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Attention: Ms Katrina O'Reilly, Team Leader Compliance

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Dear Katrina,

RE: COWAL GOLD OPERATIONS – INDEPENDENT ENVIRONMENTAL AUDIT ACTION PLAN

We refer to condition 9.2(a)(ii) of the Development Consent (DA 14/98) for the Cowal Gold Operations (CGO), which requires:

(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.

In this regard, please be advised that the triannual CGO Independent Environmental Audit 2019 (dated June 2019) was undertaken by ERM (endorsed by the Secretary in correspondence from the NSW Department of Planning and Environment [DPE] dated 29 March 2019) for the audit period 1 May 2016 to 30 April 2019.

A copy of the Independent Environmental Audit 2019 is provided in **Attachment 1**.

Evolution Mining (Cowal) Pty Limited's (Evolution's) responses to the recommendations contained in the report, and a proposed timeframe for implementation where relevant, is provided in **Attachment 2**.

Please note that a response to only those recommendations in relation to non-compliances or administrative non-compliances has been provided. Although Evolution will consider all other general observations made during the audit, responses to these have not been specifically provided in this correspondence.

Please do not hesitate to contact the undersigned should you wish to discuss further.

Yours sincerely,
Evolution Mining (Cowal) Pty Limited



LUKE BOWDEN
Sustainability Manager
Cowal Gold Operations

Attachment 1 – Independent Environmental Audit Report
Attachment 2 – Independent Environmental Audit Action Plan

ATTACHMENT 1

INDEPENDENT ENVIRONMENTAL AUDIT REPORT

ATTACHMENT 2
INDEPENDENT ENVIRONMENTAL AUDIT ACTION PLAN

**Table A2-1
Action Plan for IEA Recommendations – Development Consent (DA14/98)**

Approval Instrument/Condition	IEA Finding	IEA Recommendation	Evolution Response	Timeframe
Condition 1.3	NC	CGO to secure building certificate for stores warehouse.	Evolution is currently in consultation with Bland Shire Council in relation to obtaining a building certificate for the stores warehouse structure. This action is currently ongoing.	December 2019*
Condition 3.4(d)	ANC	CGO to continue to proactively engage with DP&E to confirm Biodiversity Offset and Conservation Bond, as the date for securing the bond has passed this is an ANC. As at the 2019 audit, CGO were still awaiting response from DP&E in advance of next steps.	Evolution notes that as per the extension granted by the DPE on 5 July 2017, the biodiversity offset areas were required to be secured and the conservation bond lodged by 31 October 2017. In this regard, it is noted that the VPA has been submitted and is currently with the DPE for execution. Evolution is awaiting further correspondence from DPE in this regard.	Awaiting DPE response on VPA
Condition 5.5	NC	Ensure batteries are stored in a designated bounded area until the new waste battery storage area has been established and deemed appropriate for storage. The auditor acknowledges that at the time of the audit, the new battery waste storage area was in the process of being constructed.	Evolution has commissioned the new waste battery storage area and deemed it appropriate for use. The area is now fully functional with all relevant employees and contractors aware of the storage process going forward.	Complete
Condition 6.5(b)	NC	Review placement of lighting and reaffirm requirements with night shift supervisors	Evolution has taken measures to ensure that all employees and contractors responsible for the lighting plant are aware of their obligations under the Development Consent (DA 14/98). As part of the process in moving and setting up lighting plants on site, operators are required to assess the light direction of the plant to avoid nuisance to people using the surrounding roads and landowners.	Complete

*Subject to Bland Shire Council approval timeframes.

**Table A2-2
Action Plan for IEA Recommendations – Environmental Protection Licence (EPL 11912)**

Approval Instrument/Condition	IEA Finding	IEA Recommendation	Evolution Response	Timeframe
Condition L4.1	ANC	The EPL prescribes noise monitoring limits which are no longer applicable. The EPL should be updated to reflect MOD14 conditions.	Environment Protection Licence 11912 was recently varied to reflect the revised approval conditions in relation to Modification 14. The EPL 11912 was issued by the NSW Environment Protection Authority on 27 June 2019.	Complete
Condition O2.2	NC	Ensure that contractor induction includes key environmental policies and training which adequately establishes CGO's requirements (i.e. spill management).	All contractors and employees at the CGO are required to undertake a site based induction, as well as completing general environmental awareness training. A gap analysis has been undertaken to ensure that all Pybar and BK Hire contractors that had not yet completed the general environmental awareness training at the time of the audit, have been scheduled to complete this training.	Complete
Condition O2.2	NC	Ensure batteries are stored in a designated bunded area until the new waste battery storage area has been established and deemed appropriate for storage. Appropriately sized containment should be provided for ICBs. The auditor acknowledges that at the time of the audit, the new battery waste storage area was in the process of being constructed.	Battery storage is as per previous comments for DA 14/98 Condition 5.5 above. Appropriate IBC storage has been established in the form of a concrete apron. All IBCs are now stored on apron to avoid any incidental spillage to ground.	Complete

**Table A2-3
Action Plan for IEA Recommendations – Management Plans**

Approval Instrument/Condition	IEA Finding	IEA Recommendation	Evolution Response	Timeframe
DA14/98 Condition 3.1(a)	ANC	A detailed review and update of the HMP should be conducted to ensure the document aligns with current approval requirements.	As a result of the approval of Modification 14, the HMP has been revised. This plan is currently being updated based on feedback from the Department and will be submitted along with the other environmental management plans.	Complete
EPL11912 Condition L3.1	ANC	The HWCMP has not been updated to reflect this condition. Given the draft HMMP is scheduled to replace the HWCMP, it should also be updated to reflect this commitment.	Evolution recognises that waste management on site must comply with the conditions of EPL11912. Notwithstanding, Evolution considers that this is not relevant to this audit report, as this is draft document that was not yet finalised at the time of the audit.	-
EPL11912 Condition L3.2	ANC	As per L3.1, the draft HMMP should be updated to address waste management requirements stipulated within the EPL.	This is not relevant to this audit report, as this is draft document that was not yet finalised at the time of the audit.	-