mining operations may be carried out until 31 December 2036. <i>Notes:</i> <ul style="list-style-type: none"> <li>• Under this consent, the Applicant is required to decommission and rehabilitate the site and carry out other requirements in relation to mining operations. Consequently, this consent will continue to apply in all respects other than to permit the carrying out of mining operations until the rehabilitation of the site and other requirements have been carried out to the required standard.</li> <li>• Mining operations and rehabilitation are also regulated under the Mining Act 1992.</li> </ul>	Noted
<b>Ore Extraction, Processing and Transport</b>		
A10	A maximum of 750,000 tonnes of ore may be extracted from the site in any financial year.	Noted
A11	A maximum of 155,000 tonnes of concentrate may be transported from the site in any financial year.	Noted
A12	A maximum of 200,000 tonnes of ore may be transported from the site to the Peak Mine in any financial year.	Noted
<b>Hours of Operation</b>		
A13	Construction and the entry or exit of vehicles transporting ore, concentrate and waste rock to or from the site must only be undertaken between the hours of 7 am and 7 pm.	Noted
<b>Community Consultative Committee</b>		
A18	The Applicant must operate the Community Consultative Committee (CCC) established for the development in accordance with the Department's <i>Community Consultative Committee Guidelines: State Significant Projects</i> (2019) during the life of the development, or other timeframe agreed by the Planning Secretary. <i>Notes:</i> <ul style="list-style-type: none"> <li>• The CCC is an advisory committee only.</li> <li>• In accordance with the Guidelines, the Committee should comprise an independent chair and appropriate representation from the Applicant, CSC, BSC and the local community.</li> </ul>	Noted
A19	With the approval of the Planning Secretary, the Applicant may combine the CCC required by this consent with any similar CCC required by a consent or approval for any adjoining mine subject to common, shared or related ownership or management.	Department Letter dated 26 September 2023 approves Hera Resources request to merge the Hera Mine CCC with the Federation Mine CCC.

Condition No.	Condition	Where Addressed
<b>APPLICATION OF EXISTING STRATEGIES, PLANS OR PROGRAMS</b>		
A24	Prior to the approval of management plans under this consent, the Applicant must continue to implement any equivalent or similar management plan/s required under existing consents listed under condition A7, to the satisfaction of the Planning Secretary.	Noted
<b>PUBLIC INFRASTRUCTURE</b>		
<b>Protection of Public Infrastructure</b>		
	Unless the Applicant and the applicable authority agree otherwise, the Applicant must:	
A25	(a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the development; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. <i>Note: This condition does not apply to any damage to roads caused as a result of general road usage or otherwise addressed by contributions made by the Applicant to the relevant Council or to damage subject to compensation under the Mining Act 1992.</i>	Noted
A26	If the Applicant and the public infrastructure owner cannot agree on whether damage to public infrastructure is attributed to the development or the measures to be implemented to repair or relocate public infrastructure, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Planning Secretary for resolution.	Noted
<b>DEMOLITION</b>		
A27	All demolition must be carried out in accordance with <i>Australian Standard AS 2601-2001 The Demolition of Structures</i> (Standards Australia, 2001), or its latest version.	Noted
<b>OPERATION OF PLANT AND EQUIPMENT</b>		
	All plant and equipment used for the development, or to monitor the performance of the development must be:	
A29	(a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Noted
<b>COMPLIANCE</b>		
A30	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	Section 7
<b>CROWN LAND</b>		
A33	The Applicant must consult with DPE Crown Lands prior to undertaking development on Crown Land or Crown Roads. <b>Notes:</b> • Under section 265 of the Mining Act 1992, the Applicant is required to enter into a compensation agreement with DPE Crown Lands prior to undertaking any mining operations or related activities on Crown land or Crown roads within a mining lease. • Under section 141 of the Mining Act 1992, the Applicant is required to enter into an access arrangement with DPE Crown Lands prior to undertaking any prospecting operations on Crown land or Crown roads within an exploration licence.	Noted
<b>VISUAL</b>		
<b>Visual Amenity and Lighting</b>		



Condition No.	Condition	Where Addressed
B73	The Applicant must:	
B74	take all reasonable steps to minimise the visual and off-site lighting impacts of the development;	
B75	ensure no fixed outdoor lights shine directly above the horizontal or above the building line or any illuminated structure;	
B76	ensure that all external lighting associated with the development complies with relevant Australian standards including the latest version of AS/ NZS 4282: 2019 – Control of Obtrusive Effects of Outdoor Lighting;	Noted
B77	ensure that the visual appearance of all new buildings, structures, facilities or works which are visible from outside the site (including paint colours and specifications) is aimed at blending as far as possible with the surrounding landscape.	
<b>Environmental Management Strategy</b>		
	The Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must:	
	(a) be submitted to the Planning Secretary for approval prior to commencing construction under this consent;	N/A
	(b) provide the strategic framework for environmental management of the development;	Section 4
	(c) identify the statutory approvals that apply to the development;	Section 2
	(d) set out the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	Section 6
C1	(e) set out the procedures to be implemented to: <ul style="list-style-type: none"> <li>(i) keep the local community and relevant agencies informed about the operation and environmental performance of the development;</li> <li>(ii) receive, record, handle and respond to complaints;</li> <li>(iii) resolve any disputes that may arise during the course of the development;</li> <li>(iv) respond to any non-compliance and any incident; and</li> <li>(v) respond to emergencies; and</li> </ul>	Section 4
	(f) include: <ul style="list-style-type: none"> <li>(i) references to any strategies, plans and programs approved under the conditions of this consent; and</li> <li>(ii) a clear plan depicting all the sites where monitoring is to be carried out under the conditions of this consent.</li> </ul>	Section 3.1 Appendix A
C2	The Applicant must implement the Environmental Management Strategy as approved by the Planning Secretary.	Noted
<b>Adaptive Management</b>		
C3	The Applicant must assess and manage development-related risks to ensure that there are no exceedances of the criteria and performance measures in this consent. Any exceedance of these criteria or performance measures constitutes a breach of this consent and may be subject to penalty or offence provisions under the EP&A Act or EP&A Regulation.	Section 4.6
	Where any exceedance of these criteria or performance measures has occurred, the Applicant must, at the earliest opportunity:	
C4	(a) take all reasonable and feasible steps to ensure that the exceedance ceases and does not reoccur. (b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing those options and any preferred remediation measures or other course of action; and (c) implement reasonable remediation measures as directed by the Planning Secretary.	Section 4.4

Condition No.	Condition	Where Addressed
<b>Management Plan Requirements</b>		
	Management plans required under this consent must be prepared in accordance with relevant guidelines, and include where relevant:	See relevant management plan
	(a) summary of relevant background or baseline data;	
	(b) details of:	
	(i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);	Section 2
	(ii) any relevant limits or performance measures and criteria; and	
	(iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;	
	(c) any relevant commitments or recommendations identified in the document/s listed in condition A2(c);	This document
	(d) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;	Section 4
C5	(e) a program to monitor and report on the:	
	(i) impacts and environmental performance of the development; and effectiveness of the management measures set out pursuant to paragraph (d);	Section 3.3
	(f) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;	Section 4.5 Section 4.6
	(g) a program to investigate and implement ways to improve the environmental performance of the development over time;	Section 8
	(h) a protocol for managing and reporting any:	
	(i) incident, non-compliance or exceedance of any impact assessment criterion or performance measure;	Section 4.4 Section 4.2
	(ii) complaint; or	Section 5
	(iii) failure to comply with other statutory requirements;	
	j) a protocol for periodic review of the plan.	Section 8
	<b>Note:</b> The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.	
<b>REVISION OF STRATEGIES, PLANS AND PROGRAMS</b>		
	Within three months of:	
	(a) the submission of an incident report under condition C8;	
	(b) the submission of an Annual Review under condition C10;	
	(c) the submission of an Independent Environmental Audit under condition C12; or	
C6	(d) the approval of any modification of the conditions of this consent (unless the conditions require otherwise);	Section 8
	(e) notification of a change in development phase under condition A5; or	
	(f) a direction of the Secretary under condition A3 of Schedule 2 the suitability of existing strategies, plans and programs required under this consent must be reviewed by the Applicant.	
C7	If necessary, to either improve the environmental performance of the development or cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review.	Section 8
	<b>Note:</b> This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.	

Condition No.	Condition	Where Addressed
<b>REPORTING AND AUDITING</b>		
<b>Incident Notification</b>		
C8	The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the development (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 6.	Section 4.4
<b>Non-Compliance Notification</b>		
C9	The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance. A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance. <i>Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.</i>	Section 4.4
<b>Annual Review</b>		
C10	By the end of September each year after the date of physical commencement of development under this consent, or other timeframe agreed by the Planning Secretary, a report must be submitted to the Department reviewing the environmental performance of the development, to the satisfaction of the Planning Secretary. This review must: <ul style="list-style-type: none"> <li>(a) describe the development (including any rehabilitation) that was carried out in the previous financial year, and the development that is proposed to be carried out over the current financial year;</li> <li>(b) include a comprehensive review of the monitoring results and complaints records of the development over the previous financial year, including a comparison of these results against the: <ul style="list-style-type: none"> <li>(i) relevant statutory requirements, limits or performance measures/criteria;</li> <li>(ii) requirements of any plan or program required under this consent;</li> <li>(iii) monitoring results of previous years; and</li> <li>(iv) relevant predictions in the document/s listed in condition A2(c);</li> </ul> </li> <li>(c) identify any non-compliance or incident which occurred in the previous financial year, and describe what actions were (or are being) taken to rectify the non-compliance and avoid reoccurrence;</li> <li>(d) evaluate and report on compliance with the performance measures, criteria and operating conditions of this consent;</li> <li>(e) identify any trends in the monitoring data over the life of the development;</li> <li>(f) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and</li> <li>(g) describe what measures will be implemented over the next financial year to improve the environmental performance of the development.</li> </ul>	Section 5.1
C11	Copies of the Annual Review must be submitted to CSC and made available to the CCC and any interested person upon request.	
<b>Independent Environmental Audit</b>		
C12	Within one year of the date of physical commencement of development under this consent, and every three years after, unless the Planning	Section 5.2

Condition No.	Condition	Where Addressed
	<p>Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. The audit must:</p> <ul style="list-style-type: none"> <li>(a) be prepared in accordance with the Independent Audit Post Approval Requirements (NSW Government 2020); and</li> <li>(b) be submitted, to the satisfaction of the Planning Secretary, within two months of undertaking the independent audit site inspection, unless otherwise agreed by the Planning Secretary.</li> </ul>	
C13	<p>In accordance with the specific requirements of the Independent Audit Post Approval Requirements (NSW Government 2020), the Applicant must:</p> <ul style="list-style-type: none"> <li>(a) review and respond to each Independent Audit Report prepared under Condition C12 of this consent;</li> <li>(b) submit a response to the Planning Secretary and any other NSW agency that requests it, together with a timetable for the implementation of the recommendations of the Independent Audit Report;</li> <li>(c) implement the recommendations to the satisfaction of the Planning Secretary; and</li> <li>(d) make each Independent Audit Report and response to it publicly available no later than 60 days after submission to the Planning Secretary.</li> </ul>	Section 5.2
<b>Monitoring and Environmental Audits</b>		
C14	<p>Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&amp;A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, compliance report and independent audit.</p> <p>For the purposes of this condition, as set out in the EP&amp;A Act, “monitoring” means monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an “environmental audit” means a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.</p>	Section 4.4
<b>ACCESS TO INFORMATION</b>		
C15	<p>Within three months of the date of physical commencement of development under this consent, until the completion of all rehabilitation required under this consent, the Applicant must:</p> <ul style="list-style-type: none"> <li>(a) make the following information and documents (as they are obtained, approved or as otherwise stipulated within the conditions of this consent) publicly available on its website: <ul style="list-style-type: none"> <li>(i) the document/s listed in condition A2(c);</li> <li>(ii) all current statutory approvals for the development;</li> <li>(iii) all approved strategies, plans and programs required under the conditions of this consent;</li> <li>(iv) minutes of CCC meetings;</li> <li>(v) regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent;</li> <li>(vi) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;</li> <li>(vii) a summary of the current phase and progress of the development;</li> <li>(viii) contact details to enquire about the development or to make a complaint;</li> <li>(ix) a complaints register, updated monthly;</li> <li>(x) the Annual Reviews of the development;</li> </ul> </li> </ul>	Section 4.1

Condition No.	Condition	Where Addressed
	(xi) audit reports prepared as part of any Independent Environmental Audit of the development and the Applicant’s response to the recommendations in any audit report; and (xii) any other matter required by the Planning Secretary; and keep such information up to date, to the satisfaction of the Planning Secretary.	
<b>APPENDIX 6 INCIDENT NOTIFICATION AND REPORTING REQUIREMENTS</b>		
<b>WRITTEN INCIDENT NOTIFICATION REQUIREMENTS</b>		
1	A written incident notification addressing the requirements set out below must be submitted to the Planning Secretary via the Major Projects website within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under condition C8 or, having given such notification, subsequently forms the view that an incident has not occurred.	
2	Written notification of an incident must: a. identify the development and application number; b. provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident); c. identify how the incident was detected; d. identify when the Applicant became aware of the incident; e. identify any actual or potential non-compliance with conditions of consent; f. describe what immediate steps were taken in relation to the incident; g. identify further action(s) that will be taken in relation to the incident; and h. identify a project contact for further communication regarding the incident.	Section 4.4
3	Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.	
4	The Incident Report must include: a. a summary of the incident; b. outcomes of an incident investigation, including identification of the cause of the incident; c. details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and d. details of any communication with other stakeholders regarding the incident.	

## 2.2. Environment Protection Licence

There are no conditions within EPL 20179 that relate specifically to this EMS. However, EPL 20179 contains criterion and monitoring requirements that are addressed in the relevant Environmental Management Plans (EMPs) (see **Section 3.1**).

## 2.3. Mining Leases

Mining leases relevant to Site are:

- ML 1686 (Hera Mine)
- ML 1746 (Hera Mine), and
- ML 1862 (Federation Mine, Services Corridor, eastern section of Hera Mine).

There are no specific conditions within the leases to be addressed in this EMS.

## 2.4. Water Access Licence

Hera Resource will manage the Site's water resources in accordance with the Water Management Act (2000). The Water Management Plan (WMP) details the specifics of Hera Resources water management, with the relevant Water Access Licence (WAL) detailed in **Table 3**.

Table 3: Groundwater approvals and licences

Works approval	Details	Location	Water Access License (WAL)	Share components (ML/year)
85WA752586	10 bores 1 excavation	Lot 664, DP 761702		
85WA752816	1 bore 1 pipeline	Lot 1, DP 665073 Various along pipeline route*	WAL43173	543

\* Lot 9, DP 3427 Section E, Lot 1, DP 588073, Lot 1, DP 665073, Lot 664, DP 761702, Lot 1730, DP 763521

## 2.5. Consultation

No consultation is required for this document, however it will be submitted to DPHI for approval in accordance with condition C1 (a).

# 3. IMPLEMENTATION OF ENVIRONMENTAL MANAGEMENT STRATEGY

## 3.1. Environmental Management Plan

Hera Resources Environmental Management Plans (EMPs) have been prepared in accordance with the relevant consent conditions. Hera Resources will implement these plans to manage the relevant environmental aspects of Site. These plans have been listed in **Table 4**.

Table 4: Management Plans

Management Plan	Condition
Noise Management Plan	B8
Blast Management Plan	B18
Air Quality and Greenhouse Gas Management Plan	B25
Water Management Plan	B43
Waste Rock Management Plan	B43(iv)
Traffic Management Plan	B58
Biodiversity Management Plan (incorporating Stewardship Agreement)	B70
Hazardous Materials Management Plan	B82
Rehabilitation Strategy <sup>1</sup>	B86
Rehabilitation Management Plan	B87



Prior to the approval of any management plans listed in **Table 4**, Hera Resources will continue to implement the relevant corresponding management plan under MP10\_0191.

Hera Resources will implement all reasonable and feasible measures to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction and operation of the development, and any rehabilitation required under this consent in accordance with Schedule 2 Condition A1 of SSD 24319456. Hera Resources will implement the controls committed to in the Management Plans listed in **Table 4**.

## 3.2. Environmental Monitoring Requirements

Condition C1(f) of SSD 24319456 requires Hera Resources to provide a clear plan depicting all monitoring required under the conditions of the approval. The monitoring locations have been presented in **Appendix A** where relevant and outlined in **Table 5**. For further information regarding monitoring requirements, including monitoring criteria, refer to the specific EMPs listed in Table 4. All monitoring will be conducted by suitably qualified and experienced personnel.

Table 5: Summary of Environmental Monitoring Requirements Associated with SSD 24319456

Aspect	Monitor Type	Frequency	Parameters
Blast	Blast Monitor	Each blast	Blast Vibration (mm/s) and overpressure (dB(Lin Peak))
Noise	Attended and unattended monitoring	As required	LAeq(15-minute) and LA1(max)
Air Quality	E-Bam and E – Samplers	Monthly	g/m <sup>2</sup> /month
	High Volume Air Sampler	24 hour period every sixth day	µg/m <sup>3</sup>
Meteorology	Automated Weather Station	Continuous	Rainfall, wind speed @ 10meters, wind direction @ 10 meters, temperature @ 2 meters and 10m, sigma theta @ 10 meters, solar radiation
Surface Water	EPA Licensed Discharge Points	Daily during any discharge	Various (refer to Water Management Plan)
Groundwater Monitoring	Groundwater Monitoring Bores – Standing Water Level	Quarterly (provided water is present)	SWL
	Groundwater Monitoring Bores – Water Quality	Federation Mine – Quarterly Hera Mine – Quarterly / Annually (refer to WMP)	Various (refer to Water Management Plan)
Ecology	Vegetation monitoring plots <sup>1</sup>	Annual (during spring or summer)	Vegetation Integrity
	Vegetation monitoring plots <sup>1</sup>	Annual (during spring or summer) or as required for specific flora	Threatened flora
	Any known threatened flora locations at the Site		
	Site inspections	Annual (during spring or summer)	Pest flora
	Threatened fauna survey transects	Annual	Threatened fauna
	Threatened fauna monitoring locations		
	Site inspections	Annual (during spring or summer)	Pest fauna

Hazardous  
Materials  
Use and  
Transport

Record keeping

As applicable

As applicable

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Note 1: Vegetation monitoring plots are to be established following Year 1 of vegetation monitoring at Site as described in the Biodiversity Management Plan.

As per Schedule 2 Condition C14 of SSD 24319456, any monitoring or environmental audit undertaken is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act.

## 4. ENVIRONMENTAL MANAGEMENT FRAMEWORK

The following sections describe Hera Resources' environmental management framework.



## 4.1. Access to Information

Hera Resources will keep the community and relevant authorities informed of the Site's environmental performance through the implementation of communication measures as required by condition C15 as stated below.

*C15 Within three months of the date of physical commencement of development under this consent, until the completion of all rehabilitation required under this consent, the Applicant must:*

- (a) *make the following information and documents (as they are obtained, approved or as otherwise stipulated within the conditions of this consent) publicly available on its website:*
- (i) *the document/s listed in condition A2(c);*
  - (ii) *all current statutory approvals for the development;*
  - (iii) *all approved strategies, plans and programs required under the conditions of this consent;*
  - (iv) *minutes of CCC meetings;*
  - (v) *regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent;*
  - (vi) *a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;*
  - (vii) *a summary of the current phase and progress of the development;*
  - (viii) *contact details to enquire about the development or to make a complaint;*
  - (ix) *a complaints register, updated monthly;*
  - (x) *the Annual Reviews of the development;*
  - (xi) *audit reports prepared as part of any Independent Environmental Audit of the development and the Applicant's response to the recommendations in any audit report; and*
  - (xii) *any other matter required by the Planning Secretary; and*  
*keep such information up to date, to the satisfaction of the Planning Secretary.*

Hera Resources will ensure the above information is available to the public through the Aurelia website ([www.aureliametals.com.au](http://www.aureliametals.com.au)).

Other methods Hera Resources will use to communicate with the public (providing and receiving information) include, where appropriate:

- Maintenance of a community hotline (phone number - 1800 437 264) or email ([hera.community@aueliametals.com.au](mailto:hera.community@aueliametals.com.au)) where community stakeholders can seek information. Responses to enquires will be made within 2 business days.
- A Site specific page maintained on Aurelia's website updated monthly
- Mass email notifications will be dispatched using Hera Resource's contact database where necessary.
- Media releases will be prepared and distributed by Aurelia or Hera Resources for Site announcements.
- Surveys will be used where appropriate to gather feedback and inform Site planning and operations.
- Presentation of information at community/stakeholder forums including the Community Consultative Committee (CCC) (see **Section 4.1.1**).

### 4.1.1. Community Consultative Committee

Condition A18 of the consent requires Hera Resources to maintain a CCC and states:

*A18 The Applicant must operate the Community Consultative Committee (CCC) established for the development in accordance with the Department's Community Consultative Committee Guidelines: State Significant Projects (2019) during the life of the development, or other timeframe agreed by the Planning Secretary.*

**Notes:**

- *The CCC is an advisory committee only.*
- *In accordance with the Guidelines, the Committee should comprise an independent chair and appropriate representation from the Applicant, Council and the local community.*

Hera Resources will maintain a CCC as a forum to discuss the Site and outcomes of monitoring programs with community stakeholders at quarterly meetings. The CCC will be operated in accordance with the Department of Planning, Housing, and Infrastructure's (DPHI) *Community Consultative Committee Guidelines: State Significant Projects (2019)*. Hera Resources will operate the CCC for the life of the development, unless otherwise agreed by the Planning Secretary.

## 4.2. Complaint Handling Protocol

Complaints, including those regarding exceedances and non-compliances, can be lodged from the community to Hera Resources via the email address or phone number displayed in

Table 6: Contact Details for Complaints

Communication Method	Details	Availability
Email	complaints@aureliametals.com.au	24/7
Telephone	1300 016 240	24/7

- Any complaints submitted through the complaints mechanism or at community forums (e.g. CCC) are escalated to the Environment Superintendent and added to the complaints register. The Environment Superintendent will determine, and add to the register, the following details:
  - Details of the complaint (date, time, details, complainants contact details).
  - Which relevant activities occurred during the complaint period to investigate the source of the complaint.
  - Whether the complaint was a result of non-compliant activities or an incident as defined in the consent.
  - What corrective or preventative actions are required to avoid the complaint recurring.
  - When corrective or preventative actions need to take place.

Hera Resources will notify the complainant that the complaint was received and is being investigated within 2 days of receiving the complaint.
- If relevant, monitoring data for the period will be reviewed to assist in determining the source of the complaint. The complainant will then be contacted to discuss and attempt to resolve the complaint.
- In the event that the complaint is resolved via Step 2, no further action would be taken. If not resolved, then supplementary monitoring may be undertaken, if relevant to the complaint, within one month of the conclusion of Step 2 in accordance with the procedures identified in the relevant EMP (see **Section 3.1**).
- Should the review of the monitoring data indicate that no non-compliance of the relevant criteria was identified, this will be communicated to the complainant. If monitoring data indicates that a non-compliance or incident has occurred, it will be communicated to the complainant and will be managed and reported in accordance with the protocol described in **Section 4.4**.
- Corrective and preventative actions identified as a result of a complaint will be communicated to all relevant personnel through toolbox meetings and/or company memorandums. The relevant EMP will be reviewed and updated to reflect the findings of the complaint investigation if required.

The complaints register will be maintained by Hera Resources for the life of the Site and updated monthly. A record of any complaint will be kept for at least the life of the Site after and the record will be produced to any authorised officer if requested as well as made available on the Aurelia Metals website. A summary of annual complaints received will be provided in the Annual Review and made available on the Aurelia website. The complaints register will include any response from the complainant.



## 4.3. Dispute Resolution

In the event of a disagreement between Hera Resources and a member of the community, the Environment Superintendent will implement the steps in **Section 4.2** to reach a resolution. Should resolution of the dispute not be reached through this primary process, Hera Resources will implement the following procedure:

1. The complaint will be escalated to the Mining Manager, or other senior company personnel, to seek resolution to the matter. The complainant will be provided with a written response from the senior representative detailing the results of any investigation, and the actions to be undertaken in response to the complaint.
2. Following implementation of the nominated measures, a further meeting will be convened to discuss the satisfaction, or otherwise, of the complainant.

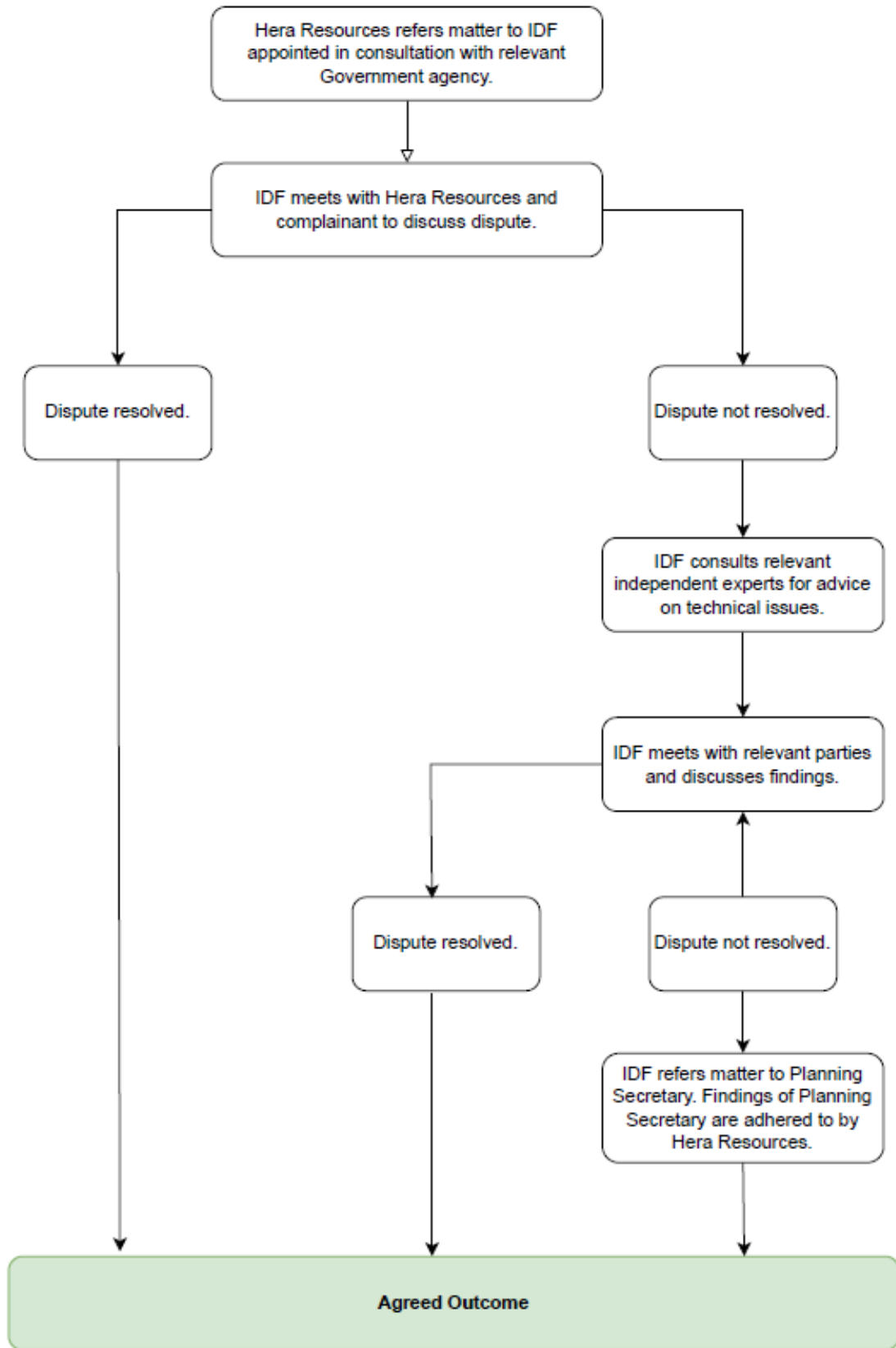
If after 21 days following the steps above, the complainant is unsatisfied with the outcome and believes the matter unresolved, Hera Resources will engage an Independent Dispute Facilitator (IDF) and the process depicted in **Figure 6** will be implemented.

As established by the relevant conditions of SSD 24319456, the Planning Secretary can provide dispute resolution without the implementation of the above process in the following situations:

**Public Infrastructure – A26:** *If the Applicant and the public infrastructure owner cannot agree on whether damage to public infrastructure is attributed to the development or the measures to be implemented to repair or relocate public infrastructure, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Planning Secretary for resolution.*

**Compensatory Water Supply – B35:** *If the Applicant and the landowner cannot agree on whether the loss of water is attributed to the development or the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Planning Secretary for resolution.*

Figure 6: Independent Dispute Resolution Process



## 4.4. Non-compliance and Incident Response

Any environmental incident or non-compliance at Site in will be managed in accordance with the consent. Incidents and non-compliances have the following definitions in the consent:

- **Incident:** *An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance*
- **Non-compliance:** *An occurrence, set of circumstances or development that is a breach of this consent*

Hera Resources will implement incident and non-compliance protocols found in the requirements of Conditions C8 and C9 of SSD 24319456. The incident and non-compliance notifications under these conditions include:

- Incident Notification provided to the Planning Secretary in writing in the Major Projects Portal immediately after becoming aware of the incident.
- Non-compliance notification will be provided to the Planning Secretary in writing in the Major Projects Portal within seven days after Hera Resources becomes aware of the non-compliance. It should be noted that a non-compliance already notified as an incident does not need to also be notified as a non-compliance.

As per item 2 of Appendix 6 of SSD 24319456, written notifications will include the following information:

- a. identify the development and application number;
- b. provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);
- c. identify how the incident was detected;
- d. identify when the Applicant became aware of the incident;
- e. identify any actual or potential non-compliance with conditions of consent;
- f. describe what immediate steps were taken in relation to the incident;
- g. identify further action(s) that will be taken in relation to the incident; and
- h. identify a project contact for further communication regarding the incident.

In the event of an incident, and following the incident notification, Hera Resources will prepare an incident report and provide it to the Planning Secretary and any relevant public authorities as determined by the Planning Secretary. Hera Resources will provide the incident report within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary.

As per item 4 of Appendix 6 of SSD 24319456, incident reports will include:

- a. a summary of the incident;
- b. outcomes of an incident investigation, including identification of the cause of the incident;
- c. details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and
- d. details of any communication with other stakeholders regarding the incident.

In the case of an environmental emergency that causes or has potential to cause environmental harm (as per the Protection of Environment Operations Act 1997 (POEO Act)) the Pollution Incident Response Management Plan (PIRMP) will be implemented.

In summary, following a non-compliance, Hera Resources will:

- Notify the Planning Secretary via the Major Project website within seven days of becoming aware of the non-compliance.
- Take all reasonable and feasible measures to ensure that the exceedance ceases and does not recur
- Consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Planning Secretary within seven days describing those options and any preferred remediation measures or other course of action
- Implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary.

Following an incident, Hera Resources will:

- Notify the Planning Secretary via the Major Project website immediately after becoming aware of the incident.
- Take all reasonable and feasible measures to ensure that the incident ceases and does not recur
- Consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Planning Secretary within 30 days describing those options and the required details of consent Appendix 6 item 4 (see above).

Hera Resources will maintain records of any environmental incidents or non-compliance, including any actions undertaken, for the life of the Site.

## 4.5. Emergency Preparedness and Response

If there is an immediate threat to human health or property, an Emergency Response will be required. Any potentially affected landholder, tenant, or lessee will be notified about the incident immediately and informed as to any appropriate actions.

### 4.5.1. Emergency Contacts

In the case of an environmental emergency that causes or has potential to cause environmental harm (as per the *Protection of Environment Operations Act 1997* (POEO Act)) the Pollution Incident Response Management Plan (PIRMP) will be implemented and the relevant emergency personnel will be contacted.

Hera Resources's emergency contact protocol is outlined in **Table 7**.

Table 7: Emergency Contact Protocol

Trigger	Agency	Contact Details
An incident that presents an immediate threat to human health or property.	Fire and Rescue NSW NSW Police NSW Ambulance Services	Call 000
An incident that:	EPA	Environment Line 131 555
<ul style="list-style-type: none"> <li>Does not require an initial combat agency, or</li> <li>Once the 000 call has been made.</li> </ul>	NSW Health	Dubbo Base Hospital Phone (02) 6809 6809
	SafeWork NSW	Call 13 14 50
Notify the relevant authorities in the following order.	CSC	Business Hours (02) 6836 5888
	DPHI	Call 1300 420 596

### 4.5.2. Emergency Response

Site maintains a Pollution Incident Response Management Plan (PIRMP) as part of the requirements of EPL 20179 and in accordance with the POEO Act to provide emergency procedures for environmental incidents. The PIRMP has been prepared to address specific requirements in the POEO Act and the EP&A Act, and includes specific measures implemented to minimise the risk of an incident occurring due to spillage, storage of hazardous materials or fire. It includes a detailed risk assessment, hazardous substances inventory, communication procedures and safety requirements.

Should an emergency occur, the general response will include the following steps:

- Take immediate action to minimise environmental harm and to mitigate the environmental impact.
- If there is a risk of material harm to the environment or an immediate threat to human health or property, prior to any other action, Hera Resources must notify any affected residence, Fire and Rescue NSW, NSW Police and NSW Ambulance – by calling 000.
- Contact other response and regulatory agencies after that to satisfy notification obligations.
- Implement corrective action to avoid a recurrence.

Following an emergency incident, these procedures will be carefully reviewed to ensure the response is practical and appropriate in practice and to implement corrective actions accordingly.

## 4.6. Adaptive Management

The EMPs have been developed with Trigger Action Response Plans (TARPs) to allow Site to respond in real-time to circumstances that may result in a potential incident or non-compliance under the consent or applicable approval. Each TARP contains trigger levels developed in accordance with the requirements of the consent, EPL or relevant legislation. When a trigger level is met, corrective actions detailed in the TARP will be implemented at the earliest opportunity to ensure the exceedance or incident ceases to occur and does not reoccur. Reasonable and feasible remediation measures will be considered and implemented at the direction of the Planning Secretary.

In the event that an incident, exceedance or non-compliance not covered by a TARP is identified, the matter will be investigated to determine the likely cause. The investigation will seek to determine:

- whether the incident or exceedance of the criteria was directly related to a source associated with the Site or if other factors contributed to the exceedance
- the primary cause of the incident or exceedance
- any contributing factors which led to the incident or exceedance
- whether appropriate controls were implemented to prevent the incident or exceedance, and
- corrective and preventative measures that may be implemented to prevent a recurrence of the incident.

This process will review whether any further reasonable and feasible engineering solutions are required to be implemented and the optimal implementation of the measures.

Actions will be communicated internally through planning meetings and toolbox talks and outstanding actions will be monitored for their effectiveness upon completion.

Potential environmental risks relevant to the Site's operations have been identified through the EIS process, environmental monitoring, and learnings from previous operations at Hera Mine. Risk mitigations have been incorporated into management practices in each EMP. Unpredicted impacts are addressed as far as practicable through TARPs in each EMP.

Any potential environmental risks that are identified during the operation of the Site will be addressed in future updates of the relevant EMP.

## 5. REPORTING

### 5.1. Annual Reporting

Hera Resources is required to prepare an Annual Review each year in accordance with condition C10, which states:

*By the end of September each year after the date of physical commencement of development under this consent, or other timeframe agreed by the Planning Secretary, a report must be submitted to the Department reviewing the environmental performance of the development, to the satisfaction of the Planning Secretary. This review must:*

- (a) describe the development (including any rehabilitation) that was carried out in the previous financial year, and the development that is proposed to be carried out over the current financial year;*
- (b) include a comprehensive review of the monitoring results and complaints records of the development over the previous financial year, including a comparison of these results against the:
 
  - (i) relevant statutory requirements, limits or performance measures/criteria;*
  - (ii) requirements of any plan or program required under this consent;*
  - (iii) monitoring results of previous years; and*
  - (iv) relevant predictions in the document/s listed in condition A2(c);**
- (c) identify any non-compliance or incident which occurred in the previous financial year, and describe what actions were (or are being) taken to rectify the non-compliance and avoid reoccurrence;*
- (d) evaluate and report on compliance with the performance measures, criteria and operating conditions of this consent;*
- (e) identify any trends in the monitoring data over the life of the development;*
- (f) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and*
- (g) describe what measures will be implemented over the next financial year to improve the environmental performance of the development.*

Hera Resources will prepare an Annual Review that meets the requirements of Conditions C10 of SSD 24319456. Hera Resources will submit the Annual Review to CSC. Hera Resources will make the Annual Review publicly available via the Aurelia website.

Hera Resources must also submit an Annual Return in accordance with condition R1.1 of EPL 20179 which states:

*R1.1 The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:*

- 1. a Statement of Compliance,*
- 2. a Monitoring and Complaints Summary,*
- 3. a Statement of Compliance – Licence Conditions,*
- 4. a Statement of Compliance -Load based Fee,*
- 5. a Statement of Compliance -Requirement to Prepare Pollution Incident Response Management Plan,*
- 6. a Statement of Compliance – Requirements to Publish Pollution Monitoring Data; and*
- 7. a Statement of Compliance – Environmental Management Systems and Practices.*

*At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.*

## 5.2. Independent Environmental Audits

Hera Resources will commission an Independent Environmental Audit (IEA) of the operation in accordance with the requirements of Conditions C12 and C13 of SSD 24319456 which states that audits must be conducted:

*C12 Within one year of the date of physical commencement of development under this consent, and every three years after, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. The audit must:*

- (a) be prepared in accordance with the Independent Audit Post Approval Requirements (NSW Government 2020); and*
- (b) be submitted, to the satisfaction of the Planning Secretary, within two months of undertaking the independent audit site inspection, unless otherwise agreed by the Planning Secretary.*

*C13 In accordance with the specific requirements of the Independent Audit Post Approval Requirements (NSW Government 2020), the Applicant must:*

- (a) review and respond to each Independent Audit Report prepared under Condition C12 of this consent;*
- (b) submit a response to the Planning Secretary and any other NSW agency that requests it, together with a timetable for the implementation of the recommendations of the Independent Audit Report;*
- (c) implement the recommendations to the satisfaction of the Planning Secretary; and*
- (d) make each Independent Audit Report and response to it publicly available no later than 60 days after submission to the Planning Secretary.*

The IEA Report and Hera Resources response to audit findings and recommendations will be published on the Aurelia website.

## 5.3. Other Reporting Requirements

Hera Resources will provide written notification to DPHI at least two weeks prior to the commencement of the following stages of the Site, in accordance with condition A5:

- Physical commencement of development under the consent
- Commencement of construction under the consent
- Commencement of mining operations under the consent
- Cessation of mining operations, and
- Any period of suspension of mining operations.

No staging is currently proposed. If the development is to be further staged the Department will be notified at least two weeks prior to the commencement of each stage, as per Condition A6 of SSD 24319456.

Other environmental aspects may require specialty reporting. These reporting requirements are detailed in the relevant EMP (see **Section 3.1**).



## 6. ROLES AND RESPONSIBILITIES

All mine employees, contractors, and visitors at Site have an overall responsibility to conduct all activities in compliance with the applicable laws, regulations, licences, and approvals detailed in **Section 2**. The roles and responsibilities for Hera Resources personnel in relation to this EMS are listed in **Table 8**. Roles are presented in order of descending authority,

Table 8: Roles and Responsibilities

Position (organisation)	Accountable Task
General Manager (Hera Resources)	<ul style="list-style-type: none"> <li>Accountable for the overall environmental performance of Site operations, including the outcomes of the management plans.</li> <li>Must ensure adequate resources are available to enable implementation of this EMS and supporting plans.</li> </ul>
Mine Manager (Hera Resources)	<ul style="list-style-type: none"> <li>Responsible for ensuring all mining works are carried out in accordance with all relevant approvals and legislation.</li> <li>Accountable for ensuring all employees in the respective areas are committed to and implement the requirements of this EMS and supporting plans.</li> <li>Report any incidences or complaints immediately to the Environment Superintendent.</li> <li>Ensure all plant and equipment is maintained and operated in a proper and efficient condition.</li> </ul>
Environment Superintendent (Hera Resources)	<ul style="list-style-type: none"> <li>Ensure the implementation of management plans and procedures (including this EMS) as part of Site's environmental framework.</li> <li>Maintain Site's environmental framework and ensure all relevant plans and procedures are reviewed and revised as required.</li> <li>Undertake or delegate required monitoring in accordance with relevant plans.</li> <li>Manage monitoring programs, results, and data.</li> <li>Notify incidents and non-compliances to the Mine Manager and relevant regulators.</li> <li>Implement Trigger Action Response Plans (TARPs) and other corrective and preventative actions.</li> <li>Manage reporting obligations, including incidents, non-compliances, and annual reports.</li> <li>Manage employee competence through inductions, training, and awareness programs.</li> <li>Escalate and act on any complaints received, including dispute resolution, where required.</li> <li>Facilitate and attend CCC meetings.</li> <li>Manage community stakeholder engagement.</li> <li>Manage accessible information on the Aurelia website.</li> <li>Certify monitoring equipment is setup in accordance with the relevant Australian Standard.</li> <li>Confirm adequate monitoring equipment is available.</li> <li>Ensure monitoring data is appropriately recorded and maintained.</li> <li>Monitoring the prevailing and predicted weather conditions.</li> <li>Ensure monitoring equipment is maintained appropriately.</li> </ul>
All Personnel (Hera Resources / contractors / visitors)	<ul style="list-style-type: none"> <li>Follow direction provided by the Environment Superintendent, Mine Manager, and General Manager.</li> <li>Abide by the conditions of the consent relevant to their works.</li> <li>Abide by Aurelia's Green Rules and The Aurelia Way.</li> <li>Show due care not to cause environmental harm.</li> <li>Notify Environment Team immediately of any actual or potential environmental non-compliance or incident.</li> </ul>

## 7. TRAINING AND AWARENESS

All personnel will be subject training via Sites' competency based induction program. Training for each role will include all environmental and legislative obligations relevant to the specific role and make all personnel aware of their obligation to comply with the relevant conditions of the consent. Training methods will be selected as appropriate for the task/role and will include one or all of the following methods:

- Generic induction courses
- Toolbox talks
- Pre-shift communications, and
- Awareness posters.

Additional training will be carried out in the event of an incident, non-compliance, or complaint where relevant. The training will be delivered to ensure that the incident, non-compliance, or cause of complaint do not reoccur.

## 8. REVIEW AND IMPROVEMENT

This EMS will be reviewed and revised as necessary in accordance with the requirements of Condition C6 of SSD 24319456 which states that reviews must be conducted:

*Within three months of:*

- a) the submission of an incident report under condition C8;*
- b) the submission of an Annual Review under condition C10;*
- c) the submission of an Independent Environmental Audit under condition C12; or*
- d) the approval of any modification of the conditions of this consent (unless the conditions require otherwise);*
- e) notification of a change in development phase under condition A5; or*
- f) a direction of the Secretary under condition A3 of Schedule 2*

*the suitability of existing strategies, plans and programs required under this consent must be reviewed by the Applicant.*

As part of the review process Hera Resources will assess the adequacy of the plan to meet the requirements contained in the relevant statutory approvals and any opportunities for improvement. The assessment will include a review of data and related trends identified in the Annual Review, a consideration of recommendations from an Independent Environmental Audit and findings arising from any incident report. If required the plan will be updated in consultation with DPHI and other relevant stakeholders.

Where there is a revision required under Condition C7 of SSD 24319456, the revised document will be submitted to the Planning Secretary for approval within six weeks of the review.

## **Appendix A – Environmental Monitoring Plans**