

Cowal Gold Operations

Conditions of Approval Independent Environmental Audit Report

Evolution Mining (Cowal) Pty Ltd

June 2018

FINAL

0456820

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Cowal Gold Operations

Conditions of Approval Independent Environmental Audit

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Evolution Mining (Cowal) Pty Limited


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Independent Audit Certification Form

Independent Audit Certification Form	
Development Name	Cowal Gold Operations
Development Consent No.	DA 14/98 (Mod 13, January 2017)
Description of Development	Cowal Gold Operations is an open-cut gold operation. Mining commenced at CGO in 2004 with gold production commencing in 2006.
Development Address	Lake Cowal Road, Lake Cowal, NSW 2671, Australia
Operator	Evolution Mining Pty Ltd
Operator Address	Level 30, 175 Liverpool Street, Sydney NSW 2000
Independent Audit	
Title of Audit	Cowal Gold Operations Conditions of Approval Independent Environmental Audit
<p><i>I certify that I have undertaken the independent audit and prepared the contents of the attached independent audit report and to the best of my knowledge:</i></p> <ul style="list-style-type: none"> • The audit has been undertaken in accordance with relevant approval condition(s) and in accordance with the auditing standard AS/NZS ISO 19011:2014 and Post Approval Guidelines – Independent Audits • The findings of the audit are reported truthfully, accurately and completely; • I have exercised due diligence and professional judgement in conducting the audit; • I have acted professionally, in an unbiased manner and did not allow undue influence to limit or over-ride objectivity in conducting the audit; • I am not related to any owner or operator of the development as an employer, business partner, employee, sharing a common employer, having a contractual arrangement outside the audit, spouse, partner, sibling, parent, or child; • I do not have any pecuniary interest in the audited development, including where there is a reasonable likelihood or expectation of financial gain or loss to me or to a person to whom I am closely related (i.e. immediate family); • Neither I nor my employer have provided consultancy services for the audited development that were subject to this audit except as otherwise declared to the lead regulator prior to the audit; and • I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from fair payment) from any owner or operator of the development, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so. <p>Note.</p> <p>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.</p> <p>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).</p>	
Signature	
Name of Lead / Principal Auditor	Oliver Moore
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Auditor Certification (if relevant)	N/A
Date	28/06/2018

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EXECUTIVE SUMMARY

Environmental Resources Management Australia Pty Ltd (ERM) was commissioned to perform an Independent Environmental Audit (IEA) of the Cowl Gold Operations (CGO). The CGO is owned and operated by Evolution Mining (Cowl) Pty Limited (Evolution). The CGO is located in the Bland Shire in the Central West region of New South Wales (NSW), 38 kilometres north-east of West Wyalong and approximately 350 kilometres west of Sydney, NSW. The primary purpose of the audit was to satisfy Condition 9.2(a) of Schedule 2 of the Cowl Gold Operations Development Consent (DA) 14/98 (Modification 13). This condition requires completion of an independent audit by the end of July 2016, and every 3 years thereafter, unless the Secretary directs otherwise.

The audit included a review of:

- DP&E, Ministers Conditions of Approval (CoA) Development Consent DA 14/98 (Modification 13);
- Environment Protection Licence (EPL) 11912;
- Mining Lease (ML) 1535; and
- implementation of environmental management plans developed as part of the Ministers Conditions of Approval.

A qualitative risk assessment was also completed on the findings, consistent with AS/NZS 4360:2004 Risk management and HB 436:2004 Risk Management Guidelines Companion to AS/NZS 4360:2004 and as described in the DP&E publication "Independent Audit Guidelines" issued October 2015. The number of non-compliances with the statutory conditions and implementation of the management plans is summarised in Table below:

Summary of Audit Findings

Number of Conditions	Non compliances	Administrative Non - compliances	Observations
Conditions of Approval Development Consent DA 14/98			
96	3 High (-), Medium (2), Low (1)	13	18
EPL_11912			
69	2 High (-), Medium (-), Low (2)	4	5
Mining Lease 1535			
29	- High (-), Medium (-), Low (-)	-	-

An action response table will be developed by Evolution addressing all audit findings and will be submitted separately to this report.

ABBREVIATIONS

AHD	Australian Height Datum
AQMP	Air Quality Management Plan
AR	Annual Review or Annual Return
BMP	Blast Management Plan or Bushfire Management Plan
BOMP	Biodiversity Offset Management Plan
CEMCC	Community Environmental Monitoring and Consultative Committee
CGO	Cowal Gold Operations
CMP	Cyanide Management Plan
CoA	Conditions of Approval
CWMP	Compensatory Wetland Management Plan
DA	Development Application
dB	Decibels
DPE/DP&E	NSW Department of Planning and Environment
DPI	NSW Department of Industry
DRE	NSW Department of Industry, Division of Resource and Energy
DRG	NSW Division of Resources & Geoscience
DSC	NSW Dams Safety Committee
EHS	Environment, Health & Safety
EIS	Environmental Impact Statement
EMS	Environmental Management System or Environmental Management Strategy
EPA	Environmental Protection Authority
EPL	Environmental Protection Licence
ERM	Environmental Resource Management Australia Pty Ltd
ERP	Emergency Response Plan
ESCMP	Erosion and Sediment Control Management Plan
FFMP	Flora and Fauna Management Plan
g/m ² /month	Grams per metre squared per month
HMP	Heritage Management Plan
HWCMP	Hazardous Waste and Chemical Management Plan
IACHMP	Indigenous Archaeology and Cultural Heritage Management Plan
IEA	Independent Environmental Audit
IMP	Interim Monitoring Panel
LMP	Land Management Plan
LPBMP	Monitoring Programme for Detection of any Movement of Lake Protection Bund, Water Storage and Tailings Structures and Pit Void Walls
ML	Mining Lease or Megaliters
MOD	Modification (in respect of CoA DA)
MOP	Mining Operations Plan

MoU	Memorandum of Understanding
NMP	Noise Management Plan
OEH	NSW Office of Environment and Heritage
POEO	Protection of the Environment Operations Act 1997
RMP	Rehabilitation Management Plan
SMS	Safety Management System
SSMP	Soil Stripping Management Plan
SWCMBMP	Surface Water, Groundwater, Meteorological and Biological Monitoring Programme
THMS	Transport of Hazardous Materials Study
TSF	Tailings Storage Facilities
VPA	Voluntary Planning Agreement
WMP	Water Management Plan

1 INTRODUCTION

1.1 BACKGROUND

Environmental Resource Management Australia Pty Ltd (ERM) was engaged by Evolution Mining (Cowal) Pty Ltd (Evolution) to undertake an independent environmental audit of the Cowal Gold Operations (CGO) near West Wyalong, New South Wales (NSW). The purpose of the audit was to satisfy the requirements of the Department of Planning and Environment (DP&E) Ministers' Conditions of Approval (CoA) for the consolidated Development Consent DA 14/98 (MOD 13) dated 6 February 2017.

This report sets out the audit purpose, methodology, summary, findings and detailed assessment. The audit period assessed in this IEA is 1 May 2017 to 30 April 2018. The audit was conducted between 16 and 19 April 2018 and included document review and a site visit.

1.2 AUDIT OBJECTIVES

The objectives of the ERM's audit were to:

- assess the environmental performance of the project and assess whether it is complying with the requirements in the Conditions of Approval Development Consent DA 14/98 (MOD 13, 6 February 2017), Environmental Protection Licence (EPL) 11912 and Mining Lease (ML) 1535 (including any assessment, plan or program required under these approvals);
- review the adequacy of CGO's Environmental Management Strategy and Environmental Monitoring Program required under the abovementioned consents/approvals;
- identify opportunities for improved environmental management and recommend appropriate measures or actions to improve the environmental performance of the project, and/or any assessment, plan or program required under the above mentioned approvals; and
- consultation with the relevant agencies such as Department of Planning and Environment (DP&E), Environment Protection Agency (EPA), NSW Office of Environment and Heritage (OEH), NSW Division of Resources and Geoscience (DRG), NSW Department of Primary Industry Water (DPI Water), Bland Shire Council (BSC) and the Community Environmental Monitoring and Consultative Committee (CEMCC).

As part of Evolution's Conditions of Approval (Development Consent DA 14/98) for operation, an Independent Environmental Audit is to be conducted of the CGO every three years after the initial Independent Environmental Audit (required by 31 July 2016), however ERM understands that the IEA is completed for CGO annually rather than 3 yearly as part of a previous commitment made with the Independent Monitoring Panel. Further recommendations in relation to the frequency of the IEA are made within this report.

Condition 9.2 of the Conditions of Approval Development Consent DA 14/98 (MOD 13, 6 February 2017), summarises the audit requirements is provided below:

(a) Independent Environmental Audit

- (i) By the end of July 2016, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:*
- be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*
 - include consultation with the relevant agencies, BSC and the CEMCC;*
 - assess the environmental performance of the development and assess whether it is complying with the requirements in this consent and any other relevant approvals (such as environment protection licences and/or mining lease (including any assessment, plan or program required under this consent));*
 - review the adequacy of any approved strategy, plan or program required under this consent or the abovementioned approvals; and*
 - recommend measures or actions to improve the environmental performance of the development, and/or any strategy, plan or program required under this consent.*

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

- (ii) (Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report, and a timetable for the implementation of these recommendations as required. The Applicant must implement these recommendations, to the satisfaction of the Secretary.*

This report constitutes outcomes of the Independent Environmental Audit to comply with Condition 9.2 of the Development Consent DA 14/98.

1.4

SCOPE OF WORKS

The audit applies to the active gold mining operations and any other infrastructure specifically approved by the Conditions of Approvals Development Consent. ERM understands that the requirement to complete annual IEAs is an outcome of findings developed by the Independent Monitoring Panel. Annual IEA's have been completed since works commenced on the mine. Therefore, the audit period assessed in this report is 1 May 2017 to 30 April 2018.

ERM assessed the environmental compliance status for all subject areas contained within the CoA Development Consent DA 14/98, EPL 11912 and ML 1535. Subject areas contained within the Development Consent are described below.

1 - General	6 - Air, Blast, Noise And Visual Impact Management
2 - Mine Management	7 - Transport Management
3 - Heritage, Flora And Fauna And Land Management	8 - Additional Procedures
4 - Water Management	9 - Environmental Management, Auditing And Reporting
5 - Hazardous Materials And Tailings Management	Appendix 5 - Noise Compliance Assessment

The subject areas contained within EPL 11912 include:

A1 What the licence authorises and regulates;	O5 Waste management;
A2 Premises or plant to which this licence applies;	O6 Other operating conditions;
A3 Other activities;	M1 Monitoring records;
A4 Information supplied to the EPA;	M2 Requirement to monitor concentration of pollutants discharged;
P1 Location of monitoring/discharge points and areas;	M3 Testing methods - concentration limits;
L1 Pollution of waters;	M4 Weather monitoring;
L2 Concentration limits;	M5 Recording of pollution complaints;
L3 Waste;	M6 Telephone complaints line;
L4 Noise limits;	M7 Blasting;
L5 Blasting;	R1 Annual return documents;
L6 Potentially offensive odour;	R2 Notification of environmental harm;
O1 Activities must be carried out in a competent manner;	R3 Written report; and
O2 Maintenance of plant and equipment;	G1 Copy of licence kept at the premises or plant
O3 Dust;	

The subject areas contained within ML 1535 include:

Notice to Landholders	Roads
Working Requirements	Trees and Timber
Reports	Resource Recovery
Licence to Use Reports	Indemnity
Confidentiality	Security
Terms of the non-exclusive licence	Mine Safety Management Plan
Safety	Mining, Rehabilitation, Environmental Management Process (MREMP) Mining Operations Plan (MOP)
Rehabilitation	Annual Environmental Management Report (AMER)
Prevention of Soil Erosion and Pollution	Blasting
Transmission lines, Communication lines and Pipelines	Use of Cyanide
Fences, Gates	Control of Operations

The site visit concentrated on the assessment of the effectiveness of the CGO's environmental management measures and adequacy of performance.

The review of environmental monitoring data has been limited to data collected during the audit period of 1 May 2017 to April 2018 (the most recent data available at the time of the site audit).

1.5

PERSONNEL AND TIMING

Mr. Oliver Moore and Ms. Nicole Whittaker were approved by the DP&E to conduct the audit, as Lead Auditor and Assistant Auditor respectively (refer to correspondence from the DP&E in Annex A).

Mr. Oliver Moore and Ms. Nicole Whittaker undertook the site visit. Mr Michael Gaggin (the ERM Partner in Charge of the Project) assisted with the peer review of the Report.

The environmental audit was conducted between 16 and 19 April 2018.

The following CGO personnel were interviewed during the course of the audit:

- Ms Danielle Wallace - Superintendent - Environment and Social Responsibility (ESR);
- Ms Kate Nixon - Environmental Systems Advisor;
- Mr Michael Crawford - Environmental Monitoring Advisor;
- Mr Tony Parkes - Process Operator;
- Mr Adam Beer - Senior Geotechnical Engineer; and
- Mr Troy Wells - Superintendent - Safety and Training.

1.6

LIMITATIONS

This disclaimer, together with any limitations specified in the report, applies to this report and its use.

This report was prepared in accordance with the contracted scope of services for the specific purpose stated and subject to the applicable cost, time and other constraints. In preparing this report, ERM relied on: (a) client/third party information which was not verified by ERM except to the extent required by the scope of services, and ERM does not accept responsibility for omissions or inaccuracies in the client / third party information; and (b) information taken at or under the particular times and conditions specified, and ERM does not accept responsibility for any subsequent changes. This report has been prepared solely for use by, and is confidential to, the client and ERM accepts no responsibility for its use by other persons. This report is subject to the copyright and protection and the copyright owner reserves its rights. This report does not constitute legal or financial advice.

AUDIT PROCESS

The independent audit was conducted against each Conditions of Approval in Development Consent DA 14/98, each Licence Condition in EPL 11912 and ML 1535. The independent audit process at CGO included:

- Off-site planning for the site audit;
- Collection of relevant background documentation;
- An opening meeting;
- Collecting audit evidence through information gathering, observations and interviews;
- Site inspections;
- A close out meeting;
- Evaluating audit documentation; and
- Compiling this audit report.

2.1

CLASSIFICATION OF AUDIT FINDINGS

Findings resulting from an assessment of audit evidence were divided into six categories as follows:

- **Compliant (C):** the intent and all elements of the audit criteria requirements have been complied with within the scope of the audit.
- **Not Verified (NV):** insufficient verifiable evidence to demonstrate that the intent and all elements of the audit criteria have been complied with within the scope of the audit.
- **Non-compliance (NC):** Failure to meet the audit requirements, failure to achieve the field performance outcomes identified in documentation, or ineffective environmental management of the activity.
- **Administrative Non-compliance (ANC):** technical conformance with audit requirements that would not impact on performance and is considered minor in nature (e.g. report submitted but not on the due date, failed monitor or late monitoring session). This would not apply to performance-related aspects (e.g. exceedance of a noise limit) or where a requirement had not been met at all (e.g. noise management plan not prepared and submitted for approval).

- **Observation (O):** Observations are recorded where the audit identified issues of concern which do not strictly relate to the scope of the audit or assessment of compliance.
- **Not Triggered (NT)** - A regulatory approval requirement has an activation or timing trigger that had not been met at the time of the audit inspection; therefore a determination of compliance could not be made.
- **Note:** A statement or fact, where no assessment of compliance is required.

A qualitative risk assessment was also completed on the findings, consistent with AS/NZS 4360:2004 Risk management and HB 436:2004 Risk Management Guidelines Companion to AS/NZS 4360:2004 and as described in the DP&E publication "Independent Audit Guidelines" issued October 2015.

Risk levels for non-compliances will also be identified and assigned as follows:

- **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).

2.2

AGENCY AND COMMUNITY CONSULTATION

As part of this audit, ERM consulted with the following agencies and stakeholders:

- NSW Division of Resource and Geoscience (DRG);
- NSW Department of Primary Industry Water (DPI Water);
- Bland Shire Council (BSC);

- Department of Planning and Environment (DP&E);
- Office of Environment and Heritage (OEH);
- NSW Environment Protection Agency (EPA); and
- Independent Chairperson (IC) of the CEMCC (as appointed by DP&E).

In each case an email was sent to representatives of each agency requesting feedback on those issues considered most relevant by their department at the time of the audit.

2.2.1 *Summary of Consultation*

The Terms of Reference were submitted to the Department of Industry (DRE and DPI Water), BSC, DP&E, OEH, EPA and CEMCC on 11 April 2018, prior to the site inspection to obtain feedback and draw attention to any key issues, within the agreed scope of the audit.

The following feedback was received and is addressed below:

- DP&E – highlighted a number of areas of consideration, in particular: compliance and status of management plans; compliance with transport routes and storage of cyanide; rehabilitation; dust management; management and monitoring of tailings dams; water management (both groundwater and surface water) including the capacity of sediment dams. The detailed assessment of these areas is addressed within Annex B1 to B3.
- OEH – requested a focus on progress around actions and monitoring of the biodiversity offset areas. The detailed assessment regarding the offsets is addressed in Annex B1: CoA DA 14/98 condition 3.4.
- EPA – was concerned with the location of the high volume sampler in relation to the Australian Standard (AS). Adherence with the AS is outside of ERM's scope, but the high volume sampler will be required to be relocated as it is no longer located on a private property (refer Annex B1: CoA DA 14/98 condition 6.1(a)).
- CEMCC– raised no concerns.

Aside from those outlined above, no response from other agencies was received during the audit process.

2.3 *OPENING MEETING*

The opening meeting was held at the CGO site office on 16 April 2018. The opening meeting was attended by Mr. Oliver Moore (Lead Auditor), and Ms. Nicole Whittaker (Assistant Auditor) and CGO Personnel Ms. Danielle Wallace and Ms. Kate Nixon.

2.4 *AUDIT*

Interviews and discussions were held in accordance with the agreed audit schedule.

Site inspections was undertaken by Mr. Oliver Moore, Ms Nicole Whittaker, Ms. Danielle Wallace, Mr Tony Parkes and Ms. Kate Nixon between 16 and 18 April 2018 and included observations of the following areas:

The active mining pit;	Groundwater sampling areas;
Lake protection bund;	Air quality sampling locations;
Rehabilitation areas;	Weather station area;
Tailings storage facility (north);	Surface water sampling areas;
A walkthrough of the processing plant;	Water storage and stormwater dams; and
Machinery workshops, washdown and refuelling areas;	Protected areas – flora and heritage;
Bioremediation area;	Northern Offset Area.
Emergency training facility;	

Ms. Danielle Wallace, Ms. Kate Nixon and Mr Michael Crawford provided assistance with collecting audit evidence by providing ERM with documentation for each approval condition, and licence conditions.

2.5 *CLOSING MEETING*

The closing meeting was conducted on 18 April 2018 at CGO's site office and included a discussion of the preliminary audit findings. Mr. Oliver Moore (ERM), Ms. Nicole Whittaker (ERM), Ms. Danielle Wallace (CGO), Ms. Kate Nixon and Mr. Michael Crawford (CGO) attended the meeting.

2.6 *AUDIT REPORT*

A summary of all non-compliances, administrative non-compliances, observations and ERM recommendations arising as a result of the audit, are included in *Table 5.2* and *Table 5.3* this report, detailed compliance tables are presented in Annex B. ERM note the audit report is based on objective evidence.

CGO is required to submit a copy of this Independent Environmental Audit report to the Secretary (NSW DP&E), together with its response to any recommendations contained in the independent audit report within 12 weeks of the audit being undertaken.

SITE DESCRIPTION

The subject property is located approximately 38 kilometres north-east of West Wyalong and 350 kilometres west of Sydney in New South Wales (NSW), Australia. The land immediately adjacent to and surrounding the CGO consists of Lake Cowal and farming land, of which a large portion is either contained within the mining lease area or CGO has purchased the land to reduce the number of private residences that could be potentially impacted by CGO's activities.

The mine operates 24 hours a day, seven days a week. Blasting is generally undertaken during daytime hours, most often between 12 pm and 1 pm and tailings construction works are restricted to the hours of 7 am to 6 pm.

3.1

CURRENT OPERATIONS

The CGO is an open pit mining operation with production from a number of different faces within the single pit. Mining is carried out with a company-owned fleet of mining equipment. Ore is hauled by truck from the pit face to either a stockpile area or directly fed into the onsite primary crusher and processed through the processing plant. The site includes two tailings storage facilities and three waste rock emplacements and a number of other ancillary aspects including workshops, offices, laydown areas, as well as soil and ore stockpiles.

CGO identified a number of projects currently underway or completed during the audit period. These included:

- "Phase H" of pit works, which includes widening the current pit to allow pit excavation works to progress down to the MOD 11 approved level of 330 m, currently at approximately 280 m.
- Float Tail Leach (FTL) project for which construction is underway and involves the installation of new leach tanks at the processing plant, to allow better gold recovery.
- Lift 6 on the Southern Tailings Storage Facility – this lift has just been completed at the end of March 2018.
- New warehouse installation, with construction underway and aimed at expanding CGO's warehouse storage capacity.

3.2

FUTURE OPERATIONS

CGO also highlighted a number of projects and changes that are forecasted to be commenced or completed during the following audit period. The most significant of which is the proposed Modification 14 to Conditions of Approvals

Development Consent, which went on exhibition, 17 April 2018, during the current audit. MOD 14 proposes, among other aspects, the following changes:

- Proposed increase in ore processing from the currently approved 7.5 Mtpa to 9.8 Mtpa;
- Expanding the site to the north, requiring a new mining lease;
- Amalgamating and expanding the northern and southern tailings storage facilities into one larger “Integrated Waste Landform” (IWL);
- To accommodate the IWL, relocation of some of the water management infrastructure and other ancillary infrastructure such as access roads, stockpiles and explosives subcontractor and storage facility; and
- Duplicating the existing water pipeline connected to the Blank Creek Palaeochannel borefield, however no changes to the extraction limit are proposed.

Other future projects proposed for CGO include:

- Completion of waste rock dumping on southern waste rock emplacement, with shaping and rehabilitation preparatory works to then follow.
- Helicopter seeding of a large portion of the reinstated and final land form of the site, including large sections of the external facing aspects of the southern and northern waste rock emplacements, as well as top sections of the pit wall.
- Lift 6 on the Northern Tailings Storage Facility.
- Redesign of carpark.

4.1 COMPLIANCE WITH CONDITIONS OF APPROVAL, EPL AND ML 1535

The Conditions of Approval Development Consent DA 14/98, EPL and ML granted to CGO from DP&E, EPA and DRE respectively were reviewed as part of this audit. Non-compliances with the sites CoA, EPL and the ML identified during the audit were largely administrative in nature. Set out below in *Table 5.2* and *Table 5.3* are the findings where either compliance could not be demonstrated or observations for improvement were identified.

4.1.1 *Review of Environmental Protection Licence Non-Compliances*

A review of the Annual Returns for 2015, 2016 and 2017 was undertaken as part of this audit. Non-compliances reported include:

- **2015:** a number of non-compliances were identified in relation to monitoring not being undertaken in accordance with the conditions due to a range of causes including:
 - Water level is below groundwater bore level or no water present at monitoring location;
 - Unsafe access to monitoring location;
 - Malfunction of monitoring equipment; and
 - Relocation or change to monitoring site before EPL was updated to reflect changes.

These non-compliances related to conditions O2.1, M2.1 and M7.1 and were predominantly closed out during the reporting period or with the subsequent EPL variation approval.

- **2016:** a number of non-compliances were identified in relation to monitoring not being undertaken in accordance with the conditions due to a range of causes including:
 - Unsafe access to monitoring location;
 - Inundation of monitoring equipment from lake waters;
 - Monitoring samples being lost in transit; and
 - Water level is below groundwater bore level or no water/slurry present at monitoring location.

These non-compliances related to conditions O2.1, M2.2, M2.3 and M7.1 and were predominantly closed out during the reporting period or with the subsequent EPL variation approval.

- **2017:** consisted of one blast related complaint and a number of non-compliances related to monitoring not being undertaken in accordance with the conditions due to a range of causes:
 - Sample container broken in transit;
 - Malfunction of monitoring equipment;
 - CGO considering sampling frequency is included in EPL as error; and
 - No water/slurry present at monitoring location.

These non-compliances related to conditions B.1, O2.1, M2.2, M2.3 and M7.1 and were either closed out during the reporting period or proposed to be investigated in 2018 or rectified with the subsequent EPL variation approval.

4.2 *INCIDENTS AND COMPLAINTS SUMMARY*

4.2.1 *Incidents*

On 21 April 2018, during a routine inspection of the Northern Tailings Storage Facility (NTSF), it was noted that there was minor seepage on the eastern bank. The seepage occurred at the toe of the most recent lift (lift 5) and was captured by the berm at the bottom of this lift, meaning the seepage was contained on the NTSF wall. The seepage extended approximately 200m and was predominately comprised of water with some tailings slurry material and clay.

Immediate actions taken following the identification of the incident were as follows:

- The processing plant was immediately shut down and pumping to the NTSF was ceased.
- The location was monitored 24hr/day to ensure no further seepage.
- An investigation into the cause of the seepage was commenced.
- CGO completed the regulatory notifications, initially verbally followed by written notification to DP&E, EPA, DRG, DPI (Water) and Dam Safety Committee NSW.
- CGO moved tailing pumping to the Southern Tailings Storage Facility (STSF).

A number of agencies visited site in the weeks proceeding to inspect the incident, including EPA, mine inspectors, DPI and DRG.

The EPA advised CGO on 3 May 2018 (ref. DOC18/249317-02) that it was satisfied with the actions taken by CGO and only required the investigation findings be submitted for review.

CGO also received a Section 240(1)(c) notice from DP&E on 14 May 2018 (ref. DI 0684 2018) which also required an investigation to be carried out and a report to be developed by 30 June 2018.

The investigation and reporting is still underway but will be submitted in accordance with the correspondence and notice.

CGO advised that the investigation had determined that the seepage occurred due to the design of spigot which caused the clay lining of the NTSF to be eroded away and thus leading to the seepage event.

CGO have updated the spigot design for the pumping occurring into STSF and have been monitoring the improved design which has shown to be successful.

No environmental material harm was caused by this incident and during the audit period CGO was not submit to any regulatory infringement notices for this incident or in any other regard.

4.2.2

Complaints

A review of the Complaints Register for the audit period shows 10 complaints have been received from May 2017 to April 2018. Investigations for each complaint have not showed any exceedances of the Conditions of Approval / EPL conditions limits. The complaints are summarised below:

- May 2017 – one complaint – related to blasting vibrations.
- June 2017 – one complaint – related to subcontractor vehicle not driving to speed limit.
- July 2017 – one complaint – related to offsite vehicle damage.
- August 2017 – one complaint – related to blasting vibrations.
- October 2017 – one complaint – related to CGO vehicle not driving to conditions.
- December 2017 – one complaint – related to community issue regarding contractor vehicle parking.
- January 2018 – one complaint – related to weeds on boundary fence.
- February 2018 – two complaints – related to community procurement complaint and one related to weeds on boundary fence.
- March 2018 – one complaint – related to community issue regarding contractor vehicle parking.

No complaints were recorded in September or November 2017 or in April 2018 (up to 19 April 2018).

CGO's complaints register is published on their website and regularly updated with the latest monthly data.

A review of the complaints register, describes that all complaints in the audit period related to vibration from blasting, weeds or community/vehicle complaints. Investigations into these complaints have not indicated any breaches of licence limits or Conditions of Approval Development Consent.

Cross referencing of the relevant environmental complaints and the annual returns indicates that one complaint (August 2017), relating to blasting, was not reported as required by the EPL.

All complaints received are recorded in CGO's QHSE Incident Register, along with all of the sites recorded incidents.

4.3 ENVIRONMENTAL PERFORMANCE

4.3.1 Noise and Blasting

The CGO's approvals outline a number of conditions regarding environmental noise, which require it to limit noise and blast impacts to the sites surrounding neighbours.

Noise

On behalf of CGO, Spectrum Acoustics conducts attended noise monitoring at quarterly intervals in accordance with the Noise Management Plan and the NSW Noise Policy. The results of this monitoring demonstrated compliance with the noise impact assessment criteria at each of the monitoring locations.

Blasting

During the audit period real time blast monitoring was undertaken and recorded for each of the site's blast events. On two occasions, 27 August 2017 and 26 November 2017, both of which were Sundays, the airblast overpressure results were recorded to be over the blast impact assessment criteria of 95dB(L) at BM08.1 and BM02. The CGO's specialist, Saros, investigated each of these events and determined that the exceedances were related to "local environmental factors" (e.g. wind) and not due to CGO's blasting activities. Even if these exceedances were considered to be related to CGO's activities, given these potential exceedances only occurred only on two occasions, the CGO activities would remain in compliance with Condition 6.3(a) of the CoA Development Consent which allows 5% of the total number of blasts over a 12 month period to exceed the blast impact assessment criteria.

While there have been no requests from adjacent residences for acquisition due to noise exceedance, ERM understands three landholders (of four neighbouring properties) have triggered their right to have put in place additional noise mitigation. Further, ERM understands the landholders have triggered this

condition because they were notified by CGO that the proposed changes to the operations, submitted under MOD 14, would likely result in their properties no longer being included in the CoA DA 14/98. These landholders did not trigger this action due to issues with noise from CGO's operations.

4.3.2 *Air Quality*

The CGO operates a network of deposited dust gauges and a High Volume Air Sampler (HVAS). The HVAS samples Total Suspended Particles (TSP) from which PM10 is calculated.

During the audit period three exceedances of PM10 were recorded, all three were recorded in January and February 2018. CGO have advised that they believe these are due to prevailing dry conditions and likely to have occurred during a number of dust storms experienced during this period. CGO has not changed their activities and the rainfall data does demonstrate an extended dry spell.

Otherwise, site observations included progressive stabilisation, active road sealant application, as well sealed main access roads, limiting disturbance where practicable with current stage of works and water cart wetting down of haul roads.

4.3.3 *Water*

Section 120 of the Protection of the Environment Operations Act 1997 prohibits the pollution of water. The CGO site is a closed catchment that is designed to not result in any releases from the site. This is achieved through the lake protection bund and the site perimeter bund that prevents external water from entering site and ensuring all runoff from site is captured in the internal drainage catchment system. An inspection of the site demonstrated that these controls were in place and functioning. All surface water monitoring of these controls were undertaken in accordance with the conditions and found to be within relevant criteria.

CGO also undertakes a regime of groundwater monitoring. All groundwater monitoring results were found to be within relevant criteria.

Monitoring of cyanide discharge levels is also being undertaken from the processing plant before being released into the Tailings Storage Facilities (TSF). Monitoring results for the audit period indicate that all tailings slurry released from the processing plant was below the weak acid dissociable (WAD) cyanide levels allowed under the CoA Development Consent conditions.

4.3.4 *Rehabilitation*

CGO currently has some 330ha currently being prepared for or under active rehabilitation. While delays in rehabilitation were observed against the Year 1 targets set out in the MOP, CGO's activities during the reporting period had

advanced rehabilitation significantly and had positioned CGO to achieve its Year 1 and Year 2 targets by the end of Year 2 (31 August 2018), with substantial seeding proposed for the next audit period. CGO has advised that delays and changes in the rehabilitation program were undertaken in consultation with relevant regulators.

During the site visit significant shaping, forming and rehabilitation works were observed, as well as observation of previously rehabilitated areas demonstrating stable and established revegetation areas.

Rehabilitation was observed during the site visit as being generally undertaken in accordance with the MOP.

4.4 *PREVIOUS INDEPENDENT AUDIT*

The previous independent environmental audit was undertaken by Trevor Brown & Associates Applied Environmental Management Consultants in May 2017. The findings of this report were reviewed and considered in the development of this report.

4.4.1 *Review of Previous Issues*

The previous independent environmental audit identified only one low non-compliance that the Auditor considers was inaccurately allocated as explained by CGO's response to the finding. The details of the finding and response are summarised in *Table 4.1* below:

Table 4.1 Previous Independent Environmental Audit Findings: Summary of Actions against Non-Compliance

Assessment Requirement	Compliance	Finding	CGO Response to Finding
<p>EPL 11912, condition L5.2 – The overpressure level from blasting operations at the premises at residences on privately owned land, when measured at the locations defined in condition M7.1 must not exceed 115dB (Lin Peak) during the day for more than five per cent of the total number of blasts over a period of 12 months. The overpressure level from blasting operations at the premises at residences on privately owned land, when measured at the locations defined in condition M7.1 must not exceed 105dB (Lin Peak) during the evening for more than five per cent of the total number of blasts over a period of 12 months. The overpressure level from blasting operations at the premises at residences on privately owned land, when measured at the locations defined in condition M7.1 must not exceed 95dB (Lin Peak) at night or on Sundays and public holidays (24 hours) for more than five per cent of the total number of blasts over a period of 12 months. Error margins associated with any monitoring equipment used to measure this are not to be taken into account in determining whether or not the limit has been exceeded.</p>	<p>Non-Compliant (Low Risk)</p>	<p>Blast events on Sundays and Public Holidays were compliant except for:</p> <ul style="list-style-type: none"> • Three (3) blast events exceeded the 95dB(L) level on Sundays and Public Holidays between January to December 2016 • Two (2) blast events between January and April 2016- (13 March 2016 at BM02-Hillgrove residence - 95.9dBL and one blast at BM01-Gumbelah residence on 26 March 2016 recorded 95.9dBL), exceeded the 95.0dBL criteria for Sundays and Public Holidays. 	<p>CGO provided correspondence to the DPE on 27 September 2016 in relation to the IEA findings. As outlined in this correspondence, CGO considers that the IEA report incorrectly identified that the CGO was non-compliant with the blasting impact assessment criteria for Sundays and public holidays as defined in Development Consent Condition 6.3(a). Development Consent Condition 6.3(a) allows 5% of the total number of blasts over a 12 month period recorded at residences on privately-owned land Monday to Saturday during the day, evening and night and on Sundays and public holidays to be above the relevant airblast overpressure or ground vibration criteria. Sections 5.15.2 and 5.15.5 and Attachment A of the 2016 IEA report described that the CGO was non-compliant with the blasting impact assessment criteria for Sundays and public holidays due to some blasts with an elevated airblast overpressure level above 95 dB(L). CGO notes that the previous auditor did not take into consideration that Development Consent 6.3(a) includes an allowable exceedance of 5% of the total number of blasts over a period of 12 months.</p>

4.5

COMPLIANCE WITH REGULATORY INSTRUMENTS

A compliance audit against the Ministers Conditions of Approval Development Consent DA 14/98 (MOD 13, 6 February 2017), EPL 11912 and Mining Lease 1535 conditions has been completed. Non-compliances and observations for each component are summarised in *Table 5.2* and *Table 5.3*.

A full review and audit findings for each component are under the following Annexures:

- *Annex B.1 – Compliance with Ministers Conditions Of Approval Development Consent DA 14/98 (MOD 13, 6 February 2017).*
- *Annex B.2 – Compliance with POEO EPL_11912.*
- *Annex B.3 – Compliance with Mining Lease 1535.*

As discussed in *Section 2.1*, a qualitative risk assessment was also completed on the findings as follows:

- Non-compliance assessed as ‘high’ have been colour coded red;
- Non-compliance assessed as ‘moderate’ have been colour coded orange;
- Non-compliance assessed as ‘low’ have been colour coded yellow; and
- Administrative non-compliances have been colour coded blue.

Table 4.2 Summary of Audit Findings, excluding Management Plans

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
		<i>CoA DA 14/98 (MOD 13, 6 February 2017)</i>			
1.1(c)	<p>The Applicant shall comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of:</p> <p>(i) any strategies, plans, programs, reviews, reports, audits or correspondence that are submitted in accordance with this consent (including any stages of these documents);</p> <p>(ii) any reviews, reports or audits commissioned by the Department regarding compliance with this consent; and</p> <p>(iii) the implementation of any actions or measures contained in these documents.</p>	<p>Thirteenth Annual Report of the Independent Monitoring Panel for the Cowal Gold Project – November 2017</p>	<p>Interim Monitoring Panel has been in place since the commencement of operations. The IMP's recommendations in Thirteenth IMP report while making a number of recommendations for continued improvement in rehabilitation (original IMP scope), the report also does make some corporate and other environmental recommendations. Previous IMP reports focus recommendations on rehabilitation.</p>	Obs	<p>Raise need for continuation of IMP with DEP. If continuation is required seek clarity on scope to confirm the IMP focuses on the initial scope and intent of the process, being to focus on rehabilitation.</p>
2.4(b)	<p>Progressive Rehabilitation</p> <p>The Applicant shall rehabilitate the site progressively as soon as reasonably practicable following disturbance. All reasonable and feasible measures must be taken to minimise the total area exposed for dust generation at any time. Interim stabilization and rehabilitation strategies shall be employed when areas prone to dust generation cannot be permanently rehabilitated.</p> <p><i>Note: It is accepted that some parts of the site that are progressively rehabilitated may be subject to further disturbance at some later stage of the development.</i></p>	<p>Rehabilitation Management Plan August 2017</p> <p>Correspondence with Department of Resources & Geoscience (DRG): CGO – MOP Rehabilitation Status Update, 12 October 2017</p> <p>Mine Operations Plan September 2017</p> <p>Auditor Observations</p>	<p>Progressive rehabilitation detailed in the RMP and MOP. Auditor observed significant shaping and ripping in preparation for seeding (April 2018).</p> <p>Auditor reviewed Year 1 of MOP August 2016 – August 2018. Correspondence with DRG CGO – MOP Rehabilitation Status Update, 12 October 2017, outlines delays in the Year 1 progress against the MOP, as indicated in 2016 Annual Review, not all rehabilitation activities proposed for Year 1 of the MOP term completed as a result of flooding event in December 2016. CGO committed to completing the required rehabilitation by the end of the MOP term (31 August 2018). In addition to the above the E&S Superintendent advised that a formal variation to the MOP is being sought to amend rehabilitation area from Southern Waste Rock Emplacement to the Perimeter Waste Rock Emplacement. CGO report verbal approval has been received. Progressive rehab was observed to be well managed and any delays proactively addressed.</p>	Obs	<p>Given the delay against year 1 progress an Observation is raised however no further action required given proactive response and meeting the rehabilitation requirements by the end of year 2 (31 August 2018).</p>
3.4(d)	<p>By the end of July 2015, unless otherwise agreed by the Secretary, the Applicant shall lodge a Conservation Bond with the Department to ensure that the biodiversity offset strategy is implemented in accordance with the performance and completion criteria in the Biodiversity Offset Management Plan. The sum of the bond shall be determined by:</p> <p>(i) calculating the full cost of implementing the biodiversity offset strategy (other than land acquisition costs); and</p> <p>(ii) employing a suitably qualified and experienced person to verify the calculated cost to the satisfaction of the Secretary.</p> <p>The calculation of the Conservation Bond must be submitted to the Department for approval at least 1 month prior to the lodgement of the bond.</p> <p>If the offset strategy is completed generally in accordance with the completion criteria in the Biodiversity Offset Management Plan to the satisfaction of the Secretary, the Secretary will release the bond.</p> <p>If the offset strategy is not completed generally in accordance with the completion criteria in the Biodiversity Offset Management Plan, the Secretary will call in all, or part of, the conservation bond, and arrange for the completion of the relevant works.</p> <p><i>Note: Alternative funding arrangements for long-term management of the biodiversity offset strategy, such as provision of capital and management funding as agreed by OEH as part of a Biobanking Agreement or transfer to conservation reserve estate can be used to reduce the liability of the conservation and biodiversity bond. The sum of the bond may be reviewed in conjunction with any revision to the Biodiversity Offset Management Plan.</i></p>	<p>Correspondence with DP&E Re: CGO Biodiversity Offset Security and Conservation Bond, 26</p>	<p>The auditor reviewed correspondence with the DP&E regarding the offset bond confirming as per the extension granted by DP&E 5 July 2017, the biodiversity offset areas are required to be secured and the conservation bond lodged by 31 October 2017. The Voluntary Planning Agreement between Evolution and NSW Minister for Planning is the mechanism to provide long term security for the CGO biodiversity offset area. Given the VPA bank guarantee (conservation bond) is a component of the VPA, the timing of the lodgement of the VPA bank guarantee is linked to the execution of the VPA. CGO detail the remaining steps to be taken and have requested an extension for finalising the VPA in May, June and October 2017 and are yet to receive a formal response.</p>	ANC	<p>CGO have proactively engaged with DP&E to confirm Biodiversity Offset and Conservation Bond, as the date for securing the bond has passed this is an ANC. CGO Are awaiting response from DP&E in advance of next steps.</p>
4.3	<p>There shall be no disposal of water from the internal catchment drainage system on site to Lake Cowal under any circumstances.</p>	<p>Water Management Plan August 2017 (under review)</p>	<p>CGO is a closed catchment – all water (rainfall and site water) is contained within the site and no water is able to flow into the site due to perimeter</p>	Obs	<p>To ensure compliance with the condition, it is recommended that CGO undertakes a post</p>

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations									
		Interview with Superintendent Auditor Observations	E&S site bunding. The auditor inspected the perimeter and lake protection bunding. CGO catchment network enables it to move any excess water to the TSF if needed and the TSF is designed to fail into the mine pit. No releases of water has been recorded from the site, during the audit period.		heavy rainfall inspection of the internal catchment drainage system.									
5.4(b)	<p>Pre-Commissioning Studies</p> <p>The Applicant shall prepare and submit for the approval of the Secretary the following studies (the pre-commissioning studies), no later than two months prior to the commencement of commissioning of the proposed development, or within such period as the Secretary may agree. Commissioning shall not commence until approval has been given by the Secretary.</p> <p>(i) Transport of Hazardous Materials</p> <p>The study comprises arrangements covering the transport of hazardous materials including details of routes to be used for the movement of vehicles carrying hazardous materials to or from the proposed development. The study shall be carried out in accordance with the Department's draft "Route Selection" guidelines. Suitable routes identified in the study shall be used except where departures are necessary for local deliveries or emergencies.</p> <p>The study should also address (1) the issues associated with spills, cleanup procedures, training of clean-up teams, communication, and liaison with organisations such as the fire brigades, District Emergency Management Coordinator (and Committee), Local Emergency Management Committee(s), and state emergency services; (2) inspection and monitoring procedures for chemicals such as explosives, xanthates and cyanides prior to commencement of a trip, to verify the integrity of the packaging; and (3) measures to be taken to ensure that the temperature of the materials does not rise above safe levels.</p> <p>(ii) Emergency Plan</p> <p>A comprehensive emergency plan and detailed emergency procedures for the proposed development. This plan shall include detailed procedures for the safety of all people outside of the development who may be at risk from the development. The plan should be in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1, "Industry Emergency Planning Guidelines", and include procedures for spillage, cleanup, control and protection, and rescue of wildlife during the emergency.</p> <p>(iii) Safety Management System</p> <p>A document setting out a comprehensive safety management system, covering all operations on-site and associated transport activities involving hazardous materials. The document shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures. Records shall be kept on-site and should be available for inspection by the Secretary upon request. The safety management system should be developed in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9, "Safety Management".</p>	<p>Transport of Hazardous Materials January 2006 (and addendums)</p> <p>Emergency Response Plan January 2016</p> <p>Correspondence to DP&E - Review and Revision of Strategies, Plans and Programs 4 May 2017</p> <p>Correspondence to DP&E - Revised Emergency Response Plan 18 July 2017</p>	<p>Pre-commissioning studies prepared prior to the current audit period. However following discussions between DP&E and CGO it is clear that these are intended to be implemented as management plans.</p> <p>THMS: There are a number of areas identified where activities do not align with approvals within THMS: - Sodium Cyanide: Not using approved storage facility in Dubbo (however facility being used is located on the same road as the approved facility in Dubbo and therefore the same route applies). - Hydrochloric Acid: Maximum frequency of deliveries 1 per week and currently using 2 per week; using route not approved for Hydrochloric acid (however the route is the same as the approved route for the transport of caustic soda). - Sulphuric Acid: Using route not approved for sulphuric acid (however the majority of the route is the same as the approved route for caustic soda). - Caustic Soda: Maximum frequency of deliveries 1 per fortnight and currently 1.5 per week. - Ammonium Nitrate Emulsion: Currently receiving up to 8 deliveries per month with a maximum limit of 4 per month.</p> <p>ERP was submitted to DP&E on 5 October 2017 for approval following updates to align with MOD 13. At the time of audit approval remains outstanding. DP&E advised that comments would be provided on 16 April 2018. No comments have been received at the time of the audit.</p>	NC	<p>Amend the THMS to reflect alignment of approvals. This is currently being proactively managed by CGO.</p> <p>CGO is to address DP&E's comments, if and when received and where appropriate revise the ERP ahead of approval and implementation.</p>									
6.1(a)	<p>Impact Assessment Criteria</p> <p>The Applicant shall 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 Tables 3, 4 and 5 at any residence on privately-owned land.</p> <p><i>Table 3: Long term impact assessment criteria for particulate matter</i></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging period</th> <th>^d Criterion</th> </tr> </thead> <tbody> <tr> <td>Total suspended particulate (TSP) matter</td> <td>Annual</td> <td>^a 90 µg/m³</td> </tr> <tr> <td>Particulate matter < 10 µm (PM₁₀)</td> <td>Annual</td> <td>^a 30 µg/m³</td> </tr> </tbody> </table>	Pollutant	Averaging period	^d Criterion	Total suspended particulate (TSP) matter	Annual	^a 90 µg/m ³	Particulate matter < 10 µm (PM ₁₀)	Annual	^a 30 µg/m ³	<p>Air Quality Management Plan February 2015</p> <p>Monitor Pro (EHS) - environmental monitoring data repository</p> <p>Interview with Environmental Advisor Monitoring Reporting Officer</p> <p>Interview with Superintendent</p>	<p>PM10 is calculated as 40% of TSP, as per the AQMP, which is recorded every 7 days at high volume sampler Point 49. During reporting period PM10 has exceeded the 24 hour average criteria of 50µg/m³ on 3 occasions:</p> <ul style="list-style-type: none"> 19/01/18 - 56.8 µg/m³ 09/02/18 - 82.8 µg/m³ 16/02/18 - 60 µg/m³ <p>CGO advised that it has not changed any of their work practices and all mitigation measures continue to be implemented. CGO advised that the prevailing dry conditions (no substantial</p>	NC	<p>Going forward CGO plan to record dust storms to determine if exceedances/high results are related to natural events.</p> <p>CGO to ensure implementation and ongoing monitoring of effectiveness of AQMP mitigation measures, as well as localised conditions in the lead up to weekly high volume sample.</p> <p>If exceedances continue, it is suggested that CGO review the</p>
Pollutant	Averaging period	^d Criterion												
Total suspended particulate (TSP) matter	Annual	^a 90 µg/m ³												
Particulate matter < 10 µm (PM ₁₀)	Annual	^a 30 µg/m ³												

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations														
	<p><i>Table 4: Short term impact assessment criterion for particulate matter</i></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging period</th> <th>^d Criterion</th> </tr> </thead> <tbody> <tr> <td>Particulate matter < 10 µm (PM₁₀)</td> <td>24 hour</td> <td>^a 50 µg/m³</td> </tr> </tbody> </table> <p><i>Table 5: Long term impact assessment criteria for deposited dust</i></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging period</th> <th>Maximum increase in deposited dust level</th> <th>Maximum total deposited dust level</th> </tr> </thead> <tbody> <tr> <td>^c Deposited dust</td> <td>Annual</td> <td>^b 2 g/m²/month</td> <td>^a 4 g/m²/month</td> </tr> </tbody> </table> <p>Notes to Tables 3-5: <i>a Total impact (i.e. incremental increase in concentrations due to the development plus background concentrations due to all other sources).</i> <i>b Incremental impact (i.e. incremental increase in concentrations due to the development on its own).</i> <i>c Deposited dust is to be assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580.10.1:2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method.</i> <i>d Excludes extraordinary events such as bushfires, prescribed burning, dust storms, fire incidents or any other activity agreed by the Secretary.</i></p>	Pollutant	Averaging period	^d Criterion	Particulate matter < 10 µm (PM ₁₀)	24 hour	^a 50 µg/m ³	Pollutant	Averaging period	Maximum increase in deposited dust level	Maximum total deposited dust level	^c Deposited dust	Annual	^b 2 g/m ² /month	^a 4 g/m ² /month		<p>rainfall received since beginning of December 2017) and a number of dust storms may have impacted results.</p> <p>Annual average of PM10 and TSP was below condition criteria.</p>		<p>implementation of the AQMP, as well as the location and movements around the high volume sampler to ensure exceedances are CGO related.</p>
Pollutant	Averaging period	^d Criterion																	
Particulate matter < 10 µm (PM ₁₀)	24 hour	^a 50 µg/m ³																	
Pollutant	Averaging period	Maximum increase in deposited dust level	Maximum total deposited dust level																
^c Deposited dust	Annual	^b 2 g/m ² /month	^a 4 g/m ² /month																
6.3(d)	<p>Operating Conditions</p> <p>The Applicant shall:</p> <p>(i) implement best management practice to:</p> <ul style="list-style-type: none"> protect the safety of people and livestock in the areas surrounding blasting operations; protect public or private infrastructure/property in the surrounding area from damage from blasting operations; and minimise the dust and fume emissions of any blasting; <p>(ii) operate a suitable system to enable the public to get up-to-date information on the proposed blasting schedule on site; and</p> <p>(iii) carry out regular monitoring to determine whether the development is complying with the relevant conditions of this consent, to the satisfaction of the Secretary.</p>	Blast Management Plan January 2015	<p>CGO do not currently provide a system to provide the public with up-to-date blast information and/or blast schedule as required by condition 6.3(d)(ii).</p> <p>No livestock are kept or allowed onto mining lease area.</p> <p>A blast exclusion zone (400m) is imposed during all blasts.</p>	NC	CGO to implement a system to allow the public to access up-to-date blast information and blasting schedules.														
6.4(b)	<p>Additional Noise Mitigation</p> <p>Upon receiving a written request from the owner of the residences listed in Tables 7 and 7A, the Applicant shall implement additional noise mitigation measures (such as double-glazing, insulation, and/or air conditioning) at the residence in consultation with the landowner. These measures must be reasonable and feasible, and directed towards reducing the noise impacts of the development on the residence.</p> <p>If within 3 months of receiving this request from the owner, the Applicant and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Secretary for resolution.</p> <p><i>Table 7A: Land subject to mitigation upon request</i></p> <table border="1"> <tbody> <tr><td>Laurel Park</td></tr> <tr><td>Lakeview III</td></tr> <tr><td>Bramboyne</td></tr> <tr><td>The Glen</td></tr> <tr><td>Caloola II</td></tr> </tbody> </table> <p><i>Note: To interpret the location referred to Table 7A, see the map in Appendix 6.</i></p>	Laurel Park	Lakeview III	Bramboyne	The Glen	Caloola II	<p>Interview with E&S Superintendent</p> <p>Correspondence from Laurel Park and Bramboyne owner 31 March 2018</p> <p>Correspondence from The Glen owner 25 March 2018</p>	<p>CGO has received written request from landholders of Laurel Park, Bramboyne and The Glen. Discussions are now underway with owners regarding mitigation measures to be implemented.</p> <p>Lakeview III and Caloola II not triggered during audit period.</p>	Obs	CGO should continue discussions with owners to ensure noise mitigation measures are agreed with the respective landholders by 30 June 2018 (Laurel Park and Bramboyne) and 25 June 2018 (The Glen).									
Laurel Park																			
Lakeview III																			
Bramboyne																			
The Glen																			
Caloola II																			
9.1(c)	<p>Within 3 months of:</p> <p>(i) the submission of an annual review under condition 9.1(b) above;</p> <p>(ii) the submission of an incident report under condition 9.3(a) below;</p> <p>(iii) the submission of an audit under condition 9.2 (a) below;</p> <p>(iv) the submission of an Annual State of the Environment Report under condition 9.2(b) below;</p> <p>(v) the approval of any modification to the conditions of this consent; or</p> <p>(vi) a direction of the Secretary under condition 1.1(c) of this consent;</p> <p>the Applicant shall review and, if necessary, revise the strategies, plans, and programs required under this consent to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then</p>	<p>Interview with E&S Superintendent</p> <p>Correspondence with DP&E.</p>	<p>Management reported that no update or review was conducted following the 2017 IEA (the audit under condition 9.2(a)).</p>	ANC	CGO to maintain records of submission of updates against this condition, demonstrating this is to the satisfaction of the Secretary.														

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	<p>within 4 weeks of the review the revised document must be submitted to the Secretary for approval, unless otherwise agreed with the Secretary.</p> <p><i>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.</i></p>				
9.1(d)	<p>Community Environmental Monitoring and Consultative Committee</p> <p>(i) The Applicant shall establish and operate a Community Environmental Monitoring and Consultative Committee (CEMCC) for the development to the satisfaction of the Secretary. This CEMCC must:</p> <ul style="list-style-type: none"> • be comprised of an independent chair and at least 2 representatives of the Applicant, 1 representative of BSC, 1 representative of the Lake Cowal Environmental Trust (but not a Trust representative of the Applicant), 4 community representatives (including one member of the Lake Cowal Landholders Association); • be operated in general accordance with the Guidelines for Establishing and Operating Community Consultative Committees for Mining Projects (Department of Planning, 2007, or its latest version). • monitor compliance with conditions of this consent and other matters relevant to the operation of the mine during the term of the consent. <p><i>Note: The CEMCC is an advisory committee. The Department and other relevant agencies are responsible for ensuring that the Applicant complies with this consent.</i></p> <p>(ii) The Applicant shall establish a trust fund to be managed by the Chair of the CEMCC to facilitate the functioning of the CEMCC, and pay \$2000 per annum to the fund for the duration of gold processing operations. The annual payment shall be indexed according to the Consumer Price Index (CPI) at the time of payment. The first payment shall be made by the date of the first Committee meeting. The Applicant shall also contribute to the Trust Fund reasonable funds for payment of the independent Chairperson, to the satisfaction of the Secretary</p> <p>(iii) At least four years prior to mine closure the Applicant shall, in consultation with the CEMCC, identify and discuss post-mining issues, particularly in relation to reduced employment and consequent impacts on West Wyalong, and develop a mine workforce phase out plan. This plan shall be reviewed and updated in consultation with the CEMCC at the commencement of the final year of mining operations.</p> <p>(iv) The Applicant shall, in consultation with the CEMCC, develop appropriate strategies to support activities which promote special interest tourism related to the co-existence of mining and the Lake Cowal environment.</p>	<p>Payment Records Interview with Superintendent E&S</p>	<p>The CEMCC was consulted in advance of this audit and their input recorded and addressed. The auditor reviewed payment records through Bland Shire Council.</p> <p>No formal records demonstrating CGO working with CEMCC to promote special interest tourism related to the co-existence of mining and the Lake Cowal environment.</p>	Obs	<p>Work with CEMCC to investigate options to promote special interest tourism related to the co-existence of mining and the Lake Cowal environment.</p>
9.2(b)	<p>Independent Monitoring Panel</p> <p>(i) The Applicant shall at its own cost establish an Independent Monitoring Panel prior to commencement of construction. The Applicant shall contribute \$30,000 per annum for the functioning of the Panel, unless otherwise agreed by the Secretary. The annual payment shall be indexed according to the Consumer Price Index at the time of payment. The first payment shall be paid by the date of commencement of construction and annually thereafter. Selection of the Panel representatives shall be agreed by the Secretary in consultation with relevant government agencies and the CEMCC. The Panel shall at least comprise two duly qualified independent environmental scientists and a representative of the Secretary.</p> <p>(ii) The panel shall:</p> <ul style="list-style-type: none"> • provide an overview of the annual reviews and independent audits required by conditions 9.1(b) and 9.2(a) above; • regularly review all environmental monitoring procedures undertaken by the Applicant, and monitoring results; and • provide an Annual State of the Environment Report for Lake Cowal with particular reference to the on-going interaction between the mine and the Lake and any requirements of the Secretary. The first report shall be prepared one year after commencement of construction. The report shall be prepared annually thereafter unless otherwise directed by the Secretary and made publically available on the Applicant's website for the development within two weeks of the report's completion. 	<p>Independent Monitoring Panel Annual Report 2017</p>	<p>The Independent Monitoring Panel has undertaken annual reporting since 2005 with no major non-compliances identified.</p>	Obs	<p>Raise need for continuation of IMP with DP&E. If continuation is required seek clarity on scope to confirm the IMP focuses on the initial scope and intent of the process, being to focus on rehabilitation.</p>

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
9.3(a)	Incident Reporting The Applicant shall immediately notify the Secretary and any other relevant agencies of any incident related to the development. Within 7 days of the date of the incident, the Applicant shall provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.	Correspondence DP&E, EPA, DRG, DPI (Water) and Dam Safety Committee NSW - Cowal Gold Operations - Seepage on NTSF dated 23 April 2018 Correspondence from EPA - Re Inspection of Cowal gold mine 3 May 2018 DP&E Notice under Section 240(1)(c) 14 May 2018 Interview with E&S Superintendent	Minor tailings seepage on the NTSF on 21 April 2018. Notice and correspondence from EPA requires submission of investigation report. Refer to Section 5.2.1 of the report for incident details.	Obs	Ensure investigation report is completed and circulated as required by the regulating authorities.
Appendix 5 Condition 5	Unless the Secretary agrees otherwise, this monitoring is to be carried out in accordance with the relevant requirements for reviewing performance set out in the NSW Industrial Noise Policy (as amended from time to time), in particular the requirements relating to: (a) monitoring locations for the collection of representative noise data; (b) meteorological conditions during which collection of noise data is not appropriate; (c) equipment used to collect noise data, and conformity with Australian Standards relevant to such equipment; and (d) modifications to noise data collected, including for the exclusion of extraneous noise and/or penalties for modifying factors apart from adjustments for duration.	Attended Noise Monitoring - Spectrum Acoustics (Quarterly) June 2017 August 2017 November 2017 February 2018 NSW Industrial Noise Policy (2000) NSW EPA Noise Policy for Industry (2017)	The auditor has reviewed CGO's noise monitoring reports and noted that they do consider and apply the Noise Policy. However, a revised Noise Policy was released in October 2017 and it appears that the noise monitoring reports submitted since then have not been updated to reflect the revised Noise Policy.	ANC	It is recommended that the updated Noise Policy 2017 is considered in future noise monitoring and reporting.
P1.1	The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point. <i>Refer to Annex B2 for full EPL condition table.</i>	POEO EPL_11912 Monitor Pro (EHS) Environmental Monitoring Data 2017 - 2018 2018 Environmental Monitoring Schedule Interview with Environmental Advisor Monitoring Reporting Officer	Refer to observation made against CoA DA 14/98 condition 6.1(a), regarding the location of the high volume sampler.	Obs	EPL will be required to be updated once high volume sampler is relocated.
P1.3	Water and Land <i>Refer to Annex B2 for full EPL condition table.</i>	Monitor Pro (EHS) Environmental Monitoring Data 2017 - 2018 2018 Environmental Monitoring Schedule Interview with Environmental Advisor Monitoring Reporting Officer	This condition outlines the monitoring locations in accordance with "Cowal Gold Operations Water Management Plan" dated May 2015". The WMP 2017 is now currently under review and once approved this condition and associated monitoring locations will refer to a superseded WMP.	Obs	Auditor suggests that this condition is discussed with EPA as this condition will continue to be superseded with every revision of WMP if not amended.

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
L3.1	The licensee must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by the licence.	Hazardous Waste and Chemical Management Plan August 2017 (under review) Auditor Observations	The HWCMP does not stipulate that no waste is permitted to be received at site from off site.	ANC	Update the HWCMP to include this commitment.
L3.2	For the purposes of condition L3.1: a) Effluent, waste rock, and tailings generated at the premises are not defined as "waste". b) Waste generated at the premises described in Attachment A 'Cowel Gold Project Proposed Bioremediation Facility' of the licence variation application supplementary material received by DECC on 16 June 2008 and classified as general solid waste (putrescible) in accordance with the Waste Classification Guidelines (DECC, 2008) is permitted by this licence to be disposed of at the premises. Disposal of this waste must be undertaken in accordance with the methods described in Attachment A of the licence variation application supplementary material received by DECC on 16 June 2008, and the Cowal Gold Project - Hazardous Waste and Chemical Management Plan. c) Waste generated at the premises described in Attachment B 'Cowel Gold Project Proposed Trash Screen Oversize Waste Management' of the licence variation application supplementary material received by DECC on 16 June 2008 and classified as general solid waste (putrescible) in accordance with the Waste Classification Guidelines (DECC, 2008) is permitted by this licence to be disposed of at the premises. Disposal of this waste must be undertaken in accordance with the methods described in Attachment B of the licence variation application supplementary material received by DECC on 16 June 2008, and the Cowal Gold Project - Hazardous Waste and Chemical Management Plan. d) Waste generated at the premises described in Attachment D 'Cowel Gold Project Proposed On-site Waste Management' of the licence variation application supplementary material received by DECC on 16 June 2008 and classified as general solid waste (putrescible) and/or general solid waste (non-putrescible) in accordance with the Waste Classification Guidelines (DECC, 2008) is permitted by this licence to be disposed of at the premises. e) Waste generated at the premises as described in Attachment A 'Cowel Gold Mine Proposed On-Site Waste Tyre Management' of the licence variation application supporting documentation received by the DECC on the 4 February 2009 and classified as special waste in accordance with the Waste Classification Guidelines (DECC 2008) is permitted by this licence to be disposed at the premises. Disposal of this waste must be undertaken in accordance with the conditions of this licence and within the waste rock emplacements only.	Hazardous Waste and Chemical Management Plan August 2017 (under review) August 2007 Variation to EPL 11912 Buried Waste Register	The auditor reviewed the 2007 EPL variation which confirms the inclusion of the waste types listed in L3.2 and including methods to manage listed waste. The auditor reviewed <i>August 2007 Variation to EPL 11912</i> and noted authorisation to dispose of solid waste (specifically bio-remediated waste) and the monitoring of solid waste prior to disposal in pit. Monitoring has previously not been conducted and commenced at the beginning of April 2018. During the audit period no disposal of Trash Screen Oversize waste was conducted. The auditor notes waste tyres disposed of in the dump are tracked on the Buried Waste Register which links through to the CGO's GIS system and GPS mapped accordingly.	NC	CGO identified monitoring against requirements of the EPL 11912 Condition L3.2 were not being conducted and proactively commenced monitoring prior to this audit. As such no further action is required.
O3.1	Activities occurring in or on the premises must be carried out in a manner that will minimise the generation, or emission from the premises, of wind-blown or traffic generated dust.	Air Quality Management Plan February 2015	Refer to Annex B1: CoA DA14/98 conditions 6.1(a). A non-compliance is recorded for condition 6.1(a), however CGO has outlined the cause is likely not related to CGO's activities.	Obs	Ensure recommendations for condition 6.1(a) are implemented. If it is determined the emissions are related to CGO activities, a review of relevant plans and CGO's activities should be undertaken to ensure impacts can be reduced and mitigated.
O5.1	All above ground storage facilities containing flammable and combustible liquids must be bunded in accordance with Australian Standard AS 1940-2004.	Environmental Bund Inspection Audit (September 2017)	The auditor reviewed Environmental Bund Inspection Audit (September 2017) conducted by Extrin. Review of the data collected during the Environmental Bund Integrity Audit of the Evolution Mining Cowal Gold mine in August 2017, reveals there are specific items which need to be addressed. The auditor has not verified the	Obs	The auditor recommends actions identified in the Environmental Bund Inspection Audit (September 2017) are reviewed and addressed.

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
M2.2	Air Monitoring Requirements <i>Refer to Annex B2 for full EPL condition table.</i>	Environmental Monitoring Data 2017 - 2018 Letter to EPA - Cowal Gold Operations - Licence Variation Application for Environmental Protection Licence 11912 9 April 2018 Interview with E&S Superintendent	third party findings to confirm this is a strict non-compliance against AS1940-2004. Point 49: Special Frequency 1 means "the collections of samples weekly and following rainfall events of 20mm or greater in a 24 hour period". CGO is undertaking the weekly monitoring but is not completing the monitoring after the specified rainfall events. On 9 April 2018 CGO notified EPA that it believed that "Special Frequency 1" included an error, relating to measuring TSP after rainfall events and proposed "Special Frequency 3" which would require "the collection of samples every 7 days". A revised EPL is currently in draft and CGO has provided comments to EPA, including comments related to updating this monitoring frequency.	NC	CGO will remain non-compliant until such time as the revised EPL is approved. CGO should continue to work closely with EPA to ensure EPL approval is expedited.
M6.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	https://evolutionmining.com.au/contact-details/	Community Relations Enquiries line (02 6975 3454) provided on Evolution website, the website does not specify the line is a complaints line.	ANC	Specify the Community Relations Enquiries line is a complaints line on the CGO website.
M7.1	To determine compliance with condition(s) L5.1, L5.2, L5.3 and L5.4: (a) Airblast overpressure and ground vibration levels must be measured at near by residences labelled as "BM01", "BM02", "BM03" and "BM08.1" on Figure 3 titled 'Blast Monitoring Locations' in the "Cowal Gold Operations Blast Management Plan" dated January 2015 for all blasts carried out on the premises; and (b) Instrumentation used to measure the airblast overpressure and ground vibration levels must meet the requirements of Australian Standard AS 2187.2-2006. (c) Monitoring at blast monitor BM01 is not required when the monitoring site is unable to be accessed safely. Monitoring is required to recommence when the outcome of a risk assessment determines a low or acceptable risk is associated with accessing the monitoring site.	Blast Management Plan January 2015	Similarly to EPL condition P1.3. This condition outlines the monitoring locations in accordance with "Figure 3 titled 'Blast Monitoring Locations' in the "Cowal Gold Operations Blast Management Plan" dated January 2015". If the BMP is updated in the future this condition will refer to a superseded BMP. BMP is currently not being revised.	Obs	As per EPL condition P1.3. Suggestion that this condition is discussed with EPA as this condition will continue to be superseded with every revision of BMP if not amended.
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.	Annual Returns	The auditor reviewed Annual Returns for 2015, 2016 and 2017. The Annual Returns meet the requirements of this condition. The auditor identified that one complaint from August 2017, relating to blasting, was not reported in the annual return but was published in the complaints register on CGO's website.	ANC	Ensure all complaints are reported within the Annual Return.
R1.8	The results of the blast monitoring required by condition M7.1 must be submitted to the EPA at the end of each reporting period.	Annual Review 2016 https://evolutionmining.com.au/cowal/ Interview with E&S Superintendent	All blast monitoring data is publicly available on CGO's website but is not submitted to the EPA. Blast monitoring exceedances are all outlined in the Annual reviews.	ANC	Recommend that blast monitoring data as required by condition M7.1 is submitted to the EPA or that it is otherwise agreed with EPA that this condition is satisfied through the publicly available blast data and submission of Annual Reviews.

The auditor has undertaken a review of CGO's management plans as required to be in place in accordance with the CoA Development Consent DA 14/98 and inspected on site, where possible, the implementation of these management plans.

In particular the auditor has reviewed the below management plans:

- Air Quality Management Plan
- Biodiversity Offset Management Plan
- Blast Management Plan
- Compensatory Wetland Management Plan
- Cyanide Management Plan
- Erosion and Sediment Control Management Plan
- Flora and Fauna Management Plan
- Land Management Plan
- Noise Management Plan
- Rehabilitation Management Plan
- Water Management Plan

Overall, CGO is generally achieving compliance against these plans and is implementing the outlined control measures.

It is noted that currently CGO has a number of management plans under review by the DP&E and until such time as these are approved, CGO activities are seemingly working in accordance with the revised plans and not in accordance with the currently approved plans.

Details of all non-compliances, administrative non-compliances, observations and ERM' recommendations arising as a result of the review of the management plans, are included in *Table 5.3* below.

Table 4.3 Summary of Audit Findings relating to Management Plans

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
<i>CoA DA 14/98 (MOD 13, 6 February 2017)</i>					
3.1(a)	The Applicant shall: <ul style="list-style-type: none"> i. prepare and implement a Heritage Management Plan for the development to the satisfaction of the Secretary. The plan shall be prepared in consultation with Bland District Historical Society, BSC, and Lake Cowal landholders/residents and address non-indigenous cultural heritage issues associated with the development; ii. prepare and implement an Indigenous Archaeology and Cultural Management Plan for the development to the satisfaction of the Secretary. The plan shall be prepared in consultation with NPWS, the Local Aboriginal Land Council, a consultant archaeologist, any other stakeholders identified by NPWS; and identify future salvage, excavation and monitoring of any archaeological sites within the DA area prior to and during development, and to address Aboriginal cultural heritage issues; and iii. retain a Cultural Heritage Officer approved by the West Wyalong Local Aboriginal Land Council who is to be available on site during construction earthworks. 	Heritage Management Plan September 2003 Indigenous Archaeology and Cultural Heritage Management Plan September 2003	The IACHMP was originally prepared by the previous site owners. CGO do not have the original approval letters. The approved HMP currently commits to superseded Consent Condition 3.2 which required the HMP "to be revised/updated at least every five years". Updates have not occurred.	Obs Obs	IACHMP to be approved by DP&E when next revised. The HMP to be updated to align with current CoA conditions opportunity to achieve this during MOD 14 when all management plans are proposed for revision.
3.2(b)	The Applicant shall prepare and implement a Flora and Fauna Management Plan for the development to the satisfaction of the Secretary. The shall be prepared in consultation with DPI (Fisheries) and OEH, and cover the mining lease area and monitoring of bird breeding areas as identified by the Applicant in consultation with OEH. The plan shall include, but not be limited to: <ul style="list-style-type: none"> i. methods for monitoring daily and seasonal fauna usage of tailings dams (eg. species, number, location, habits), and whether deaths or other effects or incidents are occurring. Usage of the tailings dams shall be reported to the OEH on a six monthly basis, unless otherwise directed by the Secretary; ii. development of a protocol for the reporting of any native fauna deaths or other incidents involving native fauna on the mining lease to the OEH, DRE, CEMCC and in the case of fish, DPI (Fisheries). Native fauna deaths (except those attributable to physical trauma such as vehicle strike) must be reported as per this protocol within 24 hours (or next working day).The Applicant shall maintain a record of any native fauna deaths or other incidents and this record must be published annually on the Applicant's website for the development; iii. provision for fauna autopsy facilities to enable the cause of any deaths to be quickly determined. The protocol required in sub clause (ii) above shall also detail collection and autopsy of fauna. This shall include but not be limited to collection and recording procedures, autopsy procedures and laboratory tests; iv. provision of contingency measures for reducing cyanide levels in the tailings dams in the event it is established that fauna deaths are occurring from cyanide in tailings dam water; v. development of effective mechanisms to keep fauna and avifauna away from the tailings storages, which shall include, but not be limited to: <ul style="list-style-type: none"> (i) minimising the area of open water in the tailings dams; (ii) fencing to prevent both medium and large fauna, terrestrial and amphibians, from entering the area. Mesh will have holes no greater than 5cm in diameter; (iii) making the area non conducive to the establishment of wildlife habitats, as far as possible; (iv) use of netting where practical; and (v) use of current best practice methods for avifauna deterrence; vi. development of plans for the rescue and rehabilitation of wildlife that may become bogged/sick/trapped in the tailings dams or elsewhere within the mining lease area; vii. methods to conserve and enhance wildlife values around Lake Cowal, within the mine lease area, including: protection and enhancement of existing retained habitats; viii. provision to continue fauna and flora, fish, and aquatic invertebrate monitoring of the Lake Cowal region as documented in the EIS including investigation of fauna deaths off site if requested by the Secretary where it is considered the deaths are attributable to activities on the site; ix. details to relocate any threatened species and/or its habitat away from disturbed areas that are created by mine operations. This will include placement and maintenance of suitable types and numbers of artificial roosting boxes for bats such as the Greater Long-eared Bat and other animals (eg birds/possums) in undisturbed areas of the mine site; and x. details of monitoring the mine's impacts particularly on birdlife in bird breeding areas identified by the Applicant in consultation with OEH, threatened fauna and flora, and fish and aquatic invertebrates around Lake Cowal, and outline contingency measures should impacts be identified as occurring. 	Flora and Fauna Management Plan May 2015	OEH 6-monthly reports are not currently submitted, however the data is internally recorded and captured in the Annual Review process. In consideration of the commitment to submit reports on a 6-monthly basis this represents an ANC. Native fauna deaths (except those attributable to physical trauma such as vehicle strike) must be reported as per this protocol within 24 hours. Records are maintained of fauna deaths and reporting within 24 hours occurred until October 2017 but ceased at this time. ANC raised as data exists but reports not submitted.	ANC ANC	Request confirmation from OEH that current reporting frequency in the AR is sufficient. CGO to submit a report on backdated fauna deaths since October 2017 and recommence 24 hour reports.

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations										
3.3	<p>The Applicant shall prepare and implement a Compensatory Wetland Management Plan for the development to the satisfaction of the Secretary. The plan shall be prepared in consultation with OEH and DPI (Fisheries), Lake Cowal Landowners Association, and Lake Cowal Environmental Trust, and detail compensation measures for the loss of 120 hectares of wetland, through the enhancement of at least the equivalent area of existing wetland within the mine lease area during operation and following closure of the mine. The plan shall include, but not be limited to:</p> <p>a) a definition of wetland which shall be all land up to the high water mark of Lake Cowal recognising that river red gum habitat is below high water mark;</p> <p>b) measures to manage the enhanced wetlands without adversely impacting adjoining private properties; and</p> <p>c) measures to improve habitats for wildlife including waterbirds, fish, aquatic organisms etc, in the wetlands covered by the plan.</p>	Compensatory Wetland Management Plan September 2003	<p>The CWMP currently commits to superseded Consent Condition 3.2 which required the CWMP "to be revised/updated at least every five years". Updates have not occurred.</p> <p>Further the current consent conditions outlined in the CWMP have been superseded and departments requiring consultation have been updated.</p>	Obs	<p>CWMP to be updated to align with current CoA conditions, opportunity to achieve this during MOD 14 as all management plans are proposed for revision.</p> <p>Further to above, at the time the CWMP is updated it should be provided to the departments as required by the current CoA conditions.</p>										
3.4(a)	<p>The Applicant shall implement the biodiversity offset strategy summarised in Table 2, shown conceptually in Appendix 4, and described in detail in the EIS to the satisfaction of the Secretary.</p> <p><i>Table 2: Summary of Biodiversity Offset Strategy</i></p> <table border="1"> <thead> <tr> <th>Area</th> <th>Minimum Size</th> </tr> </thead> <tbody> <tr> <td>Northern Offset Area (Enhancement Area)</td> <td>80 ha</td> </tr> <tr> <td>Southern Offset Area (Enhancement Area) (including 230 ha Mod 11 extension)</td> <td>260 ha</td> </tr> <tr> <td>Southern Offset Area (Revegetation Area)</td> <td>100 ha</td> </tr> <tr> <td>Total</td> <td>440 ha</td> </tr> </tbody> </table>	Area	Minimum Size	Northern Offset Area (Enhancement Area)	80 ha	Southern Offset Area (Enhancement Area) (including 230 ha Mod 11 extension)	260 ha	Southern Offset Area (Revegetation Area)	100 ha	Total	440 ha	Biodiversity Management Plan May 2015	<p>The auditor reviewed the strategy against the BOMP which indicates that Table 6 of the BOMP does not align with the areas in Table 2 updated in MOD 12. Although total area (440ha) remains the same as previous CoA and is covered by the offset areas, the breakdowns do not align. ANC as breakdowns are not aligned.</p>	ANC	<p>BOMP to be updated to align with current CoA condition when BOMP is next revised, at latest MOD 14 when all management plans are proposed to be revised.</p>
Area	Minimum Size														
Northern Offset Area (Enhancement Area)	80 ha														
Southern Offset Area (Enhancement Area) (including 230 ha Mod 11 extension)	260 ha														
Southern Offset Area (Revegetation Area)	100 ha														
Total	440 ha														
3.5	<p>The Applicant shall prepare and implement the following plans to the satisfaction of the Secretary:</p> <p>(a) an erosion and sediment control management plan for the site which shall include, but not be limited to:</p> <p>(i) details of temporary and permanent sediment and erosion control systems to be used during both mine construction and operation, including for earthworks associated with landscaping;</p> <p>(ii) details of salinity management; and</p> <p>(iii) a program for reporting on the effectiveness of the sediment and erosion control systems and performance against objectives contained in the approved erosion and sediment control management plan, and EIS; and</p> <p>(b) a soil stripping management plan for the site which shall include, but not be limited to:</p> <p>(i) details of the management of soil stockpiles, soil stripping techniques and scheduling;</p> <p>(ii) any further requirements of DRE; and</p> <p>(iii) a program for reporting on the effectiveness of the soil stripping methods and performance against objectives contained in the soil stripping management plan, and EIS.</p>	<p>Erosion and Sediment Control Management Plan July 2017 (under review)</p> <p>Soil Stripping Management Plan February 2015</p> <p>Correspondence to DP&E - Submission of Revised Erosion and Sediment Control Management Plan 31 July 2017</p> <p>Correspondence from DP&E - Cowal Gold Mine (DA 14/98) Management Plans 21 March 2016</p> <p>Correspondence from DP&E - FW: Cowal MP Review 17 April 2018</p> <p>Interview with E&S Superintendent</p>	<p>The ESCMP has been submitted to DP&E for approval following updates to align with DA 14/98 MOD 13. At the time of audit approval remains outstanding. DP&E submitted comments to CGO on 17 April 2018.</p>	ANC	<p>CGO is to address DP&E's comments and where appropriate revised the ESCMP ahead of approval and implementation. Until such time as approval is received CGO is to implement current approved ESCMP.</p>										
3.7	<p>The Applicant shall prepare and implement a Land Management Plan for all its land holdings to the satisfaction of the Secretary. The plan shall be prepared in consultation with OEH, DPI (Water), DPI (Agriculture) and BSC, be consistent with the Flora and Fauna Management Plan, provide for proper land management including, but not limited to:</p> <p>(a) pastures and remnant vegetation management;</p>	Land Management Plan October 2003 (and addendum)	<p>The LMP has not been updated since CoA DA 14/98 MOD 13, which requires consultation with DPI (Water). When LMP is next revised consultation with DPI (Water) is required.</p>	Obs	<p>Include DPI (Water) when circulating the next revision of the LMP.</p>										

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	(b) control of vermin and noxious weeds as required by the Local Lands Services, BSC and other relevant authorities; (c) integration of the latest versions of the Jemalong Land and Water Management Plan and the Lake Cowal Land and Water Management Plan; and (d) feral animal control.	Interview with E&S Superintendent	The LMP currently commits to superseded Consent Condition 3.2 which required the LMP "to be revised/updated at least every five years". Updates have not occurred.	Obs	The LMP to be updated to align with current CoA conditions, opportunity to achieve this during MOD 14 when all management plans are proposed for revision.
4.4(a)	The Applicant shall prepare a Water Management Plan for the development to the satisfaction of the Secretary. This plan must: (i) be prepared in consultation with DPI (Water) and EPA; (ii) include, but not be limited to, the following matters: <ul style="list-style-type: none"> management of the quality and quantity of surface and groundwater within and around the mine site, including water in the up catchment diversion system, internal catchment drainage system, dewatering bores, Bland Creek Palaeochannel borefield and water supply pipeline from the borefield, which shall include preparation of monitoring programs (see below); measures to prevent the quality of water in Lake Cowal or any surface waters being degraded below the relevant ANZECC water quality classification prior to construction due to the construction and/ or operation of the mine; identification of any possible adverse effects on water supply sources of surrounding land holders, and land holders near the Bland Creek Palaeochannel Borefield as a result of the mining operations, and implementation of mitigation measures as necessary; identification of changes in flood regime on productive agricultural land in Nerang Cowal as a result of the mine perimeter bund intruding into Lake Cowal, and provision of appropriate compensation measures for affected landholders based on inundation of productive land caused by the changed flood regime; construction and operation of water storages D1 and D4 as first flush systems with initial captured run-off waters from the outer batters of northern and southern emplacement dumps reporting to water storage D6; measures to manage and dispose of water that may be captured behind the temporary perimeter bund during construction of that bund; integration of the latest versions of the Jemalong Land and Water Management Plan and the Lake Cowal Land and Water Management Plan; measures to evaluate water quality data obtained from monitoring under this consent against records of baseline monitoring undertaken prior to the consent; and a program for reporting on the effectiveness of the water management systems and performance against objectives contained in the approved site water management plan, and EIS. 	Water Management Plan August 2017 (under review) Correspondence to DP&E - Review and Revision of Strategies, Plans and Programs 4 May 2017 Correspondence to DP&E - Revised Environmental Management Plans 31 August 2017 Correspondence from DP&E - FW: Cowal MP Review 17 April 2018	The WMP has been submitted to DP&E on 31 August 2017 for approval following updates to align with MOD 13. At the time of the audit, approval remains outstanding. DP&E submitted comments to CGO on 17 April 2018. Consultation has been undertaken with the required departments. The WMP includes all the necessary information to satisfy this condition.	ANC	CGO is to address DP&E's comments and where appropriate revise WMP ahead of approval and implementation. Until such time as approval is received CGO is to implement current approved WMP.
4.5(a)	The Applicant shall construct and locate: (i) surface water monitoring positions in consultation with DPI (Water) and EPA, and to the satisfaction of the Secretary, at least three months prior to the commencement of construction works unless otherwise directed by the Secretary; and (ii) groundwater monitoring positions in consultation with DPI (Water) and EPA, and to the satisfaction of the Secretary at least six months prior to the commencement of construction works unless otherwise directed by the Secretary.	Outside of audit period Interview with E&S Superintendent	CGO has decommissioned two monitoring points PP05 & CB01. Neither of these points were regulatory compliance monitoring locations but did appear in the WMP. The WMP is currently under review by the department, with both of these locations proposed to be removed from plan.	Obs	Ensure sites are removed from WMP and approval of WMP gained from DP&E and EPA.
4.5(b)	The Applicant shall prepare and implement a detailed monitoring program for the development to the satisfaction of the Secretary. This plan must be prepared in consultation with DPI (Water), EPA, DPI (Fisheries), and be directed towards monitoring the potential water impacts of the mine, including water in the up catchment diversion system, internal catchment drainage system, dewatering bores, all borefields associated with the development, and water supply pipeline, pit/void, Lake Cowal, and any other waters in and around the mine site for all stages of the development. The monitoring program will include the development of adequate chemical and biological monitoring in the waters of Lake Cowal, when water is present, by suitably qualified and experienced staff or consultants to the satisfaction of the DPI (Water) and EPA, and in the case of biological monitoring DPI(Fisheries), DPI (Water) and EPA must be satisfied as to sampling design, including sample locations, sample frequency, sample handling, transport and analysis, sampling parameters and reporting of analysis results. The results and interpretation of surface and ground water monitoring (including biological monitoring) are to be published on the Applicant's website for the development on a regular basis, or as directed by the Secretary.	Surface Water, Groundwater, Meteorological and Biological Monitoring Programme May 2015 Correspondence to DP&E - Review and Revision of Strategies, Plans and Programs 4 May 2017 Correspondence to DP&E - Cowal Gold Operations -	The SWGMBMP has been submitted to DP&E on 31 August 2017 for approval following updates to align with MOD 13. At the time of audit approval remains outstanding. DP&E submitted comments to CGO on 17 April 2018. Consultation has been undertaken with the relevant departments. Monitoring data is published on CGO website and is regularly updated with current monitoring results.	ANC	CGO is to address DP&E's comments and where appropriate revise SWGMBMP ahead of approval and implementation. Until such time as approval is received CGO is to implement current approved SWGMBMP.

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
		Revised Environmental Management Plans 31 August 2017 Correspondence from DP&E - FW: Cowal MP Review 17 April 2018 Environmental Monitoring Data 2017 - 2018			
4.5(c)	The Applicant shall prepare and implement a monitoring program for the detection of any movement of the Lake protection bund, water storage and tailings structures and pit/void walls during the life of the mine, with particular emphasis on monitoring after any seismic events prior to commencement of construction works, in consultation with DPI (Water) and DRE, and to the satisfaction of the Secretary.	Monitoring Programme for Detection of any Movement of Lake Protection Bund, Water Storage and Tailings Structures and Pit Void Walls August 2017	The LPBMP currently commits to superseded Consent Condition 9.1(c) which required the LPBMP "to be revised/updated annually". Updates have not occurred. Consultation has been undertaken with the relevant departments. The Auditor reviewed recent monitoring reports for the relevant locations that demonstrated implementation of plan.	Obs	The LPBMP is to be updated to align with current CoA conditions, opportunity to achieve this during MOD 14 as all management plans are proposed for revision.
5.3(b)	Cyanide Management The Applicant shall prepare and implement a cyanide management plan for the development to the satisfaction of the Secretary. The plan is to be prepared in consultation with DRE, EPA and DPI (Water) and include monitoring and reporting on cyanide use on the site. The plan shall make provision for, but is not limited to: (i) containing cyanide contaminated waters entirely within the mine site; (ii) maintaining weak acid dissociable (WAD) cyanide levels at the process plant to the levels stated in condition 5.3(a); (iii) contingency measures for cyanide reduction.	Cyanide Management Plan March 2017 (under review) Correspondence to DP&E - Revised Cyanide Management Plan 28 April 2017	The CMP has been submitted to DP&E for approval following updates to align with MOD 13. At the time of audit approval remains outstanding. DP&E advised that comments would be provided on 16 April 2018. No comments have been received at the time of the audit. Consultation has been undertaken with the relevant departments. The CMP includes all the necessary information to satisfy this condition.	ANC	CGO is to address DP&E's comments and where appropriate revise CMP ahead of approval and implementation. Until such time as approval is received CGO is to implement current approved CMP.
5.7	The Applicant shall prior to commencement of construction works prepare a Hazardous Waste and Chemical Management Plan as set out in section 6.4.1 of the EIS in consultation with EPA and BSC, and to the satisfaction of the Secretary.	Hazardous Waste and Chemical Management Plan August 2017 (under review) August 2007 Variation to EPL 11912	The HWCMP has been submitted to DP&E for approval following updates to align with MOD 13 (July 2017). A further revision was provided to align with variation to EPL 11912 (August 2017). At the time of audit approval remains outstanding. DP&E submitted comments to CGO on 17 April 2018.	ANC	CGO is to address DP&E's comments and where appropriate revise the HWCMP ahead of approval and implementation. Until such time as approval is received CGO is to implement current approved HWCMP.
6.1(c)	Air Quality Management Plan The Applicant shall prepare and implement an Air Quality Management Plan for the development to the satisfaction of the Secretary. This plan must: (i) be prepared in consultation with the EPA; (ii) describe the measures that would be implemented to ensure compliance with the relevant air quality criteria and operating conditions of this consent:	Air Quality Management Plan February 2015 Correspondence from DP&E - Cowal Gold Mine (DA 14/98) Air Quality	The AQMP is currently unclear on what constitutes an air quality incident. The AQMP however does set out the steps in place to address all recorded exceedances and a notification protocol for exceedances. It is	Obs	CGO to update the AQMP to clearly state what constitutes an air quality incident.

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	(iii) include an air quality monitoring program that: <ul style="list-style-type: none"> evaluates and reports on the: <ul style="list-style-type: none"> the effectiveness of the air quality management system; compliance with the air quality criteria; compliance with the air quality operating conditions; and defines what constitutes an air quality incident, and includes a protocol for identifying and notifying the Department and relevant stakeholders of any air quality incidents. 	Management Plan 18 February 2016 Interview with E&S Superintendent	understood that CGO consider an exceedance to be an incident but this is not explicitly defined. Approved by DP&E on 18 February 2016 and consultation with EPA undertaken.		
6.4(e)	Noise Management Plan The Applicant shall prepare and implement a Noise Management Plan for the development to the satisfaction of the Secretary. This plan must: <ol style="list-style-type: none"> be prepared in consultation with the EPA, and submitted to the Secretary for approval prior to carrying out any development under this consent, unless the Secretary agrees otherwise; describe the measures that would be implemented to ensure compliance with the noise criteria and operating conditions in this consent; and include a monitoring program that: <ul style="list-style-type: none"> evaluates and reports on: <ul style="list-style-type: none"> compliance with the noise criteria in this consent; and compliance with the noise operating conditions; defines what constitutes a noise incident, and includes a protocol for identifying and notifying the Department and relevant stakeholders of any noise incidents. 	Noise Management Plan July 2017 (under review) Correspondence to DP&E – Review and Revision of Strategies, Plans and Programs 4 May 2017 Correspondence to DP&E – Cowal gold Operations – Submission of Revised Noise Management Plan 10 July 2017 Correspondence from DP&E – FW: Cowal MP Review 17 April 2018	The NMP has been submitted to DP&E on 10 July 2017 for approval following updates to align with MOD 13. At the time of audit approval remains outstanding. DP&E submitted comments to CGO on 17 April 2018. Consultation with EPA has been undertaken. The NMP includes all the necessary information to satisfy this condition.	ANC	CGO is to address DP&E's comments and where appropriate revise the NMP ahead of approval and implementation. Until such time as approval is received CGO is to implement current approved NMP.
9.1(a)	Environmental Management Strategy The Applicant shall prepare and implement an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must: <ol style="list-style-type: none"> be submitted to the Secretary for approval by the end of October 2014, unless the Secretary agrees otherwise; provide the strategic framework for environmental management of the development; identify the statutory approvals that apply to the development; describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; describe the procedures that would be implemented to: <ul style="list-style-type: none"> keep the local community and relevant agencies informed about the operation and environmental performance of the development; receive, handle, respond to, and record complaints; resolve any disputes that may arise; respond to any non-compliance; respond to emergencies; and include: <ul style="list-style-type: none"> copies of any strategies, plans and programs approved under the conditions of this consent; and a clear plan depicting all the monitoring to be carried out in relation to the development. 	Environmental Management Strategy July 2017 (under review) Correspondence to DP&E – Revised Environmental Management Strategy and Hazardous Waste and Chemical Management Plan 6 July 2017 Correspondence from DP&E – FW: Cowal MP Review 17 April 2018	EMS has been submitted to DP&E for approval following updates to align “ <i>corporate Environment and Sustainability Policy and site environmental management structure, other minor amendments to reflect Evolution ownership of the CGO and a copy of the contemporary Development Consent conditions</i> ”. At the time of audit approval remains outstanding. DP&E submitted comments to CGO on 17 April 2018. The EMS includes all the necessary information to satisfy this condition.	ANC	CGO is to address DP&E's comments and where appropriate revise the EMS ahead of approval and implementation. Until such time as approval is received CGO is to implement current approved EMS.

CONCLUSION

An audit of Ministers Conditions Of Approval Development Consent DA 14/98 (MOD 13, 6 February 2017), EPL_11912 and Mining Lease 1535 conditions has been completed, as well as a check against commitments made in the management plans developed as part of Conditions of Approval for the site.

Overall, conformance was achieved with the audit documents that were reviewed. The number of non-compliances with the statutory conditions is summarised in *Table 6.1* below:

Table 5.1 *Summary of Audit Findings*

Number of Conditions	Non compliances	Administrative Non - compliances	Observations
Conditions of Approval Development Consent DA 14/98			
96	3 High (-), Medium (2), Low (1)	13	18
EPL_11912			
69	2 High (-), Medium (-), Low (2)	4	5
Mining Lease 1535			
29	- High (-), Medium (-), Low (-)	-	-

An action response table will be developed by CGO addressing all audit findings and will be submitted separately to this report.

Annex A

Department of Planning and
Environment Auditor
Approval

Ms Danielle Wallace
Superintendent - Environment and Social Responsibility
Cowel Gold Operations
Lake Cowal Road, Lake Cowal, NSW, 2671

Dear Ms Wallace,

**Cowel Gold Operations (DA 14/98)
Independent Environmental Audit 2018**

I refer to the letter dated 15 March 2018 and email dated the 5 April 2018 from yourself on behalf of Cowal Gold Operations seeking the Secretary's endorsement for an audit team to undertake the Independent Environmental Audit (audit) as required under Condition 9.2(a) of Development Approval (DA 14/98).

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

- Oliver Moore (Lead Auditor)
- Will Weir (Auditor)
- Nicole Whittaker (Auditor) and
- Nathan Lynch (Acoustics)
- Guy Williams (Ecologist)
- Dr Iain Cowan (Air Quality)

the Secretary endorses the appointment of this team to undertake the audit in accordance with Condition 9.2 (a) of the approval. This approval is conditional on the audit team being independent of the development.

The audit is to be conducted in accordance with AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing and in accordance with the Independent Audit Guideline dated October 2015. A copy of this guideline can be located at <http://www.planning.nsw.gov.au/Policy-and-Legislation/Mining-and-Resources/Integrated-Mining-Policy>.

The audit report is to include the following:

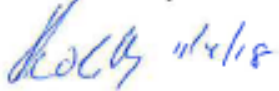
- a compliance table indicating the compliance status of each condition of approval and any relevant EPL;
- not use the term "partial compliance";
- recommend actions in response to non-compliances;
- review the adequacy of plans and programs required under this consent; and
- identify opportunities for improved environmental management and performance.

Within 3 months of completing this audit, or as otherwise agreed by the Secretary, Cowal Gold Operations is to submit a copy of the audit report to the Secretary together with its response to any recommendations contained in the audit report and a timetable to implement the recommendations.

Prior to submitting the audit report to the Secretary, it is recommended that Cowal Gold Operations review the report to ensure it complies with the relevant consent condition.

Should you have any enquiries in relation to this matter, please me on the above details

Yours sincerely



Katrina O'Reilly

Team Leader Compliance

as nominee of the Secretary

Annex B

Detailed Audit Compliance
Table - Conditions of
Approval, EPL and Mining
Lease

Annex B1.

Compliance with Ministers Conditions of Approval
Development Consent DA14/98 (Mod 13, 6 February
2017)

Table B1 Compliance with Ministers Conditions of Approval Development Consent DA 14/98 (Modification 13, approved 6 February 2017)

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
SCHEDULE 2					
1. General					
1.1 Adherence to terms of DA, EIS, SIS, etc.					
(a)	The development is to be carried out generally in accordance with the: (i) EIS; and (ii) conditions of this consent. <i>Note: The general layout of the development is shown in Appendix 1.</i>		Refer to detailed findings of this audit.	Noted	
(b)	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.	Note	Noted	Note	
(c)	The Applicant shall comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: (i) any strategies, plans, programs, reviews, reports, audits or correspondence that are submitted in accordance with this consent (including any stages of these documents); (ii) any reviews, reports or audits commissioned by the Department regarding compliance with this consent; and (iii) the implementation of any actions or measures contained in these documents.	Thirteenth Annual Report of the Independent Monitoring Panel for the Cowal Gold Project - November 2017	Interim Monitoring Panel has been in place since the commencement of operations. The IMP's recommendations in Thirteenth IMP report while making a number of recommendations for continued improvement in rehabilitation (original IMP scope), the report also does make some corporate and other environmental recommendations outside of the rehabilitation scope. Previous IMP reports focus recommendations on rehabilitation.	Obs	Raise need for continuation of IMP with DP&E. If continuation is required seek clarity on scope to confirm the IMP focuses on the initial scope and intent of the process, being to focus on rehabilitation.
1.2 Limits on Consent					
(a)	The Applicant may only carry out mining operations until 31 December 2032. <i>Note: Under this consent, the Applicant is required to rehabilitate the site and perform additional undertakings to the satisfaction of the Secretary and DRE. Consequently, this consent will continue to apply in all other respects other than the right to conduct mining operations until the rehabilitation of the site and these additional undertakings have been carried out satisfactorily.</i>	Note	Noted	Note	
(b)	The Applicant shall not process more than 7.5 million tonnes of ore on site in any calendar year.	Evolution Mining Metallurgic Reconciliation Data 2017	Reporting states that works do not exceed the maximum scale specified. 2017 Metallurgic Reconciliation Data confirms production of 7.378 tonnes.	C	
(c)	The Applicant shall comply with the following maximum heights: (i) Northern Rock Emplacement - 308 m AHD; (ii) Southern Rock Emplacement - 283 m AHD; (iii) Southern Tailings Storage Facility - 272 m AHD; (iv) Northern Tailings Storage Facility - 264 m AHD; (v) Perimeter Rock Emplacement - 233 m AHD; and (vi) Mineralised Material Stockpile - 288 m AHD.	Stockpile, waste emplacement and Survey Data, April 2018	The auditor reviewed survey data confirming reporting which states that works do not exceed the maximum scale specified. Current heights: (i) Northern Rock Emplacement - 308 m AHD; (ii) Southern Rock Emplacement - 278 m AHD; (iii) Southern Tailings Storage Facility - 244 m AHD; (iv) Northern Tailings Storage Facility - 236 m AHD; (v) Perimeter Rock Emplacement - 209 m AHD; and (vi) Mineralised Material Stockpile - 286 m AHD. Review confirms MOD 13 update to condition 1.2(c)(vi) mineralised material stockpile is captured as appropriate.	C	
(d)	The Applicant shall not carry out any construction work on the Tailings Storage Facility embankments or rock buttress outside of the hours of 7 am to 6 pm.	BK Hire Pty Ltd Contract for Southern Tailings Facility (STSF) Stage Lift	Tailings works is conducted by BK Hire, the auditor reviewed the contract agreement limiting the contractor to operational hours of 7am to 6pm.	C	
1.3 Structural Adequacy					
	The Applicant shall ensure that all new buildings and structures on site, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.	Interview with E&S Superintendent Auditor Observations	The auditor was informed that no new buildings or demolition has been completed during the reporting period. No evidence to the contrary was observed.	NT	

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	<i>Note: Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates (where applicable) for the proposed building works. Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.</i>				
1.4 Demolition					
	The Applicant shall ensure that all demolition work undertaken on site is carried out in accordance with AS 2601-2001: <i>The Demolition of Structures</i> , or its latest version.	Interview with E&S Superintendent Auditor Observations	The auditor was informed that no new buildings or demolition was completed during the reporting period. No evidence to the contrary was observed.	NT	
1.5 Protection of Public Infrastructure					
(a)	Unless the Applicant and the applicable authority agree otherwise, the Applicant shall: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and	Interview with E&S Superintendent Auditor Observations Cowan Gold Mine MoU on Road Maintenance	The auditor reviewed the Road Maintenance MoU between CGO and three Shire Councils (Bland, Forbes and Lachlan) confirms annual contribution of \$150,000. No further repairs required during audit period.	C	
(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.</i>	Interview with E&S Superintendent Mine Operations Plan September 2017	The auditor understands there has been no relocation of public infrastructure during audit period, no evidence to the contrary was observed.	NT	
1.6 Operation of Plant and Equipment					
	The Applicant shall ensure that all plant and equipment used on site, or to monitor the performance of the development, is maintained and operated in a proper and efficient manner.	Preventative Maintenance Process	The auditor observed that pre-starts are conducted on all mobile vehicles each day through Evolution Pre-Start App. The auditor was provided a demonstration of the preventative maintenance process at the Mobile Plant Workshop.	C	
1.7 Staging and Updating Strategies, Plans or Programs					
	To ensure the strategies, plans and programs under this consent are updated on a regular basis, and that they incorporate any appropriate additional measures to improve the environmental performance of the development, the Applicant may at any time submit revised strategies, plans or programs to the Secretary for approval. With the agreement of the Secretary, the Applicant may also submit any strategy, plan or program required by this consent on a staged basis. The Secretary may approve a revised strategy, plan or program required under this consent, or the staged submission of any of these documents, at any time. With the agreement of the Secretary, the Applicant may prepare a revision of or a stage of a strategy, plan or program without undertaking consultation with all parties nominated under the applicable condition in this consent. <i>Note: While any strategy, plan or program may be submitted on a staged basis, the Applicant will need to ensure that the existing operations on site are covered by suitable strategies, plans or programs at all times. If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.</i>	Review of Evolution Management Plans Correspondence with DP&E Cowal Gold Operations - Review and Revision of Plans Strategies and Programs 4 May 2017 Correspondence from DP&E - FW: Cowal MP Review 17 April 2018 Interview with E&S Superintendent	Revision to plans submitted to DP&E following MOD 13 to the DA 14/98 (6 Feb 2017). Correspondence with DP&E dated 4 May 2017 sets out the timetable and consultation for update of plans. Auditor cited email from the department providing comments on a number of management plans on 17 April 2018, with comments on remaining plans proposed to be submitted to CGO from the department shortly.	C	
1.8 Dispute Resolution					
	In the event that the Applicant and the BSC or any Government agency, other than the Department, cannot agree on the specification or requirements applicable under this consent, the matter shall be referred by either party to the Secretary for resolution. The Secretary's determination on the dispute shall be final and binding on the parties.	Note	Noted	Note	
2 - Mine Management					
2.1 Mine Management Plan, Operations and Methods					
	The Applicant shall prepare and implement a Mining Operations Plan for the development to the satisfaction of DRE. This plan must be prepared in accordance with any current guidelines issued for such plans by DRE, and should include a geotechnical analysis and review of	Correspondence with DP&E	The auditor reviewed correspondence with DP&E CGO - <i>Mining Operations Plan (1 September 2016 - 31 August 2018)</i> , dated 6 October 2017 detailing the amendment to the current MOP, confirming the MOP has	C	

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations														
	ongoing open pit development, the management of waste rock emplacements, and continued monitoring of the lake protection bund.	Correspondence from DRE 27 March 2018	been prepared in accordance with Condition 25 of the ML 1535 and Condition 2.1 of DA 14/98. The update reflects minor changes to the MOP. Auditor reviewed an email from DRE dated 27 March 2018 acknowledging the submission of plans following approval of MOD 13 (Feb 2017) and indicating that the review of plans will be forth coming. Refer to CoA DA14/94 condition 4.5(c) regarding ongoing pit and bund monitoring. Otherwise MOP outlines management and analysis of pit, waste rock emplacement and lake protection bund.																
2.2 Ore, Waste and Concentrate Production																			
	The Applicant shall not transport ore or other excavated materials not required for either construction or maintenance works from other mines or locations to the mine site without the written approval of the relevant councils.	Interview with E&S Superintendent	No ore or excavated material received on site.	C															
2.3 Mine and Public Safety																			
	The Applicant shall secure the mine site as described in the EIS. The fence for the mining lease boundary shall be designed to minimise the impact on water birds and aquatic species.	Interview with E&S Superintendent Auditor Observations	The auditor observed perimeter fence is in place. E&S Superintendent confirmed that weekly perimeter fence checks occur to monitor impact on wildlife. The perimeter fence is not electrified.	C															
2.4 Rehabilitation																			
(a)	<p>Rehabilitation Objectives</p> <p>The Applicant shall rehabilitate the site to the satisfaction of DRE. This rehabilitation must be generally consistent with the proposed rehabilitation in the EIS (which is depicted in the Figure in Appendix 2) as amended by the approved rehabilitation strategy (see condition 3.8), and comply with the objectives in Table 1.</p> <p><i>Table 1: Rehabilitation objectives</i></p> <table border="1"> <thead> <tr> <th>Feature</th> <th>Objective</th> </tr> </thead> <tbody> <tr> <td>Mine site (as a whole)</td> <td> <ul style="list-style-type: none"> Safe, stable and non-polluting Final landforms designed to incorporate micro-relief and integrate with surrounding natural landforms Constructed landforms are to generally drain to the final void Minimise long term groundwater seepage zones Minimise visual impact of final landforms as far as is reasonable and feasible </td> </tr> <tr> <td>Final void</td> <td> <ul style="list-style-type: none"> Minimise to the greatest extent practicable: <ul style="list-style-type: none"> the size and depth of final void the drainage catchment of final void risk of flood interaction for all flood events up to and including the Probable Maximum Flood To be permanently separated from Lake Cowal by the Lake Protection Bund Highwall to be long-term stable </td> </tr> <tr> <td>Surface infrastructure</td> <td> <ul style="list-style-type: none"> To be decommissioned and removed, unless DRE agrees otherwise </td> </tr> <tr> <td>Agriculture</td> <td> <ul style="list-style-type: none"> Restore or maintain land capability generally as described in the EIS </td> </tr> <tr> <td>Rehabilitation areas and other vegetated land</td> <td> <ul style="list-style-type: none"> Restore ecosystem function, including maintaining or establishing self-sustaining ecosystems </td> </tr> <tr> <td>Community</td> <td> <ul style="list-style-type: none"> Ensure public safety Minimise adverse socio-economic effects associated with mine closure </td> </tr> </tbody> </table>	Feature	Objective	Mine site (as a whole)	<ul style="list-style-type: none"> Safe, stable and non-polluting Final landforms designed to incorporate micro-relief and integrate with surrounding natural landforms Constructed landforms are to generally drain to the final void Minimise long term groundwater seepage zones Minimise visual impact of final landforms as far as is reasonable and feasible 	Final void	<ul style="list-style-type: none"> Minimise to the greatest extent practicable: <ul style="list-style-type: none"> the size and depth of final void the drainage catchment of final void risk of flood interaction for all flood events up to and including the Probable Maximum Flood To be permanently separated from Lake Cowal by the Lake Protection Bund Highwall to be long-term stable 	Surface infrastructure	<ul style="list-style-type: none"> To be decommissioned and removed, unless DRE agrees otherwise 	Agriculture	<ul style="list-style-type: none"> Restore or maintain land capability generally as described in the EIS 	Rehabilitation areas and other vegetated land	<ul style="list-style-type: none"> Restore ecosystem function, including maintaining or establishing self-sustaining ecosystems 	Community	<ul style="list-style-type: none"> Ensure public safety Minimise adverse socio-economic effects associated with mine closure 	Rehabilitation Management Plan August 2017 Annual Review 2016 Mine Operations Plan September 2017 Correspondence with Department of Resources & Geoscience (DRG) 16 October 2017	The auditor reviewed the MOP which contains the RMP and approved by DRG (previously DRE) RMP was updated to reflect Development Consent as modified on 7 February 2017 (MOD 13). The auditor reviewed the Notice of Approval for the revised MOP received from DRG 16 October 2017. The auditor reviewed the Annual Review 2016 and MOP and both identify that approximately 330ha of the lease area is undergoing preparation or active rehabilitation. The AR outlines improvements in landform stability on each of the waste rock placements and reports on ongoing monitoring of erosion and species diversity.	C	
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(b)	<p>Progressive Rehabilitation</p> <p>The Applicant shall rehabilitate the site progressively as soon as reasonably practicable following disturbance. All reasonable and feasible measures must be taken to minimise the total area exposed for dust generation at any time. Interim stabilization and rehabilitation</p>	Rehabilitation Management Plan August 2017	Progressive rehabilitation detailed in the RMP and MOP. Auditor observed significant shaping and ripping in preparation for seeding (April 2018).	Obs	Given the delay against year 1 progress an Observation is raised however no further action required given proactive														

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	strategies shall be employed when areas prone to dust generation cannot be permanently rehabilitated. <i>Note: It is accepted that some parts of the site that are progressively rehabilitated may be subject to further disturbance at some later stage of the development.</i>	Correspondence with Department of Resources & Geoscience (DRG): CGO – MOP Rehabilitation Status Update, 12 October 2017 Mine Operations Plan September 2017 Auditor Observations	Auditor reviewed Year 1 of MOP August 2016 – August 2018. Correspondence with DRG CGO – MOP Rehabilitation Status Update, 12 October 2017, outlines delays in the Year 1 progress against the MOP, as indicated in 2016 Annual Review, not all rehabilitation activities proposed for Year 1 of the MOP term completed as a result of flooding event in December 2016. CGO committed to completing the required rehabilitation by the end of the MOP term (31 August 2018). In addition to the above the E&S Superintendent advised that a formal variation to the MOP is being sought to amend rehabilitation area from Southern Waste Rock Emplacement to the Perimeter Waste Rock Emplacement. CGO report verbal approval has been received. Progressive rehab was observed to be well managed and any delays proactively addressed.		response and meeting the rehabilitation requirements by the end of year 2 (31 August 2018).
(c)	Rehabilitation Management Plan The Applicant shall prepare and implement a Rehabilitation Management Plan for the development to the satisfaction of DRE. This plan must: (i) be prepared in consultation with the Department, DPI (Water), OEHL, DPI, BSC and the CEMCC; (ii) be prepared in accordance with any relevant DRE guideline; (iii) describe how the rehabilitation of the site would be integrated with the biodiversity offset strategy for the development; (iv) include detailed performance and completion criteria for evaluating the performance of the rehabilitation of the site, and triggering remedial action (if necessary); (v) describe the measures that would be implemented to ensure compliance with the relevant conditions of this consent, and address all aspects of rehabilitation including mine closure, final landform (including final voids) and final land use; (vi) include interim rehabilitation where necessary to minimise the area exposed for dust generation; (vii) include a program to monitor, independently audit and report on the effectiveness of the measures, and progress against the detailed performance and completion criteria; and (viii) build to the maximum extent practicable on the other management plans required under this consent.	Rehabilitation Management Plan August 2017 Rehabilitation Monitoring Report (2017) Correspondence with DP&E Cowal Gold Operations – Review and Revision of Plans Strategies and Programs 4 May 2017 Interview with E&S Superintendent Auditor Observations	CoA DA 14/98 MOD 13 requires consultation with DPI (Water). When the RMP was updated in September 2017, the RMP was not circulated to DPI (Water), however this is in accordance with proposed consultation in CGO letter to DP&E dated 4 May 2017. While no written response was received from DP&E, verbal acceptance of this position was provided to CGO from DP&E. Otherwise consultation with relevant departments has been undertaken. The auditor reviewed the RMP and confirms it includes all the necessary information to satisfy this condition. The auditor reviewed the Rehabilitation Monitoring Report (2017), conducted by DnA Environmental. The results of which are summarised in the Annual Review. The monitoring reports the rehabilitation sites are meeting or exceeding the range values for representative community type, hence meeting primary completion criteria. In some instances areas may be outside of the reference target ranges but within acceptable agricultural limits.	C	
2.5 Security Deposits and Bonds					
	Security deposits and bonds will be paid as required by DRE under mining lease approval conditions.	Correspondence with DP&E ML1535, Evolution Mining (Cowal) – Notice of Assessment for Security (Assessed Deposit), 16 October 2017 ML Security Bond Confirmation of Payment	The auditor reviewed correspondence with DP&E confirming the value of assessed bond at \$65,000,000 and subsequent evidence confirming the bond is in place.	C	
No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
3 – HERITAGE, FLORA AND FAUNA AND LAND MANAGEMENT					
3.1 Heritage Management					
(a)	The Applicant shall: i. prepare and implement a Heritage Management Plan for the development to the satisfaction of the Secretary. The plan shall be prepared in consultation with Bland District Historical Society, BSC, and Lake Cowal landholders/residents and address non-indigenous cultural heritage issues associated with the development; ii. prepare and implement an Indigenous Archaeology and Cultural Management Plan for the development to the satisfaction of the Secretary. The plan shall be prepared in consultation with NPWS, the Local Aboriginal Land Council, a consultant archaeologist, any other stakeholders identified by NPWS; and identify future salvage,	Heritage Management Plan September 2003 Indigenous Archaeology and Cultural Heritage Management Plan September 2003 Correspondence from Department of Infrastructure, Planning and Natural	The IACHMP was originally prepared by the previous site owners. CGO do not have the original approval letters. The HMP was approved by the department in 2003. Both plans outline consultation with the required parties was undertaken.	Obs	IACHMP to be approved by DP&E when next revised.

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	<p>iii. excavation and monitoring of any archaeological sites within the DA area prior to and during development, and to address Aboriginal cultural heritage issues; and retain a Cultural Heritage Officer approved by the West Wyalong Local Aboriginal Land Council who is to be available on site during construction earthworks.</p>	<p>Resources - Cowal Gold Mine Our Reference: S97/01796 September 2003</p> <p>Letter to West Wyalong Local Aboriginal Land Council - CGO Stage H Cutback - Aboriginal Cultural Heritage Clearance Activities 24 May 2017</p> <p>Auditor Observations</p>	<p>The HMP currently commits to superseded Consent Condition 3.2 which required the HMP "to be revised/updated at least every five years". Updates have not occurred.</p> <p>CGO does not retain a Cultural Heritage Officer but instead engages the West Wyalong Local Aboriginal Land Council to participate in all heritage works onsite. Invitation letter to WWLALC group requesting their attendance for clearing works was cited by auditor.</p> <p>Otherwise the HMP and IACHMP includes all the necessary information to satisfy this condition.</p>	Obs	The HMP to be updated to align with current CoA conditions, opportunity to achieve this during MOD 14 as all management plans are proposed for revision.
(b)	The Applicant shall monitor the effectiveness of measures outlined in the Heritage Management Plan and Indigenous Archaeology and Cultural Management Plan to the satisfaction of the Secretary. A summary of the monitoring results is to be published annually on the Applicant's website for the development.	<p>QHSE Incident Register</p> <p>Annual Review 2016</p>	<p>The auditor reviewed the QHSE Incident Register for the audit period, and no incidents related to the Heritage and Indigenous Archaeology and Culture were recorded.</p> <p>CGO Annual Review 2016 outlines the monitoring outcomes and performance for the site for both Aboriginal and European heritage.</p>	C	
3.2 Flora and Fauna Management					
(a)	<p>The Applicant shall:</p> <p>i. minimise the removal of trees and other vegetation from the mine site and restrict any clearance to the areas occupied by the mine activity, buildings and paved surfaces, and those areas necessary for fire control in accordance with BSC's requirements, and have regard to the draft Mid-Lachlan Regional Vegetation Management Plan (or its final version);</p> <p>ii. not locate topsoil stockpiles within any area of Wilga Woodland in the DA area as identified in Figure 3-13 in the 1998 EIS (Appendix 3); and</p> <p>iii. not disturb any area of Belah Woodland in the DA area as identified in Figure 3-13 in the 1998 EIS.</p>	<p>Vegetation Clearance Protocol</p> <p>Interview with E&S Superintendent</p>	<p>CGO maintain a Vegetation Clearance Protocol, prepared in 2003. The Auditor reviewed the Fauna Management Plan which state the Mid-Lachlan Range Regional Vegetation Management Plan was considered during preparation. The auditor inspected both the Wilga Woodland and Belah Woodland and cited that each is fenced off and signage in place to prevent unauthorised disturbance.</p>	C	
(b)	<p>The Applicant shall prepare and implement a Flora and Fauna Management Plan for the development to the satisfaction of the Secretary. The shall be prepared in consultation with DPI (Fisheries) and OEI, and cover the mining lease area and monitoring of bird breeding areas as identified by the Applicant in consultation with OEI. The plan shall include, but not be limited to:</p> <p>i. methods for monitoring daily and seasonal fauna usage of tailings dams (eg. species, number, location, habits), and whether deaths or other effects or incidents are occurring. Usage of the tailings dams shall be reported to the OEI on a six monthly basis, unless otherwise directed by the Secretary;</p> <p>ii. development of a protocol for the reporting of any native fauna deaths or other incidents involving native fauna on the mining lease to the OEI, DRE, CEMCC and in the case of fish, DPI (Fisheries). Native fauna deaths (except those attributable to physical trauma such as vehicle strike) must be reported as per this protocol within 24 hours (or next working day).The Applicant shall maintain a record of any native fauna deaths or other incidents and this record must be published annually on the Applicant's website for the development;</p> <p>iii. provision for fauna autopsy facilities to enable the cause of any deaths to be quickly determined. The protocol required in sub clause (ii) above shall also detail collection and autopsy of fauna. This shall include but not be limited to collection and recording procedures, autopsy procedures and laboratory tests;</p> <p>iv. provision of contingency measures for reducing cyanide levels in the tailings dams in the event it is established that fauna deaths are occurring from cyanide in tailings dam water;</p> <p>v. development of effective mechanisms to keep fauna and avifauna away from the tailings storages, which shall include, but not be limited to:</p> <p>(i) minimising the area of open water in the tailings dams;</p>	<p>Flora and Fauna Management Plan May 2015</p> <p>Correspondence from DP&E - Cowal Gold Mine (DA 14/98) Review and Revision of Strategies, Plans and Programs 21 March 2016</p> <p>Auditor Observations</p>	<p>Approval granted by DP&E on 21 March 2016 and consultation undertaken with DPI (Fisheries) and OEI as required.</p> <p>OEI 6-monthly reports are not currently submitted, however the data is internally recorded and captured in the Annual Review process. In consideration of the commitment to submit reports on a 6-monthly basis this represents an ANC.</p> <p>Native fauna deaths (except those attributable to physical trauma such as vehicle strike) must be reported as per this protocol within 24 hours. Records are maintained of fauna deaths and reporting within 24 hours occurred until October 2017 but ceased at this time. ANC raised as data exists but reports not submitted.</p> <p>Otherwise the FFMP includes all the necessary information to satisfy this condition.</p>	<p>ANC</p> <p>ANC</p>	<p>Request confirmation from OEI that current reporting frequency in the AR is sufficient.</p> <p>CGO to submit a report on backdated fauna deaths since October 2017 and recommence 24 hour reports.</p>

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	<ul style="list-style-type: none"> (ii) fencing to prevent both medium and large fauna, terrestrial and amphibians, from entering the area. Mesh will have holes no greater than 5cm in diameter; (iii) making the area non conducive to the establishment of wildlife habitats, as far as possible; (iv) use of netting where practical; and (v) use of current best practice methods for avifauna deterrence; vi. development of plans for the rescue and rehabilitation of wildlife that may become bogged/sick/trapped in the tailings dams or elsewhere within the mining lease area; vii. methods to conserve and enhance wildlife values around Lake Cowal, within the mine lease area, including: protection and enhancement of existing retained habitats; viii. provision to continue fauna and flora, fish, and aquatic invertebrate monitoring of the Lake Cowal region as documented in the EIS including investigation of fauna deaths off site if requested by the Secretary where it is considered the deaths are attributable to activities on the site; ix. details to relocate any threatened species and/or its habitat away from disturbed areas that are created by mine operations. This will include placement and maintenance of suitable types and numbers of artificial roosting boxes for bats such as the Greater Long-eared Bat and other animals (eg birds/possums) in undisturbed areas of the mine site; and x. details of monitoring the mine's impacts particularly on birdlife in bird breeding areas identified by the Applicant in consultation with OEHL, threatened fauna and flora, and fish and aquatic invertebrates around Lake Cowal, and outline contingency measures should impacts be identified as occurring. 				
(c)	The Applicant shall implement a Threatened Species Management Protocol for the development to the satisfaction of the Secretary, which will include provisions for targeted searches prior to construction and proposed mitigation measures where threatened flora or fauna species are found.	Flora and Fauna Management Plan May 2015	The Threatened Species Management Protocol is contained in the FFMP and triggered during the VCP. Refer to the comments regarding the FFMP approval. The areas of clearance during the audit period did not contain threatened species.	C	
(d)	The Applicant shall monitor the effectiveness of measures outlined in the Flora and Fauna Management Plan and Threatened Species Protocol to the satisfaction of the Secretary. A summary of these monitoring results shall be published annually on the Applicant's website for the development.	Annual Review 2016	The auditor reviewed the Annual Review which contains a report on effectiveness of plans and protocol.	C	Ensure Annual Review 2017 continues to report on effectiveness.
3.3 Compensatory Wetland Management Plan					
	<p>The Applicant shall prepare and implement a Compensatory Wetland Management Plan for the development to the satisfaction of the Secretary. The plan shall be prepared in consultation with OEHL and DPI (Fisheries), Lake Cowal Landowners Association, and Lake Cowal Environmental Trust, and detail compensation measures for the loss of 120 hectares of wetland, through the enhancement of at least the equivalent area of existing wetland within the mine lease area during operation and following closure of the mine.</p> <p>The plan shall include, but not be limited to:</p> <ul style="list-style-type: none"> a) a definition of wetland which shall be all land up to the high water mark of Lake Cowal recognising that river red gum habitat is below high water mark; b) measures to manage the enhanced wetlands without adversely impacting adjoining private properties; and c) measures to improve habitats for wildlife including waterbirds, fish, aquatic organisms etc, in the wetlands covered by the plan. 	<p>Compensatory Wetland Management Plan September 2003</p> <p>Correspondence from Department of Infrastructure, Planning and Natural Resources - Cowal Gold Mine Our Reference: S97/01796 September 2003</p> <p>Auditor Observations</p>	<p>The CWMP was approved by the department in 2003.</p> <p>The CWMP currently commits to superseded Consent Condition 3.2 which required the CWMP "to be revised/updated at least every five years". Updates have not occurred.</p> <p>Further, the current consent conditions outlined in the CWMP have been superseded and departments requiring consultation have been updated.</p> <p>Otherwise the CWMP includes all the necessary information to satisfy this condition</p>	<p>Obs</p> <p>Obs</p>	<p>The CWMP to be updated to align with current CoA conditions, opportunity to achieve this during MOD 14 as all management plans are proposed for revision.</p> <p>Further to above, at the time the CWMP is updated it should be provided to the departments as required by the current CoA conditions.</p>
3.4 Biodiversity Offset Strategy					
(a)	The Applicant shall implement the biodiversity offset strategy summarised in Table 2, shown conceptually in Appendix 4, and described in detail in the EIS to the satisfaction of the Secretary.	Biodiversity Offset Management Plan May 2015	The BOMP was approved by DP&E on 10 September 2015.		

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations										
	<p><i>Table 2: Summary of Biodiversity Offset Strategy</i></p> <table border="1"> <thead> <tr> <th>Area</th> <th>Minimum Size</th> </tr> </thead> <tbody> <tr> <td>Northern Offset Area (Enhancement Area)</td> <td>80 ha</td> </tr> <tr> <td>Southern Offset Area (Enhancement Area) (including 230 ha Mod 11 extension)</td> <td>260 ha</td> </tr> <tr> <td>Southern Offset Area (Revegetation Area)</td> <td>100 ha</td> </tr> <tr> <td>Total</td> <td>440 ha</td> </tr> </tbody> </table>	Area	Minimum Size	Northern Offset Area (Enhancement Area)	80 ha	Southern Offset Area (Enhancement Area) (including 230 ha Mod 11 extension)	260 ha	Southern Offset Area (Revegetation Area)	100 ha	Total	440 ha	Correspondence from DP&E – Cowal Gold Mine (DA 14/98) Biodiversity Offset Management Plan 10 September 2015.	The auditor reviewed the strategy against the BOMP which indicates that Table 6 of the BOMP does not align with the areas in Table 2 updated in MOD 12. Although total area (440ha) remains the same as previous CoA and is covered by the offset areas, the breakdowns do not align. ANC as breakdowns are not aligned.	ANC	BOMP to be updated to align with current CoA condition when BOMP is next revised, at latest MOD 14 when all management plans are proposed to be revised.
Area	Minimum Size														
Northern Offset Area (Enhancement Area)	80 ha														
Southern Offset Area (Enhancement Area) (including 230 ha Mod 11 extension)	260 ha														
Southern Offset Area (Revegetation Area)	100 ha														
Total	440 ha														
(b)	By the end of July 2015, unless the Secretary agrees otherwise, the Applicant shall make suitable arrangements for the long term protection of the biodiversity offset areas in Table 2 to the satisfaction of the Secretary.	Interview with E&S Superintendent	CGO advised that it had, well before the audit period, purchased the properties containing the offset areas. Land titles or similar were not cited by Auditor.	NV	Obtain Land titles for the offset areas.										
(c)	<p>The Applicant shall prepare and implement a Biodiversity Offset Management Plan for the development to the satisfaction of the Secretary. This plan must be prepared in consultation with OEH, and include:</p> <p>(i) a description of the short, medium, and long term measures that would be implemented to:</p> <ul style="list-style-type: none"> • implement the biodiversity offset strategy; and • manage the remnant vegetation in the offset areas; and • integrate the implementation of the biodiversity offset strategy to the greatest extent practicable with the rehabilitation of the site. <p>(iii) detailed performance and completion criteria for evaluating the performance of the biodiversity offset strategy, and triggering remedial action (if necessary);</p> <p>(iv) a detailed description of the measures that would be implemented for:</p> <ul style="list-style-type: none"> • enhancing the quality of existing vegetation and fauna habitat in the biodiversity offset areas; • creating native vegetation and fauna habitat in the biodiversity offset areas; • maximising the salvage of resources from the disturbance areas on site, including the vegetative and soil resources – for beneficial use in the biodiversity offset areas; • collecting and propagating seed; • controlling weeds and feral pests; • controlling erosion; • managing any grazing; • controlling access; and • bushfire management; <p>(v) a seasonally-based program to monitor and report on the effectiveness of these measures, and progress against the detailed performance and completion criteria;</p> <p>(vi) a description of the potential risks to successful implementation of the biodiversity offset strategy, and the contingency measures that would be implemented to mitigate against these risks; and</p> <p>(vii) details of who would be responsible for monitoring, reviewing, and implementing the plan.</p>	<p>Biodiversity Offset Management Plan May 2015</p> <p>Correspondence from DP&E – Cowal Gold Mine (DA 14/98) Biodiversity Offset Management Plan 10 September 2015</p> <p>Auditor Observations</p>	<p>Approval granted from DP&E on 10 September 2015 and consultation undertaken with OEH.</p> <p>The BOMP includes all the necessary information to satisfy this condition.</p> <p>The auditor reviewed monitoring data for the Biodiversity Offset Area. Monitoring report is conducted annually by DnA Environmental (Feb 2018). The report states the offset monitoring program compares progress of Offset Area against suitable reference sites according to ESG3: MOP Guidelines. The monitoring report details results against completion targets and areas of focus going forward.</p> <p>In addition to the conditionally required monitoring, CGO also monitor the Remnant Vegetation Enhancement Program areas and Compensatory Wetland. DnA Environmental conduct the annual monitoring.</p>	C											
(d)	<p>By the end of July 2015, unless otherwise agreed by the Secretary, the Applicant shall lodge a Conservation Bond with the Department to ensure that the biodiversity offset strategy is implemented in accordance with the performance and completion criteria in the Biodiversity Offset Management Plan. The sum of the bond shall be determined by:</p> <p>(i) calculating the full cost of implementing the biodiversity offset strategy (other than land acquisition costs); and</p> <p>(ii) employing a suitably qualified and experienced person to verify the calculated cost to the satisfaction of the Secretary.</p> <p>The calculation of the Conservation Bond must be submitted to the Department for approval at least 1 month prior to the lodgement of the bond.</p> <p>If the offset strategy is completed generally in accordance with the completion criteria in the Biodiversity Offset Management Plan to the satisfaction of the Secretary, the Secretary will release the bond.</p> <p>If the offset strategy is not completed generally in accordance with the completion criteria in the Biodiversity Offset Management Plan, the Secretary will call in all, or part of, the conservation bond, and arrange for the completion of the relevant works.</p>	Correspondence with DP&E Re: CGO Biodiversity Offset Security and Conservation Bond, 26	The auditor reviewed correspondence with the DP&E regarding the offset bond confirming as per the extension granted by DP&E 5 July 2017, the biodiversity offset areas are required to be secured and the conservation bond lodged by 31 October 2017. The Voluntary Planning Agreement between Evolution and NSW Minister for Planning is the mechanism to provide long term security for the CGO biodiversity offset area. Given the VPA bank guarantee (conservation bond) is a component of the VPA, the timing of the lodgement of the VPA bank guarantee is linked to the execution of the VPA. CGO detail the remaining steps to be taken and have requested an extension for finalising the VPA in May, June and October 2017 and are yet to receive a formal response.	ANC	CGO have proactively engaged with DP&E to confirm Biodiversity Offset and Conservation Bond, as the date for securing the bond has passed this is an ANC. CGO are awaiting response from DP&E in advance of next steps.										

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	<p>Note: Alternative funding arrangements for long-term management of the biodiversity offset strategy, such as provision of capital and management funding as agreed by OEH as part of a Biobanking Agreement or transfer to conservation reserve estate can be used to reduce the liability of the conservation and biodiversity bond. The sum of the bond may be reviewed in conjunction with any revision to the Biodiversity Offset Management Plan.</p>				
3.5 Prevention of Soil Erosion					
	<p>The Applicant shall prepare and implement the following plans to the satisfaction of the Secretary:</p> <p>(a) an erosion and sediment control management plan for the site which shall include, but not be limited to:</p> <ul style="list-style-type: none"> (i) details of temporary and permanent sediment and erosion control systems to be used during both mine construction and operation, including for earthworks associated with landscaping; (ii) details of salinity management; and (iii) a program for reporting on the effectiveness of the sediment and erosion control systems and performance against objectives contained in the approved erosion and sediment control management plan, and EIS; and <p>(b) a soil stripping management plan for the site which shall include, but not be limited to:</p> <ul style="list-style-type: none"> (i) details of the management of soil stockpiles, soil stripping techniques and scheduling; (ii) any further requirements of DRE; and (iii) a program for reporting on the effectiveness of the soil stripping methods and performance against objectives contained in the soil stripping management plan, and EIS. 	<p>Erosion and Sediment Control Management Plan July 2017 (under review)</p> <p>Soil Stripping Management Plan February 2015</p> <p>Correspondence to DP&E - Submission of Revised Erosion and Sediment Control Management Plan 31 July 2017</p> <p>Correspondence from DP&E - Cowal Gold Mine (DA 14/98) Management Plans 21 March 2016</p> <p>Correspondence from DP&E - FW: Cowal MP Review 17 April 2018</p> <p>Correspondence with DP&E Cowal Gold Operations - Review and Revision of Plans Strategies and Programs 4 May 2017</p> <p>Interview with E&S Superintendent</p> <p>Auditor Observations</p>	<p>The ESCMP has been submitted to DP&E for approval following updates to align with DA 14/98 MOD 13. At the time of audit approval remains outstanding. DP&E submitted comments to CGO on 17 April 2018.</p> <p>The SSMP was approved by DP&E on 21 March 2016.</p> <p>CoA DA 14/98 condition 3.5(b)(ii) requires the SSMP to be developed in consultation with DRE, but this has not occurred, however this is in accordance with proposed consultation in CGO letter to DP&E dated 4 May 2017.</p> <p>While no written response was received from DP&E, verbal acceptance of this position was provided to CGO from DP&E.</p> <p>Otherwise the ESCMP and SSMP include all the necessary information to satisfy this condition.</p>	ANC	<p>CGO is to address DP&E's comments and where appropriate revise the ESCMP ahead of approval and implementation.</p> <p>Until such time as approval is received CGO is to implement current approved ESCMP.</p>
3.6 Bushfire Management					
	<p>The Applicant shall:</p> <p>(a) ensure the development is suitably equipped to respond to any fires on site; and</p> <p>(b) assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site.</p>	Interview with E&S Superintendent	<p>CGO advised that site maintains has 2 x 10,000 L water pumpers and 2 x 10,000 L high volume foam nozzles. As well as has an established Emergency Response Team (ERT), of which 16 hold certification III for Mine Emergency Response and Rescue and able to respond to bush fire events.</p> <p>RFS assistance not triggered during audit period.</p>	C	
3.7 Land Management					
	<p>The Applicant shall prepare and implement a Land Management Plan for all its land holdings to the satisfaction of the Secretary. The plan shall be prepared in consultation with OEH, DPI (Water), DPI (Agriculture) and BSC, be consistent with the Flora and Fauna Management Plan, provide for proper land management including, but not limited to:</p> <ul style="list-style-type: none"> (a) pastures and remnant vegetation management; (b) control of vermin and noxious weeds as required by the Local Lands Services, BSC and other relevant authorities; (c) integration of the latest versions of the Jemalong Land and Water Management Plan and the Lake Cowal Land and Water Management Plan; and (d) feral animal control. 	<p>Land Management Plan October 2003 (and addendum)</p> <p>Correspondence from Department of Infrastructure, Planning and Natural Resources - Cowal Gold Project Management Plan Approvals 30 October 2003</p> <p>Correspondence from DP&E - Cowal Gold Mine (DA 14/98) Management Plans 21 April 2015</p>	<p>The LMP was approved by the department in 2003.</p> <p>Addendum approval was granted from DP&E on 21 March 2016. Note while this letter refers to Addendum February 2015, this should be May 2015 (the most recent Addendum has been submitted to DP&E for approval)</p> <p>The LMP has not been updated since CoA DA 14/98 MOD 13, which requires consultation with DPI (Water). When LMP is next revised consultation with DPI (Water) is required.</p>	Obs	<p>Include DPI (Water) when circulating the next revision of the LMP.</p>

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
		Interview with E&S Superintendent	The LMP currently commits to superseded Consent Condition 3.2 which required the LMP "to be revised/updated at least every five years". Updates have not occurred. Otherwise the LMP includes all the necessary information to satisfy this condition.	Obs	The LMP to be updated to align with current CoA conditions, opportunity to achieve this during MOD 14 as all management plans are proposed for revision.
3.8 Rehabilitation Strategy					
	The Applicant shall develop a strategy for the long term land use of the DA area on decommissioning of the mine site. The strategy shall include, but not be limited to: appropriate landuses within the DA area, which may include areas for conservation, agriculture or recreation, long term management of the area, environmental impacts of any uses and maintenance of necessary drainage characteristics and other features provided on the site. The strategy for long term land use of the DA area shall be submitted by Year 7 of mining operations or five years before mine closure, whichever is the sooner, in consultation with DRE, DPI (Water), OEH, BSC, CEMCC, and to the satisfaction of the Secretary.	Rehabilitation Management Plan August 2017 Correspondence with DP&E Cowal Gold Operations - Review and Revision of Plans Strategies and Programs 4 May 2017 Interview with E&S Superintendent	The rehabilitation strategy is contained with the RMP. Refer to CoA condition 2.4(a) for approval details. CoA DA 14/98 MOD 13 requires consultation with DPI (Water). When the RMP was updated in September 2017, the RMP was not circulated to DPI (Water), however this is in accordance with proposed consultation in CGO letter to DP&E dated 4 May 2017. While no written response was received from DP&E, verbal acceptance of this position was provided to CGO from DP&E. Otherwise consultation with relevant departments has been undertaken.		
4 WATER MANAGEMETN					
4.1 Water Supply					
(a)	General The Applicant shall ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of operations on site to match its available water supply. <i>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.</i>	Site Water Tracker Interview with E&S Superintendent	MOD 14 propose to loop water pipeline to enable maximum extraction to be achieved but CGO is not proposing to extract more than currently approved limit. This loop will enable a 25% increase in water extraction. The auditor has reviewed the water extraction data and given that the previous annual extraction totals are substantially lower than the approved 3650ML/day, even with the looped pipeline, it is determined that CGO has sufficient water supply for current development.	C	
(b)	Bland Creek Palaeochannel Borefield The maximum daily extraction of water from the Bland Creek Palaeochannel Borefield shall not exceed 15ML/day or 3650ML/year.	Site Water Tracker Interview with E&S Superintendent	2017 extraction totals per annum: 1940 ML (1595 ML extracted during audit period) Current water pipeline limits extraction to 11ML/day. MOD 14 proposes to loop water pipeline to enable maximum extraction to be achieved (15/ML).	C	
4.2 Pipeline & Borefield Infrastructure					
(a)	All pipeline and borefield infrastructure for the development shall be: (i) constructed in consultation with DPI (Fisheries), and in accordance with the requirements of NOW; (ii) laid in such a way so as not to impede the passage of fish or other animals, or interfere with flood behaviour or the passage of boats and vehicles; and (iii) equipped with an automatic shutdown device so water pumping is immediately stopped in the event of any pipe rupture. The water supply shall not be restarted until the rupture is located and repaired.	Outside of Audit period Interview with Senior Electrical Engineer	Confirmation that the water pipeline remains equipped with shutdown valve.	C	
4.3 Disposal of Excess Water					
	There shall be no disposal of water from the internal catchment drainage system on site to Lake Cowal under any circumstances.	Water Management Plan August 2017 (under review) Interview with E&S Superintendent Auditor Observations	CGO is a closed catchment - all water (rainfall and site water) is contained within the site and no water is able to flow into the site due to perimeter site bunding. The auditor inspected the perimeter and lake protection bunding. CGO catchment network enables it to move any excess water to the TSF if needed and the TSF is designed to fail into the mine pit. No releases of water has been recorded from the site, during the audit period.	Obs	To ensure compliance with the condition, it is recommended that CGO undertakes a post heavy rainfall inspection of the internal catchment drainage system.
4.4 Water Management					
(a)	The Applicant shall prepare a Water Management Plan for the development to the satisfaction of the Secretary. This plan must:	Water Management Plan August 2017 (under review)	The WMP has been submitted to DP&E on 31 August 2017 for approval following updates to align with MOD 13. At the time of the audit,	ANC	CGO is to address DP&E's comments and where

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	(i) be prepared in consultation with DPI (Water) and EPA; (ii) include, but not be limited to, the following matters: <ul style="list-style-type: none"> • management of the quality and quantity of surface and groundwater within and around the mine site, including water in the up catchment diversion system, internal catchment drainage system, dewatering bores, Bland Creek Palaeochannel borefield and water supply pipeline from the borefield, which shall include preparation of monitoring programs (see below); • measures to prevent the quality of water in Lake Cowal or any surface waters being degraded below the relevant ANZECC water quality classification prior to construction due to the construction and/ or operation of the mine; • identification of any possible adverse effects on water supply sources of surrounding land holders, and land holders near the Bland Creek Palaeochannel Borefield as a result of the mining operations, and implementation of mitigation measures as necessary; • identification of changes in flood regime on productive agricultural land in Nerang Cowal as a result of the mine perimeter bund intruding into Lake Cowal, and provision of appropriate compensation measures for affected landholders based on inundation of productive land caused by the changed flood regime; • construction and operation of water storages D1 and D4 as first flush systems with initial captured run-off waters from the outer batters of northern and southern emplacement dumps reporting to water storage D6; • measures to manage and dispose of water that may be captured behind the temporary perimeter bund during construction of that bund; • integration of the latest versions of the Jemalong Land and Water Management Plan and the Lake Cowal Land and Water Management Plan; • measures to evaluate water quality data obtained from monitoring under this consent against records of baseline monitoring undertaken prior to the consent; and • a program for reporting on the effectiveness of the water management systems and performance against objectives contained in the approved site water management plan, and EIS. 	Correspondence to DP&E – Review and Revision of Strategies, Plans and Programs 4 May 2017 Correspondence to DP&E – Revised Environmental Management Plans 31 August 2017 Correspondence from DP&E – FW: Cowal MP Review 17 April 2018	approval remains outstanding. DP&E submitted comments to CGO on 17 April 2018. Consultation has been undertaken with the required departments. The WMP includes all the necessary information to satisfy this condition.		appropriate revise WMP ahead of approval and implementation. Until such time as approval is received CGO is to implement current approved WMP.
(b)	The Applicant shall develop a strategy for the decommissioning of water management structures, including water storages both in and around the mine site, the water pipeline and borefield infrastructure associated with the development, and long term management of final void and Lake protection bund. The strategy shall include, but not be limited to, long term monitoring of the water quality in the final void and stability of Lake protection bund and void walls, and options for alternate uses of the water pipeline. The strategy for the final void shall be submitted by Year 7 of mining operations or five years before mine closure, whichever is the sooner, in consultation with DPI (Water), EPA, DRE and CEMCC, and to the satisfaction of the Secretary.	Water Management Plan August 2017 (under review)	Decommissioning strategy contained in WMP. Refer to CoA condition 4.4(a) for approval and consultation details. The WMP includes all the necessary information to satisfy this condition.	C	
(c)	The Applicant shall: <ul style="list-style-type: none"> (i) construct the Lake protection bund and site water and tailings storages to the requirements of DPI (Water), EPA and DSC; and (ii) provide a geotechnical report on pit/void wall construction/stability to DRE prior to commencement of mining operations and construct pit/void in accordance with the requirements of DRE. 	Outside of audit period	Refer to CoA condition 4.5(c) for ongoing monitoring.	NT	Outside reporting period.
4.5 Water Monitoring					
(a)	The Applicant shall construct and locate: <ul style="list-style-type: none"> (i) surface water monitoring positions in consultation with DPI (Water) and EPA, and to the satisfaction of the Secretary, at least three months prior to the commencement of construction works unless otherwise directed by the Secretary; and 	Outside of audit period Interview with E&S Superintendent	No changes to water monitoring locations since establishment.		
	<ul style="list-style-type: none"> (ii) groundwater monitoring positions in consultation with DPI (Water) and EPA, and to the satisfaction of the Secretary at least six months prior to the commencement of construction works unless otherwise directed by the Secretary. 		CGO has decommissioned two monitoring points PP05 & CB01. Neither of these points were regulatory compliance monitoring locations but did appear in the WMP. The WMP is currently under review by the department, with both of these locations proposed to be removed from plan.	Obs	Ensure sites are removed from WMP and approval of WMP gained from DP&E and EPA.

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
(b)	<p>The Applicant shall prepare and implement a detailed monitoring program for the development to the satisfaction of the Secretary. This plan must be prepared in consultation with DPI (Water), EPA, DPI (Fisheries), and be directed towards monitoring the potential water impacts of the mine, including water in the up catchment diversion system, internal catchment drainage system, dewatering bores, all borefields associated with the development, and water supply pipeline, pit/void, Lake Cowal, and any other waters in and around the mine site for all stages of the development.</p> <p>The monitoring program will include the development of adequate chemical and biological monitoring in the waters of Lake Cowal, when water is present, by suitably qualified and experienced staff or consultants to the satisfaction of the DPI (Water) and EPA, and in the case of biological monitoring DPI(Fisheries), DPI (Water) and EPA must be satisfied as to sampling design, including sample locations, sample frequency, sample handling, transport and analysis, sampling parameters and reporting of analysis results.</p> <p>The results and interpretation of surface and ground water monitoring (including biological monitoring) are to be published on the Applicant's website for the development on a regular basis, or as directed by the Secretary.</p>	<p>Surface Water, Groundwater, Meteorological and Biological Monitoring Programme May 2015</p> <p>Correspondence to DP&E – Review and Revision of Strategies, Plans and Programs 4 May 2017</p> <p>Correspondence to DP&E – Cowal Gold Operations – Revised Environmental Management Plans 31 August 2017</p> <p>Correspondence from DP&E – FW: Cowal MP Review 17 April 2018</p> <p>Environmental Monitoring Data 2017 – 2018</p>	<p>The SWGMBMP has been submitted to DP&E on 31 August 2017 for approval following updates to align with MOD 13. At the time of audit approval remains outstanding. DP&E submitted comments to CGO on 17 April 2018.</p> <p>Consultation has been undertaken with the relevant departments.</p> <p>Monitoring data is published on CGO website and is regularly updated with current monitoring results.</p>	ANC	CGO is to address DP&E's comments and where appropriate revise SWGMBMP ahead of approval and implementation. Until such time as approval is received CGO is to implement current approved SWGMBMP.
(c)	<p>The Applicant shall prepare and implement a monitoring program for the detection of any movement of the Lake protection bund, water storage and tailings structures and pit/void walls during the life of the mine, with particular emphasis on monitoring after any seismic events prior to commencement of construction works, in consultation with DPI (Water) and DRE, and to the satisfaction of the Secretary.</p>	<p>Monitoring Programme for Detection of any Movement of Lake Protection Bund, Water Storage and Tailings Structures and Pit Void Walls August 2017</p> <p>TSF Inspection Reports – Weekly February to April 2018</p> <p>Dams and Lake Protection Bund – Monthly Inspection March 2018</p>	<p>The LPBMP currently commits to superseded Consent Condition 9.1(c) which required the LPBMP “to be revised/updated annually”. Updates have not occurred.</p> <p>Consultation has been undertaken with the relevant departments.</p> <p>The auditor reviewed recent monitoring reports for the relevant locations that demonstrated implementation of the plan.</p>	Obs	The LPBMP is to be updated to align with current CoA conditions, opportunity to achieve this during MOD 14 as all management plans are proposed for revision.
4.6 Catchment Areas and Watercourses					
	<p>The Applicant shall as a landowner have on-going regard for the provisions of the latest versions of the Jemalong Land and Water Management Plan, Lake Cowal Land and Water Management Plan, Mid-Lachlan Regional Vegetation Management Plan, and any future catchment/land and water management plans that may become relevant to the area.</p>	Interview with E&S Superintendent	<p>The WMP considers the Jemalong Land and Water Management Plan and Lake Cowal Land and Water Management Plan. CGO has advised and the auditor has not identified that there are any further revisions of these plans.</p>	C	
5 - HAZARDOUS MATERIALS AND TAILINGS MANAGEMENT					
5.1 Waste Rock Emplacement and Management					
	<p>The Applicant shall construct and manage the waste rock emplacement as set out in the EIS, and to the satisfaction of DRE.</p>	Mine Operations Plan September 2017	DRG approved MOPs which demonstrate approval of construction and management of emplacements during MOP term.	C	
5.2 Tailings Emplacement and Management					
	<p>The Applicant shall:</p> <p>(a) construct the tailings dams to the requirements of DRE, EPA and DSC and in consultation with DPI (Water); and</p> <p>(b) construct and compact the floor of the tailings storages as required to a permeability acceptable to the DRE and EPA in consultation with DPI (Water).</p>	Outside of Audit Period	Construction of the tailings facilities was undertaken well prior to the audit period.	NT	
5.3 Cyanide Management					
(a)	<p>Cyanide levels</p> <p>The Applicant shall ensure that cyanide levels of the aqueous component of the tailings slurry stream do not exceed: 20mg CNWAD/L (90 percentile over six months), and 30mg CNWAD/L (maximum permissible limit at any time), at the process plant.</p>	<p>Environmental Monitoring Data 2017 – 2018</p> <p>Monthly Trends and Data (Processing)</p>	Auditor review of monitoring data demonstrates that no exceedances of this condition have been recorded during the audit period.	C	
(b)	<p>Cyanide Management</p> <p>The Applicant shall prepare and implement a cyanide management plan for the development to the satisfaction of the Secretary. The plan is to be prepared in consultation with DRE, EPA and DPI (Water) and include monitoring and reporting on cyanide use on the site. The plan shall make provision for, but is not limited to:</p> <p>(i) containing cyanide contaminated waters entirely within the mine site;</p>	<p>Cyanide Management Plan March 2017 (under review)</p> <p>Correspondence to DP&E – Revised Cyanide Management Plan 28 April 2017</p>	<p>The CMP has been submitted to DP&E for approval following updates to align with MOD 13. At the time of audit approval remains outstanding. DP&E advised that comments would be provided on 16 April 2018. No comments have been received at the time of the audit.</p> <p>Consultation has been undertaken with the relevant departments.</p>	ANC	CGO is to address DP&E's comments and where appropriate revise CMP ahead of approval and implementation. Until such time as approval is received

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	(ii) maintaining weak acid dissociable (WAD) cyanide levels at the process plant to the levels stated in condition 5.3(a); (iii) contingency measures for cyanide reduction.		The CMP includes all the necessary information to satisfy this condition.		CGO is to implement current approved CMP.
(c)	Wildlife Deaths In the event of wildlife deaths occurring due to cyanide, review of cyanide levels shall occur by the EPA in consultation with the Applicant and DRE. Any decision to require cyanide reduction shall include, but not be limited to, consideration of the number of fauna deaths, the species involved, antecedent condition of species, methods employed at the time to prevent use of tailings dams by fauna, and antecedent climatic and surface water conditions of the Lake and surrounding area. The Applicant shall notify the CEMCC of any reductions in cyanide levels as soon as practicable.	Annual Review 2016 Interview with E&S Superintendent	The Auditor was informed that no wildlife deaths have ever been recorded as a result of cyanide levels, as such the condition is not triggered during audit period. The 2016 recorded 90 fauna incidents each determined to be unrelated to cyanide.	NT	
(d)	Cyanide Monitoring The Applicant shall prepare and implement a cyanide monitoring program for the development to the satisfaction of the Secretary. The plan must be prepared in consultation with EPA and DRE, and shall include, but not be limited to, provision for: (i) monitoring of CNWAD levels of the aqueous component of the tailings slurry stream at the process plant twice daily or as otherwise directed by the Secretary, with any increases above 20mg CNWAD/L to be assessed daily to ensure compliance and reported in the Annual Review, unless otherwise agreed by the Secretary. If the CNWAD levels of 30mg/L are exceeded in the liquid at any time, discharge to the tailings dams shall cease until CNWAD levels can be achieved below the levels stated in condition 5.3(a) and such exceedance shall be reported to the EPA within 24 hours; (ii) monitoring CNWAD levels in the decant water of the tailings dams twice daily or as otherwise directed by the Secretary; (iii) an on site laboratory for quickly establishing CNWAD levels in the liquid at the process plant and in the decant ponds for monitoring purposes; (iv) on-line monitoring of CN(FREE) at locations where employees are operating; (v) establishing a monitoring regime for detection of cyanide movement beneath and adjacent to the tailings impoundments. A summary of the cyanide monitoring results shall be provided on the Applicant's website for the development on a regular basis, or as directed by the Secretary.	Cyanide Management Plan March 2017 (under review) Correspondence to DP&E - Revised Cyanide Management Plan 28 April 2017 Environmental Monitoring Data 2017 - 2018	The CMP contains monitoring program. Refer condition 5.3(b) regarding CMP approval status. Consultation has been undertaken with the relevant departments. The CMP includes all the necessary information to satisfy this condition.	C	
5.4 Hazard Management					
<i>Note: The development consent conditions under 5.4(a)-(f) are related to offsite risk to people and the biophysical environment. The safety of all persons and operations on site is the responsibility of the DRE under the Mines Inspection Act and Dangerous Goods Act.</i>					
(a)	Pre-Construction Studies The Applicant shall prepare and submit for the approval of the Secretary, the studies set out under subsections 5.4(a)(i) to 5.4(a)(iii) (the pre-construction studies), at least one month prior to the commencement of construction of the proposed development, (except for construction of those preliminary works that are outside the scope of the hazard studies), or within such further period as Secretary may agree. Construction, other than of preliminary works, shall not commence until approval has been given by the Secretary and, with respect to the fire safety study, approval has also been given by the Commissioner of the NSW Fire Brigades. (i) Fire Safety Study This study shall cover all aspects detailed in the Department's Hazardous Industry Planning Advisory Paper No. 2, "Fire Safety Study Guidelines" and the New South Wales Government's "Best Practice Guidelines for Contaminated Water Retention and Treatment Systems". The study shall also be submitted for approval to the New South Wales Fire Brigades. The study should, in particular, address the fire related issues associated with the storage and use of Ammonium Nitrate, Sodium Isobutyl Xanthate, and Cyanide. (ii) Hazard and Operability Study The study is to be chaired by an independent qualified person approved by the Director-General prior to the commencement of the study. The study shall be carried out in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 8,	Note	Construction of development occurred prior to the current audit period.	NT	

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	<p>"HAZOP Guidelines". The HAZOP shall in particular address the monitoring, control, alarm and shutdown systems associated with xanthate and cyanide process streams.</p> <p>(iii) Final Hazard Analysis</p> <p>The analysis should be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 6, "Guidelines for Hazard Analysis".</p>				
(b)	<p>Pre-Commissioning Studies</p> <p>The Applicant shall prepare and submit for the approval of the Secretary the following studies (the pre-commissioning studies), no later than two months prior to the commencement of commissioning of the proposed development, or within such period as the Secretary may agree. Commissioning shall not commence until approval has been given by the Secretary.</p> <p>(i) Transport of Hazardous Materials</p> <p>The study comprises arrangements covering the transport of hazardous materials including details of routes to be used for the movement of vehicles carrying hazardous materials to or from the proposed development. The study shall be carried out in accordance with the Department's draft "Route Selection" guidelines. Suitable routes identified in the study shall be used except where departures are necessary for local deliveries or emergencies.</p> <p>The study should also address (1) the issues associated with spills, cleanup procedures, training of clean-up teams, communication, and liaison with organisations such as the fire brigades, District Emergency Management Coordinator (and Committee), Local Emergency Management Committee(s), and state emergency services; (2) inspection and monitoring procedures for chemicals such as explosives, xanthates and cyanides prior to commencement of a trip, to verify the integrity of the packaging; and (3) measures to be taken to ensure that the temperature of the materials does not rise above safe levels.</p> <p>(ii) Emergency Plan</p> <p>A comprehensive emergency plan and detailed emergency procedures for the proposed development. This plan shall include detailed procedures for the safety of all people outside of the development who may be at risk from the development. The plan should be in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1, "Industry Emergency Planning Guidelines", and include procedures for spillage, cleanup, control and protection, and rescue of wildlife during the emergency.</p> <p>(iii) Safety Management System</p> <p>A document setting out a comprehensive safety management system, covering all operations on-site and associated transport activities involving hazardous materials. The document shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to procedures. Records shall be kept on-site and should be available for inspection by the Secretary upon request. The safety management system should be developed in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9, "Safety Management".</p>	<p>Transport of Hazardous Materials January 2006 (and addendums)</p> <p>Emergency Response Plan September 2017 (under review)</p> <p>Safety and Health Management Plan 30 October 2017</p> <p>Correspondence to DP&E - Review and Revision of Strategies, Plans and Programs 4 May 2017</p> <p>Correspondence to DP&E - Revised Emergency Response Plan 18 July 2017</p> <p>Correspondence to DP&E - Revised Emergency Response Plan 5 October 2017</p>	<p>Pre-commissioning studies prepared prior to the current audit period. However following discussions between DP&E and CGO it is clear that these are intended to be implemented as management plans.</p> <p>THMS:</p> <p>There are a number of areas identified where activities do not align with approvals within THMS:</p> <ul style="list-style-type: none"> - Sodium Cyanide: Not using approved storage facility in Dubbo (however facility being used is located on the same road as the approved facility in Dubbo and therefore the same route applies). - Hydrochloric Acid: Maximum frequency of deliveries 1 per week and currently using 2 per week; using route not approved for Hydrochloric acid (however the route is the same as the approved route for the transport of caustic soda). - Sulphuric Acid: Using route not approved for sulphuric acid (however the majority of the route is the same as the approved route for caustic soda). - Caustic Soda: Maximum frequency of deliveries 1 per fortnight and currently 1.5 per week. - Ammonium Nitrate Emulsion: Currently receiving up to 8 deliveries per month with a maximum limit of 4 per month. <p>ERP:</p> <p>Originally scheduled for submission by end of July 2017 (refer letter May 2017).</p> <p>July 2017 CGO advised that further amendments had been identified for the ERP and therefore proposes submission by 30 September 2017.</p> <p>ERP was submitted to DP&E on 5 October 2017 for approval following updates to align with MOD 13. At the time of audit approval remains outstanding. DP&E advised that comments would be provided on 16 April 2018. No comments have been received at the time of the audit.</p> <p>SMS:</p> <p>CGO's Safety and Health Management Plan outlines the requirements around transport of hazardous materials and is development in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9, "Safety Management".</p>	<p>NC</p> <p>Obs</p>	<p>Amend the THMS to reflect alignment of approvals. This is currently being proactively managed by CGO.</p> <p>CGO is to address DP&E's comments, if and when received and where appropriate revise the ERP ahead of approval and implementation.</p>
(c)	<p>Hazard Audit</p> <p>Twelve months after the commencement of operations of the proposed development or within such further period as the Secretary may agree, the Applicant shall carry out a comprehensive hazard audit of the proposed development and submit a report of the audit to the Secretary.</p> <p>The audit shall be carried out at the Applicant's expense by a duly qualified independent person or team approved by the Secretary prior to commencement of the audit. Further audits shall be carried out every three years or as determined by the Secretary and a report of each audit shall within a month of the audit be submitted to the Secretary. Hazard audits should be carried out in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5, "Hazard Audit Guidelines".</p>	<p>Hazard Audit Report</p> <p>2010</p> <p>2013</p> <p>2016</p>	<p>Compliance with this condition was required 12 months after commencement of operations which occurred prior to the current audit period.</p>	<p>NT</p>	

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations									
5.5 Domestic Waste														
	The Applicant shall dispose of all solid waste and putrescible matter from the site to the satisfaction of BSC.	Auditor observations	The auditor observed waste management is outsourced to a licenced waste contractor JR Richards and disposed of in a Bland Shire Council Facility.	C										
5.6 Sewage and Associated Waste Management														
	The Applicant shall install the site sewage treatment facility, and dispose of treated sewage and sullage to the satisfaction of BSC and EPA, and in accordance with the requirements of the Department of Health.	Hazardous Waste and Chemical Management Plan August 2017 (under review) Correspondence to DP&E - Revised Environmental Strategy and Hazardous Waste and Chemical Management Plan 6 July 2017 Auditor Observations	CGO operates a self-contained sewage treatment facility which is periodically pumped out by JR Richards and disposed of in a Bland Shire Council Facility.	C										
5.7 Asbestos and Other Hazardous or Toxic Waste Management														
	The Applicant shall prior to commencement of construction works prepare a Hazardous Waste and Chemical Management Plan as set out in section 6.4.1 of the EIS in consultation with EPA and BSC, and to the satisfaction of the Secretary.	Hazardous Waste and Chemical Management Plan August 2017 (under review) Correspondence to DP&E - Review and Revision of Strategies, Plans and Programs 4 May 2017 Correspondence to DP&E - Revised Environmental Strategy and Hazardous Waste and Chemical Management Plan 6 July 2017 Correspondence to DP&E - Revised Environmental Management Plans 31 August 2017 Correspondence from DP&E - FW: Cowal MP Review 17 April 2018	The HWCMP has been submitted to DP&E for approval following updates to align with MOD 13 (July 2017). A further revision was provided to align with variation to EPL 11912 (August 2017). At the time of audit approval remains outstanding. DP&E submitted comments to CGO on 17 April 2018.	ANC	CGO is to address DP&E's comments and where appropriate revise the HWCMP ahead of approval and implementation. Until such time as approval is received CGO is to implement current approved HWCMP.									
6 - AIR, BLAST, NOISE AND VISUAL IMPACT MANAGEMENT														
6.1 Air Management														
(a)	Impact Assessment Criteria The Applicant shall 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 Tables 3, 4 and 5 at any residence on privately-owned land. <i>Table 3: Long term impact assessment criteria for particulate matter</i> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging period</th> <th>^d Criterion</th> </tr> </thead> <tbody> <tr> <td>Total suspended particulate (TSP) matter</td> <td>Annual</td> <td>^a 90 µg/m³</td> </tr> <tr> <td>Particulate matter < 10 µm (PM₁₀)</td> <td>Annual</td> <td>^a 30 µg/m³</td> </tr> </tbody> </table>	Pollutant	Averaging period	^d Criterion	Total suspended particulate (TSP) matter	Annual	^a 90 µg/m ³	Particulate matter < 10 µm (PM ₁₀)	Annual	^a 30 µg/m ³	Air Quality Management Plan February 2015 Monitor Pro (EHS) - environmental monitoring data repository Interpretation and Discussion of 2017 Air Quality Monitoring Results (Draft) - Associate Professor Stephen Cattle 2018 Environmental Monitoring Schedule Interview with Environmental Advisor Monitoring Reporting Officer Interview with E&S Superintendent	The CGO's relevant privately owned residences are: <ul style="list-style-type: none">McLintock's ShedDG06I5 PM10 is calculated as 40% of TSP, as per the AQMP, which is recorded every 7 days at high volume sampler Point 49. During reporting period PM10 has exceeded the 24 hour average criteria of 50µg/m ³ on 3 occasions: <ul style="list-style-type: none">19/01/18 - 56.8 µg/m³09/02/18 - 82.8 µg/m³16/02/18 - 60 µg/m³ CGO advised that it has not changed any of their work practices and all mitigation measures continue to be implemented. CGO advised that the prevailing dry conditions (no substantial rainfall received since	NC	Going forward CGO plan to record dust storms to determine if exceedances/high results are related to natural events. CGO to ensure implementation and ongoing monitoring of effectiveness of AQMP mitigation measures, as well as localised conditions in the lead
Pollutant	Averaging period	^d Criterion												
Total suspended particulate (TSP) matter	Annual	^a 90 µg/m ³												
Particulate matter < 10 µm (PM ₁₀)	Annual	^a 30 µg/m ³												

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations														
	<p>Table 4: Short term impact assessment criterion for particulate matter</p> <table border="1" data-bbox="240 268 1113 359"> <thead> <tr> <th>Pollutant</th> <th>Averaging period</th> <th>^d Criterion</th> </tr> </thead> <tbody> <tr> <td>Particulate matter < 10 µm (PM₁₀)</td> <td>24 hour</td> <td>^a 50 µg/m³</td> </tr> </tbody> </table> <p>Table 5: Long term impact assessment criteria for deposited dust</p> <table border="1" data-bbox="240 394 1113 506"> <thead> <tr> <th>Pollutant</th> <th>Averaging period</th> <th>Maximum increase in deposited dust level</th> <th>Maximum total deposited dust level</th> </tr> </thead> <tbody> <tr> <td>^c Deposited dust</td> <td>Annual</td> <td>^b 2 g/m²/month</td> <td>^a 4 g/m²/month</td> </tr> </tbody> </table> <p>Notes to Tables 3-5: a Total impact (i.e. incremental increase in concentrations due to the development plus background concentrations due to all other sources). b Incremental impact (i.e. incremental increase in concentrations due to the development on its own). c Deposited dust is to be assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580.10.1:2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method. d Excludes extraordinary events such as bushfires, prescribed burning, dust storms, fire incidents or any other activity agreed by the Secretary.</p>	Pollutant	Averaging period	^d Criterion	Particulate matter < 10 µm (PM ₁₀)	24 hour	^a 50 µg/m ³	Pollutant	Averaging period	Maximum increase in deposited dust level	Maximum total deposited dust level	^c Deposited dust	Annual	^b 2 g/m ² /month	^a 4 g/m ² /month		<p>beginning of December 2017) and a number of dust storms may have impacted results.</p> <p>Annual average of PM10 and TSP was below condition criteria.</p> <p>Table 3 and 4 criteria are measured by the high volume sampler (Point 49 - HV1), which is now located on mine owned land after the property (Coniston) was recently purchased by CGO (in 2016). Therefore this location is no longer monitoring a "residence on privately-owned". CGO looking to upgrade air quality monitoring network which will include relocating the high volume sampler to a private property.</p> <p>Previously the deposited dust records (Annual Review 2016) had shown some exceedances, these were determined to be related to combustible materials within the sample and therefore once these were removed, the levels came below the maximum allowable level (4g).</p> <p>Deposited dust readings for the audit period were below the maximum allowable level.</p>	Obs	<p>up to weekly high volume sample.</p> <p>If exceedances continue, it is suggested that CGO review the implementation of the AQMP, as well as the location and movements around the high volume sampler to ensure exceedances are CGO related.</p> <p>CGO to identify an appropriate location and relocate the high volume sampler to residences on a privately owned property.</p>
Pollutant	Averaging period	^d Criterion																	
Particulate matter < 10 µm (PM ₁₀)	24 hour	^a 50 µg/m ³																	
Pollutant	Averaging period	Maximum increase in deposited dust level	Maximum total deposited dust level																
^c Deposited dust	Annual	^b 2 g/m ² /month	^a 4 g/m ² /month																
(b)	<p>Operating Conditions The Applicant shall:</p> <ul style="list-style-type: none"> (i) implement best management practice to minimise the off-site odour, fume, spontaneous combustion and dust emissions of the development; (ii) implement all reasonable and feasible measures to minimise the release of greenhouse gas emissions from the site; (iii) minimise any visible off-site air pollution generated by the development; (iv) minimise the surface disturbance on the site; (v) minimise the air quality impacts of the development during adverse meteorological conditions and extraordinary events (see note d above under Tables 3-5); and (vi) carry out regular monitoring to determine whether there is compliance with the relevant conditions of this consent, <p>to the satisfaction of the Secretary.</p>	Air Quality Management Plan February 2015	Refer to compliance against various relevant management plans.	Refer to compliance against various relevant management plans.															
(c)	<p>Air Quality Management Plan The Applicant shall prepare and implement an Air Quality Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> (i) be prepared in consultation with the EPA; (ii) describe the measures that would be implemented to ensure compliance with the relevant air quality criteria and operating conditions of this consent; (iii) include an air quality monitoring program that: <ul style="list-style-type: none"> • evaluates and reports on the: <ul style="list-style-type: none"> - the effectiveness of the air quality management system; - compliance with the air quality criteria; - compliance with the air quality operating conditions; and • defines what constitutes an air quality incident, and includes a protocol for identifying and notifying the Department and relevant stakeholders of any air quality incidents. 	<p>Air Quality Management Plan February 2015</p> <p>Correspondence from DP&E - Cowal Gold Mine (DA 14/98) Air Quality Management Plan 18 February 2016</p> <p>Interview with E&S Superintendent</p>	<p>The AQMP is currently unclear on what constitutes an air quality incident. The AQMP however does set out the steps in place to address all recorded exceedances and a notification protocol for exceedances. It is understood that CGO consider an exceedance to be an incident but this is not explicitly defined.</p> <p>Approved by DP&E on 18 February 2016 and consultation with EPA undertaken.</p> <p>With the exception of defining an AQ incident, the AQMP includes all the necessary information to satisfy this condition.</p>	Obs	CGO to update the AQMP to clearly state what constitutes an air quality incident.														
6.2 Meteorological Monitoring																			

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations																				
	For the life of the development, the Applicant shall ensure that there is a meteorological station in the vicinity of the site that complies with the requirements in the Approved Methods for Sampling of Air Pollutants in New South Wales guideline.	Cowal Gold Mine Meteorological Station Sentinel Datasight Interview with Environmental Advisor Monitoring Reporting Officer Auditor observations	A weather station was observed during audit with results available online. All parameters required are monitored. Real time monitoring data reviewed by auditor.	C																					
6.3 Blast Management																									
(a)	<p>Impact Assessment Criteria</p> <p>The Applicant shall ensure that blasting on site does not cause any exceedance of the criteria in Table 6.</p> <p><i>Table 6: Blasting impact assessment criteria</i></p> <table border="1"> <thead> <tr> <th>Location & Time</th> <th>Airblast overpressure (dB(Lin Peak))</th> <th>Ground vibration (mm/s)</th> <th>Allowable exceedance</th> </tr> </thead> <tbody> <tr> <td>Residence on privately-owned land - Anytime</td> <td>120</td> <td>10</td> <td>0%</td> </tr> <tr> <td>Residence on privately-owned land – Monday to Saturday during day</td> <td>115</td> <td>5</td> <td>5% of the total number of blasts over a period of 12 months</td> </tr> <tr> <td>Residence on privately-owned land – Monday to Saturday during evening</td> <td>105</td> <td>2</td> <td>5% of the total number of blasts over a period of 12 months</td> </tr> <tr> <td>Residence on privately-owned land – Monday to Saturday at night, Sundays and public holidays</td> <td>95</td> <td>1</td> <td>5% of the total number of blasts over a period of 12 months</td> </tr> </tbody> </table> <p>However, these criteria do not apply if the Applicant has a written agreement with the relevant owner to exceed the limits in Table 6, and the Applicant has advised the Department in writing of the terms of this agreement.</p>	Location & Time	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance	Residence on privately-owned land - Anytime	120	10	0%	Residence on privately-owned land – Monday to Saturday during day	115	5	5% of the total number of blasts over a period of 12 months	Residence on privately-owned land – Monday to Saturday during evening	105	2	5% of the total number of blasts over a period of 12 months	Residence on privately-owned land – Monday to Saturday at night, Sundays and public holidays	95	1	5% of the total number of blasts over a period of 12 months	<p>Blast Management Plan January 2015</p> <p>Monthly Blasting Compliance Summary</p> <p>Saros (International) Pty Ltd Monthly Blast Report</p> <p>Environmental Monitoring Data 2017 – 2018</p> <p>Interview with Environmental Advisor Monitoring Reporting Officer</p>	<p>No evening, night or public holiday blasts recorded.</p> <p>8 Sunday blasts recorded for the audit period, of which two recorded overpressure exceedances:</p> <ul style="list-style-type: none"> 27/08/17 at BM08.1: 109.2dB(L) 26/11/17 at BM02: 101.0 dB(L) <p>Both exceedances were investigated further by Saros determined to be related to “local environmental factors”, such as wind and not CGO activities. Even if these exceedances were a result of CGO’s activities, these would remain below the condition’s 5% allowable exceedance criteria for all blasts.</p>	C	
Location & Time	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance																						
Residence on privately-owned land - Anytime	120	10	0%																						
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Residence on privately-owned land – Monday to Saturday at night, Sundays and public holidays	95	1	5% of the total number of blasts over a period of 12 months																						
(b)	<p>Blasting Frequency</p> <p>The Applicant may carry out a maximum of 1 blast a day on site. This condition does not apply to blasts required to ensure the safety of the mine or its workers.</p> <p><i>Note: For the purposes 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.</i></p>	Environmental Monitoring Data 2017 – 2018	The blast data identifies on a number of days 2 records for a single day. A large portion of these records are the same date and time (one blast). As the site only undertakes one blast per day, the other records are where two blasts seemed to be recorded minutes apart this would be a single blast that includes a “pre-spilt” blast.	C																					
(c)	<p>Property Investigations</p> <p>If the owner of any privately-owned land claims that buildings and/or structures on his/her land have been damaged as a result of blasting on the site, and the Secretary agrees an independent investigation of the claim is warranted, then within 2 months of receiving this claim the Applicant shall:</p> <p>(i) commission a suitably qualified, experienced and independent person, whose appointment is acceptable to both parties to investigate the claim; and</p> <p>(ii) give the landowner a copy of the property investigation report.</p> <p>If this independent property investigation confirms the landowner’s claim, and both parties agree with these findings, then the Applicant shall repair the damage to the satisfaction of the Secretary.</p> <p>If there is a dispute over the selection of the suitably qualified, experienced and independent person, or the Applicant or the landowner disagrees with the findings of the independent property investigation, then either party may refer the matter to the Secretary for resolution.</p>	Monthly Complaints Register	While CGO did record complaints with regards to blasting, investigations into these showed that all blasting was within exceedance criteria.	C																					
(d)	<p>Operating Conditions</p> <p>The Applicant shall:</p> <p>(i) implement best management practice to:</p> <ul style="list-style-type: none"> protect the safety of people and livestock in the areas surrounding blasting operations; 	Blast Management Plan January 2015	<p>CGO do not currently provide a system to provide the public with up-to-date blast information and/or blast schedule as required by condition 6.3(d)(ii).</p> <p>No livestock are kept or allowed onto mining lease area.</p>	NC	CGO to implement a system to allow the public to access up-to-date blast information and blasting schedules.																				

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations										
	<ul style="list-style-type: none"> protect public or private infrastructure/property in the surrounding area from damage from blasting operations; and minimise the dust and fume emissions of any blasting; (ii) operate a suitable system to enable the public to get up-to-date information on the proposed blasting schedule on site; and (iii) carry out regular monitoring to determine whether the development is complying with the relevant conditions of this consent, to the satisfaction of the Secretary.		A blast exclusion zone (400m) is imposed during all blasts.												
(e)	Blast Management Plan The Applicant shall prepare and implement a Blast Management Plan for the development to the satisfaction of the Secretary. This plan must: <ul style="list-style-type: none"> (i) be prepared in consultation with the EPA; (ii) describe the measures that would be implemented to ensure compliance with the blast criteria and operating conditions of this consent; and (iii) include a monitoring program for evaluating and reporting on compliance with the blasting criteria and operating conditions of this consent. 	Blast Management Plan January 2015 Correspondence from DP&E - Cowal Gold Mine (DA 14/98) Blast Management Plan 10 December 2015	Approval granted by DP&E on 10 December 2015 and consultation undertaken with EPA. The BMP includes all the necessary information to satisfy this condition.	C											
6.4 Noise Management															
(a)	Acquisition Upon Request Upon receiving a written request for acquisition from the owner of any land listed in Table 7, the Applicant shall acquire the land in accordance with the procedures in condition 8.3. Table 7: Land subject to acquisition upon request <table border="1" style="margin-left: 20px;"> <tr><td style="text-align: center;">Westella</td></tr> <tr><td style="text-align: center;">Westlea</td></tr> </table> Note: To interpret the location referred to Table 7, see the map in Appendix 6.	Westella	Westlea	Interview with E&S Superintendent Interview with E&S Superintendent	Not triggered during audit period	NT									
Westella															
Westlea															
(b)	Additional Noise Mitigation Upon receiving a written request from the owner of the residences listed in Tables 7 and 7A, the Applicant shall implement additional noise mitigation measures (such as double-glazing, insulation, and/or air conditioning) at the residence in consultation with the landowner. These measures must be reasonable and feasible, and directed towards reducing the noise impacts of the development on the residence. If within 3 months of receiving this request from the owner, the Applicant and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Secretary for resolution. Table 7A: Land subject to mitigation upon request <table border="1" style="margin-left: 20px;"> <tr><td style="text-align: center;">Laurel Park</td></tr> <tr><td style="text-align: center;">Lakeview III</td></tr> <tr><td style="text-align: center;">Bramboyne</td></tr> <tr><td style="text-align: center;">The Glen</td></tr> <tr><td style="text-align: center;">Caloola II</td></tr> </table> Note: To interpret the location referred to Table 7A, see the map in Appendix 6.	Laurel Park	Lakeview III	Bramboyne	The Glen	Caloola II	Interview with E&S Superintendent Correspondence from Laurel Park and Bramboyne owner 31 March 2018 Correspondence from The Glen owner 25 March 2018	CGO has received written request from landholders of Laurel Park, Bramboyne and The Glen. The auditor understands the landholders triggered this condition because CGO notified the landowners that their properties were likely to no longer be included in this condition after MOD 14 was approved. The landholders did not trigger this condition due to issues with noise from CGO's operations. Discussions are now underway with owners regarding mitigation measures to be implemented. Lakeview III and Caloola II not triggered during audit period.	Obs	CGO should continue discussions with owners to ensure noise mitigation measures are agreed with the respective landholders by 30 June 2018 (Laurel Park and Bramboyne) and 25 June 2018 (The Glen).					
Laurel Park															
Lakeview III															
Bramboyne															
The Glen															
Caloola II															
(c)	Impact Assessment Criteria The Applicant shall ensure that the noise generated by the development does not exceed the noise impact assessment criteria in Table 8 at any residence on privately-owned land. Table 8: Noise Impact Assessment Criteria dB(A) L _{Aeq} (15min) <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Land</th> <th>Day/Evening/Night</th> </tr> </thead> <tbody> <tr><td style="text-align: center;">Laurel Park, Lakeview III</td><td style="text-align: center;">39</td></tr> <tr><td style="text-align: center;">Bramboyne, The Glen, Caloola II</td><td style="text-align: center;">38</td></tr> <tr><td style="text-align: center;">Lakeview, Lakeview II, Foxham Downs II</td><td style="text-align: center;">37</td></tr> <tr><td style="text-align: center;">All other privately-owned land</td><td style="text-align: center;">35</td></tr> </tbody> </table> Note: To identify the land referred to in Table 8, see the map in Appendix 6.	Land	Day/Evening/Night	Laurel Park, Lakeview III	39	Bramboyne, The Glen, Caloola II	38	Lakeview, Lakeview II, Foxham Downs II	37	All other privately-owned land	35	Noise Management Plan July 2017 (under review) Environmental Monitoring Data 2017 - 2018 Attended Noise Monitoring - Spectrum Acoustics (Quarterly) June 2017 August 2017 November 2017 February 2018	No properties fall under the "All other privately-owned land". Quarterly reports state that at no time did CGO's noise exceed the noise criterion at any of the monitoring locations.	C	
Land	Day/Evening/Night														
Laurel Park, Lakeview III	39														
Bramboyne, The Glen, Caloola II	38														
Lakeview, Lakeview II, Foxham Downs II	37														
All other privately-owned land	35														

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	Noise generated by the development is to be measured in accordance with the relevant requirements of the NSW Industrial Noise Policy (as may be updated from time-to-time). Appendix 5 sets out the meteorological conditions under which these criteria apply, and the requirements for evaluating compliance with these criteria. However, these criteria do not apply if the Applicant has an agreement with the owner/s of the relevant residence or land to generate higher noise levels, and the Applicant has advised the Department in writing of the terms of this agreement.	Interview with Environmental Advisor Monitoring Reporting Officer			
(d)	Operating Conditions The Applicant shall: (i) implement best management practice, including all reasonable and feasible mitigation measures, to minimise the operational, low frequency, and road noise of the development, including mitigation measures to: (ii) minimise the noise impacts of the development during meteorological conditions when the noise limits in this consent do not apply (see Appendix 5); and (iii) carry out regular attended monitoring to determine whether the development is complying with the relevant conditions of this consent, to the satisfaction of the Secretary.	Noise Management Plan July 2017 (under review)	Addressed through below CoA conditions and Appendix 5.	C	
(e)	Noise Management Plan The Applicant shall prepare and implement a Noise Management Plan for the development to the satisfaction of the Secretary. This plan must: (i) be prepared in consultation with the EPA, and submitted to the Secretary for approval prior to carrying out any development under this consent, unless the Secretary agrees otherwise; (ii) describe the measures that would be implemented to ensure compliance with the noise criteria and operating conditions in this consent; and (iii) include a monitoring program that: • evaluates and reports on: - compliance with the noise criteria in this consent; and - compliance with the noise operating conditions; • defines what constitutes a noise incident, and includes a protocol for identifying and notifying the Department and relevant stakeholders of any noise incidents.	Noise Management Plan July 2017 (under review) Correspondence to DP&E – Review and Revision of Strategies, Plans and Programs 4 May 2017 Correspondence to DP&E – Cowal gold Operations – Submission of Revised Noise Management Plan 10 July 2017 Correspondence from DP&E – FW: Cowal MP Review 17 April 2018	The NMP has been submitted to DP&E on 10 July 2017 for approval following updates to align with MOD 13. At the time of audit approval remains outstanding. DP&E submitted comments to CGO on 17 April 2018. Consultation with EPA has been undertaken. The NMP includes all the necessary information to satisfy this condition.	ANC	CGO is to address DP&E's comments and where appropriate revise the NMP ahead of approval and implementation. Until such time as approval is received CGO is to implement current approved NMP.
6.5 Visual Management					
(a)	Additional Visual Impact Mitigation Upon receiving a written request from the owner of any residence on privately-owned land which has, or would have, significant direct views of the mining operations and infrastructure on-site during the development, the Applicant shall implement additional visual impact mitigation measures (such as landscaping treatments or vegetation screens) to reduce the visibility of the mining operations and infrastructure from the residences on the privately-owned land. These mitigation measures must be reasonable and feasible, and must be implemented within a reasonable timeframe. If the owner of the residence and the Applicant cannot agree whether there are significant direct views from the residence, then either party may refer the matter to the Secretary for resolution. If within 3 months of receiving this request, the Applicant and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Secretary for resolution. Notes: • The additional visual impact mitigation measures must be aimed at reducing the visibility of the mining operations on site from affected residences, and do not require measures to reduce the visibility of the mining operations from other locations on the affected properties. • The additional visual impact mitigation measures do not necessarily have to include the implementation of measures on the affected property itself (i.e. the additional measures could involve the implementation of measures outside the affected property boundary that provide an effective reduction in visual impacts).	Interview with E&S Superintendent	Not triggered during audit period	NT	

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
(b)	<p>Operating Conditions</p> <p>The Applicant shall:</p> <ul style="list-style-type: none"> (i) implement all reasonable and feasible measures to minimise the visual and off-site lighting impacts of the development; (ii) ensure no fixed outdoor lights shine directly above the horizontal or above the building line or any illuminated structure; (iii) ensure no in-pit mobile lighting rigs shine directly above the pit wall and other mobile lighting rigs do not shine directly above the horizontal; (iv) ensure that all external lighting associated with the development complies with relevant Australian Standards including Australian Standard AS4282 (INT) 1997 - Control of Obtrusive Effects of Outdoor Lighting, or its latest version; and (v) take all reasonable and feasible measures to shield views of mining operations and associated equipment from users of public roads and privately-owned residences, to the satisfaction of the Secretary. 	<p>Interview with E&S Superintendent</p> <p>Auditor observations</p>	<p>CGO has in the past (2013 & 2015) received complaints regarding site lighting impacting neighbours. No such complaints have been received during audit period.</p> <p>The Environmental department has requested and raised with mining department that care is taken when placing mobile lights.</p> <p>Auditor observed that vegetation screens are in place around the mines perimeter.</p>	C	
7 - TRANSPORT MANAGEMENT					
7.1 Road Transport					
(a)	Mine site access road The Applicant shall use its best endeavours to ensure that the preferred mine access road routes as described in the EIS are the only routes used by employees and contractors travelling to and from the mine site.	Interview with E&S Superintendent	All staff with the exception of management are required to travel to work on CGO buses which operate on preferred access roads described in the EIS. Preferred routes are outlined to management.	C	
8 - ADDITIONAL PROCEDURES					
8.1 Notification of Landowners/Tenants					
(a)	<p>By the end of September 2014, unless the Secretary agrees otherwise, the Applicant shall notify in writing the owners of:</p> <ul style="list-style-type: none"> (i) the land listed in Table 7 that they have the right to ask the Applicant to: <ul style="list-style-type: none"> • acquire their land at any stage during the development; and • install additional noise mitigation measures at any residence on their land; (ii) any residence on privately-owned land which has, or would have, significant direct views of the mining operations and infrastructure on-site during the development, that they have the right to ask the Applicant to implement additional visual impact mitigation measures (such as landscaping treatments or vegetation screens) to reduce the visibility of the mining operations and infrastructure from the affected residences on the land. 	Note	Condition precedes audit period.	NT	
(b)	<p>As soon as practicable after obtaining monitoring results showing:</p> <ul style="list-style-type: none"> (i) an exceedance of any relevant criteria in this consent, the Applicant shall notify the affected landowners in writing of the exceedance, and provide regular monitoring results to the landowner until the development is again complying with the relevant criteria; and (ii) an exceedance of the relevant air quality criteria in this consent, the Applicant shall send a copy of the NSW Health fact sheet entitled "Mine Dust and You" (as may be updated from time to time) to the affected landowners and/or existing tenants of the land. 	Refer to monitoring compliance findings within this report	CGO recorded 3 exceedances for the period related to PM10 from the high volume sampler (refer to CoA condition 6.1(a)). As per CoA condition 6.1(a) the high volume sampler is currently located on CGO owned land and therefore no landowner notification is triggered by these exceedances.	NT	
8.2 Independent Review					
	<p>If an owner of privately-owned land considers the development to be exceeding the criteria in this consent, then he/she may ask the Secretary in writing for an independent review of the impacts of the development on his/her land.</p> <p>If the Secretary is satisfied that an independent review is warranted, then within 2 months of the Secretary's decision, the Applicant shall:</p> <p>(a) commission a suitably qualified, experienced and independent expert, whose appointment has been approved by the Secretary, to:</p> <ul style="list-style-type: none"> • consult with the landowner to determine his/her concerns; • conduct monitoring to determine whether the development is complying with the relevant impact assessment criteria in condition 6 of this consent; and • if the development is not complying with these criteria then: <ul style="list-style-type: none"> o determine if more than one mine or development is responsible for the exceedance, and if so the relative share of each mine or development regarding the impact on the land; and 	Monthly Complaints Register	<p>No exceedance within audit period to trigger this condition.</p> <p>The auditor reviewed the complaints register for the audit period which records two complaints (May & August 2017) related to blasting vibrations. These were investigated by CGO and both found to have been within ground vibration limits.</p>	NT	

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	<p>o identify the measures that could be implemented to ensure compliance with the relevant criteria; and</p> <p>(b) give the Secretary and landowner a copy of the independent review.</p>				
8.3 Land Acquisition					
(a)	<p>Within 6 months of receiving a written request from a landowner with acquisition rights, the Applicant shall make a binding written offer to the landowner based on:</p> <p>(i) the current market value of the landowner's interest in the property at the date of this written request, as if the property was unaffected by the development, having regard to the:</p> <ul style="list-style-type: none"> • existing and permissible use of the land, in accordance with the applicable planning instruments at the date of the written request; and • presence of improvements on the property and/or any approved building or structure which has been physically commenced at the date of the landowner's written request, and is due to be completed subsequent to that date, but excluding any improvements that have resulted from the implementation of any additional noise and/or visual mitigation measures under this consent; <p>(ii) the reasonable costs associated with:</p> <ul style="list-style-type: none"> • relocating within the same local government area, or to any other local government area determined by the Secretary; • obtaining legal advice and expert advice for determining the acquisition price of the land, and the terms upon which it is to be acquired; and <p>(iii) reasonable compensation for any disturbance caused by the land acquisition process.</p> <p>However, if at the end of this period, the Applicant and landowner cannot agree on the acquisition price of the land and/or the terms upon which the land is to be acquired, then either party may refer the matter to the Secretary for resolution.</p> <p>Upon receiving such a request, the Secretary shall request the President of the NSW Division of the Australian Property Institute to appoint a qualified independent valuer to:</p> <ol style="list-style-type: none"> (1) consider submissions from both parties; (2) determine a fair and reasonable acquisition price for the land and/or the terms upon which the land is to be acquired, having regard to the matters referred to in paragraphs (i)-(iii) above; (3) prepare a detailed report setting out the reasons for any determination; and (4) provide a copy of the report to both parties. <p>Within 14 days of receiving the independent valuer's report, the Applicant shall make a binding written offer to the landowner to purchase the land at a price not less than the independent valuer's determination.</p> <p>However, if either party disputes the independent valuer's determination, then within 14 days of receiving the independent valuer's report, they may refer the matter to the Secretary for review. Any request for a review must be accompanied by a detailed report setting out the reasons why the party disputes the independent valuer's determination. Following consultation with the independent valuer and both parties, the Secretary shall determine a fair and reasonable acquisition price for the land, having regard to the matters referred to in paragraphs (i)-(iii) above, the independent valuer's report, the detailed report of the party that disputes the independent valuer's determination and any other relevant submissions.</p> <p>Within 14 days of this determination, the Applicant shall make a binding written offer to the landowner to purchase the land at a price not less than the Secretary's determination.</p> <p>If the landowner refuses to accept the Applicant's binding written offer under this condition within 6 months of the offer being made, then the Applicant's obligations to acquire the land shall cease, unless the Secretary determines otherwise.</p>	Interview with E&S Superintendent	Management report that heads of agreement have been negotiated with Westlea property owner however no acquisition rights triggered.	NT	
(b)	The Applicant shall pay all reasonable costs associated with the land acquisition process described in condition 8.3(a) above.	Interview with E&S Superintendent	Land acquisition not triggered during audit period.	NT	
(c)	If the Applicant and landowner agree that only part of the land shall be acquired, then the Applicant shall also pay all reasonable costs associated with obtaining Council approval for any plan of subdivision (where permissible), and registration of the plan at the Office of the Registrar-General.	Interview with E&S Superintendent	Land acquisition not triggered during audit period.	NT	

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
9. ENVIRONMENTAL MANAGEMENT, AUDITING AND REPORTING					
9.1 Environmental Management					
(a)	<p>Environmental Management Strategy</p> <p>The Applicant shall prepare and implement an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must:</p> <p>(i) be submitted to the Secretary for approval by the end of October 2014, unless the Secretary agrees otherwise;</p> <p>(ii) provide the strategic framework for environmental management of the development;</p> <p>(iii) identify the statutory approvals that apply to the development;</p> <p>(iv) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;</p> <p>(v) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> • keep the local community and relevant agencies informed about the operation and environmental performance of the development; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise; • respond to any non-compliance; • respond to emergencies; and <p>(vi) include:</p> <ul style="list-style-type: none"> • copies of any strategies, plans and programs approved under the conditions of this consent; and • a clear plan depicting all the monitoring to be carried out in relation to the development. 	<p>Environmental Management Strategy July 2017 (under review)</p> <p>Correspondence to DP&E - Revised Environmental Management Strategy and Hazardous Waste and Chemical Management Plan 6 July 2017</p> <p>Correspondence from DP&E - FW: Cowal MP Review 17 April 2018</p>	<p>EMS has been submitted to DP&E for approval following updates to align "corporate Environment and Sustainability Policy and site environmental management structure, other minor amendments to reflect Evolution ownership of the CGO and a copy of the contemporary Development Consent conditions". At the time of audit approval remains outstanding. DP&E submitted comments to CGO on 17 April 2018.</p> <p>The EMS includes all the necessary information to satisfy this condition.</p>	ANC	<p>CGO is to address DP&E's comments and where appropriate revise the EMS ahead of approval and implementation.</p> <p>Until such time as approval is received CGO is to implement current approved EMS.</p>
(b)	<p>Annual Review</p> <p>By the end of July each year, or as otherwise agreed with the Secretary, the Applicant shall review the environmental performance of the development to the satisfaction of the Secretary. This review must:</p> <p>(i) describe the development that was carried out in the previous calendar year, and the development that is proposed to be carried out over the next year;</p> <p>(ii) include a comprehensive review of the monitoring results and complaints records of the development over the previous calendar year, which includes a comparison of these results against the:</p> <ul style="list-style-type: none"> • the relevant statutory requirements, limits or performance measures/criteria; • the monitoring results of previous years; and • the relevant predictions in the EIS; <p>(iii) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;</p> <p>(iv) identify any trends in the monitoring data over the life of the development;</p> <p>(v) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and</p> <p>(vi) describe what measures will be implemented over the next year to improve the environmental performance of the development.</p>	Annual Review 2016	The auditor reviewed Annual Reviews which are prepared by 30 June each year and made available on the CGO website.	C	
(c)	<p>Within 3 months of:</p> <p>(i) the submission of an annual review under condition 9.1(b) above;</p> <p>(ii) the submission of an incident report under condition 9.3(a) below;</p> <p>(iii) the submission of an audit under condition 9.2 (a) below;</p> <p>(iv) the submission of an Annual State of the Environment Report under condition 9.2(b) below;</p> <p>(v) the approval of any modification to the conditions of this consent; or</p> <p>(vi) a direction of the Secretary under condition 1.1(c) of this consent;</p> <p>the Applicant shall review and, if necessary, revise the strategies, plans, and programs required under this consent to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted to the Secretary for approval, unless otherwise agreed with the Secretary.</p> <p><i>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.</i></p>	<p>Interview with E&S Superintendent</p> <p>Correspondence with DP&E.</p>	<p>CGO demonstrated submission of updates of plans within 3 months of modification to conditions of this consent and submission of the annual reviews (or agreeance with the Department for submission of plans beyond 3 months where necessary).</p> <p>Management reported that no update or review was conducted following the 2017 IEA (the audit under condition 9.2(a)).</p>	ANC	<p>CGO to maintain records of submission of updates against this condition, demonstrating this is to the satisfaction of the Secretary.</p>

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
(d)	<p>Community Environmental Monitoring and Consultative Committee</p> <p>(i) The Applicant shall establish and operate a Community Environmental Monitoring and Consultative Committee (CEMCC) for the development to the satisfaction of the Secretary. This CEMCC must:</p> <ul style="list-style-type: none"> • be comprised of an independent chair and at least 2 representatives of the Applicant, 1 representative of BSC, 1 representative of the Lake Cowal Environmental Trust (but not a Trust representative of the Applicant), 4 community representatives (including one member of the Lake Cowal Landholders Association); • be operated in general accordance with the Guidelines for Establishing and Operating Community Consultative Committees for Mining Projects (Department of Planning, 2007, or its latest version). • monitor compliance with conditions of this consent and other matters relevant to the operation of the mine during the term of the consent. <p><i>Note: The CEMCC is an advisory committee. The Department and other relevant agencies are responsible for ensuring that the Applicant complies with this consent.</i></p> <p>(ii) The Applicant shall establish a trust fund to be managed by the Chair of the CEMCC to facilitate the functioning of the CEMCC, and pay \$2000 per annum to the fund for the duration of gold processing operations. The annual payment shall be indexed according to the Consumer Price Index (CPI) at the time of payment. The first payment shall be made by the date of the first Committee meeting. The Applicant shall also contribute to the Trust Fund reasonable funds for payment of the independent Chairperson, to the satisfaction of the Secretary</p> <p>(iii) At least four years prior to mine closure the Applicant shall, in consultation with the CEMCC, identify and discuss post-mining issues, particularly in relation to reduced employment and consequent impacts on West Wyalong, and develop a mine workforce phase out plan. This plan shall be reviewed and updated in consultation with the CEMCC at the commencement of the final year of mining operations.</p> <p>(iv) The Applicant shall, in consultation with the CEMCC, develop appropriate strategies to support activities which promote special interest tourism related to the co-existence of mining and the Lake Cowal environment.</p>	<p>Payment Records</p> <p>Interview with E&S Superintendent</p>	<p>The CEMCC was consulted in advance of this audit and their input recorded and addressed. The auditor reviewed payment records through Bland Shire Council.</p> <p>No formal records demonstrating CGO working with CEMCC to promote special interest tourism related to the co-existence of mining and the Lake Cowal environment.</p>	Obs	<p>Work with CEMCC to investigate options to promote special interest tourism related to the co-existence of mining and the Lake Cowal environment.</p>
9.2 Independent Auditing and Review					
(a)	<p>Independent Environmental Audit</p> <p>(i) By the end of July 2016, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:</p> <ul style="list-style-type: none"> • be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary; • include consultation with the relevant agencies, BSC and the CEMCC; • assess the environmental performance of the development and assess whether it is complying with the requirements in this consent and any other relevant approvals (such as environment protection licences and/or mining lease (including any assessment, plan or program required under this consent)); • review the adequacy of any approved strategy, plan or program required under this consent or the abovementioned approvals; and • recommend measures or actions to improve the environmental performance of the development, and/or any strategy, plan or program required under this consent. <p><i>Note: This audit team must be led by a suitably qualified auditor, and include ecology and rehabilitation experts, and any other fields specified by the Secretary.</i></p>	This audit.	This audit.	C	

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	(ii) Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report, and a timetable for the implementation of these recommendations as required. The Applicant must implement these recommendations, to the satisfaction of the Secretary.				
(b)	<p>Independent Monitoring Panel</p> <p>(i) The Applicant shall at its own cost establish an Independent Monitoring Panel prior to commencement of construction. The Applicant shall contribute \$30,000 per annum for the functioning of the Panel, unless otherwise agreed by the Secretary. The annual payment shall be indexed according to the Consumer Price Index at the time of payment. The first payment shall be paid by the date of commencement of construction and annually thereafter. Selection of the Panel representatives shall be agreed by the Secretary in consultation with relevant government agencies and the CEMCC.</p> <p>The Panel shall at least comprise two duly qualified independent environmental scientists and a representative of the Secretary.</p> <p>(ii) The panel shall:</p> <ul style="list-style-type: none"> • provide an overview of the annual reviews and independent audits required by conditions 9.1(b) and 9.2(a) above; • regularly review all environmental monitoring procedures undertaken by the Applicant, and monitoring results; and • provide an Annual State of the Environment Report for Lake Cowal with particular reference to the on-going interaction between the mine and the Lake and any requirements of the Secretary. The first report shall be prepared one year after commencement of construction. The report shall be prepared annually thereafter unless otherwise directed by the Secretary and made publically available on the Applicant's website for the development within two weeks of the report's completion. 	Independent Monitoring Panel Annual Report 2017	The Independent Monitoring Panel has undertaken annual reporting since 2005 with no major non-compliances identified.	Obs	Raise need for continuation of IMP with DP&E. If continuation is required seek clarity on scope to confirm the IMP focuses on the initial scope and intent of the process, being to focus on rehabilitation.
9.3 Reporting					
(a)	<p>Incident Reporting</p> <p>The Applicant shall immediately notify the Secretary and any other relevant agencies of any incident related to the development. Within 7 days of the date of the incident, the Applicant shall provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.</p>	<p>Correspondence DP&E, EPA, DRG, DPI (Water) and Dam Safety Committee NSW - Cowal Gold Operations - Seepage on NTSF dated 23 April 2018</p> <p>Correspondence from EPA - Re Inspection of Cowal gold mine 3 May 2018</p> <p>DP&E Notice under Section 240(1)(c) 14 May 2018</p> <p>Interview with E&S Superintendent</p>	<p>Minor tailings seepage on the NTSF on 21 April 2018.</p> <p>Notice and correspondence from EPA requires submission of investigation report.</p> <p>Refer to Section 5.2.1 of the report for incident details.</p>	Obs	Ensure investigation report is completed and circulated as required by the regulating authorities.
(b)	<p>Regular Reporting</p> <p>The Applicant shall provide regular reporting on the environmental performance of the development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.</p>	https://evolutionmining.com.au/cowal/	The auditor reviewed Annual Reviews published on CGO website.	C	
9.4 Access to Information					
	<p>The Applicant shall:</p> <p>(a) make the following information publicly available on its website:</p> <p>(i) the EIS;</p> <p>(ii) current statutory approvals for the development;</p> <p>(iii) approved strategies, plans or programs required under the conditions of this consent;</p>	https://evolutionmining.com.au/cowal/	Modification 13 available on the CGO Website and refers to relevant plans, strategies and programs.	C	

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	(iv) a comprehensive summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent; (v) a complaints register, which is to be updated on a monthly basis; (vi) minutes of CEMCC meetings; (vii) the last five annual reviews; (viii) any independent environmental audit, and the Applicant's response to the recommendations in any audit; and (ix) any other matter required by the Secretary; and (b) keep this information up to date, to the satisfaction of the Secretary.				
Appendix 5 - Noise Compliance Assessment					
Applicable Meteorological Conditions					
1	The noise criteria in the conditions are to apply under all meteorological conditions except the following: (a) during periods of rain or hail; (b) average wind speed at microphone height exceeds 5 m/s; or wind speeds greater than 3 m/s measured at 10 m above ground level.	Attended Noise Monitoring - Spectrum Acoustics (Quarterly) June 2017 August 2017 November 2017 February 2018	Refer above to CoA condition 6.4(c) - no exceedances recorded. Spectrum Acoustics includes the wind speed of 10 m above ground level from the CGO weather station. On a number of occasions the wind speed exceeds 3 m/s and therefore the noise criteria would not apply.	C	
Determination of Meteorological Conditions					
2	Except for wind speed at microphone height, the data to be used for determining meteorological conditions shall be that recorded by the meteorological station located on the site.	Attended Noise Monitoring - Spectrum Acoustics (Quarterly) June 2017 August 2017 November 2017 February 2018 Interview with E&S Superintendent	Refer to above condition. Spectrum Acoustics judge wind speed at microphone height by feel and reviewing the real time display on the monitoring equipment. If wind speed at microphone height is impacting noise monitoring, it is postponed. Therefore wind speed at 10 m above ground level is utilised and reported against for all noise monitoring.	C	
Compliance Monitoring					
3	Attended monitoring is to be used to evaluate compliance with the relevant conditions of this approval.	Noise Management Plan November 2014 Attended Noise Monitoring - Spectrum Acoustics (Quarterly) June 2017 August 2017 November 2017 February 2018	Refer above to CoA condition 6.4(c)	C	
4	This monitoring must be carried out quarterly, unless the Secretary directs otherwise. <i>Note: The Secretary may direct that the frequency of attended monitoring increase or decrease at any time during the life of the development.</i>	Attended Noise Monitoring - Spectrum Acoustics (Quarterly) June 2017 August 2017 November 2017 February 2018	Refer above to CoA condition 6.4(c)	C	
5	Unless the Secretary agrees otherwise, this monitoring is to be carried out in accordance with the relevant requirements for reviewing performance set out in the NSW Industrial Noise Policy (as amended from time to time), in particular the requirements relating to: (a) monitoring locations for the collection of representative noise data; (b) meteorological conditions during which collection of noise data is not appropriate; (c) equipment used to collect noise data, and conformity with Australian Standards relevant to such equipment; and (d) modifications to noise data collected, including for the exclusion of extraneous noise and/or penalties for modifying factors apart from adjustments for duration.	Attended Noise Monitoring - Spectrum Acoustics (Quarterly) June 2017 August 2017 November 2017 February 2018 NSW Industrial Noise Policy (2000) NSW EPA Noise Policy for Industry (2017)	The auditor has reviewed CGO's noise monitoring reports and noted that they do consider and apply the Noise Policy. However, a revised Noise Policy was released in October 2017 and it appears that the noise monitoring reports submitted since then have not been updated to reflect the revised Noise Policy.	ANC	It is recommended that the updated Noise Policy 2017 is considered in future noise monitoring and reporting.

Annex B.2

Compliance with POEO EPL_11912

Table B2 POEO EPL_11912 Compliance Table

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations																		
1 Administrative Conditions																							
A1. What the licence authorises and regulates																							
A1.1	<p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.</p> <p>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <table border="1"> <thead> <tr> <th>Scheduled Activity</th> <th>Fee Based Activity</th> <th>Scale</th> </tr> </thead> <tbody> <tr> <td>Concrete works</td> <td>Concrete works</td> <td>0 - 13000 m3 annual production capacity</td> </tr> <tr> <td>Crushing, grinding or separating</td> <td>Crushing, grinding or separating</td> <td>> 2000000 T annual processing capacity</td> </tr> <tr> <td>Extractive activities</td> <td>Land-based extractive activity</td> <td>> 2000000 T annual capacity to extract, process or store</td> </tr> <tr> <td>Mineral processing</td> <td>Mineral processing</td> <td>> 2000000 T annual processing capacity</td> </tr> <tr> <td>Mining for minerals</td> <td>Mining for minerals</td> <td>> 5000000 T annual production capacity</td> </tr> </tbody> </table>	Scheduled Activity	Fee Based Activity	Scale	Concrete works	Concrete works	0 - 13000 m3 annual production capacity	Crushing, grinding or separating	Crushing, grinding or separating	> 2000000 T annual processing capacity	Extractive activities	Land-based extractive activity	> 2000000 T annual capacity to extract, process or store	Mineral processing	Mineral processing	> 2000000 T annual processing capacity	Mining for minerals	Mining for minerals	> 5000000 T annual production capacity	Evolution Mining Metallurgic Reconciliation Data 2017	The auditor notes CGO does not operate a concrete batching plant and is otherwise within these limits.	C	
Scheduled Activity	Fee Based Activity	Scale																					
Concrete works	Concrete works	0 - 13000 m3 annual production capacity																					
Crushing, grinding or separating	Crushing, grinding or separating	> 2000000 T annual processing capacity																					
Extractive activities	Land-based extractive activity	> 2000000 T annual capacity to extract, process or store																					
Mineral processing	Mineral processing	> 2000000 T annual processing capacity																					
Mining for minerals	Mining for minerals	> 5000000 T annual production capacity																					
A1.2	The licensee may carry out scheduled development works necessary for the activity of mineral processing to be undertaken at the premises.	Note	Noted	Note																			
A2 Premises or plant to which the licence applies																							
A2.1	<p>The licence applies to the following premises:</p> <p>COWAL GOLD PROJECT, 38KM NORTH EAST OF WEST WYALONG LAKE COWAL ROAD WEST WYALONG NSW 2671 PREMISES INCLUDES THE LAND DEFINED BY MINING LEASE NO. 1535.</p>	Note	Noted	Note																			
A3. Other activities																							
A3.1	<p>This licence applies to all other activities carried on at the premises, including:</p> <ul style="list-style-type: none"> • Ancillary Activity <ul style="list-style-type: none"> ○ Chemical Storage ○ Contaminated Soil Treatment ○ Sewage Treatment ○ Waste Disposal (application to land) 	Note	Noted	Note																			
A4. Information supplied to the EPA																							
A4.1	<p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to "the licence application" includes a reference to:</p> <p>(a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and</p> <p>(b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</p>	Mine Operations Plan (September 2017)	The EPL application was prepared reflecting the EIS and Mine Operations Plan. Activities are carried out in accordance with the MOP.	C																			
A4.2	<p>For the purposes of condition A4.1, the licence application includes:</p> <p>a) Development Consent Cowlal Project;</p> <p>b) Cowlal Gold Project - Environmental Impact Statement;</p> <p>c) List of initial development activities associated with the construction of the Cowlal Gold Project;</p> <p>d) Cowlal Gold Project - Species Impact Statement (Appendix A in Vol 2 of the Cowlal Gold Project EIS).</p> <p>e) Modifications to the Cowlal Gold Project approved by the Department of Planning.</p>	Note	Noted	Note																			
2. Discharges to Air and Water and Applications to Land																							
P1. Location of monitoring/discharge points and areas																							

No	Assessment Requirement				Reference/ Evidence	Comments	Compliance Status	Recommendations
P1.1	The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.				Monitor Pro (EHS) Environmental Monitoring Data 2017 - 2018 2018 Environmental Monitoring Schedule Interview with Environmental Advisor Monitoring Reporting Officer	All locations (and associated data) recorded in monitoring data. Refer to observation made against CoA DA 14/98 condition 6.1(a), regarding the location of the high volume sampler.	Obs	EPL will be required to be updated once high volume sampler is relocated.
	No.	Type of monitoring point	Type of Discharge point	Location description				
	1	Dust monitoring		Dust gauge located approximately 1km west of ML1535 boundary, labelled as "McLintock's Shed" in Figure 4 titled 'Air Quality Monitoring Sites' of the "Cowel Gold Operations Air Quality Management Plan" dated February 2015.				
	2	Dust monitoring		Dust gauge located south of the southern waste emplacement, labelled as "Site Office" in Figure 4 titled 'Air Quality Monitoring Sites' of the "Cowel Gold Operations Air Quality Management Plan" dated February 2015.				
	3	Dust monitoring		Dust gauge located approximately 5.5km east of ML1535 boundary, labelled as "DG6" in Figure 4 titled 'Air Quality Monitoring Sites' of the "Cowel Gold Operations Air Quality Management Plan" dated February 2015.				
	4	Dust monitoring		Dust gauge located approximately 3.5km south of ML1535 boundary, labelled as "DG9" in Figure 4 titled 'Air Quality Monitoring Sites' of the "Cowel Gold Operations Air Quality Management Plan" dated February 2015.				
	5	Dust monitoring		Dust gauge located within ML1535 and north of the open pit, labelled as "Site 52" in Figure 4 titled 'Air Quality Monitoring Sites' of the "Cowel Gold Operations Air Quality Management Plan" dated February 2015.				
	6	Dust monitoring		Dust gauge located approximately 3.5 km north of ML1535 boundary, labelled as 'DG1' in Figure 4 titled 'Air Quality Monitoring Sites' of the "Cowel Gold Operations Air Quality Management Plan" dated February 2015.				
49	TSP monitoring		High volume sampler located approximately 3.5 km north of ML1535 boundary, labelled as 'HV1' in Figure 4 titled 'Air Quality Monitoring Sites' of the "Cowel Gold Operations Air Quality Management Plan" dated February 2015.					
P1.2	The following utilisation areas referred to in the table below (now above) are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.				Note	Noted	Note	
P1.3	The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point. Water and Land				Monitor Pro (EHS) Environmental Monitoring Data 2017 - 2018 2018 Environmental Monitoring Schedule Interview with Environmental Advisor Monitoring Reporting Officer	Surface ambient monitoring locations have been monitoring up to 4 April 2018. Following this time Lake Cowal has reduced to 204.5 AHD and therefore no further monitoring below this level. This condition outlines the monitoring locations in accordance with "Cowel Gold Operations Water Management Plan" dated May 2015". The WMP 2017 is now currently under review and once approved this condition and associated monitoring locations will refer to a superseded WMP.	Obs	Auditor suggests that this condition is discussed with EPA as this condition will continue to be superseded with every revision of WMP if not amended.
	EPA I.D.	Type of Monitoring Point	Type of Discharge Point	Location Description				
	12	Stormwater quality monitoring		Northern waste emplacement contained water storage labelled as "D1" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.				
	13	Stormwater quality monitoring		Southern waste emplacement contained water storage labelled as "D4" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.				
	14	Ambient water quality monitoring		Surface water point within Lake Cowal labelled as "P1" in Figure 14 titled 'Regional Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.				
15	Ambient water quality monitoring		Surface water point within Lake Cowal labelled as "P2" in Figure 14 titled 'Regional Surface Water and Groundwater Monitoring					

No	Assessment Requirement			Reference/ Evidence	Comments	Compliance Status	Recommendations
				Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.			
16	Ambient water quality monitoring			Surface water point within Lake Cowal labelled as "P3" in Figure 14 titled 'Regional Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.			
17	Ambient water quality monitoring			Surface water point within Lake Cowal labelled as "B1" in Figure 14 titled 'Regional Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.			
18	Ambient water quality monitoring			Surface water point within Lake Cowal labelled as "B6" in Figure 14 titled 'Regional Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.			
19	Groundwater quality monitoring			Piezometer located up gradient of southern tailings storage labelled as "P555A-R" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.			
21	Groundwater quality monitoring			Piezometer located up gradient of northern tailings storage labelled as "P558A-R" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.			
22	Groundwater quality monitoring			Piezometer located down gradient of southern tailings storage labelled as "P412A-R" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.			
23	Groundwater quality monitoring			Piezometer located down gradient of southern tailings storage labelled as "P412A" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.			
24	Groundwater quality monitoring			Piezometer located down gradient of southern tailings storage labelled as "P414A" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.			
25	Groundwater quality monitoring			Piezometer located down gradient of southern tailings storage labelled as "P414B" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.			
26	Groundwater quality monitoring			Piezometer located near the process plant area labelled as "PP03" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.			
27	Groundwater quality monitoring			Piezometer located near the process plant area labelled as "PP04" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.			
30	Groundwater quality monitoring			Piezometer located down gradient of southern tailings storage labelled as "P417A" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.			
31	Groundwater quality monitoring			Piezometer located down gradient of southern tailings storage labelled as "P417B" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.			

No	Assessment Requirement			Reference/ Evidence	Comments	Compliance Status	Recommendations
32	Groundwater quality monitoring		Piezometer located down gradient of northern tailings storage labelled as "P418A" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.				
33	Groundwater quality monitoring		Piezometer located down gradient of northern tailings storage labelled as "P418B" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.				
34	Groundwater quality monitoring		Piezometer located down gradient of northern tailings storage labelled as "TSFNA" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.				
36	Groundwater quality monitoring		Pit dewatering bore labelled as "PDB1A" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.				
38	Groundwater quality monitoring		Pit dewatering bore labelled as "PDB3A" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.				
40	Groundwater quality monitoring		Pit dewatering bore labelled as "PDB5A" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.				
41	Northern waste emplacement leachate quality monitoring		Exact site to be determined upon commencement of waste rock dump.				
42	Southern waste emplacement leachate quality monitoring		Exact site to be determined upon commencement of waste rock dump.				
43	Perimeter waste emplacement leachate quality monitoring		Exact site to be determined upon commencement of waste rock dump.				
44	Groundwater quality monitoring		Groundwater monitoring bore east of the northern tailings storage labelled as "MON-01A" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.				
45	Groundwater quality monitoring		Groundwater monitoring bore south of the southern tailings storage labelled as "MON-02A" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.				
48	Water quality monitoring point	Water quality monitoring point	Automated sampler at the process plant labelled as "Monitoring Point 48" on Figure 1 "Monitoring Location for CNwad levels in Tailings Slurry Stream at the Process Plant" submitted to the DECCW on 3-12-2010 held on file LIC07/2610-08				
50	Groundwater quality monitoring		Piezometer located down gradient of northern tailings storage labelled as "TSFNB" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.				
51	Groundwater quality monitoring		Piezometer located down gradient of northern tailings storage labelled as "TSFNC" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowel Gold Operations Water Management Plan" dated May 2015.				

No	Assessment Requirement						Reference/ Evidence	Comments	Compliance Status	Recommendations
	52	Groundwater quality monitoring		Pit dewatering bore labelled as "PDB1B" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowal Gold Operations Water Management Plan" dated May 2015.						
	53	Groundwater quality monitoring		Pit dewatering bore labelled as "PDB3B" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowal Gold Operations Water Management Plan" dated May 2015.						
	54	Groundwater quality monitoring		Pit dewatering bore labelled as "PDB5B" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowal Gold Operations Water Management Plan" dated May 2015.						
	55	Groundwater quality monitoring		Groundwater monitoring bore located to the east of the northern tailings storage labelled as "MON-01B" in Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowal Gold Operations Water Management Plan" dated May 2015.						
	56	Groundwater quality monitoring		Groundwater monitoring bore located south of the southern tailings storage labelled "MON-02B" on Figure 13 titled 'ML 1535 Surface Water and Groundwater Monitoring Locations' in the "Cowal Gold Operations Water Management Plan" dated May 2015.						
P1.4	The following points in the table are identified in this licence for the purposes of the monitoring of weather parameters at the point.						Sentinel Datasight Interview with Environmental Monitoring Officer and Advisor Reporting Officer	Refer to Annex B1: CoA DA 14/98 condition 6.2.	C	
	<i>EPA I.D. Number</i>	<i>Type of monitoring point</i>	<i>Description of location</i>							
	7	Weather analysis	Weather monitoring station labelled as "Cowal Gold Mine Meteorological Station" on Figure 4 titled 'Air Quality Monitoring Sites' in the "Cowal Gold Operations Air Quality Management Plan" dated February 2015.							
Limit Conditions										
L1. Pollution of Waters										
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.						Interview with E&S Superintendent	Refer to Annex B1: CoA DA14/98 condition 4.3	C	
L2. Concentration limits										
L2.1	For each monitoring/dischARGE point or utilisation area specified in the table\ below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.						Note	Noted. Refer to statement for condition L2.4.	Note	
L2.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.						Note	Noted. Refer to statement for condition L2.4.	Note	
L2.3	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table\.						Note	Noted. Refer to statement for conditions L1.1 and L2.4.	Note	
L2.4	Water and/or Land Concentration Limits: Point 48						Monthly Trends and Data (Processing) Interview with Environmental Monitoring Officer and Advisor Reporting Officer	Refer to Annex B1: CoA DA14/98 condition 5.3(a)	C	
	Pollutant	Units of Measure	50 percentile concentration limit	90 percentile concentration limit	3DGM concentration limit	100 percentile concentration limit				
	Cyanide (weak acid dissociable)	milligrams per litre		20		30				
L3. Waste										

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations										
L3.1	The licensee must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by the licence.	Hazardous Waste and Chemical Management Plan August 2017 (under review) Auditor Observations	The HWCMP does not stipulate that no waste is permitted to be received at site from off site.	ANC	Update the HWCMP to include this commitment.										
L3.2	<p>For the purposes of condition L3.1:</p> <p>a) Effluent, waste rock, and tailings generated at the premises are not defined as "waste".</p> <p>b) Waste generated at the premises described in Attachment A 'Cowel Gold Project Proposed Bioremediation Facility' of the licence variation application supplementary material received by DECC on 16 June 2008 and classified as general solid waste (putrescible) in accordance with the Waste Classification Guidelines (DECC, 2008) is permitted by this licence to be disposed of at the premises.</p> <p>Disposal of this waste must be undertaken in accordance with the methods described in Attachment A of the licence variation application supplementary material received by DECC on 16 June 2008, and the Cowal Gold Project - Hazardous Waste and Chemical Management Plan.</p> <p>c) Waste generated at the premises described in Attachment B 'Cowel Gold Project Proposed Trash Screen Oversize Waste Management' of the licence variation application supplementary material received by DECC on 16 June 2008 and classified as general solid waste (putrescible) in accordance with the Waste Classification Guidelines (DECC, 2008) is permitted by this licence to be disposed of at the premises.</p> <p>Disposal of this waste must be undertaken in accordance with the methods described in Attachment B of the licence variation application supplementary material received by DECC on 16 June 2008, and the Cowal Gold Project - Hazardous Waste and Chemical Management Plan.</p> <p>d) Waste generated at the premises described in Attachment D 'Cowel Gold Project Proposed On-site Waste Management' of the licence variation application supplementary material received by DECC on 16 June 2008 and classified as general solid waste (putrescible) and/or general solid waste (non-putrescible) in accordance with the Waste Classification Guidelines (DECC, 2008) is permitted by this licence to be disposed of at the premises.</p> <p>e) Waste generated at the premises as described in Attachment A 'Cowel Gold Mine Proposed On-Site Waste Tyre Management' of the licence variation application supporting documentation received by the DECC on the 4 February 2009 and classified as special waste in accordance with the Waste Classification Guidelines (DECC 2008) is permitted by this licence to be disposed at the premises.</p> <p>Disposal of this waste must be undertaken in accordance with the conditions of this licence and within the waste rock emplacements only.</p>	<p>Hazardous Waste and Chemical Management Plan August 2017 (under review)</p> <p>August 2007 Variation to EPL 11912</p> <p>Buried Waste Register</p>	<p>The auditor reviewed the 2007 EPL variation which confirms the inclusion of the waste types listed in L3.2 and including methods to manage listed waste.</p> <p>The auditor reviewed <i>August 2007 Variation to EPL 11912</i> and noted authorisation to dispose of solid waste (specifically bio-remediated waste) and the monitoring of solid waste prior to disposal in pit. Monitoring has previously not been conducted and commenced at the beginning of April 2018.</p> <p>During the audit period no disposal of Trash Screen Oversize waste was conducted.</p> <p>The auditor notes waste tyres disposed of in the dump are tracked on the Buried Waste Register which links through to the CGO's GIS system and GPS mapped accordingly.</p>	NC	CGO identified monitoring against requirements of the EPL 11912 Condition L3.2 were not being conducted and proactively commenced monitoring prior to this audit. As such no further action is required.										
L4. Noise Limits															
L4.1	<p>Noise generated from the premises must not exceed criteria outlined in Table 1 at any residence on privately owned land, as shown on the plan Appendix 6 of the Cowal Gold Mine development consent DA (a) 14/98, as modified on 7 February 2017.</p> <p>Table 1</p> <table border="1" data-bbox="290 1514 1080 1707"> <thead> <tr> <th>Location</th> <th>Day/Evening/Night dB(A) LAeq (15 minutes)</th> </tr> </thead> <tbody> <tr> <td>Laurel Park, Lakeview III</td> <td>39</td> </tr> <tr> <td>Bramboyne, The Glen, Caloola II</td> <td>38</td> </tr> <tr> <td>Lakeview, Lakeview II, Foxham Downs II</td> <td>37</td> </tr> <tr> <td>Any other privately owned residence</td> <td>35</td> </tr> </tbody> </table> <p>Note:</p> <ul style="list-style-type: none"> The noise impact assessment criteria do not apply if the Licensee has an agreement with the owner/s of the relevant residence or land to generate higher noise levels, and the Licensee has advised the NSW Department of Planning and Environment in writing of the terms of the agreement. The noise impact assessment criteria do not apply to property and land subject to acquisition upon request as indentified in Table 7 of Development Consent DA 14/98. 	Location	Day/Evening/Night dB(A) LAeq (15 minutes)	Laurel Park, Lakeview III	39	Bramboyne, The Glen, Caloola II	38	Lakeview, Lakeview II, Foxham Downs II	37	Any other privately owned residence	35		Refer to Annex B1: CoA DA14/98 condition 6.4(c)	C	
Location	Day/Evening/Night dB(A) LAeq (15 minutes)														
Laurel Park, Lakeview III	39														
Bramboyne, The Glen, Caloola II	38														
Lakeview, Lakeview II, Foxham Downs II	37														
Any other privately owned residence	35														

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	<i>Note: LAeq means the equivalent continuous noise level – the level of noise equivalent to the energy-average of noise levels occurring over a measurement period.</i>				
L4.2	Noise generated from the premises is to be monitored and measured in accordance with the relevant requirements and exemptions of the "NSW Industrial Noise Policy".		Refer to Annex B1: CoA DA14/98 condition 6.4(c)	C	
L4.3	The noise criteria identified in condition L4.1 apply under meteorological conditions of temperature inversion conditions of up to 8.0°C/100 metres and wind speed up to 1 metre per second measured at 10 metres above ground level. The 1 metre per second drainage-flow wind applies where the development is at higher altitude than the residential receiver, with no intervening higher ground. The noise criteria identified in condition L4.1 do not apply during: a) periods of rain or hail; b) average wind speeds at microphone height that exceed 5 metres per second; or c) average wind speeds that exceed 3 metres per second measured at 10 metres above ground level.		Refer to Annex B1: CoA DA14/98 Appendix 5, condition 1	C	
L4.4	Attended monitoring is to be used to evaluate compliance with conditions L4.1 to L4.3.		Refer to Annex B1: CoA DA14/98 Appendix 5, condition 3	C	
L4.5	Monitoring is to be carried out quarterly unless otherwise directed by the Secretary of NSW Department of Planning and Environment.		Refer to Annex B1: CoA DA14/98 Appendix 5, condition 4	C	
L5 Blasting					
L5.1	The overpressure level from blasting operations at the premises at residences on privately owned land, when measured at the locations defined in condition M7.1 must not exceed 120 dB (Lin Peak) at any time at any noise sensitive locations. Error margins associated with any monitoring equipment used to measure this are not to be taken into account in determining whether or not the limit has been exceeded.		Refer to Annex B1: CoA DA14/98 condition 6.3(a)	C	
L5.2	The overpressure level from blasting operations at the premises at residences on privately owned land, when measured at the locations defined in condition M7.1 must not exceed 115dB (Lin Peak) Monday to Saturday during the day for more than five per cent of the total number of blasts over a period of 12 months. The overpressure level from blasting operations at the premises at residences on privately owned land, when measured at the locations defined in condition M7.1 must not exceed 105dB (Lin Peak) Monday to Saturday during the evening for more than five per cent of the total number of blasts over a period of 12 months. The overpressure level from blasting operations at the premises at residences on privately owned land, when measured at the locations defined in condition M7.1 must not exceed 95dB (Lin Peak) Monday to Saturday at night or on Sundays and public holidays (24 hours) for more than five per cent of the total number of blasts over a period of 12 months. Error margins associated with any monitoring equipment used to measure this are not to be taken into account in determining whether or not the limit has been exceeded.		Refer to Annex B1: CoA DA14/98 condition 6.3(a)	C	
L5.3	Ground vibration peak particle velocity from the blasting operations at the premises at residences on privately owned land, when measured at the locations defined in condition M7.1 must not exceed 10 mm/sec at any time. Error margins associated with any monitoring equipment used to measure this are not to be taken into account in determining whether or not the limit has been exceeded.		Refer to Annex B1: CoA DA14/98 condition 6.3(a)	C	
L5.4	Ground vibration peak particle velocity from the blasting operations at the premises at residences on privately owned land, when measured at the locations defined in condition M7.1 must not exceed 5 mm/sec Monday to Saturday during the day for more than five per cent of the total number of blasts over a period of 12 months. Ground vibration peak particle velocity from the blasting operations at the premises at residences on privately owned land, when measured at the locations defined in condition M7.1 must not exceed 2 mm/sec Monday to Saturday during the evening for more than five per cent of the total number of blasts over a period of 12 months. Ground vibration peak particle velocity from the blasting operations at the premises at residences on privately owned land, when measured at the locations defined in condition M7.1 must not exceed 1 mm/sec Monday to Saturday at night and on Sundays and public holidays (24 hours) for more than five per cent of the total number of blasts over a period of 12 months.		Refer to Annex B1: CoA DA14/98 condition 6.3(a)	C	

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	Error margins associated with any monitoring equipment used to measure this are not to be taken into account in determining whether or not the limit has been exceeded.				
L6 Potentially offensive odour					
L6.1	No condition of this licence identifies a potentially offensive odour for the purposes of section 129 of the Protection of the Environment Operations Act 1997. <i>Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.</i>	Note	Noted	Note	
4 Operating Conditions					
O1 Activities must be carried out in a competent manner					
O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Audit report findings Auditor observations	Management Plans are in place for CGO activities. These are prepared to achieve operations in a competent manner and include; Air Quality Management Plan, Blast Management Plan, Water Management Plan, Hazardous Waste and Chemical Management Plan.	C	
O2 Maintenance of plant and equipment					
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: (a) must be maintained in a proper and efficient condition; and (b) must be operated in a proper and efficient manner.		Refer to Annex B1: CoA DA14/98 condition 1.6	C	
O2.2	All persons associated with the licensee including employee's, agents' licensee, contractors and subcontractors must be advised of their responsibilities and liabilities under the Protection of the Environment Operations Act 1997.	Interview with E&S Superintendent Site Induction Training Records	The auditor reviewed the training matrix, all persons working on site are required to be inducted to the site which includes reference the POEO Act and incident reporting. The EPL is made available to all site personnel and a hard copy is maintained by the E&S Superintendent and within the security office.	C	
O3 Dust					
O3.1	Activities occurring in or on the premises must be carried out in a manner that will minimise the generation, or emission from the premises, of wind-blown or traffic generated dust.	Air Quality Management Plan February 2015	Refer to Annex B1: CoA DA14/98 conditions 6.1(a). A non-compliance is recorded for condition 6.1(a), however CGO has outlined the cause is likely not related to CGO's activities.	Obs	Ensure recommendations for condition 6.1(a) are implemented. If it is determined the emissions are related to CGO activities, a review of relevant plans and CGO's activities should be undertaken to ensure impacts can be reduced and mitigated.
O4 Waste Management					
O4.1	The waste rock emplacements areas and the perimeter waste emplacement must be located on a base drainage control zone with a minimum slope towards the open pit of 1 (vertical):200 (horizontal) and be designed to ensure all seepage from beneath the waste rock emplacement areas and the perimeter waste emplacement is directed towards the open pit.	Mine Operations Plan September 2017	Waste rock emplacements are designed and constructed in accordance with the MOP and RMP. These documents specifically reference requirements of EPL Condition O4.1.	C	
O4.2	The tailings storage facilities and contained water storage facilities must have a basal barrier or impermeable liner with an equivalent permeability of 1x10 ⁻⁹ metres per second over a thickness of 1 metre.	Geotechnical Investigation Report by SNC Lavalin Australia 18 December 2003	Report states that "[t]he permeability of the upper 5m transported clay overburden has been determined to be very low (between 6x 10 ⁻¹⁰ and 1 x 10 ⁻⁸ cm/sec)" for the TSF, which satisfies the condition when converted to metres per second.	C	
O5 Other operating conditions					
O5.1	All above ground storage facilities containing flammable and combustible liquids must be banded in accordance with Australian Standard AS 1940-2004.	Environmental Bund Inspection (September 2017)	The auditor reviewed Environmental Bund Inspection Audit (September 2017) conducted by Extrin. Review of the data collected during	Obs	The auditor recommends actions identified in the Environmental Bund Inspection

No	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations																
			the Environmental Bund Integrity Audit of the Evolution Mining Cowal Gold mine in August 2017, reveals there are specific items which need to be addressed. The auditor has not verified the third party findings to confirm this is a strict non-compliance against AS1940-2004.		Audit (September 2017) are reviewed and addressed.																
5 Monitoring and Recording Conditions																					
M1 Monitoring records																					
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	Note	Noted	Note																	
M1.2	All records required to be kept by this licence must be: (a) in a legible form, or in a form that can readily be reduced to a legible form; (b) kept for at least 4 years after the monitoring or event to which they relate took place; and (c) produced in a legible form to any authorised officer of the EPA who asks to see them.	Monitoring records review https://evolutionmining.com.au/cowal/	Monitoring records legible and published on CGO website, going back to 2012.	C																	
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: (a) the date(s) on which the sample was taken; (b) the time(s) at which the sample was collected; (c) the point at which the sample was taken; and (d) the name of the person who collected the sample.	Selection of sampling records (electronic and hard copy) CGO Environment server	Auditor reviewed a selection of sampling records and each recorded the required details.	C																	
M2 Requirement to monitor concentration of pollutants discharged																					
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	Environmental Monitoring Data 2017 - 2018	Auditor has reviewed the monitoring data for the period and CGO is undertaking auditing in accordance with condition.	C																	
M2.2	Air Monitoring Requirements POINT 1, 2, 3, 4, 5, 6 <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Particulates - deposited matter</td> <td>grams per square metre per month</td> <td>Monthly</td> <td>AM - 19</td> </tr> </tbody> </table> POINT 49 <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Total suspended particles</td> <td>Micrograms per cubic metre</td> <td>Special frequency 1</td> <td>Special method 1</td> </tr> </tbody> </table>	Pollutant	Units of measure	Frequency	Sampling Method	Particulates - deposited matter	grams per square metre per month	Monthly	AM - 19	Pollutant	Units of measure	Frequency	Sampling Method	Total suspended particles	Micrograms per cubic metre	Special frequency 1	Special method 1	Environmental Monitoring Data 2017 - 2018 Letter to EPA - Cowal Gold Operations - Licence Variation Application for Environmental Protection Licence 11912 9 April 2018 Interview with E&S Superintendent	Monitoring undertaken monthly at Points 1 to 6 for deposited dust. Point 49: Special Frequency 1 means "the collections of samples weekly and following rainfall events of 20mm or greater in a 24 hour period". CGO is undertaking the weekly monitoring but is not completing the monitoring after the specified rainfall events. On 9 April 2018 CGO notified EPA that it believed that "Special Frequency 1" included an error, relating to measuring TSP after rainfall events and proposed "Special Frequency 3" which would require "the collection of samples every 7 days". A revised EPL is currently in draft and CGO has provided comments to EPA, including comments related to updating this monitoring frequency. Also refer to observation for CoA DA 14/98 condition 6.1(a) regarding location of high volume sampler.	NC	CGO will remain non-compliant until such time as the revised EPL is approved. CGO should continue to work closely with EPA to ensure EPL approval is expedited.
Pollutant	Units of measure	Frequency	Sampling Method																		
Particulates - deposited matter	grams per square metre per month	Monthly	AM - 19																		
Pollutant	Units of measure	Frequency	Sampling Method																		
Total suspended particles	Micrograms per cubic metre	Special frequency 1	Special method 1																		
M2.3	Water and/ or Land Monitoring Requirements POINT 12, 13 <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>pH</td> <td>Special Frequency 2</td> <td>In situ</td> </tr> <tr> <td>Total suspended solids</td> <td>milligrams per litre</td> <td>Special frequency 2</td> <td>Representative sample</td> </tr> <tr> <td>Conductivity</td> <td>Microsiemens per centimeter</td> <td>Special frequency 2</td> <td>In situ</td> </tr> </tbody> </table>	Pollutant	Units of measure	Frequency	Sampling Method	pH	pH	Special Frequency 2	In situ	Total suspended solids	milligrams per litre	Special frequency 2	Representative sample	Conductivity	Microsiemens per centimeter	Special frequency 2	In situ	Environmental Monitoring Data 2017 - 2018 Meteorological Monitoring Report for June 2017, January 2018 and April 2018 by Sentinel	Point 12, 13 and Point 14, 16: For each of the above monitoring locations, either special frequency 1 or 2 applies, which requires monitoring "following rainfall events of 20mm or greater in a 24 hour period". To calibrate the weather station the system is required to be flushed which results in data that appears to be rainfall over 20mm. These are recorded as: <ul style="list-style-type: none"> 01/07/17 - 21.2mm 	C	
Pollutant	Units of measure	Frequency	Sampling Method																		
pH	pH	Special Frequency 2	In situ																		
Total suspended solids	milligrams per litre	Special frequency 2	Representative sample																		
Conductivity	Microsiemens per centimeter	Special frequency 2	In situ																		

No	Assessment Requirement				Reference/ Evidence	Comments	Compliance Status	Recommendations
	POINT 14, 16				Interview with E&S Superintendent	<ul style="list-style-type: none"> • 04/01/18 - 21mm • 11/04/18 - 22.8mm As this is not due to a rainfall event, no monitoring was triggered or undertaken. All monitoring required by this condition has been completed as per the required frequencies and all relevant parameters were monitored.		
	Pollutant	Units of measure	Frequency	Sampling Method				
	Alkalinity (as calcium carbonate)	milligrams per litre	Quarterly	Representative sample				
	Antimony	milligrams per litre	Quarterly	Representative sample				
	Arsenic	milligrams per litre	Quarterly	Representative sample				
	Cadmium	milligrams per litre	Quarterly	Representative sample				
	Conductivity	Microsiemens per centimeter	Special Frequency 1	In situ				
	Copper	milligrams per litre	Quarterly	Representative sample				
	Lead	milligrams per litre	Quarterly	Representative sample				
	Molybdenum	milligrams per litre	Quarterly	Representative sample				
	Nickel	milligrams per litre	Quarterly	Representative sample				
	pH	pH	Special Frequency 1	In situ				
	Selenium	milligrams per litre	Quarterly	Representative sample				
	Total suspended solids	Milligrams per litre	Special Frequency 1	Representative sample				
	Zinc	milligrams per litre	Quarterly	Representative sample				
	POINT 15, 17, 18							
	Pollutant	Units of measure	Frequency	Sampling Method				
	Alkalinity (as calcium carbonate)	milligrams per litre	Quarterly	Representative sample				
	Antimony	milligrams per litre	Quarterly	Representative sample				
	Arsenic	milligrams per litre	Quarterly	Representative sample				
	Cadmium	milligrams per litre	Quarterly	Representative sample				
	Conductivity	Microsiemens per centimeter	Monthly	In situ				
	Copper	milligrams per litre	Quarterly	Representative sample				
	Lead	milligrams per litre	Quarterly	Representative sample				
	Molybdenum	milligrams per litre	Quarterly	Representative sample				
	Nickel	milligrams per litre	Quarterly	Representative sample				
	pH	pH	Monthly	In situ				
	Selenium	milligrams per litre	Quarterly	Representative sample				
	Total suspended solids	Milligrams per litre	Quarterly	Representative sample				
	Zinc	milligrams per litre	Quarterly	Representative sample				
	POINT 19, 21, 22, 23, 24,25,26,27,30,31,32,33,34,44,45,50,51,55,56							
	Pollutant	Units of measure	Frequency	Sampling Method				
	Alkalinity (as calcium carbonate)	milligrams per litre	Quarterly	Representative sample				
	Antimony (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Arsenic (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Cadmium (dissolved)	milligrams per litre	Quarterly	Representative sample				

No	Assessment Requirement				Reference/ Evidence	Comments	Compliance Status	Recommendations
	Calcium	milligrams per litre	Quarterly	Representative sample				
	Chloride	milligrams per litre	Quarterly	Representative sample				
	Conductivity	Microsiemens per centimeter	Monthly	In situ				
	Copper (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Cyanide (weak acid dissociable)	milligrams per litre	Quarterly	Other approved method 1				
	Iron (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Lead (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Magnesium (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Manganese (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Molybdenum (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Nickel (dissolved)	milligrams per litre	Quarterly	Representative sample				
	pH	pH	Monthly	In situ				
	Selenium (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Sodium	milligrams per litre	Quarterly	Representative sample				
	Standing water level	Metres	Monthly	Inspection				
	Sulfate	milligrams per litre	Quarterly	Representative sample				
	Total dissolved solids	Milligrams per litre	Quarterly	Representative sample				
	Total hardness	milligrams per litre	Quarterly	Representative sample				
	Zinc (dissolved)	milligrams per litre	Quarterly	Representative sample				
	POINT 36,38,40,52,53,54							
	Pollutant	Units of measure	Frequency	Sampling Method				
	Antimony (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Arsenic (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Cadmium (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Calcium	milligrams per litre	Quarterly	Representative sample				
	Chloride	milligrams per litre	Quarterly	Representative sample				
	Conductivity	Microsiemens per centimeter	Monthly	In situ				
	Copper (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Iron (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Lead (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Magnesium (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Manganese (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Molybdenum (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Nickel (dissolved)	milligrams per litre	Quarterly	Representative sample				
	pH	pH	Monthly	In situ				
	Potassium	milligrams per litre	Quarterly	Representative sample				
	Selenium (dissolved)	milligrams per litre	Quarterly	Representative sample				

No	Assessment Requirement				Reference/ Evidence	Comments	Compliance Status	Recommendations
	Sodium	milligrams per litre	Quarterly	Representative sample				
	Standing water level	Metres	Monthly	Inspection				
	Sulfate	milligrams per litre	Quarterly	Representative sample				
	Total dissolved solids	Milligrams per litre	Quarterly	Representative sample				
	Total hardness	milligrams per litre	Quarterly	Representative sample				
	Zinc (dissolved)	milligrams per litre	Quarterly	Representative sample				
	POINT 41,42,43							
	Pollutant	Units of measure	Frequency	Sampling Method				
	Alkalinity (as calcium carbonate)	milligrams per litre	Quarterly	Representative sample				
	Antimony (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Arsenic (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Cadmium (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Calcium	milligrams per litre	Quarterly	Representative sample				
	Chloride	milligrams per litre	Quarterly	Representative sample				
	Conductivity	Microsiemens per centimeter	Monthly	In situ				
	Copper (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Iron (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Lead (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Magnesium (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Manganese (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Molybdenum (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Nickel (dissolved)	milligrams per litre	Quarterly	Representative sample				
	pH	pH	Monthly	In situ				
	Potassium	milligrams per litre	Quarterly	Representative sample				
	Selenium (dissolved)	milligrams per litre	Quarterly	Representative sample				
	Sodium	milligrams per litre	Quarterly	Representative sample				
	Standing water level	Metres	Monthly	Inspection				
	Sulfate	milligrams per litre	Quarterly	Representative sample				
Total dissolved solids	Milligrams per litre	Quarterly	Representative sample					
Total hardness	milligrams per litre	Quarterly	Representative sample					
Zinc (dissolved)	milligrams per litre	Quarterly	Representative sample					
POINT 48								
Pollutant	Units of measure	Frequency	Sampling Method					
Cyanide (total)	milligrams per litre	Weekly	Other Approved Method 2					
Cyanide (weak acid dissociable)	milligrams per litre	2 times daily during discharge	Other Approved Method 3					

No	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations																																																							
M2.4	<p>For the purposes of the table(s) above</p> <ul style="list-style-type: none"> • Special Frequency 1 means "the collections of samples weekly and following rainfall events of 20mm or greater in a 24 hour period". • Special Frequency 2 means "the collection of samples monthly and following rainfall events of 20mm or greater in a 24 hour period". • Special Method 1 means "the collection and analysis of samples generally in accordance with AS/NZS 3580.9.6:2015, subject to Special Frequency 1". • Other Approved Method 1 means "methods based on 22nd Ed. APHA 4500-CN Method O (or most contemporary APHA methods for analysing WAD cyanide), or as otherwise approved under EPL Condition M3.2". • Other Approved Method 2 means "methods based on 22nd Ed. APHA 4500 CN Method B, C, E and/or O (or most contemporary APHA methods for analysing total cyanide), or as otherwise approved under EPL Condition M3.2". • Other Approved Method 3 means "methods based on 22nd Ed. APHA 4500 CN Method B, C, E, I and/or O (or most contemporary APHA methods for analysing WAD cyanide), or as otherwise approved under EPL Condition M3.2". • Monitoring at points 14, 15, 16, 17 & 18 is not required when the monitoring site is dry or if the water level of Lake Cowal is at or below 204.5 metres Australian Height Datum or when the monitoring site is unable to be accessed safely. Monitoring is required to recommence when the outcome of a risk assessment determines a low or acceptable risk associated with the monitoring site. • Monitoring at points 36, 38, 40, 52, 53 & 54 is not required where a piezometer is lost or destroyed as a result of mine growth. 	Note	Noted	Note																																																								
M3 Testing methods - concentration limits																																																												
<i>Note: The Protection of the Environment Operations (Clean Air) Regulation 2010 requires testing purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".</i>																																																												
M3.1	<p>Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with:</p> <ul style="list-style-type: none"> (a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or (b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or (c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place. 	Air Quality Management Plan February 2015	The methodologies and approvals of such are outlined in the AQMP.	C																																																								
M3.2	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	Note	Noted	Note																																																								
M4 Weather monitoring																																																												
M4.1	<p>For each monitoring point specified in the table below, the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1. The licensee must use the sampling method, units of measure, averaging period and sample at the frequency, specified opposite in the other columns.</p> <p>Point 7</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Parameter</th> <th>Units of Measure</th> <th>Frequency</th> <th>Averaging Period</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Rainfall</td> <td>Mm</td> <td>Continuous</td> <td>24 hour</td> <td>AM-4</td> </tr> <tr> <td>Wind direction@10m</td> <td>Degrees</td> <td>Continuous</td> <td>15 minute</td> <td>AM-2 & AM-4</td> </tr> <tr> <td>Wind speed@10m</td> <td>metres per second</td> <td>Continuous</td> <td>15 minute</td> <td>AM-2 & AM-4</td> </tr> <tr> <td>Temperature @ 2 metres</td> <td>Degrees Celsius</td> <td>Continuous</td> <td>15 minute</td> <td>AM-4</td> </tr> <tr> <td>Temperature @ 10 metres</td> <td>Degrees Celsius</td> <td>Continuous</td> <td>15 minute</td> <td>AM-4</td> </tr> <tr> <td>Sigma theta @ 10 metres</td> <td>degrees</td> <td>Continuous</td> <td>15 minute</td> <td>AM-2 & AM-4</td> </tr> <tr> <td>Solar radiation</td> <td>Watts per square metre</td> <td>Continuous</td> <td>15 minute</td> <td>AM-4</td> </tr> <tr> <td>Additional Requirements:</td> <td>-</td> <td>-</td> <td>-</td> <td>AM-1 & AM-4</td> </tr> <tr> <td>- Siting</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>- Measurement</td> <td></td> <td></td> <td></td> <td>AM-2 & AM-4</td> </tr> </tbody> </table>	Parameter	Units of Measure	Frequency	Averaging Period	Sampling Method	Rainfall	Mm	Continuous	24 hour	AM-4	Wind direction@10m	Degrees	Continuous	15 minute	AM-2 & AM-4	Wind speed@10m	metres per second	Continuous	15 minute	AM-2 & AM-4	Temperature @ 2 metres	Degrees Celsius	Continuous	15 minute	AM-4	Temperature @ 10 metres	Degrees Celsius	Continuous	15 minute	AM-4	Sigma theta @ 10 metres	degrees	Continuous	15 minute	AM-2 & AM-4	Solar radiation	Watts per square metre	Continuous	15 minute	AM-4	Additional Requirements:	-	-	-	AM-1 & AM-4	- Siting					- Measurement				AM-2 & AM-4	<p>Sentinel Datasight</p> <p>Interview with Environmental Advisor Monitoring Reporting Officer</p>	All parameters required are monitored, with real time monitoring data available.	C	
Parameter	Units of Measure	Frequency	Averaging Period	Sampling Method																																																								
Rainfall	Mm	Continuous	24 hour	AM-4																																																								
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- Siting																																																												
- Measurement				AM-2 & AM-4																																																								

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
M5 Recording of pollution complaints					
M5.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	CGO Monthly Complaint Register	The auditor reviewed CGO's complaints register and no record of complaints regarding pollution have been recorded during audit period.	NT	
M5.2	The record must include details of the following: (a) the date and time of the complaint; (b) the method by which the complaint was made; (c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; (d) the nature of the complaint; (e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and (f) if no action was taken by the licensee, the reasons why no action was taken.	Note	Noted. Refer to statement for condition M5.1.	Note	
M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	CGO Monthly Complaint Register	The detailed record of complaints published on the website date back to July 2014 with Annual Reviews published on the website recording a summary of complaints back to 2010.	C	
M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Note	Noted. Refer to statement for condition M5.1.	Note	
M6 Telephone complaints line					
M6.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	https://evolutionmining.com.au/contact-details/	Community Relations Enquiries line (02 6975 3454) provided on Evolution website. The line is 24 hours and directs emails to the E&S Superintendent. The auditor tested the system during the audit.	C	
M6.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	https://evolutionmining.com.au/contact-details/	Community Relations Enquiries line (02 6975 3454) provided on Evolution website, the website does not specify the line is a complaints line.	ANC	Specify the Community Relations Enquiries line is a complaints line on the CGO website.
M6.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.	Note	Noted	Note	
M7 Blasting					
M7.1	To determine compliance with condition(s) L5.1, L5.2, L5.3 and L5.4: (a) Airblast overpressure and ground vibration levels must be measured at near by residences labelled as "BM01", "BM02", "BM03" and "BM08.1" on Figure 3 titled 'Blast Monitoring Locations' in the "Cowal Gold Operations Blast Management Plan" dated January 2015 for all blasts carried out on the premises; and (b) Instrumentation used to measure the airblast overpressure and ground vibration levels must meet the requirements of Australian Standard AS 2187.2-2006. (c) Monitoring at blast monitor BM01 is not required when the monitoring site is unable to be accessed safely. Monitoring is required to recommence when the outcome of a risk assessment determines a low or acceptable risk is associated with accessing the monitoring site.	Blast Management Plan January 2015	Similarly to EPL condition P1.3. This condition outlines the monitoring locations in accordance with "Figure 3 titled 'Blast Monitoring Locations' in the "Cowal Gold Operations Blast Management Plan" dated January 2015". If the BMP is updated in the future this condition will refer to a superseded BMP. BMP is currently not being revised. The auditor has not verified if instrumentation is in accordance with AS.	Obs NV	As per EPL condition P1.3. Suggestion that this condition is discussed with EPA as this condition will continue to be superseded with every revision of BMP if not amended.
6 Reporting Conditions					
R1 Annual return documents					
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.	Annual Returns	The auditor reviewed Annual Returns for 2015, 2016 and 2017. The Annual Returns meet the requirements of this condition. The auditor identified that one complaint from August 2017, relating to blasting, was not reported in the annual return but was published in the complaints register on CGO's website.	ANC	Ensure all complaints are reported within the Annual Return.

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.	Annual Returns	The auditor reviewed Annual Returns for 2015, 2016 and 2017. The Annual Returns meet the requirements of this condition.	C	
R1.3	Where this licence is transferred from the licensee to a new licensee: (a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and (b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.	NSW EPA Public Record	The auditor notes the EPL has not been transferred to a new licensee during the audit period.	NT	
R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: (a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or (b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	NSW EPA Public Record	The auditor notes the EPL has not been surrendered or revoked during the audit period.	NT	
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date')	NSW EPA Public Record	The Annual Return has been supplied to the EPA within the required period.	C	
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	Note	Noted	Note	
R1.7	Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: (a) the licence holder; or (b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	Annual Returns	The auditor reviewed signed Annual Returns.	C	
R1.8	The results of the blast monitoring required by condition M7.1 must be submitted to the EPA at the end of each reporting period.	Annual Review 2016 https://evolutionmining.com.au/cowal/ Interview with E&S Superintendent	All blast monitoring data is publicly available on CGO's website but is not submitted to the EPA. Blast monitoring exceedances are all outlined in the Annual reviews.	ANC	Recommend that blast monitoring data as required by condition M7.1 is submitted to the EPA or that it is otherwise agreed with EPA that this condition is satisfied through the publicly available blast data and submission of Annual Reviews.
R1.9	The licensee must report any exceedance of the licence blasting limits to the regional office of the EPA as soon as practicable after the exceedance becomes known to the licensee or to one of the licensee's employees or agents. <i>Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.</i> <i>Note: An application to transfer a licence must be made in the approved form for this purpose.</i>	Environmental Monitoring Data 2017 - 2018	Not triggered during audit period. Previous recorded exceedances have been attributable to "local environmental factors" and not CGO activities.	NT	
R2 Notification of environmental harm					
<i>Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.</i>					
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	Interview with E&S Superintendent	No incidents of environmental harm occurred during the audit period.	NT	
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.	Interview with E&S Superintendent	No incidents of environmental harm occurred during the audit period.	NT	
R3 Written report					
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: (a) where this licence applies to premises, an event has occurred at the premises; or (b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	Interview with E&S Superintendent	No requests made by the EPA.	NT	
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	Interview with E&S Superintendent	No requests made by the EPA.	NT	

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
R3.3	The request may require a report which includes any or all of the following information: (a) the cause, time and duration of the event; (b) the type, volume and concentration of every pollutant discharged as a result of the event; (c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; (d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; (e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; (f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and (g) any other relevant matters.	Interview with E&S Superintendent	No requests made by the EPA.	NT	
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	Interview with E&S Superintendent	No requests made by the EPA.	NT	
7 General Conditions					
G1 Copy of licence kept at the premises or plant					
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	Site observations	The EPL is made available to all site personnel and a hard copy is maintained by the E&S Superintendent and within the security office.	C	
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Interview with E&S Superintendent	Noted. No request made during audit period.	NT	
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Site observations	The EPL is made available to all site personnel and a hard copy is maintained by the E&S Superintendent and within the security office.	C	

Annex B.3

Compliance with Mining Lease 1535

Table B3 Mining Lease 1535 Compliance Table

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
Notice to Landholders					
1.	<p>Within a period of three months from the date of grant/renewal of this lease or within such further time as the Minister may allow, the lease holder must serve on each landholder of the land a notice in writing indicating that this lease has been granted/renewed and whether the lease includes the surface. The notice must be accompanied by an adequate plan and description of the lease area.</p> <p>If there are ten or more land holders affected, the lease holder may serve the notice by publication in a newspaper circulating in the region where the lease area is situated. The notice must indicate that this lease has been granted/renewed; state whether the lease includes the surface and must contain an adequate plan and description of the lease area.</p>	Note	Notice occurred prior to the current audit period.	Note	
Working Requirement					
4.	<p>The lease holder must:-</p> <p>(a) ensure that at least 135 competent people are efficiently employed on the lease area on each week day except Saturday or any week day that is a public holiday,</p> <p>OR</p> <p>(b) expend on operations carried out in the course of prospecting or mining the lease area, an amount of not less than \$2,400,000 during each year of the term of this lease.</p> <p>The Minister may at any time or times after a period of 2 years from the date of grant/ renewal of this lease, by instrument in writing served on the lease holder, increase or decrease the expenditure required or the number of people to be employed.</p>	<p>Interview with E&S Superintendent</p> <p>Correspondence from CGO's Manager - People and Culture</p>	CGO employ a total of approximately 350 people with 235 across four crews on a back to back two shift roster. As such on any given day approximately 170 employees are employed on the lease area each week day.	C	
Reports					
6.	<p>The lease holder shall provide, within a period of twenty-eight days after each anniversary of the date this lease has effect or at such other date as the Director-General may stipulate, of each year, a progress report(s) to the satisfaction of the Director-General containing the following:-</p> <p>(a) Full particulars, including results, interpretation and conclusions, of all exploration conducted during the twelve months period;</p> <p>(b) Details of expenditure incurred in conducting that exploration;</p> <p>(c) A summary of all geological findings acquired through mining or development evaluation activities;</p> <p>(d) Particulars of exploration proposed to be conducted in the next twelve months period;</p> <p>(e) All plans, maps, sections and other data necessary to satisfactorily interpret the report(s).</p>	DPI ML 1535 Annual Report	The auditor reviewed the annual report to the DPI for the period June 2016 through June 2017, submitted within the required time frame covering the requirements of this condition.	C	
Licence to Use Reports					
7.	<p>(a) The lease holder grants to the Minister, by way of a non-exclusive licence, the right in copyright to publish, print, adapt and reproduce all exploration reports lodged in any form and for the full duration of copyright.</p> <p>(b) The non-exclusive licence will operate as a consent for the purposes of section 365 of the Mining Act 1992.</p>	Note	Noted	Note	
Confidentially					
8.	<p>(a) All exploration reports submitted in accordance with the conditions of this lease will be kept confidential while the lease is in force, except in cases where:</p> <p>(i) the lease holder has agreed that specified reports may be made non-confidential; or</p> <p>(ii) reports deal with exploration conducted exclusively on areas that have ceased to be part of the lease.</p> <p>(b) Confidentiality will be continued beyond the termination of a lease where an application for a flow-on title was lodged during the currency of the lease. The confidentiality will last until that flow-on title or any subsequent flow-on title, has terminated.</p> <p>(c) The Director-General may extend the period of confidentiality.</p>	Note	Noted	Note	

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
Terms of the non-exclusive licence					
9.	<p>The terms of the non-exclusive copyright licence granted under condition 7(a) are:</p> <p>(a) the Minister may sub-licence others to publish, print, adapt and reproduce but not on-licence reports.</p> <p>(b) the Minister and any sub-licensee will acknowledge the lease holder's and any identifiable consultant's ownership of copyright in any reproduction of the reports, including storage of reports onto an electronic database.</p> <p>(c) the lease holder does not warrant ownership of all copyright works in any report and, the lease holder will use best endeavours to identify those parts of the report for which the lease holder owns the copyright.</p> <p>(d) there is no royalty payable by the Minister for the licence.</p> <p>(e) if the lease holder has reasonable grounds to believe that the Minister has exercised his rights under the non-exclusive copyright licence in a manner which adversely affects the operations of the lease holder, that licence is revocable on the giving of a period of not less than three months notice.</p>	Note	Noted	Note	
Safety					
11.	<p>Operations must be carried out in a manner that ensures the safety of persons or stock in the vicinity of the operations. All drill holes, shafts and excavations must be appropriately protected, to the satisfaction of the Director-General, to ensure that access to them by persons and stock is restricted. Abandoned shafts and excavations opened up or used by the lease holder must be filled in or otherwise rendered safe to a standard acceptable to the Director-General.</p>	<p>Safety and Health Management Plan 30 October 2017</p> <p>Interview with E&S Superintendent</p>	<p>Stock is excluded for the mining licence.</p> <p>CGO maintains a safety management system that addresses the protection requirements for excavations and holes.</p> <p>CGO currently don't have any abandoned shafts or excavations on their mining lease.</p>	C	
Rehabilitation					
12.	<p>(a) Land disturbed must be rehabilitated to a stable and permanent form suitable for a subsequent land use acceptable to the Director-General and in accordance with the Mining Operations Plan so that:-</p> <ul style="list-style-type: none"> • there is no adverse environmental effect outside the disturbed area and that the land is properly drained and protected from soil erosion. • the state of the land is compatible with the surrounding land and land use requirements. • the landforms, soils, hydrology and flora require no greater maintenance than that in the surrounding land. • in cases where revegetation is required and native vegetation has been removed or damaged, the original species must be re-established with close reference to the flora survey included in the Mining Operations Plan. If the original vegetation was not native, any re-established vegetation must be appropriate to the area and at an acceptable density. • the land does not pose a threat to public safety. <p>(b) Any topsoil that is removed must be stored and maintained in a manner acceptable to the Director-General.</p>	<p>Rehabilitation Management Plan August 2017</p> <p>Mining Operations Plan September 2017</p> <p>Topsoil Stockpile Map</p>	<p>Rehabilitation is progressed against the MOP and RMP in accordance with this condition.</p> <p>Topsoil is managed in stockpiles which are recorded / logged on a top soil register.</p> <p>The auditor reviewed GIS map of topsoil and subsoil locations which includes locations and volumes stored. Further the auditor observed topsoil stockpiles in situ with detailed signage.</p>	C	
13.	<p>The lease holder must comply with any direction given by the Director-General regarding the stabilisation and revegetation of any mine residues, tailings or overburden dumps situated on the lease area.</p>	<p>Interview with E&S Superintendent</p>	<p>No direction received during the audit period.</p>	NT	
Prevention of Soil Erosion and Pollution					
14.	<p>Operations must be carried out in a manner that does not cause or aggravate air pollution, water pollution (including sedimentation) or soil contamination or erosion, unless otherwise authorised by a relevant approval, and in accordance with an accepted Mining Operations Plan. For the purpose of this condition, water shall be taken to include any watercourse, waterbody or groundwaters. The lease holder must observe and perform any instructions given by the Director-General in this regard.</p>	<p>Mining Operations Plan September 2017</p>	<p>MOP is implemented as well as a number of other management plans that ensure pollution from CGO's activities is within approved criteria.</p>	C	

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
Transmission lines, Communication lines and Pipelines					
15.	Operations must not interfere with or impair the stability or efficiency of any transmission line, communication line, pipeline or any other utility on the area without the prior written approval of the Director-General and subject to any conditions he may stipulate.	Interview with E&S Superintendent Auditor Observations	CGO work with Essential Energy to maintain clearance of easements when required to operate within lease area. No interference with transmission lines was observed.	C	
Fences, Gates					
16.	(a) Activities on the lease must not interfere with or damage fences without the prior written approval of the owner thereof or the Minister and subject to any conditions the Minister may stipulate. (b) Gates within the lease area must be closed or left open in accordance with the requirements of the landholder.	Interview with E&S Superintendent	Where Lake Cowal is receding, damage to fences is being discussed with land holders to ensure this is rectified.	NV	
Roads					
17.	(a) Operations must not affect any road unless in accordance with an accepted Mining Operations Plan or with the prior written approval of the Director-General and subject to any conditions he may stipulate. (b) The lease holder must pay to the local council, the Department of Land and Water Conservation or the Roads and Traffic Authority the cost incurred in fixing any damage to roads caused by operations carried out under the lease, less any amount paid or payable from the Mine Subsidence Compensation Fund.	Interview with E&S Superintendent Cowal Gold Mine MoU on Road Maintenance	Refer to Annex B1: CoA DA 14/98 condition 1.5(a)	C	
18.	Access tracks must be kept to a minimum and be positioned so that they do not cause any unnecessary damage to the land. Temporary access tracks must be ripped, topsoiled and revegetated as soon as possible after they are no longer required for mining operations. The design and construction of access tracks must be in accordance with specifications fixed by the Department of Land and Water Conservation.	Interview with E&S Superintendent Auditor observations	New access tracks across to 3C area are rocked and kept to minimum areas. Access track to southern soil stockpile is kept to minimum disturbance areas. No seeding of past access tracks has occurred at this time. No access tracks outside of ML area and CGO owned properties.	C	
Trees and Timber					
19.	(a) The lease holder must not fell trees, strip bark or cut timber on the lease without the consent of the landholder who is entitled to the use of the timber, or if such a landholder refuses consent or attaches unreasonable conditions to the consent, without the approval of a warden. (b) The lease holder must not cut, destroy, ringbark or remove any timber or other vegetative cover on the lease area except such as directly obstructs or prevents the carrying on of operations. Any clearing not authorised under the Mining Act 1992 must comply with the provisions of the Native Vegetation Conservation Act 1997. (c) The lease holder must have any necessary licence from the Forestry Commission of New South Wales before using timber from any Crown land within the lease area.	Vegetation Clearance Protocol Interview with E&S Superintendent	Tree felling has only occurred within lease holder. CGO maintain a Vegetation Clearance Protocol, prepared in 2003 which considers this condition. No timber from crown land utilised on site.	C	
Resource Recovery					
21.	(a) Notwithstanding any description of mining methods and their sequence or of proposed resource recovery contained within the Mining Operations Plan, if at any time the Director-General is of the opinion that minerals which the lease entitles the lease holder to mine and which are economically recoverable at the time are not being recovered from the lease area, or that any such minerals which are being recovered are not being recovered to the extent which should be economically possible or which for environmental reasons are necessary to be recovered, he may give notice in writing to the lease holder requiring the holder to recover such minerals. (b) The notice shall specify the minerals to be recovered and the extent to which they are to be recovered, or the objectives in regard to resource recovery, but shall not specify the processes the lease holder shall use to achieve the specified recovery. (c) The lease holder must, when requested by the Director-General, provide such information as the Director-General may specify about the recovery of the mineral resources of the lease area.	Interview with E&S Superintendent	No notice received during the audit period.	NT	

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	<p>(d) No such notice shall be issued by the Director-General unless the matter has firstly been thoroughly discussed with and a report to the Director-General has incorporated the views of the lease holder.</p> <p>(e) The lease holder may object to the requirements of any notice issued under this condition and on receipt of such an objection the Minister shall refer it to a Warden for inquiry and report under Section 334 of the Mining Act, 1992.</p> <p>(f) After considering the Warden's report the Minister shall decide whether to withdraw, modify or maintain the requirements specified in the original notice and shall give the lease holder written notice of the decision. The lease holder must comply with the requirements of this notice.</p>				
Indemnity					
22.	The lease holder must indemnify and keep indemnified the Crown from and against all actions, suits, claims and demands of whatsoever nature and all costs, charges and expenses which may be brought against the lease holder or which the lease holder may incur in respect of any accident or injury to any person or property which may arise out of the construction, maintenance or working of any workings now existing or to be made by the lease holder within the lease area or in connection with any of the operations notwithstanding that all other conditions of this lease shall in all respects have been observed by the lease holder or that any such accident or injury shall arise from any act or thing which the lease holder may be licensed or compelled to do.	Insurance Certificate	CGO maintains bonds as required and discussed against conditions in this audit in addition to Professional Liability Insurance.	C	
Security					
23.	<p>(a) Securities as indicated below must be lodged with the Minister by the lease holder for the purpose of ensuring the fulfilment by the lease holder of his obligations under this lease. If the lease holder fails to fulfil any one or more of such obligations the said sum may be applied at the discretion of the Minister towards the cost of fulfilling such obligations. For the purpose of this clause the lease holder shall be deemed to have failed to fulfil the obligations of this lease if he fails to comply with any condition or provision hereof, any provision of the Act or regulations made thereunder or any condition or direction imposed or given pursuant to a condition or provision hereof or of any provision of the Act or regulations made thereunder.</p> <p>(i) an amount of \$250,000 must be lodged prior to the grant of a lease, and</p> <p>(ii) a further amount of \$11,750,000 must be lodged prior to the commencement of any construction activities.</p> <p>(b) The lease holder must provide the security required by sub-clause (a) hereof in one of the following forms:-</p> <p>(i) cash,</p> <p>(ii) a security certificate in such form and given by such surety as may from time to time be approved by the Minister.</p>	<p>Correspondence from DP&E Mining Lease No. 1535, Mining Act 1992, Evolution Mining (Cowal) Pty Limited - Notice of assessment for security (Assessed Deposit) 16 October 2017</p> <p>Deed of Security Deposit Bond:</p> <ul style="list-style-type: none"> • 4 August 2015 (\$35.5) • 10 August 2015 (\$28M) • 8 November 2017 (\$1.5M) 	<p>Since the issuance of ML 1535 the security has been amended on a number of occasions. Currently the required security to be given and maintained is \$65,000,000.00 as at 16 October 2017.</p> <p>CGO holds 3 security deposit bonds to satisfy bond requirements for ML 1535.</p>	C	
Mine Safety Management Plan					
24.	Prior to the commencement of any construction activities on the lease area and as required by the Director-General the lease holder must prepare a Mine Safety Management Plan to ensure the Mines Inspection General Rule 2000 is adhered to.	Safety and Health Management Plan 30 October 2017	<p>Outside of audit period.</p> <p>CGO has current safety management plan in place.</p>	C	
Mining, Rehabilitation, Environmental Management Process (MREMP)					
Mining Operations Plan (MOP)					
25.	<p>(1) Mining operations, including mining purposes, must be conducted in accordance with a Mining Operations Plan (the Plan) satisfactory to the Director-General. The Plan together with environmental conditions of development consent and other approvals will form the basis for-</p> <p>(a) ongoing mining operations and environmental management; and</p> <p>(b) ongoing monitoring of the project.</p> <p>(2) The Plan must be prepared in accordance with the Director-General's guidelines current at the time of lodgement.</p> <p>(3) A Plan must be lodged with the Director-General:-</p> <p>(a) prior to the commencement of mining and milling of ore;</p>	<p>Mining Operations Plan September 2017</p> <p>Correspondence with DP&E</p> <p>Letter from DRG: Mining Lease No. 1535, Mining Act 1992, Evolution Mining (Cowal) Pty Limited, Approval of Mining</p>	The auditor reviewed correspondence with DP&E CGO - Mining Operations Plan (1 September 2016 - 31 August 2018), dated 6 October 2017 detailing the amendment to the current MOP, confirming the MOP has been prepared in accordance with Condition 25 of the ML 1535 and Condition 2.1 of DA 14/98. The update reflects minor changes to the MOP.	C	

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	<p>(b) subsequently as appropriate prior to the expiry of any current Plan; and</p> <p>(c) in accordance with any direction issued by the Director-General.</p> <p>(4) The Plan must present a schedule of proposed mine development for a period of up to seven (7) years and contain diagrams and documentation which identify:-</p> <p>(a) area(s) proposed to be disturbed under the Plan;</p> <p>(b) mining and rehabilitation method(s) to be used and their sequence;</p> <p>(c) areas to be used for disposal of tailings/waste;</p> <p>(d) existing and proposed surface infrastructure;</p> <p>(e) flora and fauna management plan for the mine;</p> <p>(f) progressive landscape and rehabilitation management plan including schedules;</p> <p>(g) areas of particular environmental, ecological, archaeological and cultural sensitivity and measures to protect these areas;</p> <p>(h) soil stripping management plan;</p> <p>(i) surface & ground-water management systems including monitoring (including integrated erosion and sediment controls);</p> <p>(j) proposed resource recovery;</p> <p>(k) management plan for the construction and operation of the tailings dam;</p> <p>(l) environmental monitoring program listing the location of monitoring points, frequency of monitoring and parameters to be monitored; and</p> <p>(m) where the mine will cease extraction during the term of the Plan, a closure plan including final rehabilitation objectives/ methods and post mining land use/ vegetation.</p> <p>(5) The Plan when lodged will be reviewed by the Department of Mineral Resources.</p> <p>(6) The Director-General may within two (2) months of the lodgement of a Plan, require modification and re-lodgement.</p> <p>(7) If a requirement in accordance with clause (6) is not issued within two (2) months of the lodgement of a Plan, the lease holder may proceed with implementation of the Plan.</p> <p>(8) During the life of the Mining Operations Plan, proposed modifications to the Plan must be lodged with the Director-General and will be subject to the review process outlined in clauses (5) - (7) above.</p> <p>(9)(i) An initial Mining Operations Plan must be submitted prior to the commencement of construction on the site and include the following to the satisfaction of the Director-General and in conformity with the requirements of the Department of Infrastructure Planning and Natural Resources and the Dams Safety Committee:</p> <p>(a) plans to construct and maintain the site water management structures, namely the temporary perimeter bund, lake protection bund, up-catchment diversion system and internal catchment drainage system;</p> <p>(b) measures to manage and dispose of water that may be captured behind the temporary perimeter bund during construction of that bund;</p>	Operations Plan 16 October 2017	<p>DRG approved the MOP in 16 October 2017.</p> <p>While the MOP does not specifically list the details of various environmental monitoring programs as required by condition 25(4)(i), it does refer to each of the relevant plans where this level of monitoring information is provided. This strategy aligns with the NSW Government Trade & Investment "ESG3: Mining Operations Plan (MOP) Guidelines".</p>		

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	(c) the program for reporting on the site water management structures. (ii) The lease holder must construct and maintain the lake protection bund and other site water management structures as detailed in clause (9) (i) above.				
Annual Environmental Management Report (AEMR)					
26.	(1) Within 12 months of the commencement of mining operations and thereafter annually or, at such other times as may be allowed by the Director-General, the lease holder must lodge an Annual Environmental Management Report (AEMR) with the Director-General. (2) The AEMR must be prepared in accordance with the Director-General's guidelines current at the time of reporting and contain a review and forecast of performance for the preceding and ensuing twelve months in terms of: (a) the accepted Mining Operations Plan; (b) development consent requirements and conditions; (c) Environment Protection Authority and Department of Land and Water Conservation licences and approvals; (d) any other statutory environmental requirements; (e) details of any variations to environmental approvals applicable to the lease area; and (f) where relevant, progress towards final rehabilitation objectives. (3) After considering an AEMR the Director-General may, by notice in writing, direct the lease holder to undertake operations, remedial actions or supplementary studies in the manner and within the period specified in the notice to ensure that operations on the lease area are conducted in accordance with sound mining and environmental practice. (4) The lease holder shall, as and when directed by the Minister, cooperate with the Director-General to conduct and facilitate review of the AEMR involving other government agencies and the local council.	Annual Review 2016	The auditor reviewed Annual Reviews which are prepared by 30 June each year and made available on the CGO website. The Annual Review satisfies the requirements of the condition.	C	
Blasting					
27.	(a) <u>Ground Vibration</u> The lease holder must ensure that the ground vibration peak particle velocity generated by any blasting within the lease area does not exceed 10 mm/second and does not exceed 5 mm/second in more than 5% of the total number of blasts over a period of 12 months at any dwelling or occupied premises, not owned by the lease holder or a related corporation, as the case may be, unless determined otherwise by the Environment Protection Authority. (b) <u>Blast Overpressure</u> The lease holder must ensure that the blast overpressure noise level generated by any blasting within the lease area does not exceed 120 dB (linear) and does not exceed 115 dB (linear) in more than 5% of the total number of blasts over a period of 12 months, at any dwelling or occupied premises, not owned by the lease holder or a related corporation, as the case may be, unless determined otherwise by the Environment Protection Authority.		Refer to Annex B1: CoA DA14/98 condition 6.3(a)	C	
Use of Cyanide					
28.	The lease holder must not use cyanide or any solution containing cyanide for the recovery of minerals on the lease area without the prior written approval of the Minister and subject to any conditions he may stipulate.	CoA DA14/98	CGO is authorised under its CoA DA14/98 to utilise cyanide during the leaching process. Refer to Annex B1: CoA DA14/98 condition 5.3	C	
Control of Operations					
29.	(a) If an Environmental Officer of the Department of Mineral Resources believes that the lease holder is not complying with any provision of the Act or any condition of this lease relating to the working of the lease, he may direct the lease holder to:-	Interview with E&S Superintendent	No written direction made during the audit period.	NT	

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	<p>(i) cease working the lease; or</p> <p>(ii) cease that part of the operation not complying with the Act or conditions; until in the opinion of the Environmental Officer the situation is rectified.</p> <p>(b) The lease holder must comply with any written direction given. The Director-General may confirm, vary or revoke any such direction.</p> <p>(c) A written direction referred to in this condition may be served on the Mine Manager.</p>				

Annex C

Consultation with the Relevant Agencies

Nicole Whittaker

From: Oliver Moore
Sent: Monday, 16 April 2018 5:24 PM
To: Nicole Whittaker
Subject: FW: Cowal Gold Operations IEA

Follow Up Flag: Follow up
Flag Status: Flagged

Please keep this on file for the report. Cheers Olly

Oliver Moore
Principal Environmental Consultant
T +61 2 8584 8886 | M +61 419 222 370

From: Lisa Andrews <lisaandrews.ic@gmail.com>
Sent: Monday, April 16, 2018 8:33 AM
To: Oliver Moore <Oliver.Moore@erm.com>
Subject: Re: Cowal Gold Operations IEA

Thank you for the contact Olly.

I have recently taken over as Independent Chairperson of Cowal Gold Operations Community Environmental Monitoring and Consultative Committee. The committee operates extremely effectively and comprises of company representatives, community members, stakeholder groups and local government delegates.

I am unaware of any concerns regarding this project from an environmental management perspective, however, I will canvass the committee members, advising them of your audit and come back to you if there are any issues that they wish to raise.

All the best with your review.

Regards
Lisa

Lisa Andrews
t: 0401 609 693
e: lisaandrews.ic@gmail.com

On Wed, Apr 11, 2018 at 9:27 AM, Oliver Moore <Oliver.Moore@erm.com> wrote:

Lisa,

ERM is currently completing an independent environmental audit on the Conditions of Approval issued to Evolution Mining for the Cowal Gold Operations.

The attached Terms of Reference outlines the audit process, and also introduces the team of suitably qualified, experienced and independent experts who will be undertaking the audit. The site inspection will be completed over the period 16 – 19 April 2018.

One of the requirements of the audit is that it is to be undertaken in consultation with relevant agencies. To that end, this email invites you to raise any questions or concerns regarding this project from an environmental management perspective. Please send through to myself copying in my colleague Nicole.

Kind regards

Olly

Oliver Moore

Principal Environmental Consultant

ERM

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E Oliver.Moore@erm.com | W www.erm.com



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Nicole Whittaker

From: Oliver Moore
Sent: Wednesday, 11 April 2018 9:23 AM
To: rsmith@blandshire.nsw.gov.au
Cc: Nicole Whittaker; Michael Gaggin; Danielle Wallace
Subject: Cowal Gold Operations IEA
Attachments: ERM Audit Terms of Reference (April 2018) - Evolution Mining CGO.pdf

Ray,

ERM is currently completing an independent environmental audit on the Conditions of Approval issued to Evolution Mining for the Cowal Gold Operations.

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Kind regards

Olly

Oliver Moore
Principal Environmental Consultant

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E Oliver.Moore@erm.com | **W** www.erm.com



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Nicole Whittaker

From: Oliver Moore
Sent: Wednesday, 11 April 2018 9:25 AM
To: amy.mckenzie@industry.nsw.gov.au
Cc: Nicole Whittaker; Michael Gaggin; Danielle Wallace
Subject: Cowal Gold Operations IEA
Attachments: ERM Audit Terms of Reference (April 2018) - Evolution Mining CGO.pdf

Amy,

ERM is currently completing an independent environmental audit on the Conditions of Approval issued to Evolution Mining for the Cowal Gold Operations.

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One of the requirements of the audit is that it is to be undertaken in consultation with relevant agencies. To that end, this email invites you to raise any questions or concerns regarding this project from an environmental management perspective. Please send through to myself copying in my colleague Nicole.

Kind regards

Olly

Oliver Moore
Principal Environmental Consultant

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E Oliver.Moore@erm.com | **W** www.erm.com



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Nicole Whittaker

From: Miranda Kerr <Miranda.Kerr@environment.nsw.gov.au> on behalf of ROG South West Region Mailbox <rog.southwest@environment.nsw.gov.au>
Sent: Wednesday, 11 April 2018 12:50 PM
To: Oliver Moore
Cc: Nicole Whittaker; Michael Gaggin; Danielle.Wallace@evolutionmining.com.au
Subject: FW: Cowal Gold Operations IEA
Attachments: ERM Audit Terms of Reference (April 2018) - Evolution Mining CGO.pdf

Hi Oliver

Thanks for your invitation to provide input to the Cowal Gold Operations IEA. We are particularly interested in progress around actions and monitoring of the biodiversity offset areas.

Do you intend to use agency feedback to guide the site component of the audit, scheduled for 16 – 19 April? If so, three business days is an unreasonable timeframe for OEH to provide considered input.

The TOR is informative but doesn't appear to have a response date for input. Could you please let me know a date by when our written feedback would be useful?

Regards
Miranda



**Office of
Environment
& Heritage**

Miranda Kerr

A/ Senior Team Leader Planning
Planning, South West Branch
Regional Operations Division

Level 2, 512 Dean St, Albury
PO Box 1040, Albury NSW 2640
T 02 6022 0607 M 0407 752 822

The Office of Environment and Heritage (OEH) South West Planning Team has a new email address. Please send submissions for biodiversity and Aboriginal cultural heritage planning and regulation matters to rog.southwest@environment.nsw.gov.au.

From: Peter Ewin
Sent: Wednesday, 11 April 2018 10:19 AM
To: ROG South West Region Mailbox <rog.southwest@environment.nsw.gov.au>
Subject: FW: Cowal Gold Operations IEA



**Biodiversity
Conservation
Trust**

Peter Ewin

Regional Coordinator
Murray-Riverina

Level 2, 512 Dean Street, Albury 2640
PO Box 1040 Albury 2640
T 02 6022 0606 F 02 6022 0610
M 0427 433 937
W www.bct.nsw.gov.au

From: Oliver Moore [<mailto:Oliver.Moore@erm.com>]
Sent: Wednesday, 11 April 2018 9:27 AM
To: Peter Ewin <Peter.Ewin@bct.nsw.gov.au>
Cc: Nicole Whittaker <Nicole.Whittaker@erm.com>; Michael Gaggin <Michael.Gaggin@erm.com>; Danielle Wallace <Danielle.Wallace@evolutionmining.com.au>
Subject: Cowal Gold Operations IEA

Peter,

ERM is currently completing an independent environmental audit on the Conditions of Approval issued to Evolution Mining for the Cowal Gold Operations.

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Kind regards

Olly

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Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

Nicole Whittaker

From: Jason Price <Jason.Price@epa.nsw.gov.au>
Sent: Friday, 13 April 2018 9:40 AM
To: Oliver Moore
Cc: Nicole Whittaker; Michael Gaggin; Danielle Wallace
Subject: RE: Cowal Gold Operations IEA

G'day Oliver – I have reviewed the scope and criteria of the proposed audit and make only the following comment.

I'm not sure if it could be interpreted as part of your criteria but we have previously questioned the location of the high volume sampler (EPL point 49) relative to the requirements of Australian Standard AS/NZS 3580.1.1:2016 (Ambient Air – Guide to Siting Air Monitoring Equipment). An independent assessment of this monitoring point's location would resolve any concerns.

Not that this standard superseded Australian Standard AS/NZS 3580.1.1:2007 (Ambient Air – Guide for the Siting of Sampling Units) under which the sampling unit was located.

Regards

Jason Price

Operations Officer

Riverina Far West Region

South & West Branch, NSW Environment Protection Authority

☎ (02) 6969 0700 Mobile ☎ 0428 460 247

jason.price@epa.nsw.gov.au www.epa.nsw.gov.au [@EPA_NSW](https://twitter.com/EPA_NSW)

Report pollution and environmental incidents 131 555 (NSW only) or 02 9995 5555



Please send all official electronic correspondence to riverina.farwest@epa.nsw.gov.au

From: Oliver Moore [mailto:Oliver.Moore@erm.com]
Sent: Wednesday, 11 April 2018 9:24 AM
To: Jason Price <Jason.Price@epa.nsw.gov.au>
Cc: Nicole Whittaker <Nicole.Whittaker@erm.com>; Michael Gaggin <Michael.Gaggin@erm.com>; Danielle Wallace <Danielle.Wallace@evolutionmining.com.au>
Subject: Cowal Gold Operations IEA

Jason,

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Kind regards

Olly

Oliver Moore
Principal Environmental Consultant

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Nicole Whittaker

From: Oliver Moore
Sent: Wednesday, 18 April 2018 9:21 AM
To: Katrina O'Reilly
Cc: Nicole Whittaker
Subject: RE: HPE CM: Cowal Gold Operations IEA

Follow Up Flag: Follow up
Flag Status: Flagged

Katrina,

Thank you very much for providing a response, we will consider this during the audit.

Kind regards

Ollly

Oliver Moore
Principal Environmental Consultant
T +61 2 8584 8886 | M +61 419 222 370

From: Katrina O'Reilly <Katrina.OReilly@planning.nsw.gov.au>
Sent: Wednesday, April 18, 2018 9:16 AM
To: Oliver Moore <Oliver.Moore@erm.com>
Subject: RE: HPE CM: Cowal Gold Operations IEA

Oliver,

The Department would like consideration around:

Compliance with and status of all mgt plans;
Compliance with transport routes in regards to cyanide and storage of cyanide;
Rehabilitation;
Dust mgt; and
Management and monitoring of tailings dams;
Water mgt (both groundwater and surface water) and including capacity of any sediment dams.

Sorry about the delay in responding

Thanks and regards
Katrina

From: Oliver Moore [<mailto:Oliver.Moore@erm.com>]
Sent: Wednesday, 11 April 2018 9:26 AM
To: Katrina O'Reilly <Katrina.OReilly@planning.nsw.gov.au>
Cc: Nicole Whittaker <Nicole.Whittaker@erm.com>; Michael Gaggin <Michael.Gaggin@erm.com>; Danielle Wallace <Danielle.Wallace@evolutionmining.com.au>
Subject: HPE CM: Cowal Gold Operations IEA

Katrina,

ERM is currently completing an independent environmental audit on the Conditions of Approval issued to Evolution Mining for the Cowal Gold Operations.

The attached Terms of Reference outlines the audit process, and also introduces the team of suitably qualified, experienced and independent experts who will be undertaking the audit. The site inspection will be completed over the period 16 – 19 April 2018.

One of the requirements of the audit is that it is to be undertaken in consultation with relevant agencies. To that end, this email invites you to raise any questions or concerns regarding this project from an environmental management perspective. Please send through to myself copying in my colleague Nicole.

Kind regards

Olly

Oliver Moore
Principal Environmental Consultant

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