

BARNETT & MAY

Federation Mine

SSD 24319456)

2025 Independent Environmental
Audit

Prepared for

Hera Resources Pty Ltd.

Client representative

Liam Richards

Date

13 August 2025

Revision 0



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Prepared by — K. Holmes		Date – 13 August 2025
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Revision History					
Rev No.	Description	Prepared by	Reviewed by	Authorised by	Date
a	Draft for client Review	K. Holmes	R Peterson	K. Holmes	22 July 2025
0	Final Report	K. Holmes	K Holmes	K. Holmes	13 August 2025

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1. Introduction

Hera Resources Pty Ltd, a wholly owned subsidiary of Aurelia Metals Ltd, is the operator of the Federation Gold Project (SSD 24319456) located approximately 100 km southeast of Cobar in western new South Wales. The mining operations commenced in November 2024.

The purpose of the audit, that was undertaken in accordance with the **Barnett and May's** proposal (dated 13 February 2025), was to determine if the compliance obligations contained in the Project Approval (SSD 24319456) as required under Condition C12, which states:

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.

The Department of Planning, Housing and Infrastructure (DPHI) approved the appointment of the Auditor on 9 January 2025. The Audit was commissioned in February 2025, and the site inspection was undertaken by Ken Holmes (Accredited Lead Auditor) of Barnett & May on 8 and 9 May 2025.

This audit is the first Independent Environmental Audit of the mine under the current Approval.

1.1 Federation Gold Mine.

The Federation Mine is located approximately 100km south-east of Cobar in central NSW. The underground mine has a planning life of eight years and produces ore containing zinc, lead, copper, gold and silver. The mining operations were undertaken by Redpath (mining operations contractor).

The original plan was that the ore would be processed at the Hera processing plant, located immediately adjacent to the Federation site, however the economics of restarting the Hera processing plant was not optimal and a decision was made to transport the ore by road to the Peak site for processing.

At the time of this audit, most of the surface infrastructure had been completed, mining and the transportation of ore to the Peak for processing was occurring. Exploration works associated with potential future underground workings were also progressing.

1.2 Audit Objectives

The objectives of this Independent Environmental Audit were to:

1. Assess compliance against the conditions of the Project Approval.
2. Review all relevant post approval documentation required by the Project Approval(s) including an assessment of the implementation of Environmental Management Plans and Sub-plans.
3. Review compliance against other environmental licences and approvals excluding any Environmental Protection Licence issued under the Protection of the Environment Operations Act 1997.
4. Review the environmental performance of the development including:
 - a. A high-level comparison of actual impacts against predicted impacts as documented in the environmental impact assessment.
 - b. The physical extent of the development in comparison with the approved project boundaries.
 - c. Review of environmental incidents, non-compliances, and complaints relevant to the audit period.
 - d. Performance against any applicable environmental policy or environmental issue identified through consultation with the relevant Regulatory Authorities.
 - e. Feedback received from DPE, other Agencies or Stakeholders including the community Consultative Committee (or equivalent body) relating to environmental performance of the development.
5. Review of the status of non-compliances and recommendations made in the preceding Independent Environmental Audit.
6. A high-level assessment of the adequacy of the Environmental Management Plans and Sub-plans required by the Approval.
7. Review performance of the development against any other matters considered relevant by the auditor or the Department, considering relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices.

1.3 Audit Scope

The audit was undertaken as per the brief outlined in the Barnett and May proposal (dated 13 February 2025) and provides an assessment of the compliance of the project with the conditions of the following approvals:

- Project Approval SSD 24319456 Modification 2 (March 2025)
- Mining Lease ML 1746
- Mining Lease ML 1686

The scope of this audit was developed to meet the requirements of the New South Wales Department of Planning, Industry and Environment (DPIE) Independent Audit Post Approval Guidelines May 2020 and was developed with consideration of:

- Requirements of the Project Approval(s)
- Relevant correspondence from DPHI (provided by the Auditee);
- Inputs provided by the Stakeholders consulted as part of this IEA; and
- The Auditor's experience in relation to relevant industry practices.

1.4 Audit Period

The audit covered the period from the commencement of construction 3 May 2024 to 8 May 2025 (the Audit Period).

1.5 Limitations of this Report

In preparing this Independent Environmental Audit Report, Barnett and May has assessed the activities appropriate and necessary to evaluate the compliance status against the conditions contained in the Auditee's Project Approval. Barnett and May has addressed the general technical matters which might reasonably be considered to be relevant to such an assessment.

The findings of this Independent Environmental Audit are based on observations of the site, interviews with personnel nominated by the Auditee and review of the documentation provided by the Auditee. Barnett and May has relied on the accuracy and completeness of the documentation and other information provided by the Auditee.

Barnett and May can only advise based on the information provided to them and therefore cannot dismiss the possibility that compliance or environmental performance issues, other than those presented in the report existed at the time of this Audit.

The audit findings presented in this report are professional opinions based solely upon Barnett and May's visual observations of the site, and upon Barnett and May's interpretation of the documentation reviewed, interviews and conversations with personnel nominated by the Auditee, as referenced in this report. These conclusions are intended exclusively for the purposes stated herein, at the site listed, and for the project indicated. Opinions presented in this report apply to the site's conditions and features as they existed at the time of the audit, and those reasonably foreseeable. They necessarily cannot apply to conditions and features which Barnett and May is unaware of and has not had the opportunity to evaluate. This report does not, and does not purport to, give legal advice on the actual or potential environmental liabilities of any individual or organisation.

2. Definitions

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

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

3. Auditor Certification

Independent Audit Certification Form	
Development Name	Federation Project
Development Consent No.	SSD 24319456
Description of Development	Gold /Silver/Lead / Zinc Mine
Development Address	Nymagee, New South Wales
Proponent	Aurelia Metals Limited
Operator Address	Suite 5, Level 2, 60-62 McNamara Street, Orange
Title of Audit	Federation Mine 2025 Independent Environmental Audit
<i>I certify that I have undertaken the independent audit and prepared the contents of the attached independent audit report and to the best of my knowledge:</i> <i>The audit has been undertaken in accordance with relevant approval condition(s) and in general accordance with the auditing standard AS/NZS ISO 19011:2011 and in general conformance with the DPE's Independent Audit Post Approval Requirements (June 2018).</i> <i>The findings of the audit are reported truthfully, accurately and completely;</i> <i>I have exercised due diligence and professional judgement in conducting the audit;</i> <i>I have acted professionally, in an unbiased manner and did not allow undue influence to limit or over-ride objectivity in conducting the audit;</i> <i>I am not related to any owner or operator of the development as an employer, business partner, employee, sharing a common employer, having a contractual arrangement outside the audit, spouse, partner, sibling, parent, or child;</i> <i>I do not have any pecuniary interest in the audited development, including where there is a reasonable likelihood or expectation of financial gain or loss to me or to a person to whom I am closely related (i.e. immediate family);</i> <i>Neither I nor my employer have provided consultancy services for the audited development that were subject to this audit except as otherwise declared to the lead regulator prior to the audit; and</i> <i>I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from fair payment) from any owner or operator of the development, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.</i> <i>Note.</i> <i>a) The Independent Audit is an 'environmental audit' for the purposes of section 122B (2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000.</i> <i>b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or \$22,000, or both).</i>	
Signature	
Name of Lead/Principal Auditor	Ken Holmes
Address	102 / 75-77 Foamcrest Avenue, Newport, NSW
Email Address	ken@baeckea.com.au
Auditor Certification (if relevant)	Exemplar Global 14065
Date	13 August 2025

3.1 Auditee Details

Audit Title:	Federation Mine 2025 Independent Environmental Audit
Site:	Federation Project, Nymagee, New South Wales
Client Contact:	Liam Richards
Position:	Acting Environmental Superintendent
Client:	Hera Resources Pty Ltd
Client Address:	Level 17, 144 Edward Street Brisbane QLD 4000
Client Phone Number	0447 257 312
Client Email:	liam.richards@aureliametals.com.au
Audit Team:	Ken Holmes – Certified Lead Auditor
Auditor's Telephone:	0438 046 261
Auditor's Email:	ken@baeckea.com.au
Date of Site Visit	8-9 May 2025

4. Audit process

4.1 Audit Guidelines

This audit report has also been prepared in accordance with the 'Independent Audit Guideline, May 2020 (Audit Guidelines) (DPIE, 2020). Table 1 lists key requirements from the Audit Guidelines, the relevant Section of the Guidelines which references the requirement and indicates where each is addressed in this report.

Table 1 - Post Approval Audit Guidelines

Section	Independent Audit Report Requirements	Addressed
4.1	Version Control 1) the application number of the project; 2) each version or revision number of the report; 3) the date on which the report was prepared and issued to the Department; and 4) the title and name of the person who certified the Independent Audit Report.	Section 3 Page iii Page iii Section 3.1
4.2	Contents	
4.2.1	Introduction – a brief overview of the audit including: 1) background of the project; 2) the audit team (including qualifications and experience); 3) the objectives of the audit; 4) the audit scope; and 5) the temporal period covered by the audit.	Section 1.1 Section 4.3.1 and Appendix E Section 1.2 Section 1.3 Section 1.4
4.2.2	Audit Methodology 1) documentation from the Planning Secretary agreeing to the auditor and any technical specialist(s); 2) how the audit scope was developed; 3) a summary of the audit process adopted to determine the compliance status and assess if documents are adequate; 4) site personnel interviewed including their name and position title (and including if access was not granted or possible with any required personnel and why); 5) details of site inspections undertaken (including any areas where access was not granted or possible and why); 6) a summary of the consultation undertaken; and 7) meanings of compliance status descriptors used, as set out in this document.	Appendix C Section 1.3 Section 4 Section 4.5.3 Section 4.5.2 Section 5 Section 4.6
4.2.3	Audit Findings 1) a list of the approvals and documents audited; 2) a summary of the assessment of compliance i.e. comparison between the total number of compliance requirements and any non-compliances identified during the reporting period. Graphics can be used to summarise project performance in relation to compliance requirements; 3) a summary of any notices, orders, penalty notices or prosecutions issued in relation to the consent during the audit period;	Appendix A Section 6.1 Section 7.3

Section	Independent Audit Report Requirements	Addressed
	4) exception reporting of all non-compliances identified during the audit period. Details must include the relevant consent condition, the condition reference number, a unique non-compliance identification number, details of the non-compliance and the auditor's recommended actions that are proposed to be taken or have been taken to address the non-compliance;	Section 6.2
	5) a brief discussion or table of the status of actions arising from previous audits and the progress or outcomes of each action. Details must include the source of the action, reference (condition number), action proposed, proposed completion date, the status (date completed, if relevant) and the action complete.	Section 7.6
	6) a brief discussion of whether the Environmental Management Plans, Sub-plans and compliance documents are adequate, implemented and whether there are any opportunities for improvement;	Section 7.5
	7) a discussion of other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance;	Section 7.9
	8) documentation of any feedback received as a result of consultation undertaken with the Department, and other agencies or stakeholders including the community and Community Consultative Committee for the audit and the outcomes of this consultation;	Section 5
	9) a summary of complaints, and the adequacy of the response to, and management of complaints;	Section 7.2
	10) details of any incidents (including any enforcement action by any agency) and the adequacy of the response to, and management of such incidents;	Section 7.1
	11) an assessment of the compliance between actual and predicted impacts documented in environmental impact assessment, including an assessment of the physical extent of the development in comparison with the approved boundary and any potential off-site impacts of the development required under the Environmental Planning and Assessment Act 1979;	Section 7.8
	12) evidence collected through site inspections undertaken during the audit;	Appendix A
	13) evidence to support compliance assessment provided by the personnel interviewed during the audit;	Appendix A
	14) a brief discussion of any continual environmental management improvement opportunities identified as part of the audit; and	Section 6.2
	15) key strengths of the development's environmental management and performance identified by the auditor.	Section 7.4
4.2.4	Recommendations and opportunities for Improvement	Section 6.2

Section	Independent Audit Report Requirements	Addressed
4.2.5	Appendices 1) a completed Independent Compliance Register with all relevant conditions of consent, identifying each requirement, compliance status assessed, documenting verified evidence and providing recommendations for any non-compliance that is identified;	Appendix A
	2) a copy of documentation from the Planning Secretary agreeing to the auditor and any technical specialist(s);	Appendix C
	3) documentation detailing consultation with the Department, and other agencies or stakeholders including the community and Community Consultative Committee;	Appendix D
	4) completed and signed Independent Audit Declaration Form(s);	Section 3
	5) any reports prepared by the agreed technical specialist(s), as required; and	Not required
	6) site inspection photographs.	Appendix B

4.2 Overview

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

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

4.3 Preliminary activities

Off-site planning for the site audit comprised:

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

4.3.1 Approval of audit teams

Hera Resources Limited sought the Secretary's endorsement for the Auditor to undertake this Independent Environmental Audit. The Secretary approved the appointment of the Lead Auditor (Ken Holmes) on 9 January 2025 (Appendix C).

4.3.2 Consultation with Agencies

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

- Department of Planning, House and Infrastructure (DPHI);
- NSW Environment Protection Authority (EPA);
- Heritage NSW
- Biodiversity Conservation Service
- DPHI Water
- Resource Regulator
- Local Aboriginal Land Councils (Colac LALC and Condobolin LALC)
- Transport for NSW (TfNSW)
- Cobar Shire Council (CSC);
- Bogan Shire Council (BSC); and
- Community Consultative Committee (CCC).

Emails (and initial telephone contact with both LALC representatives) were initially sent (via Email) to each of the above agencies / groups advising them of the audit and the scope of the audit and inviting them to provide comments/requirements or specific environmental issues they required the audit to target.

Note that consultation with DPHI was undertaken via a telephone conversation and documented by the Auditor.

4.4 Information Review and Compliance Register

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

4.5 Site audit

The site inspection component of the audit was undertaken over two days from 8 and 9 May 2025.

4.5.1 Opening Meeting

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

- Mark Williams (Environmental Superintendent)
- Alexandria Butt (Environmental Advisor)
- Ken Holmes (Lead Auditor) – Barnett ad May.

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

4.5.2 Site Inspections

A initial tour of the site was undertaken by the Auditor, accompanied by Mr Islam and Ms Butt. Subsequent detailed inspections of specific areas of the operation were subsequently undertaken. The Auditor was provided with access to all areas of the site, except for underground areas, for safety reasons. The site inspection included observation of:

- Site access and security;
- Federation and Hera surface mine infrastructure;
- Hera processing plant (now dormant);
- Tailings storage;
- Waste storage areas;
- Fuel and dangerous goods storage areas;
- Equipment maintenance area;
- Rehabilitation areas;
- Upgraded roads leading into the mine site; and
- Surface water management infrastructure.

4.5.3 Interviews

Audit interviews comprised of a series of meetings with:

- Mark Williams (Environmental Superintendent); and
- Alexandra Butt (Environmental Advisor)
- Travis Carter (Mine Manager)
- Rick Carney (Redpath Safety and Training Advisor)
- Liam Richards (Contractor Environmental)

4.5.4 Document review

Compliance related documents that were not available prior to, and during site discussions of, the audit, were requested to be provided following the audit. The Auditee's personnel assisted with the provision of documentation following the audit, through secure file transfer mechanisms. The key documents reviewed during this audit are listed in the

Compliance Registers against specific conditions.

4.6 Reporting

The compliance register was completed using notes and observations recorded during the site inspection / interviews and review of appropriate documentation. The completed compliance register is presented in **Appendix A**. A summary of the non-compliances identified during this audit are provided in Table 5 and Table 6. The audit criteria used to determine compliance for this audit is defined in Table 2

Table 2 - Compliance Assessment Matrix

Assessment	Criteria
Complies	Compliance - The site complies with the requirements of applicable pre-operational Consent Conditions. - A judgment made by an auditor that the activities undertaken, and the results achieved fulfil the specified requirements of the audit criteria. While further improvements may still be possible, the minimum requirements are being met.
Non-Compliance	Non-Compliance - Clear evidence has been collected to demonstrate the requirement has not been complied with and is within the scope of the audit. - Site displays little or no evidence of compliance with the requirements of the regulatory documentation. Note: Where the auditor has not been able to collect enough verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit. In the absence of enough verification, the auditor may in some instances be able to verify by other means (visual inspection, personal communication, etc.) that a requirement has been met. In such a situation, the requirement should still be assessed as not verified. As the condition cannot be verified it is treated as a non-compliance.
Not Triggered	Not Applicable / Not Triggered The respective condition / requirement was not activated within the scope of the audit.
Noted	A statement or fact, where no assessment of compliance is required.

Risk levels for each non-compliance identified have been assessed in accordance with

Table 3 - Risk Assessment Matrix

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

5. Stakeholder Consultation

Table 4 - Summary of Stakeholder Inputs provides a summary of the Stakeholder Consultation undertaken by the Auditors.

Table 4 - Summary of Stakeholder Inputs

Department	Contact	Stakeholder Comments	Auditor Response
NSW Department of Planning, Industry and Environment	Katrina O'Reilly – Senior Compliance Officer.	Areas to be focused to include: Evidence of compliance with commitments, reporting and monitoring in all management plans.	Please refer to Appendix A.
		Evidence of compliance with approved footprint and current activities.	During the site inspection the Auditor verified that the development appears to be confined to the approved project footprint.
		Erosion and sediment controls, management, monitoring and maintenance.	The erosion and sediment controls observed during this audit were in accordance with the current ERSED plans.
		Comparison between EA predictions and actual impacts.	Please refer to Section 7.9
		Road maintenance/ monitoring and management and the interface /access onto road networks.	Agreements are in place with Cobar Shire Council for road maintenance.
		Evidence of Progressive Rehabilitation.	Limited progressive rehabilitation works have been completed.
		Complaints management, monitoring and response.	Refer to Section 7.2.
Cobar Council	Garry Ryman – Director Planning and Environmental Services	Council did not respond to the consultation request.	Noted

Department	Contact	Stakeholder Comments	Auditor Response
Resource Regulator	Jenny Ehmsen – Principal Compliance Auditor	Thank you for your email dated 27 March 2025 (our reference: AREQ0062979) requesting consultation on the independent audit to be undertaken of the Federation Mine Project which is covered by mining lease ML1862 (1992). The independent environmental audit should provide an assessment of compliance with the requirements of Schedule 8A Standard conditions of mining leases, Part 2 Standard conditions, as set out in the Mining Regulation 2016. The audit should note observations where rehabilitation procedures, practices and outcomes represent best industry practice. It would be appreciated if a copy of the final audit report could be sent to the Regulator at nswresourcesregulator@service-now.com upon completion of the audit.	Please see Appendix A1 and Section 6 below. Note that limited rehabilitation works have been undertaken to date and that an assessment of the rehabilitation practices is not yet feasible.
NSW EPA	Brooke Emerton (Regional Operations Officer)	The main ongoing issues regarding Hera Mine from a brief view would be to do with limit exceedances and failure to monitor in every annual return.	The Auditor noted that all air quality monitoring required under the Approval had not been undertaken.
Heritage NSW	Nicole Davis – Manager Assessments	Nothing comes to mind re this one, we have had no issues re ACH that I am aware of and there is nothing on file that I can see.	Noted
CCC	Garry West (Chair)	The CCC monitors the environmental performance at each quarterly meeting. Nothing over the past 12 months has caused concern to members. Thank you for the opportunity to identify any issues of concern.	Noted

Department	Contact	Stakeholder Comments	Auditor Response
DPE Water	Tim Baker – Senior Water Regulation Officer	The department requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope: • The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include: ○ Water Management Plans and related sub-plans eg. Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan. ○ Extraction Plans and related sub-plans eg. Water Management Plan, Subsidence Management Plan. • The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting. • Water supply availability is clearly defined for the project. • Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018.	A Water Management Plan has been prepared and implemented and meets the requirements of the Approval. Water supply requirements for the mine were met during this audit period. WAL 85AL753867 is held by Aurelia Metals for this operation. A high-level assessment of compliance against the licence was completed. The Federation mine is operating in compliance with that licence. The first Annual Environmental Report for this project has not yet been triggered.

Department	Contact	Stakeholder Comments	Auditor Response
		- Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant. - Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from. - Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous year's, and 3) identifies exceedances and how these are managed/mitigated.	
TfNSW	Kylie-Anne Pont – Team Leader Development Services West	TfNSW understands that the proponent is currently going through the process of delivering road upgrades on the classified road network in accordance with Condition B51 of the consent for SSD-24319456 via a Works Authorisation Deed. More recently, a Travel Management Plan (TMP) was submitted to TfNSW in accordance with Condition B58 via the Major Projects ePlanning Portal. The TMP is currently under consideration by TfNSW. TfNSW will continue to work with the proponent (where required) to achieve compliance with the relevant conditions of consent and has no recommended matters to be considered in the independent audit.	Noted

Department	Contact	Stakeholder Comments	Auditor Response
Bogan Shire Council	Derek Francis – General Manager	Thank you for your email regarding the Federation Project Environmental Audit. Our understanding is that the Federation Project is in Cobar Shire. In undertaking your audit on environmental matters, inclusion of detection of any non-compliance associated to contaminated water (stays on site/appropriate freeboard/ appropriate lining) and appropriate management of any potentially acid forming material; that is likely up to Cobar Shire to address those matters. However, the one impact that has been brought to our attention, is the potential to haul product to the Hermidale handstand, in Bogan Shire, which would have implications to the roads and possibly the environment through dust, if roads aren't sealed/hardstand not watered down. Apart from the potential environmental impact at the Hermidale handstand, we are not aware of any environmental non-compliance in the Bogan Shire from the Federation Project.	Acid forming material are being managed in accordance with the mines EMS and no issues of concern were identified by the Auditor. Dust management on site is a priority, however recommendations for improvement have been made in this audit report (refer to Section 6.2) The project is not currently and has no plans to send concentrate to the Hermindale Siding as all ore from the mine is being transported to the Peak Mine for processing and no processing is being undertaken at the Hera / Federation Mine.
Biodiversity Conservation Service	Jo Milgate	BCS did not respond to the consultation request	Noted
Cobar LALC	Chairperson	The Cobar LALC did not respond to the Auditor's consultation Requests	Noted
Condobolin LALC		The Condobolin LALC did not respond to the Auditor's consultation Requests	Noted

6. Statutory Compliance and Recommendations

Compliance with the Conditions of Consent and the Environment Protection Licence has been reviewed by assessing compliance against the various documentation related to the project approvals and licences listed in Section 1.3 of this report. The Compliance Register presented in Appendix A provides a detailed review of the compliance status of the site, including recommendations to address non-conformances.

6.1 Summary of Compliance Status

A summary of compliance with pre-operations statutory requirements is provided in Table 5 - Summary of Statutory Compliance. The number of conditions include relevant sub-clauses within each approval document.

Table 5 - Summary of Statutory Compliance

Approval/ Licence	No. of Conditions	Compliant	Non- Compliant	Noted	Not Triggered
SSD 24319456	222	133	22	24	43
Mining Lease Standard Conditions	85	30	6	22	27
TOTAL	307	163	28	46	70

6.2 Non-Compliances and other recommendations

Non-compliances identified during the site inspection, interviews and document reviews are recorded in detail in the Compliance Registers in **Appendix A** and are summarised in Table 6.

Table 6 - Statutory Non-Compliances

No.	Condition	Observation	Recommendation	Risk Level
PROJECT APPROVAL – SSD 24319456				
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, except as permitted by condition A13A.	Two incidents were ore trucks arrived early. Non-compliance reports were sent to DPHI.	Ensure that all haulage contractors are provided with the Drivers' Code of Conduct and an induction that includes transportation restrictions.	Low
A13A	The entry and exit of vehicles transporting ore between Peak Mine and the site can only be undertaken between the hours of 7 am and 10 pm.	Two incidents were ore trucks arrived early. Non-compliance reports were sent to DPHI.	Ensure that all haulage contractors are provided with the Drivers' Code of Conduct and an induction that includes transportation restrictions.	Low
B17	The Applicant must: (b) operate a suitable system to enable the public to get up-to-date information on the proposed blasting schedule on site; and	Table 4 of the Blast Management Plan states that a blasting schedule will be published on the project website and in monthly reports. Table 4 also states that the nearest property owners and police will be notified of any planned surface blasting. The Auditor understands that no surface blasting was undertaken during the audit period, and that Federation's intent is to provide notification of surface blasting. However, this condition does not distinguish between surface and subsurface blasting. No blasting schedule is provided on the website or in the monthly reports published on the website. The Auditor notes that as the impacts of underground blasting (predominantly ground vibration) impact properties close to the blast location, that notification of the property owners in close proximity to the mine should be the priority.	It is recommended that Hera Resources either: • Publish a monthly blast schedule on the website and in the monthly reports; or • Apply for an exemption from DPHI for the publication of the schedule for underground blasting.	Low
B18 (d)	(The Applicant must prepare a Blast Management Plan for the development. This plan must: d) include a protocol for identifying any blast-related exceedance, incident or non-compliance and for notifying the Department, the EPA and relevant stakeholders of these events;	Section 7.1 of the Blast Management Plan describes the protocol for incident and non-compliance identification and Sections 8.2 and 8.3 specify the reporting requirements (to DPHI) for incidents and non-compliances respectively. Section 7.1 of the plan references Section 4.4 of the Environmental Management Strategy. The EMS does not cover the reporting on (blast) incidents, exceedances or non-compliances to the EPA or Resource Regulator.	Revise the Blast Management Plan to specifically include the notification of DPHI, the Resource Regulator and the EPA if a blast incident, blast criteria exceedance or non-compliance is identified.	Administrative non-compliance

No.	Condition	Observation	Recommendation	Risk Level
B20	The Applicant must implement the Blast Management Plan	The Blast Management Plan states that a blasting schedule will be published on the project website and in monthly reports. No blasting schedule is provided on the website or in the monthly reports published on the website. Please refer to Condition B17 (b) above.	It is recommended that Hera Resources either: • Publish a monthly blast schedule on the website and in the monthly reports; or • Apply for an exemption from DPHI for the publication of the schedule for underground blasting.	Administrative non-compliance
B22	The Applicant must ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not cause exceedances of the criteria listed in Table 3 at any residence on privately-owned land	One complaint relating to dust from the TSF was received during the audit period A review of the air quality monitoring data on the Aurelia website indicated that the PM10 criterion was exceeded on the High-Volume Sampler on 24 April 2025. The Auditor understands that the exceedance was not investigated and therefore a non-compliance against this condition cannot be ruled out. No monitoring for PM2.5 levels was undertaken during this audit period, therefore compliance against this condition cannot be verified. The auditor understands that Aurelia is planning to install a solar farm to provide power to the project.	1. Commission a suitably qualified air quality specialist to review the suitability of the existing air quality monitoring equipment for the monitoring of PM2.5 levels. 2. Implement routine PM2.5 Monitoring 3. Review the allocation of responsibilities for the review of all environmental monitoring data to ensure that all exceedances are identified promptly, investigated and non-compliance reporting undertaken when required.	Medium
B24 (a)	The Applicant must: (a) take all reasonable steps to (i) minimise odour, fume, and particulate matter (including PM10 and PM2.5) emissions of the development, paying particular attention to minimising odour from ventilation shafts, wheel-generated haul road emissions, and emissions from the waste rock emplacements; (ii) improve energy efficiency and reduce greenhouse gas emissions of the development; (iii) minimise any visible off-site air pollution generated by the development; (iv) minimise to the greatest extent practicable, the area of dust generating surfaces at any given point in time;			Medium

No.	Condition	Observation	Recommendation	Risk Level
B24 (b)	The Applicant must: (b) operate a comprehensive air quality management system that uses a combination of predictive meteorological forecasting and air quality monitoring to guide the day-to-day planning of mining operations and the implementation of both proactive and reactive air quality mitigation measures to ensure compliance with the relevant conditions of this consent;	A subscription for Weatherzone is in place and can be used for predictive meteorological forecasting tool to inform proactive dust mitigation strategies. During this audit, no records were available to verify that this system is routinely used and that the operations team are advised of predicated adverse weather conditions.	Develop and implement a process that uses a combination of predictive meteorological forecasting and air quality monitoring to guide the day-to-day planning of mining operations.	Low
B24 (c)	(c) minimise the air quality impacts of the development during adverse meteorological conditions and extraordinary events (see Note c to Table 3 above);	A subscription for Weatherzone is in place and can be used for predictive meteorological forecasting tool to inform proactive dust mitigation strategies. During this audit, no records were available to verify that this system is routinely used and that the operations team are advised of predicated adverse weather conditions.	Develop and implement a process that uses a combination of predictive meteorological forecasting and air quality monitoring to guide the day-to-day planning of mining operations.	Low
B24 (d)	The Applicant must: (d) carry out regular air quality monitoring to determine whether the development is complying with the relevant conditions of this consent; and	A dust monitoring program is in place, however no monitoring of PM2.5 levels is being undertaken. Therefore, compliance with the PM2.5 levels specified in Table 3 cannot be verified.	Expand the air quality monitoring program to include monitoring for PM2.5.	Low
B25 (b)	The Applicant must prepare an Air Quality and Greenhouse Gas Management Plan for the development. This plan must: (b) describe the measures to be implemented to ensure: (vi) the air quality impacts of the development are minimised during adverse meteorological conditions and extraordinary events;	Air quality management measures are described in Section 4 of the AQGGMP. Section 4.2 describes the existing greenhouse gas mitigation measures. This section of the plan also states that energy efficiency measures will be reviewed annually. The Plan does not include a protocol for the ensuring that the air quality impacts of the operation are minimised during adverse meteorological and extraordinary events. The Auditor notes that Hera / Federation has an account with Weatherzone that predicts dust-noise that has been in place since 2023.	Revise the Air Quality and Greenhouse Gas Management Plan to include a protocol for ensuring that the air quality impacts of the operation are minimised during adverse meteorological and extraordinary events.	Administrative non-compliance

No.	Condition	Observation	Recommendation	Risk Level
B25 (d)	(d) include an air quality monitoring program, undertaken in accordance with the Approved Methods for Sampling and Analysis of Air Pollutants in NSW (EPA, 2022) and Ambient Air Monitoring Guidance Note (EPA, 2022), or its latest version, that: (i) uses monitors to evaluate the performance of the development against the air quality criteria in this consent and to guide day to day planning of operations; (ii) adequately supports the air quality management system; (iii) includes a protocol for distinguishing the dust emissions of the development from any neighbouring developments; and (iv) includes a protocol for identifying any air quality-related exceedance, incident or non-compliance and for notifying the Department and relevant stakeholders of these events.	The air monitoring program is described in Section 5 of the plan. Monitoring equipment is described in Section 5 and 5.2. While reference is made to monitoring using an E-BAM (trailer), the requirement to monitor PM2.5 is not specified. The plan does not include a protocol for distinguishing the dust emissions of the development from any neighbouring developments. The plan does not include a protocol for identifying any air quality-related exceedance, incident or non-compliance and for notifying the Department and relevant stakeholders (for example the EPA and the RR) of these events.	Revise the Air Quality and Greenhouse Gas Management Plan to include: • Monitoring and reporting on PM2.5. • a protocol for distinguishing the dust emissions of the development from any neighbouring developments. • a protocol for identifying any air quality-related exceedance, incident or non-compliance and for notifying the Department and relevant stakeholders (for example the EPA and the RR) of these events.	Administrative non-compliance
B42	The Applicant must ensure that the development complies with the performance measures in Table 4: Chemical and hydrocarbon products to be stored in bunded areas in accordance with the relevant Australian Standard	Deficiencies were identified with the storage of chemicals and hydrocarbons at both the Hera and Federation Sites. Refer to Section 7.9.2	Refer to Section 7.9.2	Medium
B72	The Applicant must implement the Biodiversity Management Plan.	During the site inspection, as clearing works have been completed, there is limited opportunity to observe the practical aspects of the implementation of the BMP. However, the storage of excavated materials was observed that did not conform with the obligations established in Section 4.3.1, Table 10. It is noted however, that no other non-conformances were identified and that the Auditor is satisfied that generally the BMP is being implemented.	Review procedures for the excavation and storage of materials from earthworks and ensure that, for example work method statements, cover all of the necessary biodiversity management measures. Relocate any topsoil or other stockpiles that encroach on remnant vegetation.	Medium

No.	Condition	Observation	Recommendation	Risk Level
B84	The Applicant must implement the Hazardous Materials Management Plan as approved by the Planning Secretary.	The HMMP states that liquids (for example fuels, oils and chemicals) are stored in accordance with the NSW EPA Storage of Liquids Guidelines that incorporate the requirements of AS 1940, AS 2507, AS 2714, AS 3883, AS 3780 and AS 3846 that cover all of the liquids and chemicals used and stored that the Hera / Federation site. Deficiencies were identified with the storage of chemicals and hydrocarbons at both the Hera and Federation sites. Refer to Section 7.9.2	Refer to Section 7.9.2	Medium
B86 (c)	This Rehabilitation Management Plan Strategy must: (c) be submitted to the Planning Secretary for approval within six months of the date of physical commencement of development under this consent, unless otherwise agreed by the Planning Secretary;	DPHI was notified that the commencement of construction would occur on 3 May 2024. The plan was submitted to DPE for review and comment on 23 October 2023. The Rehabilitation Management Plan was finalised and published on 16 December 2024. The finalisation of the plan and therefore approval occurred after the six months specified in this Condition.	Ensure that all future submissions to DPHI are submitted within the required timelines.	Administrative non-compliance
B86 (k)	(k) investigate ways to minimise adverse socio-economic effects associated with rehabilitation and mine closure; and	A strategy to investigate ways to minimise adverse socio-economic effects associated with rehabilitation and mine closure has not been included in the plan.	During the next revision of the plan include a strategy to investigate ways to minimise adverse socio-economic effects associated with rehabilitation and mine closure.	Administrative non-compliance
B86 (l)	(l) include a program to report on the outcomes of the investigations required under this condition and review and update this strategy at least every five years.	A reporting program is not included in the plan.	During the next revision of the plan include a reporting program.	Administrative non-compliance
C2	The Applicant must implement the Environmental Management Strategy as approved by the Planning Secretary.	A relatively high number of non-compliances have been identified during this audit. While the broad framework provided by this EMS is appropriate, the implementation of responsibilities has not been consistent. Refer to Section 7.4	Refer to Section 7.4.	Administrative non-compliance

No.	Condition	Observation	Recommendation	Risk Level
C4	Where any exceedance of these criteria or performance measures has occurred, the Applicant must, at the earliest opportunity: (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.	An exceedance of the air quality criteria was identified during this audit. That exceedance was not investigated and as a result, it is not possible to determine if and adverse impact on any neighbouring residential property occurred. The Auditor accepts that while the likelihood of adverse impact may be low, that this cannot be verified and consequently the need for the implementation of remedial actions could not be determined.	Refer to Section 7.4.	Administrative non-compliance
C5	Management plans required under this consent must be prepared in accordance with relevant guidelines, and include where relevant: (e) a program to monitor and report on the: (i) impacts and environmental performance of the development; and (ii) effectiveness of the management measures set out pursuant to paragraph (d);	All plans required under this Approval met the requirements of Condition C5 (e), except the Rehabilitation Management Plan.	During the next revision of the Rehabilitation Management Plan include a reporting program.	Administrative non-compliance

No.	Condition	Observation	Recommendation	Risk Level
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.	Three incidents were reported to DPHI during this audit period. The initial notification should occur on the day that the incident is detected. This did not occur for the water leak incident. The initial notification should include the Development Name and Application Number. All three initial reports to DPHI referenced on the EPL number. None of the three initial incident reports contained this information. The formal incident notification that are due within seven days of the initial notification should include the details contained in Appendix 6 of the Approval including: • identify the development and application number; • provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident); • identify how the incident was detected; • identify when the Applicant became aware of the incident; • identify any actual or potential non-compliance with conditions of consent; • describe what immediate steps were taken in relation to the incident; • identify further action(s) that will be taken in relation to the incident; and • identify a project contact for further communication regarding the incident. The written reports provided to DPHI did not include all of this information. Within 30 days of the incident a formal report is to be submitted to DPHI that includes the above information plus • a summary of the incident; • outcomes of an incident investigation, including identification of the cause of the incident; • details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and • details of any communication with other stakeholders regarding the incident	1. Ensure that all incident notifications to DPHI are submitted immediately following the identification of the incident. 2. Prepare a template Initial Incident Notification Form, a template Written Incident Report to ensure that all notifications to DPHI and the subsequent formal written notification and incident reports reference the development name (Federation Project) the Application Number (SSD 24319456) and all information required under Appendix 6 of the Approval.	Administrative non-compliance

No.	Condition	Observation	Recommendation	Risk Level
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; (ix) a complaints register, updated monthly; (b) keep such information up to date, to the satisfaction of the Planning Secretary.	A review of the Aurelia Website has found that all of the documentation required by this Condition was uploaded to the website and up to date, with the following exceptions: - Complaints Register was last updated in 2023. - The most recent modification to this Approval was not available onto the Website - The original version of the Rehabilitation Management Plan was available on the website, but not the current version. - The mining lease for the Federation site was not available on the web site. (a copy of the conditions attached to the lease were uploaded).	Ensure that the complaints register is updated monthly Ensure that all documents required by this Condition are available on the web site and kept up to date.	Administrative non-compliance

No.	Condition	Observation	Recommendation	Risk Level
MINING LEASE STANDARD CONDITIONS				
D3 C15a	The holder of a mining lease must do the following before the end of the initial period— • prepare a rehabilitation management plan, and	A Rehabilitation Management Plan was prepared for the Hera site covering the period from July 2022 to 2025, that plan covered the original Hera Mine site (not the Federation site). A Rehabilitation Management Plan covering the mining leases associated with both the Hera and Federation site was prepared in 2025, after completion of the Initial Period.	Ensure that all revised plans are prepared within timelines set in the mining lease conditions.	Administrative non-compliance
D3 C15b	The holder of a mining lease must do the following before the end of the initial period— - prepare rehabilitation outcome documents and give them, other than the rehabilitation completion criteria statement, to the Secretary for approval, and	Rehabilitation Outcome documents were submitted to the RR on 18 November 2022. That submission was related to the Hera Mining Operations only. A subsequent submission in October 2025 covered the Federation mining operations. This submission occurred outside of the Initial Period.	Ensure that all submissions required by the Mining Leases are prepared and submitted within timelines set in the mining lease conditions.	Administrative non-compliance
D3 C15c	The holder of a mining lease must do the following before the end of the initial period— prepare a forward program and give it to the Secretary.	A Forward Program was submitted to the RR on 18 November 2022. That submission was related to the Hera Mining Operations only. A subsequent submission in September 2024 and then 27 October 2025, covered the Federation mining operations. The September 2024 submission occurred outside of the Initial Period.	Ensure that all submissions required by the Mining Leases are prepared and submitted within timelines set in the mining lease conditions.	Administrative non-compliance
D3 C16a	The holder of a mining lease must make a document to which this clause applies publicly available by— • publishing it on its website in a prominent position, or	Rehabilitation objectives are presented in the Rehabilitation Management Strategy that is provided on the website, albeit the version available at the time of the audit had been superseded. The forward program is provided on the website; however, copies of the Annual Rehabilitation Reports were not available.	Upload (current) versions of the: • the rehabilitation management plan, • the forward program, • the annual rehabilitation report	Administrative non-compliance

No.	Condition	Observation	Recommendation	Risk Level
D3 C16b	If a document is published on the website of the holder of the mining lease, the holder must ensure that it is published— • for a rehabilitation management plan—within 14 days after it is prepared or amended, or • for a forward program or an annual rehabilitation report—within 14 days after it is given to the Secretary or amended,	Insufficient information was provided to the Auditor to verify compliance with this Condition.	Ensure that all records associated with the requirement of mining leases are maintained.	Administrative non-compliance
D3 C17c	The holder of a mining lease must create and maintain records of all actions taken that demonstrate compliance with each of the conditions set out in this Part. Note— The Act, sections 163D and 163E provide for the form in which records must be kept and the period for which they must be retained.	The Auditor was not able to access all relevant compliance related documents requested.	Ensure that all records associated with the requirement of mining leases are maintained.	Administrative non-compliance

7. Independent Audit Post Approval Requirements

This audit focused on the compliance requirements established by the Conditions of Approval. The audit has been conducted in accordance with DPHI's Independent Audit Post Approval Requirements (DPIE, May 2020). This section of the report covers the specific requirements contained in the DPHI Guidelines.

7.1 Summary of Environmental Incidents

Federation records all incidents in the INEX Software System, a proprietary EHSQ management system that allows operational personnel to log incidents directly in management system. All incidents are recorded and actioned through that system. The System requires details of the incident, actions taken, incident investigation results and corrective and preventative (learnings/recommendations taken). All Federation personnel have access to that system.

Incident management procedures are described in Section 7 of the Environmental Management Strategy and incident response (actions) are detailed in the Pollution Incident Response Management Plan (PIRMP).

Details of three reportable incidents were provided to the Auditor, however access to the record of all (minor) incidents was not available. Table 7 provides an overview of the three identified reportable incidents recorded during the Audit Period.

Table 7 - Summary of Incidents

Date	Category	Description
16 September 2024	Water	Mine water leakage from pipeline resulting in approximately 40 kl of water discharging onto mine owned land. No discharge from the site was reported. Analysis of the water did not identify a significant contamination risk. The source of the leak (breather pipe) was repaired.
24 September 2024	Fauna Fatality	A dead kangaroo was found in the sump of the water management dam. The dam has since been fenced (following completion of construction).
7 October 2024	Fauna Fatality	A dead kangaroo was found in the sump of the water management dam. The dam has since been fenced.

7.1.1 Incident Response Assessment

During this IEA the Auditor accessed the incident management system and reviewed the reportable incidents. The system implemented by Federation is documented in the Environmental Management Strategy and includes:

- Incident reporting;
- Implementation of immediate response actions;
- Incident investigation;
- Development of corrective and preventative actions;
- Reporting (internal and external): and
- Incident record management.

The Auditor sighted evidence that the incident management system is understood and being implemented

7.2 Summary of Complaints

A complaints register is maintained for internal use that contains details of community contacts (including complaints) received. This summary of the register is available on the company website.

Table 8 provides a summary of complaints received over the Audit Period.

Table 8 - Complaints Summary

Date Received	Method of Receipt	Nature of Enquiry	Actions Taken, Outcomes and Follow Up Contact
6 Oct 2024		Dust	Dust from the TSF. The dust complaint was investigated. A review of the operations on the day of the event and the weather conditions (wind speed and direction) determined that the dust reported by the complainant could not have originated at the TSF. A review of the dust monitoring levels at the time of the complaint found that the site was not exceeding the allowable dust level criteria.
2 December 2024		Transport	Rocks on Road - Dust from the TSF. No records relating to this complaint and any follow were available.

7.2.1 Compliant Management System Assessment

During this IEA the Auditor accessed the complaints management system and reviewed the Incident Register. The system implemented by Hera is documented in the Environmental Management Strategy and includes:

- Complaint reporting;
- Communication protocol (initial and on-going contact with complainants);
- Compliant investigation;
- Development of corrective and preventative actions (where appropriate);
- Reporting (internal and external);
- Complaint record management.

During discussions with the environment team members, the Auditor was satisfied that the team understood the requirements of the complaints management system, however there were insufficient records available to verify that all complaints are appropriately investigated and closed out.

7.3 Summary of Notices

7.3.1 Notices Issued by the DPHI

Hera Resources management advised that no notices were issued by DPHI during this audit period.

7.3.2 Notices Issued by the RR

Hera Resources management advised that no notices were issued by the RR during this audit period.

7.3.3 Notices Issued by the EPA

A review of the NSW EPA Public Register found that no compliance related notices were issued during this audit period.

7.4 Project Environmental Management System

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

- Hera / Federation operates under an informal Environmental Management System (EMS).
- A computer-based environmental record keeping system (INX database) is utilised.
- Environmental records are maintained by the Environmental Advisor on site server file system (O: Drive) and access to the records requested by the Auditor was not efficient with some records requested by the Auditor were not subsequently found by the Auditee.
- In general compliance requirements are communicated to operational personnel through toolbox sessions. There is no formal "environmental awareness training provided to operational personnel. Environment is covered in the surface work induction.
- Documented operational procedures exist, however there are limited environmental management procedures in place.
- Effective signage is used around the site, for example to show workers where to disposed of wastes.
- A centralised incident register has been developed; and extensive incident related records are maintained.
- The Hera JHA that is used at Hera does not cover environment specifically.

The site employs an Environmental Superintendent and environmental advisors who is supported by the Group Manager - Environment.

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

- Establishment of environmental objectives and targets,
- Environmental hazard and risk identification.
- Environmental procedures, including spill management (where appropriate these should be integrated into the existing operational procedures.
- The identification of environmentally related roles and responsibilities that would be integrated into existing role / responsibility documentation.
- Environmental checklists and internal reporting processes.
- Environmental Awareness and Training needs.
- Environmental Record keeping requirements (including record retention policy).

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

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

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

During the site inspection the Auditor reviewed (by sampling elements from each plans) the implementation of the management plans and determined that the operations are being conducted in general accordance with the approved plans.

7.6 Status of Previous IEA Findings

This audit was the first IEA under this project approval, therefore there are no previous audit findings to review.

7.7 Specialist Auditor Reports

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

7.8 Operational Environmental Impacts

The Federation project operations are relatively new and therefore an accurate assessment of actual impacts against those predicted in the EIS, is considered premature. However, an overview of the impacts of the operation to date is provided in Table 9.

Table 9 - Predicted vs Actual Impacts

Category	Predicted Impact	Actual Impact
Fauna	Project Impacts on threatened species is unlikely to be significant.	Some fauna fatalities have been recorded at the TSF and water storage dam. Fencing has been installed to keep fauna out of these areas. The impacts on fauna to date is considered minor.
Flora	Clearing of native vegetation will be restricted to those areas approved in the Planning Approval.	No additional clearing has been undertaken on the Hera site. Limited (circa 3 hectares) of clearing has been undertaken at the Federation site, well below the area approved.
Groundwater	No significant impacts on groundwater levels are predicted	No evidence of groundwater impacts have been identified to date.
Surface Water	1. With the proposed sediment and erosion measures in place it is unlikely the Project would have the potential to adversely impact on the water quality of the receiving waters. 2. No adverse impacts associated with wastewater, generated within the Surface Facilities Area and the Mine Camp, would result since the wastewater would be treated appropriately and disposed of in designated irrigation areas. 3. There would be no offsite discharges of contaminated water because the processing water and tailings water would be contained within appropriately constructed areas and surface water (and groundwater) monitoring would identify any leakage early, enabling the issue to be rectified. 4. With the proposed mitigation measures in place it is concluded that the Project would not have a measurable detrimental impact on the surface water quality or quantity of the receiving waters downstream from the Project Site.	No off-site discharge of water were recorded for the audit period. No evidence of significant erosion was identified during this audit.
Noise and Blasting	1. The site establishment, operational and sleep disturbance predicted noise levels at the four nearest receivers are below the relevant criterion. 2. The peak vibration velocities and peak blast over pressures at the closest residential property will be well below the relevant criteria.	No surface blasting has been undertaken during this audit period. No adverse blasting impacts have been identified.

Category	Predicted Impact	Actual Impact
Aboriginal Heritage	Since no Aboriginal sites or objects were recorded during the EIA assessments and no area within the Project Site has been assessed as holding archaeological potential it has been concluded that there will be no impact to cultural heritage arising from the Project.	No unapproved impacts in aboriginal heritage have been identified.
European Heritage	The Project is unlikely to impact upon any items of historical heritage significance.	No unapproved impacts in historical heritage have been identified.
Air Quality and Greenhouse Gas	1. The incremental and cumulative dust deposition levels as a result of the Project will satisfy the relevant criteria at all selected receptor locations. 2. The cumulative PM10 and PM2.5 concentrations will be less than the applicable NSW criterion at all receptor locations.	During the audit period, PM2.5 monitoring was not undertaken, however based on the other air quality monitoring undertaken, the mine does not appear to be impacting ambient air quality.
Traffic and Transport	1. There would be adequate vehicle access and parking within the Project Site. 2. The proposed heavy vehicle transportation route is designated for road trains and the additional heavy vehicle traffic generated by the Project would not have an unacceptable impact upon the operation of the roads along that route.	No material adverse traffic impacts have been identified.
Soils	The impacts of the Project on the soils to be disturbed within the Project Site are considered to be insignificant.	No adverse soil impacts have been identified.
Visual Amenity	The Project would not impact significantly on the visual amenity surrounding the Project Site.	No adverse visual amenity impacts have been identified.
Bushfire	The Project is unlikely to increase the fire hazard rating of the Project Site and the surrounding areas.	No fires occurred during this audit period.

7.9 Other Matters

7.9.1 Hydrocarbon and Chemical Management Recommendations

The storage of chemicals, including hydrocarbons at the Federation site does not meet the requirements of the relevant Australian Standards, including AS1940. See for example photographs 22, 23 and 24 in Appendix B. It is noted that the general use of bunded pallets (the blue pallets shown in the photographs) for the storage of liquids is not sufficient to meet the relevant standards. Because for example, a leak from the side of a drum or IBC would not be captured within the pallet. Likewise, liquid and hazardous wastes, including batteries, should be stored in roofed, bunded areas.

Therefore, the following recommendations:

- Establish a properly bunded and roofed store for all hydrocarbons that meets the requirements of AS1940, including the provision of a sealed bunded area capable of accommodating 110% of the total volume of materials to be stored in that area.
- The chemical storage should provide for appropriate segregation of those materials and comply with the requirements of the Dangerous Goods regulations.

7.9.2 Waste Management Recommendations:

- Provide a properly bunded and roofed store for all liquid / hazardous waste
- Provide a separate bunded and roofed storage area for waste batteries.

7.9.3 "General Recommendations relating to the Hera Site:

- collect all IBCs / drums and other containers of liquids / hydrocarbons and chemicals, including from the laboratory and locate to a secure bunded area and either relocate to the Federation / The Peak for use, or arrange collection and disposal.
- Decommission the process water treatment plant and ponds – rationale: the ponds contain tailings and potentially heavy metals, that material has dried out and could be dispersed by adverse weather events, and mobilised resulting in localised soil contamination and worker health risk from inhalation of dust.
- Quarry Hill, it was formerly intended that the materials excavated in the quarry would be used as underground backfill and for on-site construction. It is now derelict and a potential dust generation source. Prepare and implement a rehabilitation strategy for Quarry Hill, with the objective of stabilising (to reduce erosion and dust generation) the unsealed surface.

Compliance Table

Planning Approval

SSD 24319456

Appendix A

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
A1	Obligation to minimise harm to the environment	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.				All reasonable and feasible measures to minimise material environmental harm were observed during the audit site inspection with documented evidence provided to demonstrate their implementation. Any exceptions are detailed below.	Noted	
A2	Terms of consent	The development may only be carried out: a) in compliance with the conditions of this consent;				The assessment of compliance in relation to this approval has been undertaken against the requirements of the consolidated approval and is presented in detail below. It is noted that some works were undertaken by the Proponent outside of the project boundary, however, those works were undertaken under the Approvals for that development.	Complies	
		b) in accordance with all written directions of the Planning Secretary;		Environment and Social Responsibility Superintendent – No directions were issued by DPPI during this audit period.		No directions related to the construction or operational phases of the project during the audit period.	Not Triggered	
		c) generally in accordance with the EIS; and				The project is being undertaken in general accordance with the EIS.	Complies	
		d) generally in accordance with the Development Layout.			All surface work was inspected during this IEA.	The development layout is generally consistent with the site plans shown in Appendix 2 of the Approval.	Complies	
A3	Terms of consent	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: (a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; and (b) the implementation of any actions or measures contained in any such document referred to in condition A3(a).					Noted	
A4	Terms of consent	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				Noted	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
A5	Notification of commencement	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;	Email from J Thompson (Aurelia Metals Ltd) to M Nuttall (Aurelia Metals Ltd) titled “Notification of intention to commence construction”, dated 19 April 2024.	Environment and Social Responsibility Superintendent – The construction of the dive, site access and surface works were completed under exploration REF. The REF was used up until the commencement of construction notification under the SSD that was sent to DPHI on 3 May 2024.		The Physical commencement of the project was initiated under the Approved REF, prior to the commencement of the current Approval. A substantial portion of the underground infrastructure and surface works were completed as part of the works associated with the REF, that approved the construction of the mine decline, supporting surface works and the mining of a limited quantity of ore for testing in the Peak processing plant. This condition is therefore redundant.	Not Triggered	
A5	Notification of commencement	(b) commencement of construction under this consent;	Email from J Thompson (Aurelia Metals Ltd) to M Nuttall (Aurelia Metals Ltd) titled “Notification of intention to commence construction”, dated 19 April 2024.			DPHI was notified that the commencement of construction would occur on 3 May 2024.	Compliance	
A5	Notification of commencement	(c) commencement of mining operations under this consent;	Letter from DPHI (K O'Reilly) to Hera Resources (M Williams) titled “Federation Project – Notification – commencement of mining – 15 November 2024.			DPHI was notified of the commencement of mining on 1 November 2024.	Compliance	
A5	Notification of commencement	(d) cessation of mining operations (i.e. mine closure); and					Not Triggered	
A5	Notification of commencement	(e) any period of suspension of mining operations (i.e. care and maintenance).					Not Triggered	
A6	Notification of commencement	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.		Environment and Social Responsibility Superintendent – no further staging of the development has occurred since the Approval was granted.		no further staging of the development has occurred since the Approval was granted.	Not Triggered	
A7	Surrender of existing consents or approvals	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.	Letter from DPHI (S O'Donoghue) to Hera Resources (M Williams) titled “Federation Mine - Surrender of Development Consent (MP10_0191) - Surrender of Development Consent”, dated 1 May 2025.			The works under this approval (commencement of construction) commenced on 3 May 2024. DPHI acknowledged the surrender of the MP10_0191 on 12 May 2024.	Compliance	
A8	Surrender of existing consents or approvals	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.					Noted	
A9	Limits of consent	Mining operations may be carried out until 31 December 2036.					Noted	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
A10	Limits of consent	A maximum of 750,000 tonnes of ore may be extracted from the site in any financial year.	Redpath Daily Report – 4-12-2024 Redpath Daily Report –23-1-2025 Redpath Daily Report –24-5-2025 Aurelia Geology Daily Report 20 Dec 2024	Environment and Social Responsibility Superintendent – Ore production is tracked daily by the mining contractor (Redpath) and Federation geology team	Ore was being dumped and stored on the ROM Pad at the time of site inspection.	Underground Production 20 Jan 2024 – 19,975 Tonne FYTD 18 May 2025– 73,854 Tonne FYTD The Financial year to date mine production records indicate ore production was well within the limits set in this condition.	Compliance	
A11	Limits of consent	A maximum of 155,000 tonnes of concentrate may be transported from the site in any financial year.	Aurelia Geology Daily Report 18 May 2025 Aurelia Peak Mine Daily Tons Hauled_31 December 24 BAY REPORTING NL Times.xlsx	Environment and Social Responsibility Superintendent – no concentrate is produced at this mine.		No concentrate is produced at this mine.	Compliance	
A12	Limits of consent	A maximum of 600,000 tonnes of ore may be transported from the site to the Peak Mine in any financial year.	Aurelia Peak Mine Daily Tons Hauled_31 November 34 BAY NL REPORTING.xlsx Aurelia Peak Mine Daily Tons Hauled_31 March 25 BAY NL REPORTING.xlsx	Environment and Social Responsibility Superintendent – Ore production is tracked daily by the mining contractor (Redpath) and Federation geology team		Ore transported to Peak Nov 24 – 4,503.7 tonne Dec 24 – 12,407.2 tonne Jan 25 – no transport Feb 25 – 716.75 tonne Mar 25 – 15,607.75 tonne The transport records indicate ore transportation to Peak was well within the limits set in this condition.	Compliance	
A13	Hours of Operation	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, except as permitted by condition A13A.	Aurelia Peak Mine Daily Tons Hauled_31 December 24 BAY REPORTING NL Times.xlsx Aurelia Peak Mine Daily Tons Hauled_31 November 34 BAY NL REPORTING.xlsx Aurelia Peak Mine Daily Tons Hauled_31 March 25 BAY NL REPORTING.xlsx	Environment and Social Responsibility Superintendent – Two incidents were ore trucks arrived early. These occurred in December 24 and March 25		Two incidents were ore trucks arrived early. Non-compliance reports were sent to DPHI.	Non-Compliance	Ensure that all haulage contractors are provided with the Drivers' Code of Conduct and an induction that includes transportation restrictions.
A13A	Hours of Operation	The entry and exit of vehicles transporting ore between Peak Mine and the site can only be undertaken between the hours of 7 am and 10 pm.	Aurelia Peak Mine Daily Tons Hauled_31 December 24 BAY REPORTING NL Times.xlsx Aurelia Peak Mine Daily Tons Hauled_31 November 34 BAY NL REPORTING.xlsx Aurelia Peak Mine Daily Tons Hauled_31 March 25 BAY NL REPORTING.xlsx	Environment and Social Responsibility Superintendent – Two incidents were ore trucks arrived early. These occurred in December 24 and March 25		Two incidents were ore trucks arrived early. Non-compliance reports were sent to DPHI.	Non-Compliance	Ensure that all haulage contractors are provided with the Drivers' Code of Conduct and an induction that includes transportation restrictions.
A14	Planning agreement	Within six months of the date of physical commencement of development under this consent, or other timeframe agreed by the Planning Secretary, the Applicant must enter into a planning agreement with CSC and BSC in accordance with Division 7.1 of Part 7 of the EP&A Act. The planning agreement with BSC must include a contribution to road safety upgrades of Nymagee-Hermidale Road, at least consistent with the upgrade requirements under condition B54.	Planning Agreement Federation Mine Project (SSD24319456) between Hera Resources Pty Limited and Cobar Shire Council, dated 5 March 2024. Planning Agreement Federation Mine Project (SSD24319456) between Hera Resources Pty Limited and Bogan Shire Council, dated 3 October 2023.			A planning agreement between both Cobar Shire Council and Bogan Shire Council and the proponent are in place.	Compliance	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
A15	Planning agreement	If the Applicant and CSC do not enter into a planning agreement within the timeframe required by condition A14, then within a further 3 months, the Applicant must make a contribution to CSC of \$2 million in accordance with Section 7.12 of the EP&A Act. The amount to be paid is to be adjusted at the time of the actual payment, in accordance with the provisions of the Cobar Local Infrastructure Contributions Plan 2012.				The Planning Agreement is in place.	Not Triggered	
A16	Planning agreement	If the Applicant and BSC do not enter into a planning agreement within the timeframe described under condition A14, then the Applicant must contribute funding to BSC for the road safety upgrades to Nymagee-Hermdale Road under condition B54.		Environment and Social Responsibility Superintendent – No concentrate is transported from this mine.		A planning agreement between both Cobar Shire Council and Bogan Shire Council and the proponent are in place.	Not Triggered	
A17	Road contributions	The Applicant must make annual financial contributions to CSC and BSC towards the maintenance of local public roads used for haulage for the development. The contributions to CSC and BSC must be determined in accordance with the Cobar Local Infrastructure Contributions Plan 2012.		Environment and Social Responsibility Superintendent – This will only be triggered end of 25 FY. So, no payment has been made or calculated.		This condition has not been triggered.	Not Triggered	
A18	Community consultative committee	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, CSC, BSC and the local community.	Hera Mine CCC Minutes 14 May 2024 Hera Federation Mine CCC Minutes 10 December 2024 Hera Federation Mine CCC Minutes 18 February 2025			The CCC established under for the Hera Mine has been extended to cover the requirements of this Condition.	Compliance	
A19	Community consultative committee	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.	Letter from DPHI (S O'Donoghue) to Aurelia Metals (M Williams) titled "Combining Hera and Federation Community Consultative Committees", dated 26 September 2023			The CCC established under for the Hera Mine has been extended to cover the requirements of this Condition. DPHI has approved the combining of the Hera and Federation CCCs.	Compliance	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
A20	Evidence of consultation	Where conditions of this consent require consultation with an identified party, the Applicant must: (f) consult with the relevant party prior to submitting the subject document for approval; and (g) provide details of the consultation undertaken to the Planning Secretary, including: (h) the outcome of that consultation, matters resolved and unresolved; and (i) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.				Refer to specific conditions below	Noted	
A21	Staging, combining and updating strategies, plans or programs	With the approval of the Planning Secretary, the Applicant may: (a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); (b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); (c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development); and (d) combine any strategy, plan or program required by this consent with any similar strategy, plan or program required by other consents subject to common, shared or related ownership or management.		Environment and Social Responsibility Superintendent – No staging of the works has been sought under this approval.		No staging of the works has been sought under this approval.	Noted	
A22	Staging, combining and updating strategies, plans or programs	If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing particular requirements of the relevant condition of this consent if those requirements are not applicable to the particular stage.		Environment and Social Responsibility Superintendent – No staging of the works has been sought under this approval.		No staging of the works has been sought under this approval.	Noted	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
A23	Staging, combining and updating strategies, plans or programs	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.		Environment and Social Responsibility Superintendent – No request to suspend any consultation requirements has been made to DPHI.		No request to suspend any consultation requirements has been made to DPHI.	Noted	
A24	Application of existing strategies, plans or programs	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	
A25	Protection of Public Infrastructure	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: (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>	Stakeholder consultation records Complaints Register.	Environment and Social Responsibility Superintendent – There has been no damage to any public infrastructure during this audit period.		There has been no damage to any public infrastructure identified during this audit.	Not Triggered	
A26	Protection of Public Infrastructure	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.	Stakeholder consultation records Complaints Register.	Environment and Social Responsibility Superintendent – There has been no damage to any public infrastructure during this audit period.		There has been no damage to any public infrastructure identified during this audit.	Noted	
A27	Demolition	All demolition must be carried out in accordance with Australian Standard AS 2601-2001 The Demolition of Structures (Standards Australia, 2001), or its latest version.		Environment and Social Responsibility Superintendent – No demolition works have been undertaken during this audit period.	No evidence of any demolition was sighted during the site inspection. The Hera surface works, and associated facilities are no longer operational.	No demolition work has been undertaken during this audit period.	Not Triggered	
A28	Structural adequacy	All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development must be constructed in accordance with the relevant requirements of the BCA. <i>Notes: Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works.</i>	Occupation Certificate for construction certificate CC24/007 353 Burthong Road, Nymagee, Primary Ventilation Fan and Access Structure, dated 21 May 2025.	Environment and Social Responsibility Superintendent – occupation certificates have been prepared for all relevant surface works. All mine surface works are complete, except the new surface workshop that is under construction.		Examples of Occupation Certificates were sighted by the Auditor. The certificates verify compliance with the BCA and relevant construction standards.	Compliance	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
A29	Operation of plant and equipment	All plant and equipment used for the development, or to monitor the performance of the development must be: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Hera Federation LV Maintenance Schedule 16-10-24 to 22 10-24 Redpath Mining – Maintenance work orders, examples covering the audit period.	Environment and Social Responsibility Superintendent – Pronto (asset and facility management software) is used to plan and track routine maintenance of fixed and moving plant. The mining contractor (Redpath) is contracted to perform all mining plant maintenance functions on site and Federation maintains surface plant and equipment.	The auditor witnessed the processes used to setup, manage and monitor fixed and mobile plant maintenance. Fixed and mobile plant sighted during the audit was operational and appropriately maintained.	The mine operates a commercial maintenance management system. Maintenance records sighted (on the Pronto System) demonstrated that an appropriate proactive maintenance program is in place.	Compliance	
A30	Compliance	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.	Federation & Hera Short Term Contractor Induction Booklet Federation Mine General Surface Induction.		The Auditor was required to complete a detailed visitor's induction prior to accessing the site.	The mine has an established induction training program covering both permanent employees and contractors and short-term contractors and visitors	Compliance	
A31	Applicability of guidelines	References in the conditions of this consent to any guideline, protocol, Australian standard or policy are to guidelines, protocols, standards or policies in the form they are in at the date of inclusion of the condition.					Noted	
A32	Applicability of guidelines	However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, in respect of ongoing monitoring and management obligations, agree to or require compliance with an updated or revised version of such a guideline, protocol, standard or policy, or a replacement of them.					Noted	
A33	Crown land	The Applicant must consult with Crown Lands prior to undertaking development on Crown Land or Crown Roads.		Environment and Social Responsibility Superintendent – No works have been undertaken on Crown Land.		No work has been undertaken on Crown Land		
B1	Construction noise	The Applicant must minimise the noise generated by any construction, upgrading or decommissioning activities in accordance with the best practice requirements outlined in the Interim Construction Noise Guideline (DECC, 2009), or its latest version.	Hera and Federation Mine Noise Management Plan Version 0.1, dated 17 November 2023. 2023/4 Annual Review	Environment and Social Responsibility Superintendent – No noise complaints or compliance issues have occurred during this audit period.		No noise complaints were received during the audit period, relating to mine premises. Section 6.3 of the Noise Management Plan states that annual attended monitoring will be undertaken. The most recent attended monitoring was undertaken by Mueller Acoustics in May 2024. No noise exceedances were detected.	Compliance	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B2	Exceptions to Construction Hours	The following activities may be carried out outside the construction hours in condition A13: (a) construction that causes LAeq(15minute) noise levels that are: (i) no more than 5 dB above Rating Background Level at any residence in accordance with the Interim Construction Noise Guideline (DECC, 2009); and (ii) no more than the Noise Management Levels specified in Table 3 of the Interim Construction Noise Guideline (DECC, 2009) at other sensitive land uses; or (b) for the delivery of materials required by the police or other authorities for safety reasons; or (c) emergency work to avoid loss of life, damage to property and/or environmental harm; or (d) out of hours works approved under condition B3 of this approval.	Complaints Register CCC Meeting Minutes.	Environment and Social Responsibility Superintendent – No construction works were carried on outside of the approved hours		No construction-related complaints were recorded during this audit period. No evidence of construction works being undertaken outside or the approved hours was found during this audit.	Compliance	
B3	Variation of Construction Hours	The hours of construction activities specified in condition A13 of this approval may be varied with the prior written approval of the Planning Secretary. Any request to alter the hours of construction must be: (a) considered on a case-by-case or activity-specific basis; (b) accompanied by details of the nature and justification for activities to be conducted during the varied construction hours; (c) accompanied by written evidence that appropriate consultation with potentially affected sensitive receivers and notification of CSC (and other relevant agencies) has been and will be undertaken; (d) accompanied by evidence that all feasible and reasonable noise mitigation measures have been put in place; and (e) accompanied by a noise impact assessment consistent with the requirements of the Interim Construction Noise Guideline (DECCW, 2009), or latest version.		Environment and Social Responsibility Superintendent – No requests were submitted for variation of the construction hours.		No requests were submitted for variation of the construction hours.	Not Triggered	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B4	Noise Criteria	The Applicant must ensure that the noise generated by the development does not exceed the criteria in Table 1 at any residence on privately-owned land.	Hera and Federation Mine Noise Management Plan Version 0.1, dated 17 November 2023. Noise Monitoring Assessment, Hera Gold Mine, dated May 2024, prepared by Mueller Acoustic Consulting. Letter from Mueller Acoustic Consultants (K Allen) to Aurelia (M Williams) titled “Unattended Noise Monitoring – Federation Site, Burthong Road, Nymagee, NSW, Month Ending August 2024, dated 11 September 2024. Letter from Mueller Acoustic Consultants (K Allen) to Aurelia (M Williams) titled “Unattended Noise Monitoring – Federation Site, Burthong Road, Nymagee, NSW, Month Ending October 2024, dated 11 November 2024 Letter from Mueller Acoustic Consultants (K Allen) to Aurelia (M Williams) titled “Unattended Noise Monitoring – Federation Site, Burthong Road, Nymagee, NSW, Month Ending January 2025, dated 11 February 2025	Environment and Social Responsibility Superintendent – No noise complaints or compliance issues have occurred during this audit period.	Noise monitoring stations were inspected. Photograph 14, shows the noise monitoring station located between the Federation Mine and the nearest sensitive receivers.	No noise complaints were received during the audit period, relating to mine premises. Section 6.3 of the Noise Management Plan states that annual attended monitoring will be undertaken. Attended monitoring was undertaken by Mueller Acoustics in May 2024, August 2024, October 2024. No noise exceedances were detected.	Compliance	
	Table 1	Noise Assessment Location	<i>Day LAeq (15 min) dB(A)</i>	<i>Evening LAeq (15 min) dB(A)</i>	<i>Night LAeq (15 min) dB(A)</i>	<i>Night LMax dB(A)</i>		
		All privately owned residences	40	35	35	52		
B5	Noise Criteria	Noise generated by the development must be monitored and measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Noise Policy for Industry (EPA, 2017).				The annual attended noise monitoring is undertaken by an independent noise consultant (Mueller). The monitoring is undertaken in accordance with the NSW Noise Policy.	Compliance	
B6	Noise Criteria	The noise criteria in Table 1 do not apply if the Applicant has an agreement with the owner/s of the relevant residence or land to exceed the noise criteria, and the Applicant has advised the Department in writing of the terms of this agreement.	Noise and Blasting Agreement Between Hera Resources Pty Ltd and M Harris (Landholder), dated 23 December 2023.			One noise and blasting agreement has been established.	Noted	

PLANNING APPROVAL SSD 24319456 MOD 2								
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B7	Noise Operating Conditions	The Applicant must: (a) take all reasonable steps to minimise noise from construction and operational activities, including low frequency noise and other audible characteristics, as well as road noise associated with the development; (b) take all reasonable steps to minimise the noise impacts of the development during noise-enhancing meteorological conditions; (c) regularly assess the noise monitoring data, and modify or stop operations to ensure compliance with the relevant conditions of this consent.	Hera and Federation Mine Noise Management Plan Version 0.1, dated 17 November 2023. 2023/4 Annual Review	Environment and Social Responsibility Superintendent – No noise complaints or compliance issues have occurred during this audit period.		No noise complaints were received during the audit period, relating to mine premises. Section 6.3 of the Noise Management Plan states that annual attended monitoring will be undertaken. The most recent attended monitoring was undertaken by Mueller Acoustics in May 2024. No noise exceedances were detected.	Compliance	
B8	Noise Management Plan	The Applicant must prepare a Noise Management Plan for the development. This plan must: (a) be prepared by a suitably qualified and experienced person/s;	Hera and Federation Mine Noise Management Plan Version 0.1, dated 17 November 2023.			The noise management plan was prepared by Mueller Acoustical Consultants who are appropriately experienced and qualified.	Compliance	
		(b) include an out-of-hours works protocol; and				Section 5.1.1 of the Noise Management Plan describes the out-of-hour work protocol	Compliance	
		(c) describe the measures to be implemented to ensure: (i) compliance with the noise criteria and operating conditions in this consent; (ii) best practice management is being employed; and (iii) include a monitoring program that: • is capable of evaluating the performance of the development against the noise criteria; • monitors noise at the nearest and/or most affected residences; and • includes a protocol for identifying any noise-related exceedance, incident or non-compliance and for notifying the Department and relevant stakeholders of any such event.				Noise criteria are presented in Section 5 of the NMP. Noise management measurements are provided in Section 4 of the NMP. The noise monitoring program is described in Section 6 of the NMP.	Compliance	
B9	Noise Management Plan	The Applicant must not commence construction until the Noise Management Plan has been prepared, and a copy has been provided to the Planning Secretary.	Email from DPE (Major Projects) to Aurelia (J Thompson) titled “Federation Project – Noise Management Plan”, dated 15 December 2023.			The Noise Management Plan was issued in November 2023. Construction (under this Approval) was commenced on 3 May 2024. DPE confirmed receipt of the plan in December 2023.	Compliance	
B10	Noise Management Plan	The Applicant must implement the Noise Management Plan.				Based on the results of noise monitoring and lack of noise complaints, the Auditor is satisfied that the NMP is being implemented.	Compliance	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B11	Blast Criteria	The Applicant must ensure that blasting from the development does not cause exceedances of the criteria in Table 2.	Federation-Hera Web Report (https://aureliametals.com/hera-mine-compliance-and-regulatory-reporting/) - November 2024 - December 2024 - January 2025 - February 2025 - March 2025 - April 2025			A review of blasting records found that no blasts exceeded the ground vibration criteria of 5mm/s or the overpressure criteria of 120 dBA.	Compliance	
	Table 2	Location	Airblast Overpressure (dB Linear Peak)	Ground vibration (mm/s)	Allowable exceedance			
		Residence on privately- owned land *	120 115	10 5	0% 5% of the total number of blasts over a financial year			
B12	Blast Criteria	The blasting criteria in Table 2 do not apply to a residence if the Applicant has an agreement with the owner/s of that residence or infrastructure to exceed the blasting criteria, and the Applicant has advised the Department in writing of the terms of this agreement.	Noise and Blasting Agreement Between Hera Resources Pty Ltd and M Harris (Landholder), dated 23 December 2023.			One noise and blasting agreement has been established.	Noted	
B13	Blast Criteria	The Applicant may carry out a maximum of: (a) 3 blasts per 24-hour period; and (b) 20 blasts per week.	Federation-Hera Web Report (https://aureliametals.com/hera-mine-compliance-and-regulatory-reporting/) - November 2024 - December 2024 - January 2025 - February 2025 - March 2025 - April 2025			A review of blasting records found that no blasts exceeding the ground vibration criteria of 0.5mm/s exceeded the blasting frequency criteria.	Compliance	
B14	Blast Criteria	Condition B13 does not apply to blasts that generate ground vibration of 0.5 mm/s or less at any residence on privately-owned land, or to blast misfires or blasts required to ensure the safety of the mine, its workers or the general public. Notes: - For the purpose of this condition, a blast refers to a single blast event, which may involve a number of individual blasts fired in quick succession in a discrete area of the mine. - Should an additional blast be required after a blast misfire, the additional blast and the blast misfire are counted as a single blast.					Noted	
B15	Blasting Hours	The Applicant must only carry out above ground blasting between 9:00 am and 5:00 pm Monday to Saturday, inclusive. No above ground blasting is allowed on Sundays, public holidays or at any other time without the written approval of the Secretary.		Environment and Social Responsibility Superintendent – No above ground blasting has been undertaken during this audit period.		No above ground blasting has been undertaken during this audit period.	Compliance	
B16	Blasting Hours	Underground blasting may be undertaken at any time, subject to compliance with the conditions of this consent.					Noted	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B17	Blast Operating Conditions	The Applicant must: (a) take all reasonable steps to: (i) protect the safety of people and livestock in the areas surrounding blasting operations; and (ii) protect public or private infrastructure and property in the surrounding area from damage from blasting operations;	Complaints Register Incident Register	Environment and Social Responsibility Superintendent – No above ground blasting has been undertaken during this audit period.		All blasting undertaken during this audit period was underground. No evidence of blasting impacts on people, livestock or property were identified during this audit.	Compliance	
		(b) operate a suitable system to enable the public to get up-to-date information on the proposed blasting schedule on site; and	Hera and Federation Mine Blast Management Plan Version 0.1, dated 8 December 2023.			Table 4 of the Blast Management Plan states that a blasting schedule will be published on the project website and in monthly reports. Table 4 also states that the nearest property owners and police will be notified of any planned surface blasting. The Auditor understands that no surface blasting was undertaken during the audit period, and that Federation's intent is to provide notification of surface blasting. However, this condition does not distinguish between surface and subsurface blasting. No blasting schedule is provided on the website or in the monthly reports published on the website. The Auditor notes that as the impacts of underground blasting (predominantly ground vibration) impact properties close to the blast location, that notification of the property owners in close proximity to the mine should be the priority.	Non-Compliance	It is recommended that Hera Resources either: • Publish a monthly blast schedule on the website and in the monthly reports; or • Apply for an exemption from DPHI for the publication of the schedule for underground blasting.
		(c) carry out regular monitoring to determine whether the development is complying with the relevant conditions of this consent.	Federation-Hera Web Report (https://aureliametals.com/hera-mine-compliance-and-regulatory-reporting/) • November 2024 • December 2024 • January 2025 • February 2025 • March 2025 • April 2025			Blast monitoring records for the audit period are provided on the Aurelia Metals website.	Compliance	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B18	Blast Management Plan	The Applicant must prepare a Blast Management Plan for the development. This plan must: (a) be prepared by a suitably qualified and experienced person/s;	Hera and Federation Mine Blast Management Plan Version 0.1, dated 8 December 2023.			The Noise Management Plan was prepared by Mueller Acoustical Consultants who are appropriately experienced and qualified.	Compliance	
		(b) describe the blast management system and the measures that will be implemented to ensure compliance with the blasting criteria and conditions of this consent;	Hera and Federation Mine Blast Management Plan Version 0.1, dated 8 December 2023.			Section 4 of the Blast Management Plan describes the management measures to be implemented.	Compliance	
		(c) include a monitoring program for evaluating and reporting on compliance with the relevant conditions of this consent;	Hera and Federation Mine Blast Management Plan Version 0.1, dated 8 December 2023.			Section 5 of the Blast Management Plan describes the blast monitoring program.	Compliance	
		(d) include a protocol for identifying any blast-related exceedance, incident or non-compliance and for notifying the Department, the EPA and relevant stakeholders of these events;	Hera and Federation Mine Blast Management Plan Version 0.1, dated 8 December 2023.			Section 7.1 of the Blast Management Plan describes the protocol for incident and non-compliance identification and Sections 8.2 and 8.3 specify the reporting requirements (to DPHI) for incidents and non-compliances respectively. Section 7.1 of the plan references Section 4.4 of the Environmental Management Strategy. The EMS does not cover the reporting on (blast) incidents, exceedances or non-compliances to the EPA or Resource Regulator.	Non-Compliance	Revise the Blast Management Plan to specifically include the notification of DPHI, the Resource Regulator and the EPA if a blast incident, blast criteria exceedance or non-compliance is identified.
		(e) includes a review mechanism and contingency measures if blasting causes amenity impacts at levels below the relevant criteria;	Hera and Federation Mine Blast Management Plan Version 0.1, dated 8 December 2023.			Section 6 of the Blast Management Plan describes the blast contingency plan and measures to be implemented.	Compliance	
		(f) include public notification procedures to enable members of the public, particularly surrounding residents, to get up-to-date information on the proposed blasting schedule; and	Hera and Federation Mine Blast Management Plan Version 0.1, dated 8 December 2023.			Table 4 of the Blast Management Plan states that a blasting schedule will be published on the project website and in monthly reports. Table 4 also states that the nearest property owners and police will be notified of any planned surface blasting (please also refer to Condition B17).	Compliance	
		(g) include a protocol for investigating and responding to blast-related complaints.	Hera and Federation Mine Blast Management Plan Version 0.1, dated 8 December 2023.			Section 7.2 of the Blast Management Plan describes the complaints management procedure.	Compliance	
B19	Blast Management Plan	The Applicant must not commence construction until the Blast Management Plan has been prepared, and a copy has been provided to the Planning Secretary.	Email from DPE (Major Projects) to Hera Resources (J Thompson) titled "Federation Project – Blast Management Plan", dated 13 December 2023.			The works under this approval (commencement of construction) commenced on 3 May 2024. The Blast Management Plan was published in 2023. The Department acknowledged receipt of the Plan on 13 December 2023.	Compliance	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B20	Blast Management Plan	The Applicant must implement the Blast Management Plan				The Blast Management Plan states that a blasting schedule will be published on the project website and in monthly reports. No blasting schedule is provided on the website or in the monthly reports published on the website. Please refer to Condition B17 (b) above.	Non-Compliance	It is recommended that Hera Resources either: • Publish a monthly blast schedule on the website and in the monthly reports; or • Apply for an exemption from DPHI for the publication of the schedule for underground blasting.
B21	Odour	The Applicant must ensure that no offensive odours, as defined under the POEO Act, are emitted from the development.	Complaints Register		No offensive odours were detected during the site inspection.	No odour complaints were received during this audit period. No offensive odours were detected during the site inspection.	Compliance	
B22	Air Quality Criteria	The Applicant must ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not cause exceedances of the criteria listed in Table 3 at any residence on privately-owned land	Complaints Register Federation-Hera Web Report (https://aureliametals.com/hera-mine-compliance-and-regulatory-reporting/) • November 2024 • December 2024 • January 2025 • February 2025 • March 2025 • April 2025 Monitoring Results spreadsheet and ALS analysis reports.		Air quality monitoring stations were inspected. Photograph 13, shows the E-Sampler monitoring station, located between the Federation Mine and the nearest sensitive receivers.	One complaint relating to dust from the TSF was received during the audit period A review of the air quality monitoring data on the Aurelia website indicated that the PM ₁₀ criterion was exceeded on the High-Volume Sampler on 24 April 2025. The Auditor understands that the exceedance was not investigated and therefore a non-compliance against this condition cannot be ruled out. No monitoring for PM _{2.5} levels was undertaken during this audit period, therefore compliance against this condition cannot be verified.	Non-Compliance	1. Commission a suitably qualified air quality specialist to review the suitability of the existing air quality monitoring equipment for the monitoring of PM_{2.5} levels. 2. Implement routine PM_{2.5} Monitoring 3. Review the allocation of responsibilities for the review of all environmental monitoring data to ensure that all exceedances are identified promptly, investigated and non-compliance reporting undertaken when required.
	Table 3	Pollutant	Averaging period	Criterion				
		Particulate matter < 10 µm (PM ₁₀)	Annual	25 µg/m ³				
			24 hour	50 µg/m ³				
		Particulate matter < 2.5 µm (PM _{2.5})	Annual	8 µg/m ³				
			24 hour	25 µg/m ³				
		Total suspended particulate (TSP) matter	Annual	90 µg/m ³				
B23	Air Quality Criteria	The air quality criteria in Table 3 do not apply if the Applicant has an agreement with the owner/s of the relevant residence or land to exceed the air quality criteria, and the Applicant has advised the Department in writing of the terms of this agreement.		Environment and Social Responsibility Superintendent – No air quality agreements are in place.			Noted	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B24	Air Quality Operating Conditions	The Applicant must: (a) take all reasonable steps to (i) minimise odour, fume, and particulate matter (including PM10 and PM2.5) emissions of the development, paying particular attention to minimising odour from ventilation shafts, wheel-generated haul road emissions, and emissions from the waste rock emplacements; (ii) improve energy efficiency and reduce greenhouse gas emissions of the development; (iii) minimise any visible off-site air pollution generated by the development; (iv) minimise to the greatest extent practicable, the area of dust generating surfaces at any given point in time;	Complaints Register Hera and Federation Mine Air Quality and Greenhouse Gas Management Plan Version 1.0, dated 7 December 2023		During the site inspection, minor dust generation was observed, predominantly from heavy vehicle movements, although not visible dust was observed to be leaving the site. The haul road (from the surface works area to the public road has been sealed. Water trucks are used for dust control elsewhere. Dust mitigation activities on the TSF include the binding of the tailings surface with a chemical fixative and the use of water sprays. No dust controls were sighted on the waste rock emplacement	One complaint relating to dust from the TSF was received during the audit period A review of the air quality monitoring data on the Aurelia website indicated that the PM10 criterion was exceeded on the High-Volume Sampler on 24 April 2025. The Auditor understands that the exceedance was not investigated and therefore non-compliance against this condition cannot be ruled out. No monitoring for PM2.5 levels was undertaken during this audit period, therefore an assessment of the potential impact of PM2.5 is not possible and therefore compliance with this condition cannot be verified. The auditor understands that Aurelia is planning to install a solar farm to provide power for the project.	Non-Compliance	- Commission a suitably qualified air quality specialist to review the suitability of the existing air quality monitoring equipment for the monitoring of PM2.5 levels. - Implement routine PM2.5 Monitoring - Review the allocation of responsibilities for the review of all environmental monitoring data to ensure that all exceedances are identified promptly, investigated and non-compliance reporting undertaken when required.
		(b) operate a comprehensive air quality management system that uses a combination of predictive meteorological forecasting and air quality monitoring to guide the day to day planning of mining operations and the implementation of both proactive and reactive air quality mitigation measures to ensure compliance with the relevant conditions of this consent;	Hera and Federation Mine Air Quality and Greenhouse Gas Management Plan Version 1.0, dated 7 December 2023	Contractor Environmental – Hera / Federation subscribes to Weatherzone. That system can be used to predict dust impacts during predicated adverse weather conditions.		A subscription for Weatherzone is in place and can be used for predictive meteorological forecasting tool to inform proactive dust mitigation strategies. During this audit, no records were available to verify that this system is routinely used and that the operations team are advised of predicated adverse weather conditions.		Develop and implement a process that uses a combination of predictive meteorological forecasting and air quality monitoring to guide the day-to-day planning of mining operations.
		(c) minimise the air quality impacts of the development during adverse meteorological conditions and extraordinary events (see Note c to Table 3 above);	Hera and Federation Mine Air Quality and Greenhouse Gas Management Plan Version 1.0, dated 7 December 2023					Develop and implement a process that uses a combination of predictive meteorological forecasting and air quality monitoring to guide the day-to-day planning of mining operations.
		(d) carry out regular air quality monitoring to determine whether the development is complying with the relevant conditions of this consent; and	Hera and Federation Mine Air Quality and Greenhouse Gas Management Plan Version 1.0, dated 7 December 2023		Air quality monitoring stations were inspected. Photograph 13, shows the E-Bam monitoring station, located between the Federation Mine and the nearest sensitive receivers.	A dust monitoring program is in place, however no monitoring of PM _{2.5} levels is being undertaken. Therefore, compliance with the PM _{2.5} levels specified in Table 3 cannot be verified.		Expand the air quality monitoring program to include monitoring for PM _{2.5} .
		(e) regularly assess the air quality monitoring data and modify operations to ensure compliance with the relevant conditions of this consent.	Hera and Federation Mine Air Quality and Greenhouse Gas Management Plan Version 1.0, dated 7 December 2023			A Trigger Action Response plan for assessing air quality monitoring data has been prepared and implemented.	Compliance	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B25	Air Quality and Greenhouse Gas Management Plan	The Applicant must prepare an Air Quality and Greenhouse Gas Management Plan for the development. This plan must: (a) be prepared by a suitably qualified and experienced person/s;	Hera and Federation Mine Air Quality and Greenhouse Gas Management Plan Version 1.0, dated 7 December 2023			Authorship of the plan (page 4) is stated as being Todoroski Air Sciences and IEMA. Both these organisations are appropriately experienced and qualified.	Compliance	
		(b) describe the measures to be implemented to ensure: (i) compliance with the air quality criteria and operating conditions in this consent; (ii) reasonable and feasible measures are being employed to: (iii) minimise the development's air quality impacts; (iv) minimise the development's Scope 1 and 2 greenhouse gas emissions; and (v) improve the development's energy efficiency; and (vi) the air quality impacts of the development are minimised during adverse meteorological conditions and extraordinary events;	Hera and Federation Mine Air Quality and Greenhouse Gas Management Plan Version 1.0, dated 7 December 2023			Air quality management measures are described in Section 4 of the AQGGMP. Section 4.2 describes the existing greenhouse gas mitigation measures. This section of the plan also states that energy efficiency measures will be reviewed annually. The Plan does not include a protocol for the ensuring that the air quality impacts of the operation are minimised during adverse meteorological and extraordinary events. The Auditor notes that Hera / Federation has an account with Weatherzone that predicts dust-noise that has been in place since 2023.	Non-Compliance	Revise the Air Quality and Greenhouse Gas Management Plan to include a protocol for ensuring that the air quality impacts of the operation are minimised during adverse meteorological and extraordinary events.
		(c) describe the air quality management system in detail; and	Hera and Federation Mine Air Quality and Greenhouse Gas Management Plan Version 1.0, dated 7 December 2023			The plan provides an adequate framework for managing air quality at the mine site.	Compliance	
		(d) include an air quality monitoring program, undertaken in accordance with the Approved Methods for Sampling and Analysis of Air Pollutants in NSW (EPA, 2022) and Ambient Air Monitoring Guidance Note (EPA, 2022), or its latest version, that: (i) uses monitors to evaluate the performance of the development against the air quality criteria in this consent and to guide day to day planning of operations; (ii) adequately supports the air quality management system; (iii) includes a protocol for distinguishing the dust emissions of the development from any neighbouring developments; and (iv) includes a protocol for identifying any air quality-related exceedance, incident or non-compliance and for notifying the Department and relevant stakeholders of these events.	Hera and Federation Mine Air Quality and Greenhouse Gas Management Plan Version 1.0, dated 7 December 2023			The air monitoring program is described in Section 5 of the plan. Monitoring equipment is described in Section 5 and 5.2. While reference is made to monitoring using an E-BAM (trailer), the requirement to monitor PM _{2.5} is not specified. The plan does not include a protocol for distinguishing the dust emissions of the development from any neighbouring developments. The plan does not include a protocol for identifying any air quality-related exceedance, incident or non-compliance and for notifying the Department and relevant stakeholders (for example the EPA and the RR) of these events.	Non-Compliance	Revise the Air Quality and Greenhouse Gas Management Plan to include: - Monitoring and reporting on PM_{2.5}. - a protocol for distinguishing the dust emissions of the development from any neighbouring developments. - a protocol for identifying any air quality-related exceedance, incident or non-compliance and for notifying the Department and relevant stakeholders (for example the EPA and the RR) of these events.

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B26	Air Quality and Greenhouse Gas Management Plan	Every three years during the life of mining operations, unless otherwise agreed by the Planning Secretary, the Air Quality and Greenhouse Gas Management Plan must be updated to include the following information in relation to Scope 1 and Scope 2 greenhouse gas emissions: (a) a review of abatement technologies relevant to the development's greenhouse gas emissions; (b) a detailed review of the feasibility of implementing various greenhouse gas abatement options, and economic considerations for the development; and (c) a 3-year action plan to investigate and implement reasonable and feasible measure to minimise greenhouse gas emissions.				Not yet triggered	Not Triggered	
B27	Air Quality and Greenhouse Gas Management Plan	The Applicant must not commence construction until the Air Quality and Greenhouse Gas Management Plan has been prepared, and a copy has been provided to the Planning Secretary.	Email from DPE (Major Projects) to Hera Resources (J Thompson) titled "Federation Project Air Quality and Greenhouse Gas Management Plan", dated 13 December 2023.			The works under this approval (commencement of construction) commenced on 3 May 2024. The plan was published in 2023. The Department acknowledged receipt of the Plan on 13 December 2023.	Compliance	
B28	Air Quality and Greenhouse Gas Management Plan	The Applicant must implement the Air Quality and Greenhouse Gas Management Plan.				Based on the results of air quality monitoring and minimal complaints, the Auditor is satisfied that the AQGGMP is being implemented.	Compliance	
B29	Meteorological monitoring	Prior to the commencement of construction and for the life of the development, the Applicant must ensure that there is a suitable meteorological station operating in the vicinity of the site that: (a) complies with the requirements in the Approved Methods for Sampling and Analysis of Air Pollutants in NSW (EPA, 2022) and Ambient Air Monitoring Guidance Note (EPA, 2022); and (b) is capable of measuring meteorological conditions in accordance with the NSW Noise Policy for Industry (EPA, 2017), unless a suitable alternative is approved by the Planning Secretary following consultation with the EPA.	Hera and Federation Mine Air Quality and Greenhouse Gas Management Plan Version 1.0, dated 7 December 2023		The Meteorological Station was inspected during this audit. This station is located near the Hera (mine accommodation village) and was originally established for the Hera mining operations.	Weather station monitoring results for the Audit Period were sighted by the Auditor. The weather station satisfies the requirements of the Approved Methods for Sampling Air Pollutants in New South Wales Guidelines.	Compliance	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B30	Water Discharges	The Applicant must ensure that: (a) all surface discharges from the development comply with discharge limits (both volume and quality) set for the development in any EPL or the relevant provisions of the POEO Act; (b) the concentration of Weak Acid Dissociable (WAD) cyanide in tailings discharged from the discharge point to the tailings storage facility does not exceed 20 mg/L (90th percentile) and 30ml/L (maximum); (c) the concentration of Weak Acid Dissociable (WAD) cyanide at the discharge point to the process water dam does not exceed 20 mg/L (90th percentile) or 30 mg/L (maximum).	Letter from Aurelia Metals (G Brown) to DPHI (R Sherry) titled “Incident Report water leak (EPA Environment Line REF-NO-32873) Hera – Federation Mine: EPL 20179”, dated 19 December 2024. Certificate of Analysis ES2430581 issued by ALS, dated 26 September 2024 Federation-Hera Web Report (https://aureliametals.com/hera-mine-compliance-and-regulatory-reporting/) - November 2024 - December 2024 - January 2025 - February 2025 - March 2025 - April 2025	Environment and Social Responsibility Superintendent – One surface water discharge incident (mine water leak from a pipeline) occurred during this audit period. That water leak did not result in a discharge from site. The Hera processing plant is no longer operational therefore, cyanide is no longer used on site and all cyanide (previously held at the Hera processing plant) has been removed.		No water discharges for the Hera – Federation site occurred during this audit period. No WAD testing was undertaken during this audit period. The water incident did not result in a discharge from site.	Compliance	
B31	Water Supply	The Applicant must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply.	Site Water Balance	Environment and Social Responsibility Superintendent – sufficient water has been available during this audit period from on-site water sources.		Sufficient water was available for all operations during this audit period.	Compliance	
B32	Water Supply	The Applicant must report on water extracted from the development each year (direct and indirect) in the Annual Review, including water taken under each water licence. Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Applicant is required to obtain all necessary water licences for the development, including during rehabilitation and post mine closure.	Hera Annual Review Reporting Period 1 July 2023 to 30 June 2024, dated 20 August 2024.			Water takes and groundwater extraction volumes were reported in the 2023/4 Annual Review (Tables 23 and 24 respectively).	Compliance	
B33	Compensatory Water Supply	The Applicant must provide a compensatory water supply to any landowner of privately-owned land whose rightful water supply is adversely and directly impacted (other than an impact that is minor or negligible) as a result of the development, in consultation with Water Group, and to the satisfaction of the Planning Secretary.		Environment and Social Responsibility Superintendent – no requirement for compensatory water supplies were triggered during this audit period.		No requirement for compensatory water supplies was triggered during this audit period.	Not Triggered	
B34	Compensatory Water Supply	The compensatory water supply measures must provide an alternative long term supply of water that is equivalent, in quality and volume, to the loss attributable to the development. Equivalent water supply should be provided (at least on an interim basis) as soon as practicable after the loss is identified, unless otherwise agreed with the landowner.		Environment and Social Responsibility Superintendent – no requirement for compensatory water supplies were triggered during this audit period.		No requirement for compensatory water supplies was triggered during this audit period.	Not Triggered	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B35	Compensatory Water Supply	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.		Environment and Social Responsibility Superintendent – no requirement for compensatory water supplies were triggered during this audit period.		No requirement for compensatory water supplies was triggered during this audit period.	Not Triggered	
B36	Compensatory Water Supply	If the Applicant is unable to provide an alternative long term supply of water, then the Applicant must provide compensation, to the satisfaction of the Planning Secretary		Noted		No requirement for compensatory water supplies was triggered during this audit period.	Not Triggered	
B37	Compensatory Water Supply	However, conditions B33 to B36 do not apply if the Applicant has a compensatory water agreement with the owner/s of the land and the Applicant has advised the Department in writing of the terms of this agreement.					Noted	
B38	Compensatory Water Supply	In the event of any complaint related to a privately-owned licensed groundwater bore which may, in the opinion of the Planning Secretary, have been adversely and directly impacted as a result of the development (other than an impact that is minor or negligible), the Applicant must, as soon as practicable, facilitate the provision of a temporary water supply, pending the outcome of any groundwater investigation and/or provision of an alternative long-term supply of water as required under condition B34, the satisfaction of the Planning Secretary.		Environment and Social Responsibility Superintendent – no groundwater related complaints were received during this audit period.		No groundwater related complaints were received during this audit period.	Not Triggered	
B39	Design and Permeability of Storages	The Applicant shall ensure that the floor and walls of: (a) the leachate management ponds, seepage collection pond (associated with the tailings storage facility), process water dam and raw water dam are lined to achieve a permeability of no less than 1 x 10-9 m/s to a depth of at least 900 millimetres of clay (or equivalent); (b) the tailings storage facility (except for the seepage collection pond) is lined to achieve a permeability of no less than 1 x 10-8 m/s to a depth of at least 600 millimetres of clay (or equivalent); and (c) the water management dam is lined to achieve a permeability of no less than 1 x 10-9 m/s to a depth of at least 1000 millimetres of clay or equivalent geosynthetic liner.	Neill Earthmoving Pty Ltd, Hera Resources Pty Ltd, Federation Mine Expansion – Dewater & Leachate Ponds QA/QC Submission, dated 22 October 2022. Enviro Lining, EL073 CQA Validation Report, undated Aurelia Metals, Hera/WMD Project Federation Project Stage 2, QA/QC Submission, prepared by TLS, dated 24 January 2025.		The entire water management system was inspected during this audit. Photograph 11 shows the water management dam and Photograph 19 shows the Federation leach pond. These water capture and storage ponds were lined.	a) Documentation certifying the installation and testing of leachate and water dams associated with the Federation project were sighted. b) Documentation certifying the installation and testing of tailings dam and associated water management system were verified during the previous audits. c) Documentation certifying the installation and testing of water management dam was sighted.	Compliance	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B40	Design and Permeability of Storages	The clean water diversion around the tailings storage facility shall be designed, constructed and maintained to prevent the probable maximum flood from the catchment upstream of the facility from entering the facility.	Letter from Hera (J Thompson) to DPE (K O'Reilly) titled "Independent Environmental Audit Aug 2013 – Sep 2016 – Action Plan Condition 23, Schedule 3 Design and Permeability of Storages", dated 21 December 2017. The includes a plan showing the TSF diversion drain construction compliance with the requirements of this Condition. The letter also contained a survey plan that confirms the that the as built structure meets these requirements.	Environment and Social Responsibility Superintendent – No new work associated with the TSF were undertaken during this audit period.		Compliance with this condition was verified during the 2019 IEA. The clean water diversion meets the design requirements detailed in this Condition.	Compliance	
B41	Design and Permeability of Storages	The process water dam, raw water dams, stormwater retention pond and lined leachate ponds must be maintained with a minimum freeboard sufficient to accommodate a 1 in 100-year ARI, 72-hour rainfall event without overtopping at all times.	Hera Mine Water Management Plan, Dated December 2021. Hera and Federation Water Management Plan, Rev 1.0, dated 4 April 2024.		The 200 mm free board is indicated by a marker installed in the Hera stormwater retention pond. The Hera process water, leachate and raw water ponds are no longer in operation and were empty or near empty. Photograph 11 shows the Water Management Pond and depth indicator pole. Photograph 17 shows the Federation stormwater retention pond and dewatering lines. Photograph 19 shows that Federation leach pad pond.	Compliance of the Hera water storages with this condition was verified during the 2019 IEA. A freeboard of at least 200mm is to be achieved as a minimum operational condition allowing capacity to capture the 100-year 72 hour design rainfall event (GHD: July 2016: Water Management Plan). Compliance with this condition is covered in the Hera and Federation Water Management Plan.	Compliance	
B42	Water Management Performance Measures	The Applicant must ensure that the development complies with the performance measures in Table 4.	Hera and Federation Water Management Plan, Rev 1.0, dated 4 April 2024.					
	Table 4	Feature	Performance Measure					
		Water management general	• Maximise water recycling, reuse and sharing opportunities • Minimise the need for make-up water from external supplies, particularly the use of higher quality water used by other land users • Design, install, operate and maintain water management infrastructure in a proper and efficient manner • Minimise risks to the receiving environment and downstream water users			All available water on both the Hera and Federation sites are recycled where appropriate.	Compliance	
		Aquifers	• Negligible impacts to fractured rock aquifers caused by the development beyond those predicted in the EIS, including: - negligible change in groundwater levels beyond those predicted; - negligible change in water quality beyond those predicted; - negligible impact to other groundwater users; and - no exceedance of the minimal impact considerations in the NSW Aquifer Interference Policy			No impacts to the aquifer were identified in groundwater monitoring undertaken during this audit period.	Compliance	
		Surface water resources	• Negligible impacts to surface water resources caused by the development beyond those predicted in the EIS; • Maximise, as far as reasonable and feasible, the diversion of all clean water around disturbed areas			No surface water impacts were identified during this audit.	Compliance	
		Waste Rock Storage Areas	• Minimise, as far as reasonable and feasible, the potential for acid mine drainage			PAS materials are segregated and managed.	Compliance	
		Flood Mitigation	• Negligible change to off-site flood regime, including flows, levels, storage capacity or velocities			No flood impacts were identified during this audit	Compliance	
		Chemical and Hydrocarbon Storage	• Chemical and hydrocarbon products to be stored in bunded areas in accordance with the relevant Australian Standard			Deficiencies were identified with the storage of chemicals and hydrocarbons at both the Hera and Federation Sites. Refer to Section 7.9.2	Non-Compliance	Refer to Section 7.9.2 above.

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B43	Water Management Plan	The Applicant must prepare a Water Management Plan for the development to the satisfaction of the Planning Secretary. This plan must: (a) be prepared by a suitably qualified and experienced person/s;	Hera and Federation Water Management Plan, Rev 1.0, dated 4 April 2024. Email from DPE (Major Projects) to Aurelia Metals (J Thompson) titled "Federation Project Water Management Plan", dated 16 April 2024. Email from DPE (Major Projects) to Aurelia Metals (J Thompson) titled "Federation Project Waste Rock Management Plan", dated 16 April 2024.			The Water Management Plan and the Waste Rock Management Plan were prepared by GHD, IEMA Consultants and Aurelia Metals Environment Team. GHD and IEMA are appropriately qualified and experienced consultants. The Water Management Plan was approved by DPE on 16 April 2024.	Compliance	
		(b) be prepared in consultation with Water Group, EPA, Resources Regulator and Council;	Hera and Federation Water Management Plan, Rev 1.0, dated 4 April 2024. Hera and Federation Waste Rock Management Plan, Rev 0.4, dated 10 April 2024.			Appendix C of the Water Management Plan contains copies of the correspondence with the relevant regulators, specifically: - DPHI - DPE Water Appendix C of the Waste Rock Management Plan contains copies of the correspondence with the relevant regulators, specifically: - EPA - Resource Regulator - Cobar Council	Compliance	
		c) describe the measures to be implemented to comply with the water management performance measures in Table 4 and conditions of this consent	Hera and Federation Water Management Plan, Rev 1.0, dated 4 April 2024.			Section 4 of the Water Management Plan describes the management measures to be implemented.	Compliance	
		(d) include a (i) Site Water Balance that: - includes details of: - predicted inflows and outflows; - sources and security of water supply, including contingency planning for various climate scenarios and allocations; - reporting procedures, including the preparation of an updated annual site water balance; and - measures actual water take from surface and groundwater sources, including accurate metering where possible;	Hera and Federation Water Management Plan, Rev 1.0, dated 4 April 2024.			Section 5 of the Water Management Plan site water balance. Section 5.1 describes the water sources and demands. Section 7 provides the contingency plan to ensure water security. Section 9 describes the reporting procedures and section 9.2.2 establishes an annual review of the water balance. Section 7 describes the water monitoring program.	Compliance	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B43	Water Management Plan	(d) include a (ii) Surface Water Management Plan, that includes: • a detailed description of the water management system, including the; - clean water capture and diversion system; - dirty water system (including sediment detention basins); and - mine water capture system; • detailed plans for the design and management for the emplacement of reject materials and acid or sulphate generating materials; • detailed objectives and performance criteria, including trigger levels for investigating any potentially adverse impacts associated with: - o the water management system; - o downstream surface water flows and quality; - o water supply for other water users; - o post-mining water pollution from rehabilitated areas of the development; - o surface water quality attributes relevant to water quality impacts on biological diversity and aquatic ecological integrity; • a program to monitor and evaluate: - o compliance with the relevant performance measures in Table 5 and the performance criteria established; - o the effectiveness of the water management system; - o surface water flows and quality in waterbodies that could be affected by the development; - o impacts on water users; and - o impacts on wildlife from exposure to cyanide or other toxic chemicals; • reporting procedures for the results of the monitoring program; and • a plan to respond to any exceedances of the performance measures or performance criteria, and mitigate any adverse surface water impacts of the development, including contingency strategies for addressing: - any discharge of pollutants from water storages, emplacements, infrastructure and processing areas (including pipelines); and - any identified impacts to waterbodies;	Hera and Federation Water Management Plan, Rev 1.0, dated 4 April 2024.			The Surface Water Management Plan is described in: • Section 4.1.1 and 4.2.1– Surface Water Management Measures • Section 6.1 Inspections • Section 6.2 Surface Water Monitoring Section 7.1.2 Surface Water Trigger Values • Section 7.2 Performance Criteria Section 7.3 Trigger Action Response Plan and • Section 9 Reporting All of the content requirements required by these conditions are covered in the sections listed above.	Compliance	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B43	Water Management Plan	(iii) Groundwater Management Plan, that includes: • a detailed description of the groundwater management system, including measures to minimise acid mine drainage from potentially acid forming material; • detailed objectives and performance criteria, including trigger levels for investigating any potentially adverse impacts associated with the development for: - local and regional aquifers; - groundwater users bores; - groundwater inflows to the mining operations; - seepage/leachate from underground voids, water storages, emplacements, infrastructure and processing areas, and the surface extraction area; and - groundwater dependent ecosystems; • a program to monitor and evaluate: - compliance with the relevant performance measures listed in Table 5 and the performance criteria established above; - potential acid mine drainage; - the effectiveness of the groundwater management system; - groundwater inflows to the mining operations; - any localised enhanced groundwater inflows associated with faults or other structures; - the effectiveness of the seepage collection and storage system and associated infrastructure in collecting and containing all seepage from the tailings storage facility and all other water storages that receive chemical or salt-laden water; - background changes in groundwater yield/quality against mine-induced changes; - any post-rehabilitation seepage from the tailings storage facility - impacts of the development on: - local and regional aquifers; - waterbodies; - groundwater supply of potentially affected landowners; • reporting procedures for the results of the monitoring program; and • a plan to respond to any exceedances of the performance measures or	Hera and Federation Water Management Plan, Rev 1.0, dated 4 April 2024.			The Surface Water Management Plan is described in: • Section 4.1.2 and 4.2.2– Groundwater Management Measures • Section 6.3 Groundwater Monitoring Section 7.1.1 Groundwater Trigger Values • Section 7.2 Performance Criteria Section 7.3 Trigger Action Response Plan and • Section 9 Reporting All of the content requirements required by these conditions are covered in the sections listed above.	Compliance	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
		performance criteria, and mitigate any adverse groundwater impacts of the development, including contingency strategies for addressing: - seepage/leachate of pollutants from underground voids, water storages, emplacements, infrastructure and processing areas, and surface extraction area; - any localised enhanced groundwater inflows associated with faults or other structures; and						
B43	Water Management Plan	(iv) Waste Rock Management Plan, that includes: • a detailed description of the procedures to be implemented to monitor and manage potential acid forming material; • reference to the groundwater and surface water monitoring programs to monitor potentially acid- forming waste rock and any leachate generated, including appropriately designed detection and response systems for acid generation (covering monitoring methods, trigger levels and proposed management actions); • measures to ensure effective isolation of potential acid forming material in waste rock storage areas; • procedures to ensure that material relocated underground does not, to the extent reasonable and feasible, further oxidise or cause impact to groundwater; • notwithstanding the above, trigger levels for any material that has oxidised to the extent that it cannot be placed underground without impacting groundwater quality; and	Hera and Federation Waste Rock Management Plan, Rev 0.4, dated 10 April 2024.			A separate Waste Rock Management Plan has been prepared to meet the requirements of this Condition. The management of acid forming materials is covered in section 4.1.4 and 4.2.1 of the plan. Surface and groundwater monitoring is described in Sections 5.1 and 5.2 respectively. Trigger action criteria are presented in Section 6 of the plan.	Compliance	
		(v) a program to validate the water balance and groundwater model for the development every 3 years and compare monitoring results against modelled predictions.	Hera and Federation Water Management Plan, Rev 1.0, dated 4 April 2024.			Not yet triggered.	Not Triggered	
B44	Water Management Plan	The Applicant must not commence construction until the Water Management Plan is approved by the Planning Secretary.	Email from DPE (Major Projects) to Aurelia Metals (J Thompson) titled “Federation Project Water Management Plan”, dated 16 April 2024. Email from DPE (Major Projects) to Aurelia Metals (J Thompson) titled “Federation Project Waste Rock Management Plan”, dated 16 April 2024.			The works under this approval (commencement of construction) commenced on 3 May 2024. The plans were published in 2023. The Department acknowledged receipt of the Plan on 16 April 2023.	Compliance	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B45	Water Management Plan	The Applicant must implement the Water Management Plan as approved by the Planning Secretary.				Based on the results of water quality monitoring and minimal incidents, the Auditor is satisfied that the WMP is being implemented.	Compliance	
B46	Paste Fill	Only consolidated paste fill material may be used as tailings material to backfill stopes.		Environment and Social Responsibility Superintendent – Waste rock backfill is being used which is an approved method. No paste fill currently in use but company would not remove this from the approval as an option in the future		The paste fill plant has not been constructed as there is sufficient waste rock to back fill the stopes.	Not Triggered	
B47	Paste Fill	The Applicant must ensure material used to backfill stopes is physically and chemically stable.		Environment and Social Responsibility Superintendent – The paste fill plant has not been constructed as there is sufficient waste rock to back fill the stopes.		The paste fill plant has not been constructed as there is sufficient waste rock to back fill the stopes.	Not Triggered	
B48	Paste Fill	The Applicant must commission a suitably qualified and experienced person to: (a) carry out trials to clarify the physical and leaching characteristics of the paste fill and set technical specifications for the production of the consolidated paste fill material to meet the performance measures in Condition B47; (b) prepare a program for the ongoing testing of the consolidated paste fill material to ensure it meets these technical specifications; and (c) prepare a report on the findings of the trial and proposed implementation of the testing program, to the Secretary's satisfaction prior to backfilling stopes with consolidated paste fill material.		Environment and Social Responsibility Superintendent – The paste fill plant has not been constructed as there is sufficient waste rock to back fill the stopes.		The paste fill plant has not been constructed as there is sufficient waste rock to back fill the stopes.	Not Triggered	
B49	Paste Fill	The Applicant must implement the approved program in Condition B48(b).		Environment and Social Responsibility Superintendent – The paste fill plant has not been constructed as there is sufficient waste rock to back fill the stopes.		The paste fill plant has not been constructed as there is sufficient waste rock to back fill the stopes.	Not Triggered	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B50	Subsidence Performance Measures	The Applicant must ensure that all stopes and associated backfilling maintains long term stope stability and that the development results in negligible subsidence impacts or environmental consequences.	Life of Mine Surface Subsidence Assessment Federation Project, prepared by Beck Engineering, dated 2 September 2021	Environment and Social Responsibility Superintendent – Monitoring for surface subsidence is not required, as modelling indicates negligible displacement (<3 cm) and no significant surface impact, subject to compliance with design parameters and continued geotechnical validation. See page 3 Executive summary Page 43 for conclusion.		An independent assessment of mine subsidence concluded that the total cumulative subsidence will be in the range of 1-2 cm.	Compliance	
B51	Road Upgrades	Prior to commencing the transport of ore to Peak Mine, or an alternative date nominated by CSC and TfNSW, the Applicant must upgrade the intersections of Kidman Way and Priory Tank Road, Kidman Way and the Peak Mine, and Burthong Road and Priory Tank Road to provide a basic left turn treatment in accordance with the relevant AUSTROADS standards, to the satisfaction of CSC and TfNSW.	Letter from Aurelia Metals (J Thompson) to TfNSW (A McIntyre) titled “Letter of Commitment relating to the temporary approval of haulage between the Federation Project and Peak Mine”, dated 30 August 2024. Letter from TfNSW (D Pfeiffer) to Aurelia Metals (J Thompson) titled “Response to correspondence letter relating to the temporary approval of haulage between the Federation Project and Peak Mine”, dated 3 September 2024 Email from Cobar Shire Council (M Bell) to Aurelia Metals (J Thompson) titled “Priory tank / Kidman Way intersection and Peak Way / Kidman Way intersection”, dated <ay 15 2024.	Environment and Social Responsibility Superintendent – The road works yet to be completed due to design delays with TfNSW. We are operating under a temporary exemption approved by TfNSW and CSC.		The approval of the interaction design has delayed the upgrade of the nominated intersections. Both TfNSW and CSC have approved the transport of ore to the Peak Mine prior to the upgrade of those intersections.	Compliance	
B52	Road Upgrades	Prior to the transport of more than 60,000 tonnes of concentrate from the site in a financial year, unless otherwise agreed by the Planning Secretary, the Applicant must either: (a) upgrade the following intersections: (i) the Barrier Highway and Hermidale Nymagee Road to provide an Auxiliary Left (AUL) Turn Lane in accordance with the relevant AUSTROADS standards; and (ii) the Barrier Highway and the Rail Siding Access to provide a Channelised Right (CHR) Turn Lane in accordance with the relevant AUSTROADS standards; or (b) identify alternative intersection safety mitigation measures for the transport of concentrate to the satisfaction of TfNSW.		Environment and Social Responsibility Superintendent – no concentrate is produced at this mine.		No concentrate is produced at this mine.	Not Triggered	
B53	Road Upgrades	The intersections must be upgraded in accordance with the relevant Austroads guidelines, Australian standards and TfNSW specifications, or alternative measures must be implemented to the satisfaction of TfNSW.				Refer to Condition B51 above.	Noted	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B54	Road Upgrades	If the Applicant and BSC do not enter into a planning agreement within the timeframe described under condition A14, then prior to the transport of more than 60,000 tonnes of concentrate from the site in a financial year, or alternative timing agreed by the Planning Secretary, the Applicant must make payment to BSC for the full amount required to upgrade Nymagee-Hermidale Road between chainage 4.5 km to 7.9 km as shown in Appendix 5 to an 8 metre wide seal or alternative upgrades of equivalent financial value along Nymagee-Hermidale Road as otherwise agreed with BSC		Environment and Social Responsibility Superintendent – no concentrate is produced at this mine.		No concentrate is produced at this mine.	Not Triggered	
B55	Road Upgrades	If there is any dispute between the Applicant and BSC regarding the payment required in condition B54, then any of the parties involved may refer the matter to the Secretary for resolution.		Environment and Social Responsibility Superintendent – no concentrate is produced at this mine.		No concentrate is produced at this mine.	Not Triggered	
B56	Monitoring Road Transport	The Applicant must: (a) keep accurate records of the: (i) amount of ore, concentrate and/or waste transported from the site, including between Hera Mine and Federation Mine (on a daily basis); and (ii) number of daily and annual truck movements generated by the development; and (b) publish a summary of these results in the Annual Review.	Aurelia Peak Mine Daily Tons Hauled_31 December 24 BAY REPORTING NL Times.xlsx Aurelia Peak Mine Daily Tons Hauled_31 November 34 BAY NL REPORTING.xlsx Aurelia Peak Mine Daily Tons Hauled_31 March 25 BAY NL REPORTING.xlsx	Environment and Social Responsibility Superintendent – no concentrate is produced at this mine.		No concentrate is produced at this mine. Ore haulage records were sighted, covering the entire audit period.	Compliance	
B57	Transport Operating Conditions	The Applicant must ensure that: (a) ensure that all laden trucks transporting ore, waste rock and tailings entering or exiting the site have their loads covered; (b) take all reasonable steps to minimise traffic safety issues and disruptions to local road users, including school buses. <i>Note: The Applicant is required to obtain relevant permits under the Heavy Vehicle National Law (NSW) for the use of over-dimension vehicles on the road network.</i>	Hera Mine and Federation Mine Traffic Management Plan, Rev 1.1, dated 1 October 2024		During this audit, the Auditor observed the loading of ore trucks and those trucks leaving the Federation Site. All trucks were properly covered. Photograph 21 shows the loading and queuing or the ore transport trucks. The trucks are provided with load covers that are permanently attached.	The Drivers' Code of Conduct specifies that all loads to and from the mine must be covered. All trucks observed by the Auditor were covered.	Compliance	
B58	Traffic Management Plan	The Applicant must prepare a Traffic Management Plan for the development to the satisfaction of the Planning Secretary. This plan must: (a) be prepared by a suitably qualified and experienced person/s;	Hera Mine and Federation Mine Traffic Management Plan, Rev 1.1, dated 1 October 2024			The Traffic Management Plan was prepared by The Transport Planning Partnership and IEMA. These consultants are appropriately qualified and experienced.	Compliance	
		(b) be prepared in consultation with CSC, BSC and TfNSW;	Hera Mine and Federation Mine Traffic Management Plan, Rev 1.1, dated 1 October 2024			Appendix A of the TMP contains consultation correspondence with TfNSW, CSC and BSC.	Compliance	
		(c) include details of all transport routes and traffic types to be used for development-related traffic;	Hera Mine and Federation Mine Traffic Management Plan, Rev 1.1, dated 1 October 2024			Figures 5 to 10 inclusive provide details of the approved transport routes.	Compliance	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B58	Traffic Management Plan	(d) identify the maximum daily truck movements transporting ore, concentrate, tailings and waste rock to and from the site, including between Hera Mine and Federation Mine. The nominated maximum daily truck movements must be based on an assessment of the impact of these movements on the capacity, safety and efficiency of the local road network;	Hera Mine and Federation Mine Traffic Management Plan, Rev 1.1, dated 1 October 2024			Section 4 of the Traffic Management Plan specifies each of the requirements of this Condition.	Compliance	
		(e) include a program to monitor and regularly report on the daily and cumulative truck movements from the site;	Hera Mine and Federation Mine Traffic Management Plan, Rev 1.1, dated 1 October 2024			The traffic monitoring program is presented in Section 5.	Compliance	
		(f) include details of the measures to be implemented to: (i) comply with the operating conditions in condition B57; (ii) minimise traffic safety issues and disruption to local road users, including: (iii) minimising potential for conflict with school buses; (iv) installation of advance truck warning signage on Kidman Way; (v) a traffic management system for managing over-dimensional vehicles; and (vi) implementation of temporary traffic controls, including detours and signage; (vii) manage and coordinate ore, tailings, waste rock and concentrate haulage movements; (viii) notify the local community about development-related traffic impacts; (ix) respond to any emergency repair requirements or maintenance during construction and/or decommissioning;	Hera Mine and Federation Mine Traffic Management Plan, Rev 1.1, dated 1 October 2024			Section 4 of the Traffic Management Plan specifies each of the requirements of this Condition.	Compliance	
		(g) include a Drivers' Code of Conduct that includes procedures to ensure that drivers: (i) adhere to posted speed limits or other required travelling speeds; (ii) adhere to the designated transport routes;	Hera Mine and Federation Mine Traffic Management Plan, Rev 1.1, dated 1 October 2024			The Drivers' Code of Conduct is provided in Appendix B and covers the requirements of this condition.	Compliance	
		(h) implement safe driving practices, including through residential areas and school zones and during hazardous weather conditions; and	Hera Mine and Federation Mine Traffic Management Plan, Rev 1.1, dated 1 October 2024			Section 4 of the Traffic Management Plan specifies each of the requirements of this Condition.	Compliance	
		(i) minimise traffic noise.	Hera Mine and Federation Mine Traffic Management Plan, Rev 1.1, dated 1 October 2024			Section 4 of the Traffic Management Plan specifies each of the requirements of this Condition.	Compliance	
B59	Traffic Management Plan	If the development is to be staged, the obligations in this condition apply to each stage of the development.		Environment and Social Responsibility Superintendent – No staging of the works has been sought under this approval.		No staging of the works has been sought under this approval.	Noted	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B60	Traffic Management Plan	The Applicant must not commence construction of the road upgrades required under condition B52 until the Traffic Management Plan is approved by the Planning Secretary.	Letter from DPPI (S O'Donoghue) to Aurelia Metals (M Williams) titled "Traffic Management Plan", dated 5 November 2024.			The construction of road upgrades commenced in 2025. The plans were published in 2023. The Department acknowledged receipt of the Plan on 5 November 2024.	Compliance	
B61	Traffic Management Plan	The Applicant must implement the Traffic Management Plan as approved by the Planning Secretary.	Complaints Register			Based on the limited number of complaints received during the audit period and no reported incidents, the Auditor is satisfied that the TMP is being implemented.	Compliance	
B62	Protection of Aboriginal Heritage	The Applicant must ensure that the development does not cause any direct or indirect impact on any identified Heritage item located outside the approved disturbance areas, beyond those predicted in the document/s listed in condition A2(c).	Stakeholder Consultation.	Environment and Social Responsibility Superintendent – No heritage incidents or unapproved impacts have occurred.		No heritage incidents or unapproved impacts were recorded during this audit period.	Compliance	
B63	Protection of Aboriginal Heritage	If suspected human remains are discovered on the site, then all work surrounding the area must cease, and the area must be secured. The Applicant must immediately notify NSW Police Force and Heritage NSW, and work must not recommence in the area until authorised by NSW Police Force and Heritage NSW.	Stakeholder Consultation.	Environment and Social Responsibility Superintendent – No heritage incidents or unapproved impacts have occurred.		No heritage incidents or unapproved impacts were recorded during this audit period.	Not Triggered	
B64	Protection of Aboriginal Heritage	If any previously unknown Aboriginal object is discovered, or suspected to be within or adjacent to the approved disturbance area: (a) all work in the immediate vicinity of the object or place must cease immediately; (b) a 10m buffer area around the object or place must be cordoned off; and (c) Heritage NSW must be contacted immediately.	Stakeholder Consultation.	Environment and Social Responsibility Superintendent – No heritage incidents or unapproved impacts have occurred.		No heritage incidents or unapproved impacts were recorded during this audit period.	Not Triggered	
B65	Protection of Aboriginal Heritage	Work in the immediate vicinity may only recommence if: (a) the potential Aboriginal object is confirmed by Heritage NSW, in consultation with the Registered Aboriginal Parties, not to be an Aboriginal object or Aboriginal Place; (b) the Aboriginal Cultural Heritage Management Plan is revised to include the Aboriginal object and appropriate measures in respect of it; or (c) the Planning Secretary is satisfied with the measures to be implemented in respect of the Aboriginal object and makes a written direction in that regard.	Stakeholder Consultation.	Environment and Social Responsibility Superintendent – No heritage incidents or unapproved impacts have occurred.		No heritage incidents or unapproved impacts were recorded during this audit period.		

PLANNING APPROVAL SSD 24319456 MOD 2										
Cond.	Short Title	Condition		Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation	
B66	Protection of Aboriginal Heritage	The Applicant must ensure that all known Aboriginal objects or Aboriginal places on the site and within any offset areas are properly recorded, and those records are kept up to date, in the Aboriginal Heritage Information Management System (AHIMS) Register.		AHIMS Register dated September 2023.			A register of Aboriginal objects and places has been established.	Compliance		
B67	Protection of Aboriginal Heritage	The Applicant must carry out ongoing consultation with Registered Aboriginal Parties regarding the conservation and management of Aboriginal cultural heritage values.		Email from Area Landscape Design (P Cameron) to RAP (M Sad) titled “Aurelia Metals Project – 28-day RAP review of Federation Project Addendum ACHAR”, dated 8/10/2022. Clearance Certificate issued by Area Landscaping for drilling works, dated 22 September 2023. Clearance Certificate issued by Area Landscaping - boundary fence clearing and construction, dated 22/9/23.	Environment and Social Responsibility Superintendent – RAPS are present during any Aboriginal Heritage assessment		Evidence of the participation of RAPS during the clearance inspections was sighted.	Compliance		
B68	Biodiversity Credit Requirements	The Applicant must retire the biodiversity credits for Offset Stages 1a, 1b, 1c, 1d, 1e, 1f, 2a, 2b, 2c, 2d, 3, 4 and 5, as specified in Table 5 below (summary provided only), prior to commencing vegetation clearing in those stages. The retirement of credits must be carried out in accordance with the Biodiversity Offsets Scheme of the BC Act.		Biodiversity Off-set Credit payment application dated 26 February 2024. Credit Retirement report transaction number CT-3568, dated 22 May 2024. Statement confirming payment into Biodiversity Conservation Fund for offset obligation, BCT Reference BCF689, date 18 March 2024.	Environmental Manager (Aurelia Resources) The retirement of biodiversity credits is being staged. This process was approved as part of Modification 1. We have retired the credits for the areas cleared to date. For the stages we have not cleared, we have not retired the credits associated with those areas. The reason for the low retirement of credits is we have only cleared approximately 3 Hectares of land.		99 credits for PCT 103 and 286 credits for PCT 174 were retired on 18 March 2024. 133 credits for PCT 13 were retired May 2024.	Compliance		
	Table 5	Offset Stage	Offset Liability							
		1a	442							
		1b	76							
		1c	51							
		1d	101							
		1e	662							
		1f	72							
		2a	282							
		2b	245							
		2c	209							
		2d	75							
		3	255							
		4	77							
5	72									
Total	2619									
B69	Biodiversity credits – carryover from Hera Mine offset requirements	Within two years of commencing construction of the water management dam, unless the Secretary agrees otherwise, the Applicant must retire biodiversity credits of a number and class identified in Table 6 below. The retirement of credits must be carried out in consultation with CPHR and in accordance with the Biodiversity Offsets Scheme of the BC Act.					The construction of the Water Management Dam commenced in 2024. Therefore, this condition is not triggered until 2026.	Not Triggered		

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B70	Biodiversity Management Plan	The Applicant must prepare a Biodiversity Management Plan for the development. This plan must: (a) be prepared by a suitably qualified and experienced person/s;	Hera Mine and Federation Mine Biodiversity Management Plan, Rev 0.3, dated 21 October 2024			The Biodiversity Management Plan was prepared by Rowen Murphy and Andrew Watson, both of whom are qualified ecologists and accredited BAM Assessors.	Compliance	
		(b) be prepared in consultation with CPHR;	Letter from BCSD (C Houlison) to Aurelia Metals (A Butt) titled "Hera and Federation Mine Biodiversity Management Plan (SSD 24319456-PA-12), dated 7 February 2024.			The Biodiversity, Conservation and Science Directorate was consulted during the preparation of the BioMP.	Compliance	
		(c) describe the short, medium, and long-term measures to be undertaken to manage the remnant vegetation and fauna habitat on the site;	Hera Mine and Federation Mine Biodiversity Management Plan, Rev 0.3, dated 21 October 2024			The strategies to be implemented are contained within Section 4 (Management Measures), although the Auditor notes that specific reference to protection of remnant vegetation.	Compliance	
		(d) describe how biodiversity management would be integrated with similar measures within other management plans, including the Rehabilitation Management Strategy referred to in condition B86;	Hera Mine and Federation Mine Biodiversity Management Plan, Rev 0.3, dated 21 October 2024			Integration of the BioMP and RMP is addressed in Section 4.2.3.	Compliance	
		(e) describe the measures to be implemented within the approved disturbance areas to: (i) minimise the amount of clearing; (ii) minimise impacts on fauna, including undertaking pre-clearance surveys and translocation of threatened species as guided by the NSW Government's Translocation Operational Policy 2019 (as amended from time to time); and (iii) maximise the salvage of resources, including tree hollows, vegetation and soil resources, for beneficial reuse, including fauna habitat enhancement	Hera Mine and Federation Mine Biodiversity Management Plan, Rev 0.3, dated 21 October 2024			The strategies to be implemented are contained within Section 4.3.1 (Management Measures).	Compliance	
		(f) describe the measures to be implemented on the site to: (i) minimise impacts on fauna habitat resources such as hunting and foraging areas, habitat trees, fallen timber and hollow-bearing trees; (ii) protect vegetation and fauna habitat outside of the approved disturbance areas; (iii) manage the collection and propagation of seed from the local area; (iv) control weeds, including measures to avoid and mitigate the spread of noxious weeds; (v) control feral pests; and (vi) control access to vegetated or revegetated areas.	Hera Mine and Federation Mine Biodiversity Management Plan, Rev 0.3, dated 21 October 2024			The strategies to be implemented are contained within Section 4.3.2 (Management Measures).	Compliance	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B71	Biodiversity Management Plan	The Applicant must not commence construction until the Biodiversity Management Plan has been prepared, and a copy has been provided to the Planning Secretary	Email from J Thompson (Aurelia Metals Ltd) to M Nuttall (Aurelia Metals Ltd) titled “Notification of intention to commence construction”, dated 19 April 2024. Post Approval Submission Receipt, Federation Biodiversity Management Strategy (submitted to DPE on 13 May 2023) Letter from DPHI (W Jones) to Hera Resources (M Williams) titled “Biodiversity Management Plan”, dated 25 October 2024.			DPHI was notified that the commencement of construction would occur on 3 May 2024. The Biodiversity Management Plan was submitted to DPE on 13 May 2023. The Biodiversity Plan was revised and published on 25 October 2025. The Department acknowledged receipt of the Plan on 21 October 2024.	Compliance	
B72	Biodiversity Management Plan	The Applicant must implement the Biodiversity Management Plan.	Hera Mine and Federation Mine Biodiversity Management Plan, Rev 0.3, dated 21 October 2024		During the inspection of the works in the vicinity of the recently constructed Water Management Dam, stockpiles of the materials excavated to allow construction of the dam were viewed. The stockpiles (Photograph 12) found that the materials were in some areas pushed up around the remnant trees in contravention of the obligation to ensure that no materials would be stored under the drip lines of trees.	During the site inspection, as clearing works have been completed, there is limited opportunity to observe the practical aspects of the implementation of the BMP. However, the storage of excavated materials was observed that did not conform with the obligations established in Section 4.3.1, Table 10. It is noted however, that no other non-conformances were identified and that the Auditor is satisfied that generally the BMP is being implemented.	Non-Compliance	Review procedures for the excavation and storage of materials from earthworks and ensure that, for example work method statements, cover all of the necessary biodiversity management measures. Relocate any topsoil or other stockpiles that encroach on remnant vegetation.
B73	Visual Amenity and Lighting	The Applicant must:					Noted	
B74	Visual Amenity and Lighting	take all reasonable steps to minimise the visual and off-site lighting impacts of the development;			There are no sensitive receivers close to the develop, that would have direct line of site to any of the surface works.	There are no sensitive receivers close to the develop, that would have direct line of site to any of the surface works.	Compliance	
B75	Visual Amenity and Lighting	ensure no fixed outdoor lights shine directly above the horizontal or above the building line or any illuminated structure;	Complaints Register		There are no sensitive receivers close to the develop, that would have direct line of site to any of the surface works.	There are no sensitive receivers close to the develop, that would have direct line of site to any of the surface works. There have been no lighting related complaints.	Compliance	
B76	Visual Amenity and Lighting	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;	Complaints Register		There are no sensitive receivers close to the develop, that would have direct line of site to any of the surface works.	There are no sensitive receivers close to the develop, that would have direct line of site to any of the surface works. There have been no lighting related complaints.	Compliance	
B77	Visual Amenity and Lighting	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.	Complaints Register		There are no sensitive receivers close to the develop, that would have direct line of site to any of the surface works.	There are no sensitive receivers close to the develop, that would have direct line of site to any of the surface works.	Compliance	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B79	Waste	The Applicant must: take all reasonable steps to minimise the waste generated by the development; (a) classify all waste in accordance with the Waste Classification Guidelines (EPA, 2014);	EPA Intrastate Waste Consignment Authorisation for J100 Mineral Oils – from the Hera Site, certificates covering the audit period. EPA Intrastate Waste Consignment Authorisation for J100 Mineral Oils, from the Federation site covering the audit period.		Wastes are segregated and stored separately. Photograph 18 shows an example of waste segregation and storage at the Federation site.	Wastes are segregated for disposal at each site. A review of waste transportation documentation indicates that waste is classified appropriately in accordance with EPA guidelines.	Compliance	
		(b) dispose of all waste, except for waste rock and tailings, at appropriately licensed waste facilities;	EPA Intrastate Waste Consignment Authorisation for contaminated soils, from the Federation site covering the audit period. EPA Intrastate Waste Consignment Authorisation for oil filters, from the Federation site covering the audit period. EPA Intrastate Waste Consignment Authorisation for batteries, from the Federation site covering the audit period. EPA Intrastate Waste Consignment Authorisation for J100 hydraulic houses, approval to 10 December 2025.			A review of waste transportation documentation indicates that waste is transported and disposed of in accordance with EPA guidelines.	Compliance	
		(c) manage on-site sewage treatment and disposal in accordance with the requirements of the Council; and			Inspection of sewage treatment systems identified no issues of concern.	The Hera and federation sites operate council approved sewage treatment systems.	Compliance	
		(d) monitor and report on the effectiveness of the waste minimisation and management measures in the Annual Review referred to in condition C10.	Hera Resources Monthly Waste Summary Report (July 2023 to June 2024)			Hera Resources maintains records of all wastes generated including volumes, and details of the transport and disposal locations of those wastes.	Compliance	
		(e) Dangerous Goods	Hera Resources Monthly Waste Summary Report (July 2024 to April 2024)			A review of the waste registers for both Hera and Federation indicates that the wastes generated are typical for mining operations in regards to quantities and categories.	Compliance	
B80	Waste	The Applicant must ensure that the storage, handling, and transport of: (a) dangerous goods is done in accordance with the relevant Australian Standards, particularly AS1940 and AS1596, and the Dangerous Goods Code; and (b) explosives are managed in accordance with the requirements of the Resources Regulator.	See B79 above.			Hera Resources maintains records of all wastes generated including volumes, and details of the transport and disposal locations of those wastes.	Compliance	
B81	Waste	The storage of explosives and explosive precursors for the development must comply with relevant Australian Standards and codes of practices including AS 2187.			Explosives store (photograph 20)	A dedicated, licensed explosives store has been constructed at the Federation Site	Compliance	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B82	Hazardous Materials Management Plan	The Applicant must prepare a Hazardous Materials Management Plan for the development to the satisfaction of the Planning Secretary. The plan must: (a) be prepared in consultation with TfNSW, EPA, DPE Water, SafeWork NSW and Resources Regulator;	Hera Mine and Federation Mine Hazardous Materials Management Plan, Rev 0.4, dated 17 April 2024 Letter from the EPA (S Lund) to Aurelia Metals (R Oldham) titled “Hera Resources Hazardous Materials Management Plan, Waste Rock Management Plan and Water Management Plan for Federation and Hera Mine – Post Approval Consultation SSD 2439456-PA-1”, dated 20 September 2023.			Appendix A of the Hazardous Materials Management Plan contains copies of consultation correspondence with TfNSW, EPA, DPE Water, SafeWork NSW and Resources Regulator.	Compliance	
		(b) be consistent with the International Cyanide Management Code for the Manufacture, Transport and Use of Cyanide in the Production of Gold;	Hera Mine and Federation Mine Hazardous Materials Management Plan, Rev 0.4, dated 17 April 2024	Environment and Social Responsibility Superintendent – Cyanide is no longer in use on the Hera site. All ore processing is being undertaken at the Peak Mine.		Sectio 4.1.2 of the HMMP describes the management measures to be implemented for the storage and use of Cyanide on the Hera site. The management measures include conformance with the Cyanide Code.	Compliance	
		(c) describe the measures that would be implemented to: (i) ensure sodium cyanide and other toxic chemicals are stored and handled in accordance with AS/NZS 4452:1997 – The Storage and Handling of Toxic Substances; and (ii) ensure the transportation of hazardous materials to or from the site is undertaken in accordance with the Department’s Hazardous Industry Planning Advisory Paper No. 11 – Route Selection and the Australian Code for the Transport of Dangerous Goods by Road and Rail; (iii) detail the emergency procedures for the development consistent with the Department’s Hazardous Industry Planning Advisory Paper No. 1 – Emergency Planning.	Hera Mine and Federation Mine Hazardous Materials Management Plan, Rev 0.4, dated 17 April 2024			Sectio 4.1.2 of the HMMP describes the management measures to be implemented for the storage and use of Cyanide on the Hera site. The management measures include conformance with the Cyanide Code. Section 4.1.3 details the management measures for the storage and use of other hazardous materials. Section 4.1.5 describes the requirements for the transport of dangerous goods to the mine site.	Compliance	
B83	Hazardous Materials Management Plan	The Applicant must not commence mining operations until the Hazardous Materials Management Plan has been approved by the Planning Secretary.	Hera Mine and Federation Mine Hazardous Materials Management Plan, Rev 0.4, dated 17 April 2024 Letter from DPHI (S O’Donoghue) to Hera Resources (M Williams) titled “Hazardous Materials Management Plan”, dated 26 June 2024.			DPHI was notified that the commencement of mining operations under this approval would occur on 1 November2024. The Hazardous Materials Management Plan was finalised and published on 17 April 2024. The Department approved of the Plan on 26 June 2024.	Compliance	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B84	Hazardous Materials Management Plan	The Applicant must implement the Hazardous Materials Management Plan as approved by the Planning Secretary.	Hera Mine and Federation Mine Hazardous Materials Management Plan, Rev 0.4, dated 17 April 2024			The HMMP states that liquids (for example fuels, oils and chemicals) are stored in accordance with the NSW EPA Storage of Liquids Guidelines that incorporate the requirements of AS 1940, AS 2507, AS 2714, AS 3883, AS 3780 and AS 3846 that cover all of the liquids and chemicals used and stored that the Hera / Federation site. Deficiencies were identified with the storage of chemicals and hydrocarbons at both the Hera and Federation sites. Refer to Section 7.9.2	Non-Compliance	Refer to Section 7.9.2 above.
B85	Rehabilitation Objectives	The Applicant must rehabilitate all areas affected by the development accordance with the conditions imposed on the mining leases(s) associated with the development under the Mining Act 1992. The rehabilitation must be generally consistent with the proposed rehabilitation strategy described in the EIS (and shown conceptually in the Rehabilitation Plan in Appendix 3) and must comply with the objectives in Table 7.						
	Table 7	Feature	Objectives					
		All areas affected by the development	- Safe, stable and non-polluting - Fit for the intended post-mining land use/s - Establish the final landform and post mining- land use/s as soon as practicable after cessation of mining - Minimise post-mining environmental impacts			Post Mining Requirement	Not Triggered	
		Final landform	- Stable and sustainable for the intended post-mining land use/s - Integrated with surrounding natural landforms and other mine rehabilitated landforms, to the greatest extent practicable - Incorporate macro-relief and micro-relief and drainage features that mimic natural topography and mitigate erosion, to the greatest extent practicable - Maximise surface water drainage to the natural environment - Minimise visual impacts, where practicable			Post Mining Requirement	Not Triggered	
		Stopes	- Backfilled - Safe and stable - Negligible surface subsidence in the long term - To be decommissioned and made safe and stable			Refer to Condition B50	Compliance	
		Portals and vent shafts				Post Mining Requirement	Not Triggered	
		Tailings storage facility	- Final landform designed for native grassland species, unless further assessment indicates the capping design can accommodate woodland vegetation - Free draining			Post Mining Requirement	Not Triggered	
		Surface extraction area	- Free draining - Optimise the size and depth to ensure the final landform is stable and non-polluting - Minimise to the greatest extent practicable the drainage catchment and any instability risk.			Post Mining Requirement	Not Triggered	
		Waste rock storage areas	- Minimise the potential for acid mine drainage and erosion - Potentially acid forming materials to be emplaced in the underground workings			Post Mining Requirement	Not Triggered	
		Mine water discharges following mine closure (from any location)	Negligible environmental impact			Post Mining Requirement	Not Triggered	
		Water quality	Water retained on the site is fit for intended post-mining land use/s			Refer to Condition B42	Compliance	
		Surface infrastructure	- To be decommissioned and removed, unless Resources Regulator agrees otherwise - Ensure public safety			Post Mining Requirement	Not Triggered	
		Community	Minimise adverse socio-economic effects associated with mine closure			Post Mining Requirement	Not Triggered	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B86	Rehabilitation Strategy	The Applicant must prepare a Rehabilitation Strategy for the development to the satisfaction of the Planning Secretary. This strategy must: (a) be prepared by a suitably qualified and experienced person/s;	Hera Mine and Federation Mine Rehabilitation Management Plan, Rev 0.1, dated 16 December 2024 It is noted that the Rehabilitation Management Plan uploaded to the website is not the current version (Rev 0.2 at the time of the site inspection, and Ver 1.0 at the time of preparation of this report.			The Rehabilitation Management Plan was authored by IEMA Consultants. The Rehabilitation Management Plan (RMP) has been prepared in accordance with the NSW Resources Regulator's (RR) Form and Way: Rehabilitation Management Plan for Large Mines (RR, 2024) and associated guidelines .	Compliance	
		(b) be prepared in consultation with Resources Regulator, Water Group, CPHR, CSC and the CCC;	Letter from the Biodiversity Conservation and Science Group (S Wynn) to Hera Resources Pty Ltd (sic) (A Butt), titled "Hera and Federation Mine Rehabilitation Strategy", dated 20 June 2024 Letter from the DPE Water (T Baker) to Aurelia Metals (M Williams), titled "Hera - Federation Project Rehabilitation Strategy", dated 7 June 2024 Email from Cobar Shire Council (G Ryman) to Aurelia Metals (A Butt) titled "Federation Rehabilitation Strategy", dated 5 July 2024 Email from Aurelia Metals (A Butt) to Resource Regulator titled "Hera-Federation Rehabilitation Strategy", dated 4 June 2024			Correspondence evidencing consultation with the relevant stakeholders was sighted.	Compliance	
		(c) be submitted to the Planning Secretary for approval within six months of the date of physical commencement of development under this consent, unless otherwise agreed by the Planning Secretary;	Post Approval Submission Receipt, Federation Mine Rehabilitation Strategy (submitted to DPE on 23 October 2023 for review and comment)			DPHI was notified that the commencement of construction would occur on 3 May 2024. The plan was submitted to DPE for review and comment on 23 October 2023. The Rehabilitation Management Plan was finalised and published on 16 December 2024. The finalisation of the plan and therefore approval occurred after the six months specified in this Condition.	Non-Compliance	Ensure that all future submissions to DPHI are submitted within the required timelines.
		(d) build upon the Rehabilitation Objectives in Table 7, describe the overall rehabilitation outcomes for the development, and address all aspects of rehabilitation including mine closure, final landform, , post-mining land use/s and water management;	Hera Mine and Federation Mine Rehabilitation Management Plan, Rev 0.1, dated 16 December 2024			Section 4 of the Rehabilitation Management Plan presents the rehabilitation objectives.	Compliance	
		(e) align with strategic rehabilitation and mine closure objectives and address the principles of the Strategic Framework for Mine Closure (ANZMEC and MCA, 2000);	Hera Mine and Federation Mine Rehabilitation Management Plan, Rev 0.1, dated 16 December 2024			Section 4 of the Rehabilitation Management Plan presents the rehabilitation objectives. These objects are generally consistent with the Strategic Framework for Mine Closure.	Compliance	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
B86	Rehabilitation Strategy	(f) describe how rehabilitation will be integrated with the mine planning process, including a plan to address premature or temporary mine closure; and	Hera Mine and Federation Mine Rehabilitation Management Plan, Rev 0.1, dated 16 December 2024			Section 6 of the Rehabilitation Management Plan presents the rehabilitation implementation plan.	Compliance	
B86	Rehabilitation Strategy	(g) include details of: (i) how the tailings storage facility will be designed to meet the rehabilitation objectives in Table 7; (ii) target vegetation communities and species to be established within the proposed revegetation areas; and (iii) the design of the surface water drainage network on the final landform;	Hera Mine and Federation Mine Rehabilitation Management Plan, Rev 0.1, dated 16 December 2024			Section 6 of the Rehabilitation Management Plan presents the rehabilitation implementation plan.	Compliance	
		(h) investigate opportunities to refine and improve the final landform over time, including the configuration of the waste rock emplacement;	Hera Mine and Federation Mine Rehabilitation Management Plan, Rev 0.1, dated 16 December 2024			Section 9.2 of the Rehabilitation Management Plan describes the future rehabilitation, modelling and trails to be undertaken.	Compliance	
		(i) include a post-mining land use strategy to investigate and facilitate post-mining beneficial land uses for the site, that: (i) align with regional and local strategic land use planning objectives and outcomes; (ii) support a sustainable future for the local community; (iii) utilise existing mining infrastructure, where practicable; and (iv) avoid disturbing self-sustaining native ecosystems, where practicable;	Hera Mine and Federation Mine Rehabilitation Management Plan, Rev 0.1, dated 16 December 2024			Section 4 of the Rehabilitation Management Plan presents the Rehabilitation Objectives and Completion Criteria. Section 5 presents the Final Landform and Rehabilitation Plan.	Compliance	
		(j) include a stakeholder engagement plan to guide rehabilitation and mine closure planning processes and outcomes;	Hera Mine and Federation Mine Rehabilitation Management Plan, Rev 0.1, dated 16 December 2024			Section 4.4 of the Rehabilitation Management Plan presents the stakeholder consultation plan	Compliance	
		(k) investigate ways to minimise adverse socio-economic effects associated with rehabilitation and mine closure; and	Hera Mine and Federation Mine Rehabilitation Management Plan, Rev 0.1, dated 16 December 2024			A strategy to investigate ways to minimise adverse socio-economic effects associated with rehabilitation and mine closure has not been included in the plan.	Non-Compliance	During the next revision of the plan include a strategy to investigate ways to minimise adverse socio-economic effects associated with rehabilitation and mine closure.
		(l) include a program to report on the outcomes of the investigations required under this condition and review and update this strategy at least every five years.	Hera Mine and Federation Mine Rehabilitation Management Plan, Rev 0.1, dated 16 December 2024			A reporting program is not included in the plan.	Non-Compliance	During the next revision of the plan include a reporting program.
B87	Rehabilitation Strategy	The Applicant must implement the Rehabilitation Strategy approved by the Planning Secretary.				Meaningful implementation of the plan has not commenced as the mine is in the early stages of operations.	Noted	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
C1	Environmental Management Strategy	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;	Letter from DPE (S O'Donoghue) to Hera Resources (M Williams) titled "Federation Mine – Environmental Management Strategy", 15 May 2024.			The works under this approval (commencement of construction) commenced on 3 May 2024. The Plan was issued to DPHI for review and approval (initially) on 29 February 2024 and following comments from DPHI, resubmitted on 8 April 2024. The EMP was published on 15 May 2024. The Department Approved the plan on 15 May 2024. The initial plan submission date preceded the commencement of construction.	Compliance	
		(b) provide the strategic framework for environmental management of the development;	Hera and Federation Mine Environmental Management Strategy, Rev 0.4, dated 8 April 2024.			The EMS provides a strategic framework for environmental management of the development.	Compliance	
		(c) identify the statutory approvals that apply to the development;	Hera and Federation Mine Environmental Management Strategy, Rev 0.4, dated 8 April 2024.			Section 2 describes the statutory approvals for the mine.	Compliance	
		(d) set out the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	Hera and Federation Mine Environmental Management Strategy, Rev 0.4, dated 8 April 2024.			Roles and responsibilities are presented in Section 6.	Compliance	
		(e) set out the procedures to be implemented to: (i) keep the local community and relevant agencies informed about the operation and environmental performance of the development; (ii) receive, record, handle and respond to complaints; (iii) resolve any disputes that may arise during the course of the development; (iv) respond to any non-compliance and any incident; and (v) respond to emergencies; and	Hera and Federation Mine Environmental Management Strategy, Rev 0.4, dated 8 April 2024.			These key communication procedures are presented in Sections 4 and 5 of the EMS.	Compliance	
		(f) include: (i) references to any strategies, plans and programs approved under the conditions of this consent; and (ii) a clear plan depicting all the sites where monitoring is to be carried out under the conditions of this consent.	Hera and Federation Mine Environmental Management Strategy, Rev 0.4, dated 8 April 2024.			All relevant management plans (Table 4) and strategies and clear site plans (Figures 1, 2, 3 and 4) are provided in the EMS.	Compliance	
C2	Environmental Management Strategy	The Applicant must implement the Environmental Management Strategy as approved by the Planning Secretary.				A relatively high number of non-compliances have been identified during this audit. While the broad framework provided by this EMS is appropriate, the implementation of responsibilities has not been consistent. Refer to Section 7.4	Non-Compliance	Refer to Section 7.4 Above.

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
C3	Adaptive Management	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.				.	Noted	
C4	Adaptive Management	Where any exceedance of these criteria or performance measures has occurred, the Applicant must, at the earliest opportunity: (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.				An exceedance of the air quality criteria was identified during this audit. That exceedance was not investigated and as a result, it is not possible to determine if and adverse impact on any neighbouring residential property occurred. The Auditor accepts that while the likelihood of adverse impact may be low, that this cannot be verified and consequently the need for the implementation of remedial actions could not be determined.	Non-Compliance	Refer to the management system improvement recommendation in Section 7.4 Above.
C5	Management Plan Requirements	Management plans required under this consent must be prepared in accordance with relevant guidelines, and include where relevant: (a) summary of relevant background or baseline data;	Hera and Federation Mine Noise Management Plan Version 0.1, dated 17 November 2023. Hera and Federation Mine Blast Management Plan Version 0.1, dated 8 December 2023.			All plans required under this Approval met the requirements of Condition C5 (a)	Compliance	
		(b) details of: (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (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;	Hera and Federation Mine Air Quality and Greenhouse Gas Management Plan Version 1.0, dated 7 December 2023 Hera and Federation Water Management Plan, Rev 1.0, dated 4 April 2024. Hera and Federation Waste Rock Management Plan, Rev 0.4, dated 10 April 2024. Hera Mine and Federation Mine Traffic Management Plan, Rev 1.1, dated 1 January 2024			All plans required under this Approval met the requirements of Condition C5 (b)	Compliance	
		(c) any relevant commitments or recommendations identified in the document/s listed in condition A2(c);	Hera Mine and Federation Mine Biodiversity Management Plan, Rev 0.3, dated 21 October 2024			All plans required under this Approval met the requirements of Condition C5 (c)	Compliance	
		(d) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;	Hera Mine and Federation Mine Hazardous Materials Management Plan, Rev 0.4, dated 17 April 2024 Hera Mine and Federation Mine Rehabilitation Management Plan, Rev 0.1, dated 16 December 2024 Hera and Federation Mine Environmental Management Strategy, Rev 0.4, dated 8 April 2024.			All plans required under this Approval met the requirements of Condition C5 (d)	Compliance	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
C5	Management Plan Requirements	(e) a program to monitor and report on the: (i) impacts and environmental performance of the development; and (ii) effectiveness of the management measures set out pursuant to paragraph (d);	Hera and Federation Mine Noise Management Plan Version 0.1, dated 17 November 2023. Hera and Federation Mine Blast Management Plan Version 0.1, dated 8 December 2023.			All plans required under this Approval met the requirements of Condition C5 (e), except the Rehabilitation Management Plan.	Non-Compliance	During the next revision of the Rehabilitation Management Plan include a reporting program.
		(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;	Hera and Federation Mine Air Quality and Greenhouse Gas Management Plan Version 1.0, dated 7 December 2023 Hera and Federation Water Management Plan, Rev 1.0, dated 4 April 2024.			All plans required under this Approval met the requirements of Condition C5 (f)	Compliance	
		(g) a program to investigate and implement ways to improve the environmental performance of the development over time;	Hera and Federation Waste Rock Management Plan, Rev 0.4, dated 10 April 2024.			All plans required under this Approval met the requirements of Condition C5 (g)	Compliance	
		(h) a protocol for managing and reporting any: (i) incident, non-compliance or exceedance of any impact assessment criterion or performance measure; (ii) complaint; or (iii) failure to comply with other statutory requirements;	Hera Mine and Federation Mine Traffic Management Plan, Rev 1.1, dated 1 October 2024 Hera Mine and Federation Mine Biodiversity Management Plan, Rev 0.3, dated 21 October 2024 Hera Mine and Federation Mine Hazardous Materials Management Plan, Rev 0.4, dated 17 April 2024			All plans required under this Approval met the requirements of Condition C5 (h)	Compliance	
		(i) public sources of information and data to assist stakeholders in understanding environmental impacts of the development; and	Hera Mine and Federation Mine Rehabilitation Management Plan, Rev 0.1, dated 16 December 2024			All plans required under this Approval met the requirements of Condition C5 (i)	Compliance	
		(j) a protocol for periodic review of the plan.	Hera and Federation Mine Environmental Management Strategy, Rev 0.4, dated 8 April 2024.			All plans required under this Approval met the requirements of Condition C5 (j)	Compliance	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
C6	Revision of Strategies, Plans and Programs	Within three months of the following events, the suitability of existing strategies, plans and programs required under this consent must be reviewed by the Applicant: (a) the submission of an incident report under condition C8; or	Draft Traffic Management Plan Revision 1.2	Environment and Social Responsibility Superintendent – EMS was reviewed following reportable incidents relating to fauna deaths and pipeline leak. The TMP and Drivers CoC was reviewed and amended following incidents in relation to ore haulage times.			Compliance	
		(b) the submission of an Annual Review under condition C10;				The first Annual Review under this Approval is being prepared.	Not Triggered	
		(c) the submission of an Independent Environmental Audit under condition C12; or				No previous audits have been undertaken under this Approval.	Not Triggered	
		(d) the approval of any modification of the conditions of this consent (unless the conditions require otherwise);		Environment and Social Responsibility Superintendent – The review cycle is currently underway again following Mod 2 approval.		The review cycle is currently underway again following Mod 2 approval.	Compliance	
		(e) notification of a change in development phase under condition A5;				While the audit period covers both the construction of mine infrastructure and commencement of operations, all of the plans reviewed are applicable to the operational phase of the project.	Not Triggered	
		(f) a direction of the Secretary under condition A3 of Schedule 2		Environment and Social Responsibility Superintendent – no directions have been received from DPHI		Do directions to revise any plan (other than responding to review comments had during the preparation of the plans).	Not Triggered	
C7	Revision of Strategies, Plans and Programs	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. <i>Note: 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.</i>					Noted	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
C8	Incident Notification	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.	Email from Aurelia (G Brown) to DPHI (K O'Reilly) titled "Her-Federation Mine, dated 17 September 2024. Letter from Aurelia Metals (G Brown) to DPHI (R Sherry) titled "Incident Report water leak (EPA Environment Line REF-NO-32873) Hera – Federation Mine: EPL 20179", dated 19 December 2024. Email from Aurelia (G Brown) to DPHI (K O'Reilly) titled "Her-Federation Mine, dated 26 September 2024. Letter from Aurelia Metals (G Brown) to DPHI (R Sherry) titled "Incident Report Deceased Kangaroo (EPA Environment Line REF-NO-33047) Hera – Federation Mine: EPL 20179", dated 26 September 2024. Email from Aurelia (G Brown) to DPHI (K O'Reilly) titled "Her-Federation Mine, dated 6 October 2024. Letter from Aurelia Metals (G Brown) to DPHI (R Sherry) titled "Incident Report Deceased Kangaroo (EPA Environment Line REF-NO-33047) Hera – Federation Mine: EPL 20179", dated 26 September 2024.		Three incidents were reported to DPHI during this audit period. The initial notification should occur on the day that the incident is detected. This did not occur for the water leak incident. The initial notification should include the Development Name and Application Number. All three initial reports to DPHI referenced on the EPL number. None of the three initial incident reports contained this information. The formal incident notifications that are due within seven days of the initial notification should include the details contained in Appendix 6 of the Approval including: - identify the development and application number; - provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident); - identify how the incident was detected; - identify when the Applicant became aware of the incident; - identify any actual or potential non-compliance with conditions of consent; - describe what immediate steps were taken in relation to the incident; - identify further action(s) that will be taken in relation to the incident; and - identify a project contact for further communication regarding the incident. The written reports provided to DPHI did not include all of this information. Within 30 days of the incident a formal report is to be submitted to DPHI that includes the above information plus - a summary of the incident; - outcomes of an incident investigation, including identification of the cause of the incident; - details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and - details of any communication with other stakeholders regarding the incident		Non-Compliance	- Ensure that all incident notifications to DPHI are submitted immediately following the identification of the incident. - Prepare a template Initial Incident Notification Form, a template Written Notification form and a template Incident Report to ensure that all notifications to DPHI and the subsequent formal written notification and incident reports reference the development name (Federation Project) the Application Number (SSD 24319456) and all information required under Appendix 6 of the Approval.

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
C9	Non-Compliance Notification	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.	Letter from DPHI (K O'Reilly) to Hera Resources (M Williams) titled "Federation Mine – Notification non-compliance – truck movement outside hours 2 December 2024", dated 18 March 2025. Letter from DPHI (K O'Reilly) to Hera Resources (M Williams) titled "Federation Mine – Notification non-compliance – truck movement outside hours 14 March 2025", dated 18 March 2025.			Two non-compliances were identified and reported to DPHI within 7 days of identifying the non-compliance.	Compliance	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
C10	Annual Review	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.				The first Annual Review for the project is currently being prepared. The previous Annual Reviews related to the Hera Project. The Auditor notes that the 2023/4 Annual Review that was prepared for the Hera Mine met the requirements of this Condition.	Not Triggered	
C11	Annual Review	Copies of the Annual Review must be submitted to CSC and made available to the CCC and any interested person upon request.				The first Annual Review for the project is currently being prepared. The previous Annual Reviews related to the Hera Project. The Auditor notes that the 2023/4 Annual Review that was prepared for the Hera Mine was distributed to the parties nominated in this Condition.	Not Triggered	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
C12	Independent Environmental Audit	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.				No previous Independent Environmental Audits have been undertaken under this Project Approval.	Not Triggered	
C13	Independent Environmental Audit	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.				No previous Independent Environmental Audits have been undertaken under this Project Approval.	Not Triggered	
C14	Monitoring and Environmental Audits	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&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, compliance report and independent audit. For the purposes of this condition, as set out in the EP&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					Noted	

PLANNING APPROVAL SSD 24319456 MOD 2								
Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Finding	Recommendation
		environmental management or impact of the development.						
C15	Access to Information	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 (b) keep such information up to date, to the satisfaction of the Planning Secretary.				A review of the Aurelia Website has found that all of the documentation required by this Condition was uploaded to the website and up to date, with the following exceptions: - Complaints Register was last updated in 2023. - The most recent modification to this Approval was not available onto the Website - The original version of the Rehabilitation Management Plan was available on the website, but not the current version.	Non-Compliance	Ensure that the complaints register is updated monthly Ensure that all documents required by this Condition are available on the web site and kept up to date.

Compliance Table

Mining Leases

Appendix A2

Standard Mining Lease Terms (Applies from 2 July 2022)								
Cond.	Title	Condition	Documents Reviewed	Interviews	Audit Inspections	Assessment	Finding	Recommendations
Conditions 1 to 4 are administrative only								
D1-C4	Protection of the environment and rehabilitation	The holder of a mining lease must take all reasonable measures to prevent, or if that is not reasonably practicable, to minimise, harm to the environment caused by activities under the mining lease.	Incident Register Complaints Register		The surface water management infrastructure was inspected. All surface water controls were in place and properly maintained.	All reasonable and feasible measures to minimise material environmental harm were observed during the audit site inspection with documented evidence provided to demonstrate their implementation.	Complies	
	Must prevent or minimise harm to environment	In this clause—harm to the environment has the same meaning as in the Protection of the Environment Operations Act 1997.				Explanatory Clause Only.	Noted	
D1-C5	Rehabilitation to occur as soon as reasonably practicable after disturbance	The holder of a mining lease must rehabilitate land and water in the mining area that is disturbed by activities under the mining lease as soon as reasonably practicable after the disturbance occurs.		Environment and Social Responsibility Superintendent – Progressive rehabilitation has not yet commenced but is planned for this site as approved by Resource Regulator in Forward Plan.	Surface works and adjacent areas were inspected during the audit. Significant rehabilitation works have not commenced, however evidence of the rehabilitation of former drilling sites was sighted.	There is limited opportunity for progressive rehabilitation to be undertaken during this stage of the operations. However, the Auditor is satisfied, based on observations made and the routine biodiversity monitoring undertaken that progressive rehabilitation is proceeding where feasible.	Complies	
D1-C6	Rehabilitation must achieve final land use	The holder of a mining lease must ensure that rehabilitation of the mining area achieves the final land use for the mining area.				The condition has not been triggered and it applies to the final landform.	Not Triggered	
		The holder of the mining lease must ensure any planning approval has been obtained that is necessary to enable the holder to comply with subclause (1).	Planning Approvals SSD 244319456 EPL 20179			The required planning approvals and licences are in place.	Complies	
D1-C6	Protection of the environment and rehabilitation Rehabilitation must achieve final land use	The holder of the mining lease must identify and record any reasonably foreseeable hazard that presents a risk to the holder's ability to comply with subclause (1) Note— Clause 7 requires a rehabilitation risk assessment to be conducted whenever a hazard is identified under this subclause.	Hera Mine and Federation Mine Rehabilitation Management Plan, Rev 0.1, dated 16 December 2024 It is noted that the Rehabilitation Management Plan uploaded to the website is not the current version (Rev 0.2 at the time of the site inspection, and Ver 1.0 at the time of preparation of this report.			Section 3 of the Rehabilitation Management Plan identifies rehabilitation hazards.	Complies	
		In this clause—final land use for the mining area means the final landform and land uses to be achieved for the mining area— as set out in the rehabilitation objectives statement and rehabilitation completion criteria statement, and				Explanatory Clause Only.	Noted	
		for a large mine—as spatially depicted in the final landform and rehabilitation plan, and				Explanatory Clause Only.	Noted	
		if the final land use for the mining area is required by a condition of development consent for activities under the mining lease—as stated in the condition.				Explanatory Clause Only.	Noted	
		Planning Approval Means a development consent within the meaning of the Environmental Planning and Assessment Act 1979, or				Explanatory Clause Only.	Noted	
		an approval under that Act, Division 5.1.				Explanatory Clause Only.	Noted	

Standard Mining Lease Terms (Applies from 2 July 2022)								
Cond.	Title	Condition	Documents Reviewed	Interviews	Audit Inspections	Assessment	Finding	Recommendations
D2-7	Risk Assessment Rehabilitation risk assessment	The holder of a mining lease must conduct a risk assessment (a rehabilitation risk assessment) that— - identifies, assesses, and evaluates the risks that need to be addressed to achieve the following in relation to the mining lease— - the rehabilitation objectives, - the rehabilitation completion criteria - for large mines—the final land use as spatially depicted in the final landform and rehabilitation plan, and	Hera Mine and Federation Mine Rehabilitation Management Plan, Rev 0.1, dated 16 December 2024 It is noted that the Rehabilitation Management Plan uploaded to the website is not the current version (Rev 0.2 at the time of the site inspection, and Ver 1.0 at the time of preparation of this report.			Section 3 of the Rehabilitation Management Plan presents the rehabilitation risk assessment that was undertaken during preparation of the Rehabilitation Management Plan	Complies	
		identifies the measures that need to be implemented to eliminate, minimise or mitigate the risks.	Hera Mine and Federation Mine Rehabilitation Management Plan, Rev 0.1, dated 16 December 2024 It is noted that the Rehabilitation Management Plan uploaded to the website is not the current version (Rev 0.2 at the time of the site inspection, and Ver 1.0 at the time of preparation of this report.			Section 3, Table 11 of the Rehabilitation Management Plan presents the rehabilitation risk assessment that was undertaken during preparation of the Rehabilitation Management Plan	Complies	
		The holder of the mining lease must implement the measures identified.					Noted	
		The holder of a mining lease must conduct a rehabilitation risk assessment— - for a large mine—before preparing a rehabilitation management plan, and - for a small mine—before preparing the rehabilitation outcome documents for the mine, and - whenever a hazard is identified under clause 6(3)—as soon as reasonably practicable after it is identified, and - whenever given a written direction to do so by the Secretary	Rehabilitation Management Plan Version 0.1, dated 15 March 2024. It is noted that the Rehabilitation Management Plan uploaded to the website is not the current version (Rev 0.2 at the time of the site inspection, and Ver 1.0 at the time of preparation of this report.	Environment and Social Responsibility Superintendent – The Rehabilitation Management Plan was revised following the approval of Modification 2.		The risk assessment was completed prior to completion of the Rehabilitation Management Plan. The Rehabilitation Management Plan was revised following the approval of Modification 2.	Complies	
D3-8	Records, Reporting and Notification Application of Division 3	This Division does not apply to a mining lease unless— - the security deposit required under the mining lease is greater than the minimum deposit prescribed under the Act, section 261BF in relation to that type of mining lease, or - the Secretary gives a written direction to the holder of the mining lease that this Division, or a provision of this Division, applies to the mining lease.	Email from NSW Resources (C Cottee) to Hera Resources (M Williams) titled “Variation of Security Deposit Condition of Mining lease 5295 (Act 1906) (ML5295)”, dated 19 December 2024 Email from Aurelia Metals (M Williams) to the Resource Regulator (M Buchan) titled “RFI – RCE cost estimate Hera Mine Explanation”, dated 19 December 2024.			This condition is administrative only. The value of the security deposit is greater than the minimum-security deposit set under the Mining Act Regulations. Therefore, this division applies.	Noted	

Standard Mining Lease Terms (Applies from 2 July 2022)								
Cond.	Title	Condition	Documents Reviewed	Interviews	Audit Inspections	Assessment	Finding	Recommendations
D3-9	Rehabilitation Documents	A document required to be prepared under this Division must—	Hera Mine and Federation Mine Rehabilitation Management Plan, Rev 0.1, dated 16 December 2024 It is noted that the Rehabilitation Management Plan uploaded to the website is not the current version (Rev 0.2 at the time of the site inspection, and Ver 1.0 at the time of preparation of this report.			The rehabilitation Management Plan meets the requirements for Rehabilitation Management Plans, as published by the Resource Regulator (Form and Way Rehabilitation Management Plan for Large Mines, February 2024)	Complies	
	General requirements for documents	be in a form approved by the Secretary, and					Complies	
		include any matter required to be included by the form, and				Administrative Condition Only	Noted	
D3 C10	Rehabilitation Documents Rehabilitation management plans for large mines	The holder of a mining lease relating to a large mine must prepare a plan (a rehabilitation management plan) for the mining lease that includes the following—	Hera Mine and Federation Mine Rehabilitation Management Plan, Rev 0.1, dated 16 December 2024 It is noted that the Rehabilitation Management Plan uploaded to the website is not the current version (Rev 0.2 at the time of the site inspection, and Ver 1.0 at the time of preparation of this report.			Section 6 of the Rehabilitation Management Plan describes the rehabilitation methodology.	Complies	
		a description of how the holder proposes to manage all aspects of the rehabilitation of the mining area						
		a description of the steps and actions the holder proposes to take to comply with the conditions of the mining lease that relate to rehabilitation,				Section 2 of the Rehabilitation Management Plan describes the regulatory (Mining Lease) requirements for rehabilitation.	Complies	
		a summary of rehabilitation risk assessments conducted by the holder,				Sections 3 of the Rehabilitation Management Plan presents the rehabilitation risk assessment that was undertaken prior to the preparation of the Rehabilitation Management Plan	Complies	
		the risk control measures identified in the rehabilitation risk assessments,				Section 6 of the Rehabilitation Management Plan describes the rehabilitation methodology.	Complies	
		the rehabilitation outcome documents for the mining lease				The requirements of the rehabilitation outcome document are provided in Section 4 of the Rehabilitation Management Plan.	Complies	
		a statement of the performance outcomes for the matters addressed by the rehabilitation outcome documents and the ways in which those outcomes are to be measured and monitored.				Section 4 describes the rehabilitation objectives and performance indicators.	Complies	
		If a rehabilitation outcome document has not been approved by the Secretary, the holder of the mining lease must include a proposed version of the document.				The approved Forward Program is available on the Mine Website.	Not Triggered	
		A rehabilitation management plan is not required to be given to the Secretary for approval.				Administrative Condition only	Noted	
D3 C10	Rehabilitation Documents Rehabilitation management plans for large mines	The holder of the mining lease— - must implement the matters set out in the rehabilitation management plan, and - if the forward program specifies timeframes for the implementation of the matters—must implement the matters within those timeframes				Administrative Condition only	Noted	

Standard Mining Lease Terms (Applies from 2 July 2022)								
Cond.	Title	Condition	Documents Reviewed	Interviews	Audit Inspections	Assessment	Finding	Recommendations
D3 C11	Rehabilitation Documents Amendment of Rehabilitation Plans	The holder of a mining lease must amend the rehabilitation management plan for the mining lease as follows— to substitute the proposed version of a rehabilitation outcome document with the version approved by the Secretary—within 30 days after the document is approved	Hera Mine and Federation Mine Rehabilitation Management Plan, Rev 0.1, dated 16 December 2024 It is noted that the Rehabilitation Management Plan uploaded to the website is not the current version (Rev 0.2 at the time of the site inspection, and Ver 1.0 at the time of preparation of this report.			The Rehabilitation Management Plan required by Condition D3 C10 finalised (and approved by DPHI in October 2024. No amendment to the plan were made during this audit period.	Not Triggered	
		as a consequence of an amendment made under clause 14 to a rehabilitation outcome document—within 30 days after the amendment is made,					Not Triggered	
		to reflect any changes to the risk control measures in the prepared plan that are identified in a rehabilitation risk assessment—as soon as practicable after the rehabilitation risk assessment is conducted,					Not Triggered	
		whenever given a written direction to do so by the Secretary—in accordance with the direction.		Environment and Social Responsibility Superintendent – no written directions have been received from the Secretary.			Not Triggered	
D3 C12	Rehabilitation Documents Rehabilitation outcome documents	The holder of a mining lease must prepare the following documents (the rehabilitation outcome documents) for the mining lease and give them to the Secretary for approval— the rehabilitation objectives statement, which sets out the rehabilitation objectives required to achieve the final land use for the mining area	RR Task List (downloaded from the Portal by A Butt, 11 August 2025)			The most recent version of the rehabilitation objectives statement and completion criteria were uploaded to the Resource Regulator Portal on 26 May 2025	Complies	
		the rehabilitation completion criteria statement, which sets out criteria, the completion of which will demonstrate the achievement of the rehabilitation objectives,	RR Task List (downloaded from the Portal by A Butt, 11 August 2025)			The most recent version of the rehabilitation objectives statement and completion criteria were uploaded to the Resource Regulator Portal on 26 May 2025.	Complies	
		for a large mine, the final landform and rehabilitation plan, showing aspatial depiction of the final land use.	RR Task List (downloaded from the Portal by A Butt, 11 August 2025)			A copy of the final landform and rehabilitation plan (that was submitted to the Resource Regulator) and evidence of submission was verified in the submission extract from the RR Portal.	Complies	
		If the final land use for the mining area is required by a condition of development consent for activities under the mining lease, the holder of the mining lease must ensure the rehabilitation outcome documents are consistent with that condition.	Planning Approval SSD 24319456			The requirements for final landuse are not specified in the Planning Approval.	Not Triggered	

Standard Mining Lease Terms (Applies from 2 July 2022)								
Cond.	Title	Condition	Documents Reviewed	Interviews	Audit Inspections	Assessment	Finding	Recommendations
D3 C13	Rehabilitation Documents	The holder of a mining lease must prepare a program (a forward program) for the mining lease that includes the following— a schedule of mining activities for the mining area for the next 3 years,	Hera Mine Forward Program Monday 1 July 2024 to Wednesday 30 June 2027.			The Forward Program required by this Condition has been prepared and has been uploaded to the Mine Website. The Program has been prepared using the Resources Regulator’s proforma and meets the requirements of this Condition.	Complies	
		a summary of the spatial progression of rehabilitation through its various phases for the next 3 years,	Hera Mine Forward Program Monday 1 July 2024 to Wednesday 30 June 2027.			The Forward Program required by this Condition has been prepared and has been uploaded to the Mine Website. The Program has been prepared using the Resources Regulator’s proforma and meets the requirements of this Condition.	Complies	
		a requirement that the rehabilitation of land and water disturbed by mining activities under the mining lease must occur as soon as reasonably practicable after the disturbance occurs.	Hera Mine Forward Program Monday 1 July 2024 to Wednesday 30 June 2027.			The Forward Program required by this Condition has been prepared and has been uploaded to the Mine Website. The Program has been prepared using the Resources Regulator’s proforma and meets the requirements of this Condition.	Complies	
	Forward program and annual rehabilitation report	The holder of a mining lease must prepare a report (an annual rehabilitation report) for the mining lease that includes—	Hera and Federation Mine 2023 Annual Rehabilitation Report, 2024-2026 Forward Program (ARRFP) prepared by IEMA (Consultants), dated 14 September 2023. Hera and Federation Mine FY2023-2024 Annual Rehabilitation Report, FY 2024-2026 Forward Program (ARRFP) prepared by IEMA (Consultants), dated 28 August 2024.			The 2023 and 2024 Annual Rehabilitation Reports were prepared.	Complies	
		a description of the rehabilitation undertaken over the annual reporting period,				The Reports have been prepared using the Resources Regulator’s proforma and meet the requirements of this Condition.	Complies	
		a report demonstrating the progress made through the phases of rehabilitation provided for in the forward program applying to the reporting period,				The Reports have been prepared using the Resources Regulator’s proforma and meet the requirements of this Condition.	Complies	
		a report demonstrating progress made towards the achievement of the following— - the objectives set out in the rehabilitation objectives statement, - the criteria set out in the rehabilitation completion criteria statement, - for large mines—the final land use as spatially depicted in the final landform and rehabilitation plan.				The Reports have been prepared using the Resources Regulator’s proforma and meet the requirements of this Condition.	Complies	
D3 C13	Forward program and annual rehabilitation report	If a rehabilitation outcome document has not been approved by the Secretary, the holder of the mining lease must rely on a proposed version of the document.		Environment and Social Responsibility Superintendent – The rehabilitation outcome documents have been approved		Administrative Condition Only	Noted	
D3 C13	Rehabilitation Documents Forward program and annual rehabilitation report	The holder of the mining lease must give the forward program and annual rehabilitation report to the Secretary.	RR Task List (downloaded from the Portal by A Butt, 10 June 2025)			The forward program and annual rehabilitation report have been submitted to the Resource Regulator as follows: The combined Annual Rehabilitation Reports and Forward Programs were submitted to the RR on 24 June 2024 27 December 2024	Complies	

Standard Mining Lease Terms (Applies from 2 July 2022)								
Cond.	Title	Condition	Documents Reviewed	Interviews	Audit Inspections	Assessment	Finding	Recommendations
D3 C13	Rehabilitation Documents Forward program and annual rehabilitation report	In this clause—annual reporting period means each period of 12 months commencing on— - the date on which the mining lease is granted, or - if the Secretary approves another date in relation to the mining lease— the other date.				Administrative Condition Only	Noted	
D3 C14	Rehabilitation Documents Amendment of rehabilitation outcome documents and forward program	This clause applies to — a rehabilitation outcome document if the Secretary has approved it, and				Administrative Condition Only	Noted	
		a forward program if it has been given to the Secretary.		Environment and Social Responsibility Superintendent – The forward program has been provided to the RR.		Administrative Condition Only	Noted	
		The holder of a mining lease must not amend a document to which this clause applies that relates to the mining lease unless: the Secretary gives the holder a written direction to do so, or		Environment and Social Responsibility Superintendent – No written directions have been issued by the Secretary requiring the amendment of the outcome documents or forward program.		No written directions have been issued by the Secretary requiring the amendment of the outcome documents or forward program.	Not Triggered	
		the Secretary, on written application by the holder, gives a written approval of the amendment		Environment and Social Responsibility Superintendent – NPM has not requested approval to amend the outcome documents or forward program.		Federation has not requested approval to amend the outcome documents or forward program.	Not Triggered	
		The holder of the mining lease must amend the document in accordance with the Secretary’s direction or approval.		Environment and Social Responsibility Superintendent – No written directions have been issued by the Secretary requiring the amendment of the outcome documents or forward program.		No written directions have been issued by the Secretary requiring the amendment of the outcome documents or forward program.	Not Triggered	
		Nothing in this clause prevents the holder of a mining lease preparing a draft amendment for submission to the Secretary for approval					Noted	

Standard Mining Lease Terms (Applies from 2 July 2022)								
Cond.	Title	Condition	Documents Reviewed	Interviews	Audit Inspections	Assessment	Finding	Recommendations
D3-C15	Rehabilitation Documents Times at which documents must be prepared and given	The holder of a mining lease must do the following before the end of the initial period— prepare a rehabilitation management plan, and	Hera Mine and Federation Mine Rehabilitation Management Plan, Rev 0.1, dated 16 December 2024 It is noted that the Rehabilitation Management Plan uploaded to the website is not the current version (Rev 0.2 at the time of the site inspection, and Ver 1.0 at the time of preparation of this report.			A Rehabilitation Management Plan was prepared for the Hera site covering the period from July 2022 to 2025, that plan covered the original Hera Mine site (not the Federation site). A Rehabilitation Management Plan covering the mining leases associated with both the Hera and Federation site was prepared in 2025, after completion of the Initial Period.	Non-Compliance	Ensure that all revised plans are prepared within timelines set in the mining lease conditions.
		The holder of a mining lease must do the following before the end of the initial period— prepare rehabilitation outcome documents and give them, other than the rehabilitation completion criteria statement, to the Secretary for approval, and	RR Task List (downloaded from the Portal by A Butt, 11 August 2025)			Rehabilitation Outcome documents were submitted to the RR on 18 November 2022. That submission was related to the Hera Mining Operations only. A subsequent submission In October 2025 covered the Federation mining operations. This submission occurred outside of the Initial Period.	Non-Compliance	Ensure that all submissions required by the Mining Leases are prepared and submitted within timelines set in the mining lease conditions.
		The holder of a mining lease must do the following before the end of the initial period— prepare a forward program and give it to the Secretary.	RR Task List (downloaded from the Portal by A Butt, 11 August 2025)			A Forward Program was submitted to the RR on 18 November 2022. That submission was related to the Hera Mining Operations only. A subsequent submission In September 2024 and then 27 October 2025, covered the Federation mining operations. The September 2024 submission occurred outside of the Initial Period.	Non-Compliance	Ensure that all submissions required by the Mining Leases are prepared and submitted within timelines set in the mining lease conditions.
		The holder of the mining lease must prepare a forward program and annual rehabilitation report and give them to the Secretary before— 60 days after the last day of each annual reporting period, commencing with the annual reporting period in which the forward program was given to Secretary under subclause (1)(c), or	RR Task List (downloaded from the Portal by A Butt, 11 August 2025)			The submission of forward programs and annual rehabilitation reports have generally met the submission schedule.	Complies	
		a later date approved by the Secretary.					Not Triggered	
		A rehabilitation completion criteria statement relating to completion of rehabilitation during a period covered by a forward program must be given to the Secretary for approval when the forward program is required to be given to the Secretary.				No areas of rehabilitation have been completed.	Not Triggered	

Standard Mining Lease Terms (Applies from 2 July 2022)								
Cond.	Title	Condition	Documents Reviewed	Interviews	Audit Inspections	Assessment	Finding	Recommendations
D3-C15	Rehabilitation Documents Times at which documents must be prepared and given	The holder of the mining lease must prepare updated rehabilitation outcome documents for the mining lease and give them to the Secretary for approval before— 60 days after a development consent is modified following an application referred to in clause 20(1)(b), or	DPHI Planning Portal			Two Modifications to the Approval have been approved. Mod 2 was approved during this audit period (27 March 2025). This condition was therefore not triggered during this audit period.	Not Triggered	
		a later date approved by the Secretary					Not Triggered	
		A rehabilitation completion criteria statement is not required to be given to the Secretary under subclause (4) unless a rehabilitation completion criteria statement has already been given to the Secretary under subclause (3).				Administrative Statement only	Noted	
		The Secretary may, by written notice, direct the holder of a mining lease to prepare, or give to the Secretary, a document required to be prepared under this Division at a time other than that specified in this clause.		Environment and Social Responsibility Superintendent – no notices have been issued by the Resource Regulator regarding the preparation of the rehabilitation outcome documents during this audit period.		No notices have been issued by the Resource Regulator regarding the preparation of the rehabilitation outcome documents during this audit period.	Not Triggered	
		The holder of the mining lease must comply with the direction.					Not Triggered	
		In this clause—initial period means the period commencing when the mining lease is granted and ending— 30 days, or other period approved by the Secretary, after this Division first applies to the mining lease, or	NSW Resources Website (https://mtr.regional.nsw.gov.au/orders/tas/mtr/fulldetailsmddd?p6_tas_id=28996&clear=4&session=9456373651815&cs=3R9fVPOn4nL7fcUlcBpwxsYGvgJLrmXuWVXuxnnhjB9_bOxfvyUM4hQF9aVEkuEryppI0AgXKlFQp9VAtt1i4A)			Administrative Condition Only ML 1686 (Hera) was granted on 16/5/2013 and ML 1746 (Federation) was granted on 7/12/2016. The Federation Planning Approval was granted on 2 March 2023. The Initial Period, therefore finished on 2 April 2023.	Noted	
		if this Division applies to the mining lease because of an increase in the required security deposit— - when the surface of the mining area is disturbed by activities under the mining lease, or - at a later date approved by the Secretary.				Administrative Condition Only	Noted	

Standard Mining Lease Terms (Applies from 2 July 2022)								
Cond.	Title	Condition	Documents Reviewed	Interviews	Audit Inspections	Assessment	Finding	Recommendations
D3-C16	Rehabilitation Documents Certain documents to be publicly available	This clause applies to the following documents— - a rehabilitation management plan, - a forward program, - an annual rehabilitation report	Hera and Federation Mine 2023 Annual Rehabilitation Report, 2024-2026 Forward Program (ARRFP) prepared by IEMA (Consultants), dated 14 September 2023. Hera and Federation Mine FY2023-2024 Annual Rehabilitation Report, FY 2024-2026 Forward Program (ARRFP) prepared by IEMA (Consultants), dated 28 August 2024.			Administrative Condition Only	Noted	
		The holder of a mining lease must make a document to which this clause applies publicly available by— publishing it on its website in a prominent position, or	https://aureliametals.com/hera-mine-compliance-and-regulatory-reporting/			Rehabilitation objectives are presented in the Rehabilitation Management Strategy that is provided on the website, albeit the version available at the time of the audit had been superseded. The forward program is provided on the website; however, copies of the Annual Rehabilitation Reports were not available.	Non-Compliance	Upload (current) versions of the: - a rehabilitation management plan, - a forward program, - an annual rehabilitation report
		If the holder does not have a website—providing a copy of it to a person— - on the written request of a person, and - without charge, and - within 14 days after the request is received.	https://aureliametals.com/hera-mine-compliance-and-regulatory-reporting/			The mine maintains a public website	Not Triggered	
		If a document is published on the website of the holder of the mining lease, the holder must ensure that it is published— - for a rehabilitation management plan—within 14 days after it is prepared or amended, or - for a forward program or an annual rehabilitation report—within 14 days after it is given to the Secretary or amended,	https://aureliametals.com/hera-mine-compliance-and-regulatory-reporting/			Insufficient information was provided to the Auditor to verify compliance with this Condition.	Non-Compliance	Ensure that all records associated with the requirement of mining leases are maintained.
		Personal information within the meaning of the Privacy and Personal Information Protection Act 1998 is not required to be included in a document made available to a person under this clause.				Administrative Condition Only	Noted	
D4-C17	Records, Reporting and Notification Records demonstrating compliance	The holder of a mining lease must create and maintain records of all actions taken that demonstrate compliance with each of the conditions set out in this Part. Note— The Act, sections 163D and 163E provide for the form in which records must be kept and the period for which they must be retained.				The Auditor was not able to access all relevant compliance related documents requested.	Non-Compliance	Ensure that all records associated with the requirement of mining leases are maintained.

Standard Mining Lease Terms (Applies from 2 July 2022)								
Cond.	Title	Condition	Documents Reviewed	Interviews	Audit Inspections	Assessment	Finding	Recommendations
D4-C18	Records, Reporting and Notification Report on non-compliance	The holder of a mining lease must provide the Minister with a written report detailing any non-compliance with- a condition of the mining lease,		Environment and Social Responsibility Superintendent – We are not aware of any non-compliance against the mining lease conditions.		No non-compliances with the conditions of the specific mining lease documents were identified by the Auditee during this audit period.	Not Triggered	
		a requirement of the Act or this Regulation relating to activities under the mining lease.		Environment and Social Responsibility Superintendent – no non-compliances in relation to the Act or Regulations have occurred.		No non-compliances in relation to the Act or Regulations (since 2 July 2022 when these conditions came into force) were identified by the Auditee during this audit period.	Not Triggered	
		The holder of the mining lease must provide the report within 7 days after becoming aware of the non-compliance		Environment and Social Responsibility Superintendent – no non-compliances in relation to the Act or Regulations have occurred.		No non-compliances in relation to the Act or Regulations (since 2 July 2022 when these conditions came into force) were identified by the Auditee during this audit period.	Not Triggered	
		The holder of the mining lease must ensure the report— identifies the condition of the mining lease, or the requirement of the Act or this Regulation, to which the non-compliance relates, and		Environment and Social Responsibility Superintendent – no non-compliances in relation to the Act or Regulations have occurred.		No non-compliances in relation to the Act or Regulations (since 2 July 2022 when these conditions came into force) were identified by the Auditee during this audit period.	Not Triggered	
		describes the non-compliance and specifies the date or dates on which, or the period during which, the non-compliance occurred, and		Environment and Social Responsibility Superintendent – no non-compliances in relation to the Act or Regulations have occurred.		No non-compliances in relation to the Act or Regulations (since 2 July 2022 when these conditions came into force) were identified by the Auditee during this audit period.	Not Triggered	
		describes the causes or likely causes of the non-compliance, and		Environment and Social Responsibility Superintendent – no non-compliances in relation to the Act or Regulations have occurred.		No non-compliances in relation to the Act or Regulations (since 2 July 2022 when these conditions came into force) were identified by the Auditee during this audit period.	Not Triggered	
		describes the action that has been taken, or will be taken, to mitigate the effects, and to prevent any recurrence, of the non-compliance.		Environment and Social Responsibility Superintendent – no non-compliances in relation to the Act or Regulations have occurred.		No non-compliances in relation to the Act or Regulations (since 2 July 2022 when these conditions came into force) were identified by the Auditee during this audit period.	Not Triggered	

Standard Mining Lease Terms (Applies from 2 July 2022)								
Cond.	Title	Condition	Documents Reviewed	Interviews	Audit Inspections	Assessment	Finding	Recommendations
D4-C19	Records, Reporting and Notification Nominated contact person	The holder of a mining lease must nominate a natural person to be the contact person with whom the Secretary can communicate in relation to the mining lease for the purposes of the Act.	Letter from Aurelia (A Graham) to the Resources Regulator (The Secretary) titled “Nominated Contact Person”, dated 20 March 2023.	A		The Resource Regulator was provided with the name of the nominated contact person in March 2023.	Complies	
		The holder of the mining lease must give written notice to the Secretary of— the full name and contact details of the nominated person—within 28 days after the date on which the standard conditions apply to the mining lease under clause 31A of this Regulation, and	Letter from Aurelia (A Graham) to the Resources Regulator (The Secretary) titled “Nominated Contact Person”, dated 20 March 2023.	A		The Resource Regulator was provided with the name of the nominated contact person in March 2023.	Complies	
		any change in nomination or in the nominated person’s contact details—within 28 days after the change occurs.				Not triggered in this audit period.	Not Triggered	
		The holder of the mining lease must ensure that the contact details for the nominated person include the person’s phone number and postal and email addresses.	Letter from Aurelia (A Graham) to the Resources Regulator (The Secretary) titled “Nominated Contact Person”, dated 20 March 2023.	A		The Resource Regulator was provided with the name of the nominated contact person in March 2023.	Complies	
D5-20	Applications relating to development consent Additional requirements—application for or to modify development consent	The holder of a mining lease must give written notice to the Secretary within 10 days after— making an application for development consent that relates to the mining area, or				This project is a State significant development.	Not Triggered	
		making an application for modification of a development consent— - under the Environmental Planning and Assessment Act 1979, section 4.55(2), and - that proposes to modify a condition of the consent that relates to rehabilitation of the mining area in a way that may affect an obligation under the mining lease relating to rehabilitation of the mining area.				This project is a State significant development.	Not Triggered	
		This clause does not apply if the development is State significant development.				Administrative Condition Only.	Noted	

Audit Photographs

Appendix B



Photograph 1 – Hera Processing Plant (no longer operating)



Photograph 2 – Typical storage of process plant chemicals (no cyanide) at the Hera site



Photograph 3 – Bulk Fuel Storage at the Hera Site



Photograph 4 – Hera process water treatment ponds



Photograph 5 – Former quarry adjacent at the Hera site



Photograph 6 – Former Hera explosives storage site (now used as a laydown area)



Photograph 7 – Hera TSF taken from the Hera access track



Photograph 8– Hera TSF showing (green) dust suppression binder



Photograph 9– Hera TSF dust suppression / excess water evaporation sprays



Photograph 10 –Hera TSF discharge channel stabilisation



Photograph 11 – Water Management Dam



Photograph 12 – Topsoil storage (from the construction of the Water Management Dam



Photograph 13 –E-BAM (air quality) monitoring trailer



Photograph 14 – Noise monitoring station



Photograph 15 – Typical Groundwater monitoring bore



Photograph 16 – Exploration drilling site (adjacent to the Federation surface works)



Photograph 17 – Federation surface works (surface water storage dam in foreground)



Photograph 18 – Federation site waste segregation / storage area



Photograph 19 – Federation leach pond / waste rock emplacement on left



Photograph 20 – Federation explosives store



Photograph 21 – Federation ore haulage truck loading



Photograph 22 – Federation workshop and oil / chemical storage



Photograph 23 – Federation typical oil / chemical storage



Photograph 24 – Federation typical oil / chemical storage

DPE Auditor Approval

Appendix C

NSW Department of Planning, Housing and
Infrastructure

Attn: The Planning Secretary or their nominee

Submitted via the NSW Planning Portal

Re: SSD-24319456 Appointment of Auditor Hera Federation IEA

To Whom It May Concern,

Hera Resources Pty Ltd (Hera), a wholly owned subsidiary of Aurelia Metals Ltd (Aurelia), owns and operates the Federation Project, which was approved by the Minister for Planning on 2 March 2023 via Development Application SSD-24319456. A modification to the project (MOD 1) received approval on 26 November 2023.

In accordance with Section 3.12 of the *Independent Audit – Post Approval Requirements (2020)*, we hereby seek the Secretaries endorsement of Mr. Ken Holmes of Barnett and May as the Independent Environmental Auditor for the audit scheduled to be completed before 5 May 2025. This audit is required within one year of the physical commencement of the development.

This letter is submitted in full and final satisfaction of Schedule 2, Condition C12 of SSD-24319456.

Please find attached the required Declaration of Independence from Mr. Holmes. Should the Planning Secretary or their nominee require any additional information, please contact the undersigned at 0447 257 312 or via email at mark.williams@aureliametals.com.au.

We appreciate your attention to this matter and look forward to your confirmation.

Sincerely,



Mark Williams

Environmental Superintendent

07/01/2025

Stakeholder Consultation

Appendix D

30 March 2025

Mr Ken Holmes
Barnett & May
PO Box 365
Belrose NSW 2085
By Email: ken@baeckea.com.au

Re: Federation Mine Project – Independent Environmental Audit

Dear Mr Holmes,

Thank you for your email dated 27 March 2025 (our reference: AREQ0062979) requesting consultation on the independent audit to be undertaken of the Federation Mine Project which is covered by mining lease ML1862 (1992).

The independent environmental audit should provide an assessment of compliance with the requirements of Schedule 8A Standard conditions of mining leases, Part 2 Standard conditions, as set out in the Mining Regulation 2016.

The audit should note observations where rehabilitation procedures, practices and outcomes represent best industry practice. It would be appreciated if a copy of the final audit report could be sent to the Regulator at nswresourcesregulator@service-now.com upon completion of the audit.

Sincerely

Jenny Ehmsen
Principal Compliance Auditor
NSW Resources Regulator

Our ref: OUT25/3628

Ken Holmes
Barnett & May
Email: ken@baeckea.com.au

28/03/2025

Subject: Federation Project Gold Mine - Independent Environmental Audit (SSD-24319456)

Dear Ken,

I refer to your request seeking advice from the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group on an upcoming audit for the above matter. It is understood this consultation is in accordance with conditions of approval for the project.

NSW DCCEEW Water Group understands that the scope of the audit as outlined under the development consent and the reference guideline, "Independent Audit Post Approval Requirements (2020)" extends to at least the following:

- Identification of compliance requirements and documentation of any non-compliances.
- Assessment of the adequacy and implementation of management plans and sub plans.
- Assessment of compliance against relevant regulatory requirements and legislation.
- Assessment of compliance between actual and predicted impacts in the environmental assessment.
- Reporting requirements for management plans.
- Identification of strengths of the project in environmental management and opportunities for improvement.

NSW DCCEEW Water Group requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:

- The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include:
 - Water Management Plans and related sub-plans e.g., Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.
 - Extraction Plans and related sub-plans e.g., Water Management Plan, Subsidence Management Plan.

- The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.
- Water supply availability is clearly defined for the project.
- Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018.
- Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.
- Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.
- Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated.

Should you have any further queries in relation to this submission please do not hesitate to contact DCCEEW - Water Assessments at water.assessments@dpie.nsw.gov.au

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Z. Baker".

Tim Baker
Senior Project Officer
Water Assessments
NSW Department of Climate Change, Energy, the Environment and Water

From: [Melissa Salter](#)
To: [Ken Holmes](#)
Cc: [Derek Francis](#); [Grayden Curry](#); [Cathy Black](#)
Subject: Federation Project - 2025 Independent Environmental Audit - Response - Consultation Request Bogan Shire Council
Date: Tuesday, 8 April 2025 10:58:50 AM
Attachments: [image001.png](#)
[image002.png](#)

FORWARDED ON BEHALF OF DEREK FRANCIS, GENERAL MANAGER BOGAN SHIRE COUNCIL

-
Dear Ken

Thank you for your email regarding the Federation Project Environmental Audit. Our understanding is that the Federation Project is in Cobar Shire.

In undertaking your audit on environmental matters, inclusion of detection of any non-compliance associated to contaminated water (stays on site/appropriate freeboard/appropriate lining) and appropriate management of any potentially acid forming material; that is likely up to Cobar Shire to address those matters.

However, the one impact that has been brought to our attention, is the potential to haul product to the Hermidale handstand, in Bogan Shire, which would have implications to the roads and possibly the environment through dust, if roads aren't sealed/hardstand not watered down.

Apart from the the potential environmental impact at the Hermidale handstand, we are not aware of any environmental non-compliance in the Bogan Shire from the Federation Project.

Regards

Derek Francis
General Manager, Bogan Shire Council

Melissa Salter

Executive Officer to the General Manager & Mayor
Bogan Shire Council
81 Cobar Street
PO Box 221
Nyngan, NSW, 2825
P: (02) 68359000
F: (02)68359011 |
E: Melissa.Salter@bogan.nsw.gov.au
W: www.bogan.nsw.gov.au



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From: Ken Holmes <Ken@baeckea.com.au>

Sent: Thursday, March 27, 2025 3:07 PM

To: Bogan Shire Council <administrator@bogan.nsw.gov.au>

Subject: Federation Project - 2025 Independent Environmental Audit - Consultation Request
Bogan Shire Council

You don't often get email from ken@baeckea.com.au. [Learn why this is important](#)

Attention Derek Francis,

Dear Derek,

The NSW planning approval SSD 24319456 for the Federation Gold Mine Project requires that the project proponent commission an Independent Environmental Audit commencing within 12 month of the commencement of the development.

I have been commissioned by the to undertake this audit as required under the approval. The audit is scheduled for to commence at the end of April 2025 and will be undertaken in accordance with the Project Approval Conditions that require:

The Project Approval requires:

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

The Proponent has provided me with your contact details as the appropriate stakeholder representative. I would therefore appreciate if you could provide me with any information, comments or concerns that Council may have regarding the environmental performance of the development to date and provide details of any specific issues you suggest that the Auditor consider.

Please do not hesitate to contact me if you require any additional information.

Thanks and Regards,

Ken Holmes
Principal Environmental Auditor
Director

Barnett & May

P +61 [0]438 046 261

E ken@baeckea.com.au

A PO Box 365 Belrose NSW 2085

From: [Kylie-anne Pont](#)
To: [Ken Holmes](#)
Subject: RE: Federation Project - 2025 Independent Environmental Audit - Consultation Request TfNSW
Date: Tuesday, 22 April 2025 1:53:57 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Hi Ken,

I refer to your email below seeking Transport for NSW (TfNSW) advice in preparation of an Independent Environmental Audit.

TfNSW understands that the proponent is currently going through the process of delivering road upgrades on the classified road network in accordance with Condition B51 of the consent for SSD-24319456 via a Works Authorisation Deed. More recently, a Travel Management Plan (TMP) was submitted to TfNSW in accordance with Condition B58 via the Major Projects ePlanning Portal. The TMP is currently under consideration by TfNSW.

TfNSW will continue to work with the proponent (where required) to achieve compliance with the relevant conditions of consent and has no recommended matters to be considered in the independent audit.

Thank you for the opportunity to comment.

If you have any questions about the above, please do not hesitate to contact me.

Kylie-Anne Pont

Team Leader, Development Services (West)
Transport Planning
Planning, Integration and Passenger
Transport for NSW

M 0481 068 175 **E** kylie-anne.pont@transport.nsw.gov.au

transport.nsw.gov.au

I work flexibly. Unless it suits you, I don't expect you to read or respond to my emails outside of your normal work hours.



**Transport
for NSW**



I acknowledge the Aboriginal people of the country on which I work, their traditions, culture and shared history and identity. I also pay my respects to Elders pas and present and recognise the continued connection to country.

Please consider the environment before printing this email.

OFFICIAL

From: Ken Holmes <Ken@baeckea.com.au>
Sent: Thursday, 27 March 2025 3:03 PM
To: Development West <development.west@transport.nsw.gov.au>
Subject: FW: Federation Project - 2025 Independent Environmental Audit - Consultation Request TfNSW

CAUTION: This email is sent from an external source. Do not click any links or open attachments unless you recognise the sender and know the content is safe.

Attention Sarah Anderson,

Dear Sarah,

The NSW planning approval SSD 24319456 for the Federation Gold Mine Project requires that the project proponent commission an Independent Environmental Audit commencing within 12 month of the commencement of the development.

I have been commissioned by the to undertake this audit as required under the approval. The audit is scheduled for to commence at the end of April 2025 and will be undertaken in accordance with the Project Approval Conditions that require:

The Project Approval requires:

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

The Proponent has provided me with your contact details as the appropriate stakeholder representative. I would therefore appreciate if you could provide me with any information, comments or concerns that TfNSW may have regarding the environmental performance of the development to date and provide details of any specific issues you suggest that the Auditor consider.

Please do not hesitate to contact me if you require any additional information.

Thanks and Regards,

Ken Holmes
Principal Environmental Auditor
Director

Barnett & May

P +61 (0)438 046 261

E ken@baecka.com.au

A PO Box 365 Belrose NSW 2085

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Consider the environment. Please don't print this e-mail unless really necessary.

From: [Garry West](#)
To: [Ken Holmes](#)
Subject: Re: Federation Project - 2025 Independent Environmental Audit - Consultation Request Community Consultation Committee
Date: Saturday, 5 April 2025 11:37:51 AM

Ken

The CCC monitors the environmental performance at each quarterly meeting. Nothing over the past 12 months has caused concern to members.

Thank you for the opportunity to identify any issues of concern.

Regards

Garry

From: Ken Holmes <Ken@baeckea.com.au>
Date: Thursday 27 March 2025 at 3:10 pm
To: Garry West <garry.west@gbwconsulting.com.au>
Subject: Federation Project - 2025 Independent Environmental Audit - Consultation Request Community Consultation Committee

Dear Garry,

The NSW planning approval SSD 24319456 for the Federation Gold Mine Project requires that the project proponent commission an Independent Environmental Audit commencing within 12 month of the commencement of the development.

I have been commissioned by the to undertake this audit as required under the approval. The audit is scheduled for to commence at the end of April 2025 and will be undertaken in accordance with the Project Approval Conditions that require:

The Project Approval requires:

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

The Proponent has provided me with your contact details as the appropriate stakeholder representative. I would therefore appreciate if you could provide me with any information, comments or concerns that CCC may have regarding the environmental performance of the development to date and provide details of any specific issues you suggest that the Auditor

consider.

Please do not hesitate to contact me if you require any additional information.

Thanks and Regards,

Ken Holmes
Principal Environmental Auditor
Director

Barnett & May

P +61 (0)438 046 261

E ken@baeckea.com.au

A PO Box 365 Belrose NSW 2085

Lead Auditor Qualifications and Experience

Appendix E

KEN HOLMES

Senior Principal Environmental Consultant



Contact

Email ken@baeckea.com.au

Mobile +61 0438 046 261

Qualifications & professional affiliations

- Bachelor of Science (Industrial Chemistry)
- Master of Applied Science (Waste Management)
- Master of Business Administration (MBA)
- Accredited Lead Environmental Auditor (Exemplar Global #: 14065)

Ken Holmes is an acknowledged industry leader in environmental auditing, environmental management and project approvals. His career spans over 30 years and includes experience across Australia, Africa, Europe and South-east Asia.

Ken's extensive Environmental Audit, Infrastructure Planning and Approvals experience includes that preparation of environmental impact statements for major projects, pre-construction approvals, and operations environmental management experience.

He has led large scale projects on major road, rail, renewable energy, mining and water infrastructure projects across Australia. The projects presented below are a sample of the range and complexity of projects that Ken has delivered.

Project experience

Environmental Auditing (Audits completed in the recent years)

Project Energy Connect (2024 – on-going). Ken is currently undertaking the independent environmental audits of construction phase of this major (900km) electricity infrastructure project that consists of high voltage power line and associated infrastructure construction between Wagga Wagga and South Australia.

Victoria Cross Over Station Development IEA (2023 – on-going) Construction phase bi-annual independent audits - Ken has commenced a program of (six) environmental compliance audits of this landmark construction project in the North Sydney CBD. The audit program covered two separate Planning Approvals (for adjacent office tower construction sites). The audits cover the conditions of the project's Planning Approval requiring bi-annual independent environmental audit of compliance against the DP&E (NSW) Conditions of Approval. The project is part of the development of Sydney's commuter rail network expansion.

Hunter Power Project (Construction Phase IEA 2022 – on-going) - Ken has been commissioned to undertake the construction phase independent environmental audits on the Hunter Power Project. The Hunter Power Project is the construction of a new gas fired power station located in the Hunter Valley in NSW. The conditions of approval for the project requires bi-annual independent environmental audit of compliance against:

- o DP&E Conditions of Approval / Development Approvals;
- o Commonwealth Approvals;;

The independent environmental audit are being undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

As auditor, Ken's role covers all technical areas including construction management, waste, greenhouse gas, surface water management, air quality and noise management.

Kurri Kurri Lateral Pipeline (Construction Phase IEA 2023 - 2025)- Ken has been commissioned to undertake the construction phase independent environmental audits on the Kurri Kurri gas pipeline project located in the Hunter Valley in NSW. The conditions of approval for the project requires bi-annual independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Commonwealth Approvals;

The independent environmental audit are being undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

As auditor, Ken's role covers all technical areas including construction management, waste, greenhouse gas, surface water management, air quality and noise management.

Dargues Gold Mine IEA (2023)- Ken led the independent environmental audit of environmental compliance audit of the this gold mining project located near Braidwood in southern NSW. The conditions of approval for the mine requires a two-yearly independent environmental audit of compliance against:

- o DP&E Conditions of Approval / Development Approvals;
- o Water Licences;
- o Environment Protection Licences;
- o Mining Leases;

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning audit guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in air quality and noise management.

Martin Place Over Station Development (2020 – 2023) Construction phase annual independent audits) - Ken undertook the (six) environmental compliance audits of this landmark construction project in the Sydney CBD. The audit program covered two separate Planning Approvals (for adjacent office tower construction sites). The audits covered the conditions of each project's Planning Approval requiring annual independent environmental audit of compliance against the DP&E (NSW) Conditions of Approval. The project is part of the development of Sydney's commuter rail network expansion.

Mt Thorley / Warkworth Mine IEA (2023)- Ken led the multi-disciplinary team that completed the 2023 independent environmental audit of environmental compliance audit of this large mining complex located in the Hunter Valley, NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Commonwealth Approvals;
- Water Licences;
- Environment Protection Licences;
- Mining Leases;

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in air quality and noise management.

Hera Gold Mine (2019 and 2023)- Ken led the independent

environmental audits for the environmental compliance audit of the Hera Gold Mine in western NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Commonwealth Approvals;
- Water Licences;
- Environment Protection Licences;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in surface water management, air quality and noise management.

Bingo Industries Eastern Creek Resource Recovery Facility and Landfill (2022) - Ken led the environmental compliance audit of Bingo's Resource Recovery Facility and Landfill located in western Sydney. The conditions of project's Planning Approval requires a three-yearly independent environmental audit of compliance against:

- DP&E (NSW) Conditions of Approval / Development Approvals;

Environment Protection Licence.

The Audit also included an odour audit and surface water audits undertaken by specialists within the audit team.

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines and the EPBC element of the audit against the DAWE Audit Guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in air quality and noise management.

McArthur River Mine (Northern Territory) (2022) - Ken is currently leading the environmental compliance audit of McArthur River Mine in the Cape of Carpentaria, NT. EPBC Approval requires an annual independent environmental audit of compliance against that Approval.

The independent environmental audit is being undertaken in accordance with AS/NZS ISO 19011:2014 and the DAWE Audit Guidelines.

Moolarben Coal Mine (2019 and 2022) - Ken led the environmental compliance audits of Moolarben Coal Mine located near Mudgee in Western NSW. The conditions of project's Planning Approval requires a three-yearly independent environmental audit of compliance against:

- EPBC Approval
- DP&E (NSW) Conditions of Approval / Development Approvals;
- Water Licences;

Environment Protection Licence; and all Mining Leases.

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines and the EPBC element of the audit against the DAWE Audit Guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in surface water management, air quality and noise management.

Tomingley Gold Mine (2021 and 2024) - Ken was the lead auditor for the environmental compliance audit of the Tomingley Gold Mine in western NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Water Licences;
- Environment Protection Licence;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Tritton Copper Mine (2018 and 2024) - Ken was the lead auditor for the environmental compliance audit of the Tritton Copper Mine in western NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Water Licences;
- Environment Protection Licence;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Bingo Industries Mortdale Resource Recovery Facility (2022) - Ken undertook the environmental compliance audit of waste recycling plant and transfer station located in Mortdale, NSW. The conditions of project's Planning Approval requires a three-yearly independent environmental audit of compliance against:

- DP&E (NSW) Conditions of Approval / Development Approvals;
- Environment Protection Licence.

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines and the EPBC element of the audit against the DAWE Audit Guidelines.

Client: Port Waratah Coal Loader (2018, 2021 and 2024)- Ken was the lead auditor for the last two independent environmental compliance audits of the Port Waratah Coal Loader located on Kooragang Island near Newcastle. The conditions of approval for the facility Barnett & May

requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Water Licences;
- Environment Protection Licence; and the
- EIS (Statement of Commitments).

These independent environmental audit were undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in surface water, air quality and noise management.

North Parkes Mine (2021 and 2024)- Ken was the lead auditor for the environmental compliance audit of the Tritton Gold Mine in western NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Water Licences;
- Environment Protection Licence;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Metropolitan Coal Mine (2018, 2021 and 2024)

Ken was the independent environmental auditor for the last two independent environmental compliance audits of the Metropolitan Coal Mine south of Sydney, NSW. These conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Commonwealth Approvals;
- Water Licences;
- Environment Protection Licences;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in surface water management (covering the mine infrastructure areas), air quality and noise management.

Stratford and Duralie Coal Mines – (2020) Ken was the lead auditor for the environmental compliance audit of Ashton Coal Mine in the Hunter Valley. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Water Licences;
- Environment Protection Licence;
- Mining Leases and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in

accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Ashton Coal Mine (2020) - Ken was the lead auditor for the environmental compliance audit of Ashton Coal Mine in the Hunter Valley. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- EPBC Approvals;
- Water Licences;
- Environment Protection Licence;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Newcastle Coal Infrastructure Group (2019 and 2022) - Ken was the lead auditor for the environmental compliance audits of the NCIG Coal Loader located on Kooragang Island near Newcastle. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- EPBC Approvals;
- Water Licences;
- Environment Protection Licence; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Kables Sand Quarry EPBC Audit (2019) – Ken was the auditor for the EPBC audit of Hansons Kables Sand Quarry located in the Blue Mountains in NSW. The audit was a requirement of the project EPBC approval and was undertaken in accordance with the DAWE Audit Guidelines.

Bendicks Recycling Mayfield (2019)- Ken was the lead auditor for the environmental compliance audit of the Benedicks waste facility in Newcastle. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Environment Protection Licence; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Oberon Quarries (2019) - Ken was the lead auditor for the environmental compliance audit of this Gravel Quarry located in near Oberon in western NSW. The conditions of approval for the quarry requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Environment Protection Licence; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the

Department of Planning and NSW EPA audit guidelines.

Sibelco Dunes Sand Mine (2018 / 2019) – Ken was the auditor for the environmental compliance audit of the Sibelco Sand located near Nelson Bay in NSW. The conditions of approval for the mine required an independent environmental audit of against:

- DP&E Conditions of Approval / Development Approvals;
- EIS predications against actual impacts.

The Approval required that the audit be conducted within 12 months of completion of mining and focussed on mine site rehabilitation.

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines

Ardglen Quarry (Daracon) (2018) - Ken was the lead auditor for the environmental compliance audit of the Ardglen Gravel Quarry located in the upper Hunter Valley. The conditions of approval for the quarry requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Environment Protection Licence; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Holcim Hume Quarry (2017/8) - Ken was auditor for the environmental compliance audit of Holcim' hard rock quarry located near Queanbeyan in NSW. Ken undertook the compliance audits of the quarry's Conditions of Approval. The conditions of approval required a detailed assessment of compliance against:

- DP&E Conditions of Approval / Development Approvals
- Water Licences
- Environment Protection Licences.

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

PGH Bricks (2017/8) - Ken was the lead auditor for the environmental compliance audits of PGH's NSW, QLD, Vic and SA quarries. Ken undertook the compliance audits of the quarries as required by the Conditions of Approval for each site. The conditions of approval required a detailed assessment of compliance against:

- DP&E Conditions of Approval / Development Approvals (for non-NSW sites)
- Mining (and Exploration) Leases
- Environment Protection Licences (or equivalent)

Enviroking (2017/8) - Ken was the lead auditor for an independent environmental audit undertaken in accordance with AS/NZS ISO 19011:2014 "Guidelines for auditing management systems" for the liquid waste facility. The audit reviewed Enviroking's compliance with conditions of approval, made recommendations to address non-compliances and identified opportunities for improvement in the project's environmental management and performance.

Ken has also undertaken environmental management system and statutory compliance audits for a wide range of industries and projects including:

- Cowal Gold Mine
- Manildra Limited / Castlereagh Coal
- Bougainville Copper Limited (Bougainville, PNG)
- News Limited
- Fairfax News Papers
- Norske Skog
- Alcoa
- Ok Tedi Mining (PNG)
- Albright & Wilson
- Seafood Specialities
- Rio Tinto
- Hunter Water
- Department of Foreign Affairs and Trade
- Sydney Water
- Transport for NSW
- Mount Isa Mines
- Scott Transport
- Roads and Traffic Authority (now Roads and Maritime Services)
- AbiGroup (now LendLease)
- Leighton Contractors (now CPB Contractors)
- John Holland Group
- Queensland Transport
- PMP (Printing)
- Straits Resources
- Mount Isa Mines
- Philips (electronics)
- Bonlac Foods
- BHP

Ken has also led a wide range of Acquisition / Due Diligence audits for private sector clients in Australia, PNG, Africa, South Pacific, New Zealand, China, Singapore, Indonesia, Thailand.

Project Approvals

Central Station Re-development – Transport for NSW - Ken led the team responsible for gaining the environmental approvals (preparation of EMPs /construction licences etc.) for the Sydney Central Station project. In this role, Ken was responsible for the interpretation of the Approval requirements (Minister's Conditions of Approval) and the provision of strategic advice on the approvals, licencing, construction environmental management and stakeholder management.

Sydney Metro – Transport for NSW - Transport for NSW (TfNSW) commissioned two demolition contractors to demolish a number of multistorey buildings within the Sydney CBD in preparation for the construction of the Sydney Metro project. Ken led the team responsible for the preparation of environmental management plans for these works (TfNSW was not comfortable that the demolition contractors had the appropriate skills to prepare the required plans and gain the required approvals for the works). Ken worked with the demolition contractors to streamline their internal management processes and to add the requisite environmental management functions within both their corporate and project management systems.

M2 Widening Project Approvals (Roads and Maritime Services) – Ken (Project Manager) led the environmental

approvals team for the preparation of the Environmental Impact Assessment and construction approvals (preparation of EMPs /construction licence etc.) for the M2 widening project.

The management and minimisation of vegetation clearing on this project (along with the minimisation of impacts on residents a high priority. Ken oversaw all the specialist studies that supported the preparation of the Environmental Impact Assessment and subsequent Environmental Management Plans, including:

- Ecological survey;
- Tree reports;
- Noise and vibration impact assessments;
- Contamination assessments;
- Traffic impact assessments; and
- Ground and surface water impact assessments.

Sydney Light Rail – Acciona / Transport for NSW - Ken led the team responsible for leading the construction approvals program and setting up the environmental management system for this significant brown fields infrastructure construction project. His responsibilities included:

- Establishing the project Environmental Management System;
- Interpreting the Conditions of Approval and the Project Deed and advising the Acciona management team on all aspects of compliance with those key approval and contractual documents;
- Gaining the construction environmental approvals (preparation of EMPs /construction licences etc.) for the Sydney Light Rail project. In this role, Ken provided strategic advice on the approvals, licencing, construction environmental management and stakeholder management. He was also responsible for all internal (Acciona / KMH) document quality control.
- Selecting, commissioning and supervising the wide range of specialist environment service providers including ecological survey, tree reports, and pre-construction vegetation clearance reports.
- Advising the design and construction teams on tree clearing and management and integration of construction requirements into the flora and fauna management plans.

Ken also led the consultation with the NSW Government regulators and supported and mentored the Acciona Construction Environmental Manager. In addition, Ken personally led the community and business reference group consultation process on behalf of the design and construction joint venture, successfully gaining signoff from these consultation bodies on the environmental plans and strategies.

Environmental Management Representative (ER) - The role of Independent Environmental Representative on major infrastructure projects in NSW was established in 1998 and continues to be a requirement of the Conditions of Approval for all major infrastructure projects in NSW. The appointees are nominated by the project proponent or construction consortium but are approved by and report to the Director General of the Department of Planning and Environment (DPE).

- The scope of the ER's role is broad range and includes:
 - Interpreting and advising on requirements of the Project Approval.
 - Reviewing and assessing the performance of the project against the Conditions of Approval, Project Deed and other relevant project related approvals. In that role, the ER reviews and approves all environmental related plans (EMPs), audits the implementation of environmental management plans and strategies, verifies (through audit and surveillance) compliance with the relevant project approval and project deed requirements, monitors and reports on regulatory compliance and provides reports to the Department and the project proponent on these matters.
 - Reports on compliance related issues to the public and investigates environmental and compliance issues, complaints and incidents.
 - Review and approval of vegetation clearing and other high (environmentally) impact activities.

Ken has fulfilled the role of Independent Representative on seven major infrastructure projects:

- Hunter Expressway (Motorway construction, Hunter Valley) - (2011 – 2013)
- Integral Energy 9JA Project (Transmission Line Construction Western Sydney) - (2006-2007)
- Westlink M7 (40km Motorway project, Western Sydney) - (2003-2005)
- Towra Beach Nourishment Project (Wet land protection, dredging project, Botany Bay) - (2004)
- Warragamba Dam Auxiliary Spillway Project– (1998 – 2013)
- Cronulla Sewage Treatment Plant Upgrade – (1998 – 2000)
- Liverpool Sewage Treatment Plant Upgrade – (2000)

Upper Hunter Valley Alliance (UHVA) – Leighton Contractors /ARTC - Ken led the team responsible for the provision of the environmental approvals (preparation of EMPs /construction licences etc.) on this major ARTC rail infrastructure program in the Hunter Valley of New South Wales. Ken's team on this project provided the entire environment and community and stakeholder team as a Sub-Alliance partner. In this role, Ken provides strategic advice on the approvals, licencing, construction environmental management and stakeholder management. His responsibilities included:

- Establishing the project Environmental Management System;
- Interpreting the Conditions of Approval and the Project Deed and advising the Leighton management team on all aspects of compliance with those key approval and contractual documents;
- Gaining the construction environmental approvals (preparation of EMPs /construction licences etc.) for range of projects delivered by the Alliance. In this role, Ken provided strategic advice on the approvals, licencing, construction environmental management and stakeholder management. He was also responsible for all internal document quality control.
- Selecting, commissioning and supervising the wide range of specialist environment service providers

- including ecological survey, tree reports, and pre-construction vegetation clearance reports.
- Advising the design and construction teams on tree clearing and management and integration of construction requirements into the flora and fauna management plans.

Other relevant Infrastructure Projects led by Ken include:

- Joint Defence Headquarter Construction Project (ACT) – Environment Approvals Manager
- Melbourne Desalination Plant Project – EMP preparation
- Ballina Bypass (Pacific Highway construction project) - Environment Approvals Manager
- Northern Hume Alliance (Hume Highway Duplication) - Environment Approvals and Community Manager
- Anvil Hill Coal Mine (Hunter Valley) - Environment Approvals Manager
- Shannon Creek Dam Construction Project - Environment Approvals and Community Manager
- Liverpool to Ashfield Pipeline Project (Sydney Water) - Environmental Approvals Manager
- Networks Alliance (Sydney Water –water and sewage mains renewals project) – KMH Management Representative
- Technical Reviewer and Economic Impact Analyst – DEC Construction Noise Management Guidelines (2006)
- Northwest Transit Way - Environment Approvals Manager
- Lane Cove Tunnel - Environment Advisor to Approvals and Construction Team
- North Connex – Environmental Management Plan preparation, consistency assessments and preparation of Environmental Impact Assessments to support variations to the project approvals
- Sydney Desal Plant -Internal QA Reviewer
- Keepit Dam Safety Upgrade – Project Director
- Cordeaux Water Treatment Plant – Lead Consultant and Project Manager

Investigative / Expert Roles

Minter Ellison – Expert Opinion / Report (2018/9) - Ken was commissioned by Minter Ellison on behalf of their client (a consortium of major construction contractors) to provide an expert opinion regarding the interpretation of impact of changes to the Conditions of Approval for a major Sydney linear infrastructure project on environmental investigation and reporting obligations and project cost impacts. This expert opinion was commissioned to support the resolution of a contractual dispute between the consortium and their client.

Environment Protection Authority — Investigation of Illegal Land Clearing and Waste Disposal Activities (April 2015 – July 2017) - Ken was the lead auditor for the investigations undertaken by the KMH team commissioned by the NSW Environment Protection Authority (EPA) to investigate an alleged illegal vegetation clearing and waste disposal operations located in the Hunter Valley, Hawkesbury River Basin and Arcadia (north western Sydney). Ken developed and supervised the implementation site investigation strategies that included a series of investigative processes designed to identify the location and extent of vegetation clearing, and to determine the depth and volumes

of buried construction and demolition wastes.

Environment Protection Authority — Expert Reports Illegal Land Clearing and Waste Disposal Activities (2018)

- Ken was commissioned by the NSW Environment Protection Authority (EPA) to provide expert opinion regarding the alleged illegal vegetation clearing and waste disposal at a site in the Hawkesbury River Basin and Arcadia (north western Sydney).

Ken was subsequently briefed to provide expert opinion in the legal actions taken by the EPA in these matters.

Qenos Mandatory Environmental Audit - Ken was commissioned as the Expert Independent Environmental Auditor (Lead Auditor) for the Qenos Mandatory Audit. As a result of a series of environmental incidents, Qenos were required by the NSW EPA to commission an independent auditor to determine if the plant is capable of being operated and maintained and if the plant is being competently operated and maintained, in order to minimise the risk of environmental incidents and better protect the environment.

In doing this, the audit Assessed the:

- adequacy of Risk Assessment procedures and practices
- adequacy of maintenance and operational Systems
- physical condition and reliability of the Plant
- adequacy and suitability of environmental risk management
- adequacy and suitability of performance monitoring equipment
- processes and procedures for identifying and rectifying plant and equipment issues.

Incidents and assessed of the adequacy the investigations and responses to those incidents.

Orica Port Botany Ground Water Remediation Project – Expert Auditor - Ken was the lead auditor for the independent compliance audit of the Orica groundwater remediation project. These annual audits were a condition of licence established by the (then) Department of Environment and Climate Change and the Department of Planning.

Other

Kelian Equatorial Mining (Kalimantan, Indonesia) - Ken led a specialist environmental and social impact audit team that was established by Rio Tinto (and approved by the Government) to investigate and report on the environmental and social impacts associated with alluvial mining operations

(downstream) from the Rio Tinto (major owner) operated gold mine located in the remote, mountainous region of Kalimantan. The audit team included Government representatives and was undertaken to address the concerns of local village communities that were being impacted socially and economically.

Bougainville Copper Limited (Bougainville, PNG) - Ken led two specialist projects for Bougainville Copper Limited. Including Investigation of the Loloho Port Facility on Bougainville Island. Ken lead the investigation team commissioned to identify and plan for the clean-up of hazardous chemicals left after BCL evacuated Bougainville at the commencement of the civil war in 1990. The investigation covered gases, PCBs, and minerals processing chemicals. The second project was clean up and destruction of chlorine and other compressed gases located at the Loloho Port facility on Bougainville Island.

Ken subsequently lead a team dispatched to Bougainville to chemically destroy 1 tonne of chlorine and other toxic gases. The team built a treatment plant on site and successfully removed the toxic gas threat.

Waste Management

Review of Energy to Waste Technologies – Client Confidential (Australian Based Waste Management Company)

Ken participated (as technical reviewer) in the preparation of a technical review of energy to waste technologies for a major waste management group operating in Australia. The purpose of the review has to provide the client with a detailed assessment of all available and emerging energy to waste technologies available including determining the barriers to implementation within the Australian market, political and social framework.

Shredder Waste Disposal Assessment – Sims Metal

Metal shredders produce a complex waste stream consisting of a mixture of plastic, rubber, metal and other materials that is costly to dispose of. Ken led the KMH team that researched the options for management of this waste stream and prepared recommendations for the development of waste treatment and disposal options (including energy extraction) for Sims Metal.

No.	Condition	Observation	Recommendation	Timing
PROJECT APPROVAL – SSD 24319456				
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, except as permitted by condition A13A.	Two incidents were ore trucks arrived early. Non-compliance reports were sent to DPHI.	Ensure that all haulage contractors are provided with the Drivers' Code of Conduct and an induction that includes transportation restrictions.	All haulage contractors are provided with the Driver's Code of Conduct, which they sign and Hera/Federation keep copies of. An induction that includes transportation restrictions to be developed and inserted into Hera/Federation Generic Induction. To be completed by 30 November 2025.
A13A	The entry and exit of vehicles transporting ore between Peak Mine and the site can only be undertaken between the hours of 7 am and 10 pm.	Two incidents were ore trucks arrived early. Non-compliance reports were sent to DPHI.	Ensure that all haulage contractors are provided with the Drivers' Code of Conduct and an induction that includes transportation restrictions.	All haulage contractors are provided with the Driver's Code of Conduct, which they sign and Hera/Federation keep copies of. An induction that includes transportation restrictions to be developed and inserted into Hera/Federation Generic Induction. To be completed by 30 November 2025.
B17	The Applicant must: (b) operate a suitable system to enable the public to get up-to-date information on the proposed blasting schedule on site; and	Table 4 of the Blast Management Plan states that a blasting schedule will be published on the project website and in monthly reports. Table 4 also states that the nearest property owners and police will be notified of any planned surface blasting. The Auditor understands that no surface blasting was undertaken during the audit period, and that Federation's intent is to provide notification of surface blasting. However, this condition does not distinguish between surface and subsurface blasting. No blasting schedule is provided on the website or in the monthly reports published on the website. The Auditor notes that as the impacts of underground blasting (predominantly ground vibration) impact properties close to the blast location, that notification of the property owners in close proximity to the mine should be the priority.	It is recommended that Hera Resources either: • Publish a monthly blast schedule on the website and in the monthly reports; or • Apply for an exemption from DPHI for the publication of the schedule for underground blasting.	 Application for an exemption from DPHI for the publication of the schedule for underground blasting to be submitted by 30 November 2025.
B18 (d)	(The Applicant must prepare a Blast Management Plan for the development. This plan must: d) include a protocol for identifying any blast-related exceedance, incident or non-compliance and for notifying the Department, the EPA and relevant stakeholders of these events;	Section 7.1 of the Blast Management Plan describes the protocol for incident and non-compliance identification and Sections 8.2 and 8.3 specify the reporting requirements (to DPHI) for incidents and non-compliances respectively. Section 7.1 of the plan references Section 4.4 of the Environmental Management Strategy. The EMS does not cover the reporting on (blast) incidents, exceedances or non-compliances to the EPA or Resource Regulator.	Revise the Blast Management Plan to specifically include the notification of DPHI, the Resource Regulator and the EPA if a blast incident, blast criteria exceedance or non-compliance is identified.	To be considered as a part of the Management Plan updates for the next modification to the Project.
B20	The Applicant must implement the Blast Management Plan	The Blast Management Plan states that a blasting schedule will be published on the project website and in monthly reports. No blasting schedule is provided on the website or in the monthly reports published on the website. Please refer to Condition B17 (b) above.	It is recommended that Hera Resources either: • Publish a monthly blast schedule on the website and in the monthly reports; or • Apply for an exemption from DPHI for the publication of the schedule for underground blasting.	Application for an exemption from DPHI for the publication of the schedule for underground blasting to be submitted by 30 November 2025.
B22	The Applicant must ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not cause exceedances of the criteria listed in Table 3 at any residence on privately-owned land	One complaint relating to dust from the TSF was received during the audit period A review of the air quality monitoring data on the Aurelia website indicated that the PM10 criterion was exceeded on the High-Volume Sampler on 24 April 2025. The Auditor understands that the exceedance was not investigated and therefore a non-compliance against this condition cannot be ruled out. No monitoring for PM2.5 levels was undertaken during this audit period, therefore compliance against this condition cannot be verified.	1. Commission a suitably qualified air quality specialist to review the suitability of the existing air quality monitoring equipment for the monitoring of PM2.5 levels. 2. Implement routine PM2.5 Monitoring 3. Review the allocation of responsibilities for the review of all environmental monitoring data to ensure that all exceedances are identified promptly, investigated and non-compliance reporting undertaken when required.	Correspondance was emailed to DPHI on 18 July 2025 to confirm this non-compliance and seek request to submit a report detailing proposed steps to rectify this non-compliance will be provided to DPHI within 3 months of this notification (ie 16 October 2025).
B24 (a)	The Applicant must: (a) take all reasonable steps to (i) minimise odour, fume, and particulate matter (including PM10 and PM2.5) emissions of the development, paying particular attention to minimising odour from ventilation shafts, wheel-generated haul road emissions, and emissions from the waste rock emplacements; (ii) improve energy efficiency and reduce greenhouse gas emissions of the development;	The auditor understands that Aurelia is planning to install a solar farm to provide power to the project.		Correspondance was emailed to DPHI on 18 July 2025 to confirm this non-compliance and seek request to submit a report detailing proposed steps to rectify this non-compliance will be provided to DPHI within 3 months of this notification (ie 16 October 2025).

	(iii) minimise any visible off-site air pollution generated by the development; (iv) minimise to the greatest extent practicable, the area of dust generating surfaces at any given point in time;			
B24 (b)	The Applicant must: (b) operate a comprehensive air quality management system that uses a combination of predictive meteorological forecasting and air quality monitoring to guide the day-to-day planning of mining operations and the implementation of both proactive and reactive air quality mitigation measures to ensure compliance with the relevant conditions of this consent;	A subscription for Weatherzone is in place and can be used for predictive meteorological forecasting tool to inform proactive dust mitigation strategies. During this audit, no records were available to verify that this system is routinely used and that the operations team are advised of predicated adverse weather conditions.	Develop and implement a process that uses a combination of predictive meteorological forecasting and air quality monitoring to guide the day-to-day planning of mining operations.	To be developed into specific a procedure for “Meteorolgical Forecasting and Air Quality Monitoring”. To be completed by 30 November 2025.
B24 (c)	(c) minimise the air quality impacts of the development during adverse meteorological conditions and extraordinary events (see Note c to Table 3 above);	A subscription for Weatherzone is in place and can be used for predictive meteorological forecasting tool to inform proactive dust mitigation strategies. During this audit, no records were available to verify that this system is routinely used and that the operations team are advised of predicated adverse weather conditions.	Develop and implement a process that uses a combination of predictive meteorological forecasting and air quality monitoring to guide the day-to-day planning of mining operations.	To be developed into specific a procedure for “Meteorolgical Forecasting and Air Quality Monitoring”. To be completed by 30 November 2025.
B24 (d)	The Applicant must: (d) carry out regular air quality monitoring to determine whether the development is complying with the relevant conditions of this consent; and	A dust monitoring program is in place, however no monitoring of PM2.5 levels is being undertaken. Therefore, compliance with the PM2.5 levels specified in Table 3 cannot be verified.	Expand the air quality monitoring program to include monitoring for PM2.5.	Correspondance was emailed to DPHI on 18 July 2025 to confirm this non-compliance and seek request to submit a report detailing proposed steps to rectify this non-compliance will be provided to DPHI within 3 months of this notification (ie 16 October 2025).
B25 (b)	The Applicant must prepare an Air Quality and Greenhouse Gas Management Plan for the development. This plan must: (b) describe the measures to be implemented to ensure: (vi) the air quality impacts of the development are minimised during adverse meteorological conditions and extraordinary events;	Air quality management measures are described in Section 4 of the AQGGMP. Section 4.2 describes the existing greenhouse gas mitigation measures. This section of the plan also states that energy efficiency measures will be reviewed annually. The Plan does not include a protocol for the ensuring that the air quality impacts of the operation are minimised during adverse meteorological and extraordinary events. The Auditor notes that Hera / Federation has an account with Weatherzone that predicts dust-noise that has been in place since 2023.	Revise the Air Quality and Greenhouse Gas Management Plan to include a protocol for ensuring that the air quality impacts of the operation are minimised during adverse meteorological and extraordinary events.	To be considered as a part of the Management Plan updates for the next modification to the Project. To be developed into specific a procedure for “Meteorolgical Forecasting and Air Quality Monitoring”. To be completed by 30 November 2025.
B25 (d)	(d) include an air quality monitoring program, undertaken in accordance with the Approved Methods for Sampling and Analysis of Air Pollutants in NSW (EPA, 2022) and Ambient Air Monitoring Guidance Note (EPA, 2022), or its latest version, that: (i) uses monitors to evaluate the performance of the development against the air quality criteria in this consent and to guide day to day planning of operations; (ii) adequately supports the air quality management system; (iii) includes a protocol for distinguishing the dust emissions of the development from any neighbouring developments; and (iv) includes a protocol for identifying any air quality-related exceedance, incident or non-compliance and for notifying the Department and relevant stakeholders of these events.	The air monitoring program is described in Section 5 of the plan. Monitoring equipment is described in Section 5 and 5.2. While reference is made to monitoring using an E-BAM (trailer), the requirement to monitor PM2.5 is not specified. The plan does not include a protocol for distinguishing the dust emissions of the development from any neighbouring developments. The plan does not include a protocol for identifying any air quality-related exceedance, incident or non-compliance and for notifying the Department and relevant stakeholders (for example the EPA and the RR) of these events.	Revise the Air Quality and Greenhouse Gas Management Plan to include: • Monitoring and reporting on PM2.5. • a protocol for distinguishing the dust emissions of the development from any neighbouring developments. • a protocol for identifying any air quality-related exceedance, incident or non-compliance and for notifying the Department and relevant stakeholders (for example the EPA and the RR) of these events.	To be considered as a part of the Management Plan updates for the next modification to the Project.
B42	The Applicant must ensure that the development complies with the performance measures in Table 4: Chemical and hydrocarbon products to be stored in bunded areas in accordance with the relevant Australian Standard	Deficiencies were identified with the storage of chemicals and hydrocarbons at both the Hera and Federation Sites. Refer to Section 7.9.2	Refer to Section 7.9.2	Hera/Federation will provide a properly bunded and roofed store for all liquid / hazardous waste by 30 November 2025. Hera/Federation will provide a separate bunded and roofed storage area for waste batteries by 30 November 2025.

B72	The Applicant must implement the Biodiversity Management Plan.	During the site inspection, as clearing works have been completed, there is limited opportunity to observe the practical aspects of the implementation of the BMP. However, the storage of excavated materials was observed that did not conform with the obligations established in Section 4.3.1, Table 10. It is noted however, that no other non-conformances were identified and that the Auditor is satisfied that generally the BMP is being implemented.	Review procedures for the excavation and storage of materials from earthworks and ensure that, for example work method statements, cover all of the necessary biodiversity management measures. Relocate any topsoil or other stockpiles that encroach on remnant vegetation.	To be developed into a specific procedure that covers all of the necessary biodiversity management measures. To be completed by 30 November 2025. Relocation of any topsoil or other stockpiles that encroach on remnant vegetation to be completed by 30 November 2025.
B84	The Applicant must implement the Hazardous Materials Management Plan as approved by the Planning Secretary.	The HMMP states that liquids (for example fuels, oils and chemicals) are stored in accordance with the NSW EPA Storage of Liquids Guidelines that incorporate the requirements of AS 1940, AS 2507, AS 2714, AS 3883, AS 3780 and AS 3846 that cover all of the liquids and chemicals used and stored that the Hera / Federation site. Deficiencies were identified with the storage of chemicals and hydrocarbons at both the Hera and Federation sites. Refer to Section 7.9.2	Refer to Section 7.9.2	Hera/Federation will provide a properly bunded and roofed store for all liquid / hazardous waste by 30 November 2025. Hera/Federation will provide a separate bunded and roofed storage area for waste batteries by 30 November 2025.
B86 (c)	This Rehabilitation Management Plan Strategy must: (c) be submitted to the Planning Secretary for approval within six months of the date of physical commencement of development under this consent, unless otherwise agreed by the Planning Secretary;	DPHI was notified that the commencement of construction would occur on 3 May 2024. The plan was submitted to DPE for review and comment on 23 October 2023. The Rehabilitation Management Plan was finalised and published on 16 December 2024. The finalisation of the plan and therefore approval occurred after the six months specified in this Condition.	Ensure that all future submissions to DPHI are submitted within the required timelines.	Noted.
B86 (k)	(k) investigate ways to minimise adverse socio-economic effects associated with rehabilitation and mine closure; and	A strategy to investigate ways to minimise adverse socio-economic effects associated with rehabilitation and mine closure has not been included in the plan.	During the next revision of the plan include a strategy to investigate ways to minimise adverse socio-economic effects associated with rehabilitation and mine closure.	To be considered as a part of the Management Plan updates for the next modification to the Project.
B86 (l)	(l) include a program to report on the outcomes of the investigations required under this condition and review and update this strategy at least every five years.	A reporting program is not included in the plan.	During the next revision of the plan include a reporting program.	To be considered as a part of the Management Plan updates for the next modification to the Project.
C2	The Applicant must implement the Environmental Management Strategy as approved by the Planning Secretary.	A relatively high number of non-compliances have been identified during this audit. While the broad framework provided by this EMS is appropriate, the implementation of responsibilities has not been consistent. Refer to Section 7.4	Refer to Section 7.4.	Hera/Federation will develop and implement, as an integral part of the Business Management System, a formal, documented environmental system covering for example: • Establishment of environmental objectives and targets, • Environmental hazard and risk identification. • Environmental procedures, including spill management (where appropriate these should be integrated into the existing operational procedures. • The identification of environmentally related roles and responsibilities that would be integrated into existing role / responsibility documentation. • Environmental checklists and internal reporting processes. • Environmental Awareness and Training needs. • Environmental Record keeping requirements (including record retention policy). This will completed by 30 November 2025.
C4	Where any exceedance of these criteria or performance measures has occurred, the Applicant must, at the earliest opportunity: (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.	An exceedance of the air quality criteria was identified during this audit. That exceedance was not investigated and as a result, it is not possible to determine if and adverse impact on any neighbouring residential property occurred. The Auditor accepts that while the likelihood of adverse impact may be low, that this cannot be verified and consequently the need for the implementation of remedial actions could not be determined.	Refer to Section 7.4.	Hera/Federation will develop and implement, as an integral part of the Business Management System, a formal, documented environmental system covering for example: • Establishment of environmental objectives and targets, • Environmental hazard and risk identification. • Environmental procedures, including spill management (where appropriate these should be integrated into the existing operational procedures. • The identification of environmentally related roles and responsibilities that would be integrated into existing role / responsibility documentation. • Environmental checklists and internal reporting processes. • Environmental Awareness and Training needs. • Environmental Record keeping requirements (including record retention policy). This will completed by 30 November 2025.

C5	Management plans required under this consent must be prepared in accordance with relevant guidelines, and include where relevant: (e) a program to monitor and report on the: (i) impacts and environmental performance of the development; and (ii) effectiveness of the management measures set out pursuant to paragraph (d);	All plans required under this Approval met the requirements of Condition C5 (e), except the Rehabilitation Management Plan.	During the next revision of the Rehabilitation Management Plan include a reporting program.	To be considered as a part of the Management Plan updates for the next modification to the Project.
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.	Three incidents were reported to DPHI during this audit period. The initial notification should occur on the day that the incident is detected. This did not occur for the water leak incident. The initial notification should include the Development Name and Application Number. All three initial reports to DPHI referenced on the EPL number. None of the three initial incident reports contained this information. The formal incident notification that are due within seven days of the initial notification should include the details contained in Appendix 6 of the Approval including: - identify the development and application number; - provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident); - identify how the incident was detected; - identify when the Applicant became aware of the incident; - identify any actual or potential non-compliance with conditions of consent; - describe what immediate steps were taken in relation to the incident; - identify further action(s) that will be taken in relation to the incident; and - identify a project contact for further communication regarding the incident. The written reports provided to DPHI did not include all of this information. Within 30 days of the incident a formal report is to be submitted to DPHI that includes the above information plus - a summary of the incident; - outcomes of an incident investigation, including identification of the cause of the incident; - details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and - details of any communication with other stakeholders regarding the incident	1. Ensure that all incident notifications to DPHI are submitted immediately following the identification of the incident. 2. Prepare a template Initial Incident Notification Form, a template Written Notification form and a template Incident Report to ensure that all notifications to DPHI and the subsequent formal written notification and incident reports reference the development name (Federation Project) the Application Number (SSD 24319456) and all information required under Appendix 6 of the Approval.	Hera/Federation will prepare a template Initial Incident Notification Form, a template Written Notification form and a template Incident Report to ensure that all notifications to DPHI and the subsequent formal written notification and incident reports reference the development name (Federation Project) the Application Number (SSD 24319456) and all information required under Appendix 6 of the Approval. This will completed by 30 November 2025.
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;	A review of the Aurelia Website has found that all of the documentation required by this Condition was uploaded to the website and up to date, with the following exceptions: - Complaints Register was last updated in 2023. - The most recent modification to this Approval was not available onto the Website - The original version of the Rehabilitation Management Plan was available on the website, but not the current version.	Ensure that the complaints register is updated monthly Ensure that all documents required by this Condition are available on the web site and kept up to date.	Noted.

	(ix) a complaints register, updated monthly; (b) keep such information up to date, to the satisfaction of the Planning Secretary.	The mining lease for the Federation site was not available on the web site. (a copy of the conditions attached to the lease were uploaded).		
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MINING LEASE STANDARD CONDITIONS				
D3 C15a	The holder of a mining lease must do the following before the end of the initial period— prepare a rehabilitation management plan, and	A Rehabilitation Management Plan was prepared for the Hera site covering the period from July 2022 to 2025, that plan covered the original Hera Mine site (not the Federation site). A Rehabilitation Management Plan covering the mining leases associated with both the Hera and Federation site was prepared in 2025, after completion of the Initial Period.	Ensure that all revised plans are prepared within timelines set in the mining lease conditions.	Noted.
D3 C15b	The holder of a mining lease must do the following before the end of the initial period— prepare rehabilitation outcome documents and give them, other than the rehabilitation completion criteria statement, to the Secretary for approval, and	Rehabilitation Outcome documents were submitted to the RR on 18 November 2022. That submission was related to the Hera Mining Operations only. A subsequent submission In October 2025 covered the Federation mining operations. This submission occurred outside of the Initial Period.	Ensure that all submissions required by the Mining Leases are prepared and submitted within timelines set in the mining lease conditions.	Noted.
D3 C15c	The holder of a mining lease must do the following before the end of the initial period— prepare a forward program and give it to the Secretary.	A Forward Program was submitted to the RR on 18 November 2022. That submission was related to the Hera Mining Operations only. A subsequent submission In September 2024 and then 27 October 2025, covered the Federation mining operations. The September 2024 submission occurred outside of the Initial Period.	Ensure that all submissions required by the Mining Leases are prepared and submitted within timelines set in the mining lease conditions.	Noted.
D3 C16a	The holder of a mining lease must make a document to which this clause applies publicly available by— publishing it on its website in a prominent position, or	Rehabilitation objectives are presented in the Rehabilitation Management Strategy that is provided on the website, albeit the version available at the time of the audit had been superseded. The forward program is provided on the website; however, copies of the Annual Rehabilitation Reports were not available.	Upload (current) versions of the: - the rehabilitation management plan, - the forward program, - the annual rehabilitation report	Hera/Federation to upload (current) versions of the: - the rehabilitation management plan: - the forward program: and - the annual rehabilitation report. This will completed by 30 November 2025.
D3 C16b	If a document is published on the website of the holder of the mining lease, the holder must ensure that it is published— - for a rehabilitation management plan—within 14 days after it is prepared or amended, or - for a forward program or an annual rehabilitation report—within 14 days after it is given to the Secretary or amended,	Insufficient information was provided to the Auditor to verify compliance with this Condition.	Ensure that all records associated with the requirement of mining leases are maintained.	Noted.
D4 C17	The holder of a mining lease must create and maintain records of all actions taken that demonstrate compliance with each of the conditions set out in this Part. Note— The Act, sections 163D and 163E provide for the form in which records must be kept and the period for which they must be retained.	The Auditor was not able to access all relevant compliance related documents requested.	Ensure that all records associated with the requirement of mining leases are maintained.	Noted.