

## 2021 Compliance Audit Findings – Northparkes Response

Table 1: Action Plan to resolve the non-compliances and implement the recommendations:

Risk Category of Finding (Administrative, Low, Medium, High)	Description of finding (Requirement, Description, Evidence)	Recommendation	Action	Due Date	Status	Incident Management Number
<b>Development Consent 11_0060</b>						
Administrative Non-compliance Schedule 2 Condition 8	<b>Non-compliance:</b> Consent PA06_0026 and DA DA11092 were surrendered on 20 June 2018. It is noted that the surrender of the consents occurred after the 12-month period specified in this Condition.	Northparkes request that this condition be removed during from the consent during the next Modification of Development Consent	Agree. Northparkes will seek to remove condition during MOD 6 assessment	31 Dec 21	In progress	9430
Administrative Non-compliance Schedule 3 Condition 5	<b>Non-compliance:</b> Section 8 of the Noise Management Plan details the noise monitoring program. No information relating to calibration or validation of noise monitoring results is contained in the plan. Section 6.5 defines what constitutes a noise incident and the reporting requirements.	Revise the Noise Management Plan to include the description of the operation of the unattended Noise Monitoring Program as a source of validation data.	Agreed. Northparkes will review the Noise Management Plan and include relevant information to comply with this condition.	30 Sep 21	In progress	9431
Medium Non-compliance Schedule 3 Condition 21	<b>Non-compliance:</b> On 15 April 2019 slurry from the Secondary Crusher discharged into Goonumbra Creek. The creek was dry at the time of the incident and the slurry was successfully removed. No water pollution occurred as a result of this incident. Note however, that the EPA issued an official caution as a result of the incident. The incident investigation undertaken by Northparkes identified operator error as the cause and implemented further training in materials management.	The incident has been investigated and appropriate action taken. No further action required.	Noted. No further action required.	-	-	-

Administrative Non-compliance Schedule 3 Condition 21 (c) (i)	<p><b>Non-compliance:</b> Section 5.1 of the Water Management Plan provides an overview of the Site Water Balance. Section 5.1 does not contain detail regarding contingency planning or reporting procedures.</p>	Review and revise Section 5.2 of the Water Management Plan to include all requirements of Schedule 3 Condition 23(c)(i).	Agreed. Northparkes will review the Water Management Plan and include relevant information to comply with this condition.	30 Sept 21	Complete	9432
Administrative Non-compliance Schedule 3 Condition 21 (c) (ii)	<p><b>Non-compliance:</b> The SWMP/WMP does not include:</p> <ul style="list-style-type: none"> <li>• detailed baseline data on water flows and quality in the waterbodies that could be affected by the project (section 6 of the SWMP contains some baseline data on water quality (pH, electrical conductivity, total suspended solids and copper), but there is no data on water flows);</li> <li>• detailed plans, including design objectives and performance criteria, for the: <ul style="list-style-type: none"> <li>- tailings storage facilities;</li> <li>- final voids;</li> </ul> </li> <li>• detailed performance criteria, other than trigger levels, for: <ul style="list-style-type: none"> <li>- the water management systems (clean dirty and contaminated);</li> <li>- downstream surface water quality;</li> <li>- downstream flooding impacts; and</li> <li>- stream and riparian vegetation health for Bogan River, Tenandra Creek, Goonumbla Creek and Cookopie Creek;</li> </ul> </li> <li>• a program to monitor and report on downstream flooding impacts.</li> </ul>	Review and revise Surface Water Management Plan to include all requirements of Schedule 3 Condition 23(c) (ii).	Agreed. Northparkes will review the Water/Surface Water Management Plans and include relevant information to comply with this condition.	30 Sept 21	Complete	9433
Administrative Non-compliance Schedule 3 Condition 21 (c) (iii)	<p><b>Non-compliance:</b> The GWMP/WMP does not include:</p> <ul style="list-style-type: none"> <li>- detailed baseline data on groundwater levels, yield and quality in the region and privately-owned groundwater bores that could be affected by the project (section 6 of the GWMP provides some baseline data regarding pH, TDS, and spatial and temporal variations in water quality across the Northparkes site near the ore bodies);</li> <li>- a program to monitor and report on groundwater inflows to the sub-level cave mining operations;</li> <li>- a program to monitor and report on background changes in groundwater yield/quality against mine-induced changes;</li> <li>- a program to validate the groundwater model for the project, and comparison of monitoring results with modelled predictions.</li> </ul>	Review and revise Section 5.2 of the Groundwater Management Plan to include all requirements of Schedule 3 Condition 23(c) (iii).	Agreed. Northparkes will review the Water/Groundwater Management Plans and include relevant information to comply with this condition.	30 Sept 21	Complete	9434

Administrative Non-compliance Schedule 3 Condition 41 (a)	<b>Non-compliance:</b> No evidence was available to confirm that Council, BCD or the CCC were given the opportunity to review Rehabilitation Management Plan.	Ensure that during the preparation of the combined MOP / Rehabilitation Management Plan that the relevant stakeholders are consulted.	Develop the integrated MOP / Rehabilitation Management Plan in accordance with approved guideline and licence condition requirements.	31 Dec 21	Not yet commenced. In transition with Rehab reform.	9437
Administrative Non-compliance Schedule 3 Condition 41 (b)	<b>Non-compliance:</b> No evidence was available to confirm that NSW Trade & Investment approved the Rehabilitation Management Plan.	Ensure that the revised Rehabilitation Management Plan / Mining Operations Plan is approved by relevant government agency.				
Administrative Non-compliance Schedule 3 Condition 41 (c)	<b>Non-compliance:</b> DPIE considered that the plan did not appear to meet the requirements of the relevant NSW Trade and Investment Guidelines.	Ensure that the combined Rehabilitation Management Plan / Mining Operations Plan meets the requirements of the relevant guidelines.				
Administrative Non-compliance Schedule 3 Condition 41 (d)	<b>Non-compliance:</b> The current version of the Rehabilitation Management Plan does not describe how the rehabilitation of the site would be integrated with the implementation of the biodiversity offset strategies.	Ensure that the integrated MOP / Rehabilitation Management Plan describes how the rehabilitation of the site would be integrated with the implementation of the biodiversity offset strategies.				
Administrative Non-compliance Schedule 3 Condition 41 (g)	<b>Non-compliance:</b> While Table 5 of the Rehabilitation Management Plan notes the requirement, where possible, to implement interim rehabilitation, no details / strategy for interim rehabilitation is described.	Ensure that the integrated MOP / Rehabilitation Management Plan describes the interim rehabilitation strategy being or proposed to be implemented.				
Administrative Non-compliance Schedule 6 Condition 1 (e)	<p><b>Non-compliance:</b> The EMS provides a high-level overview of stakeholder communications and references to the Stakeholder Communications Management Plan.</p> <p>The Stakeholder Communications Management Plan contains a description of the Complaint Management process and processes for communications with regulators.</p> <p>Details of the dispute resolution process were not found in either the Stakeholder Communications Plan or the Environmental Management Strategy.</p> <p>The EMS contains a description of the Incident Management System. It is noted that reference to the RMSS (the system under which incidents are managed) is not described,</p>	Review the Environmental Management Strategy / Stakeholder Communications Management Plan to include details of the stakeholder dispute resolution process.	Agreed. Northparkes will review the Stakeholder Communications Management Plan and include relevant information to comply with this condition.	30 Oct 21	Complete	9438
		Revise the Incident Management Section of the EMS to include relevant details regarding the use of the RMSS.	Agreed. Northparkes will review the Environmental Management Strategy and include relevant information to comply with this condition.	30 Oct 21	Complete	9439 9440

Administrative Non-compliance Schedule 6 Condition 3(a)	<b>Non-compliance:</b> All plans contain relevant detailed baseline data except for the Noise Management Plan and Air Quality Management Plan.	Revise the Air Quality and Noise Management Plans to include detailed baseline data.	Agreed. Northparkes will review the Air Quality and Noise Management Plans and include relevant information to comply with this condition	30 Oct 21	Complete	9441
Administrative Non-compliance Schedule 6 Condition 3(g)	<b>Non-compliance:</b> Three of the plans (Environmental Management Strategy, Heritage Management Plan and Blast Management Plan) contained appropriate references to the Incident Management Process to be implemented.  Two of the Plans (Traffic Management Plan and Heritage Management Plan) contained details of the complaint management procedure.  Two of the plans (Environmental Management Strategy and Blast Management Plan) described the non-compliance management procedure.	Review and revise all plans to ensure that they contain consistent descriptions of the: <ul style="list-style-type: none"> <li>• Complaint Management</li> <li>• Incident Management; and</li> <li>• Non-compliance Management.</li> </ul>	Agreed. Northparkes will review all management plans and update with current procedures to ensure consistency.	30 Oct 21	Complete	9442
Administrative Non-compliance Schedule 6 Condition 4(b)	<b>Non-compliance:</b> Section 6 of the Annual Reviews present the environmental monitoring summaries (and interpretations) for the reporting period. The assessment of performance against the individual environmental parameters includes a discussion of trends in the monitoring data and performance against trigger values (including statutory compliance criteria), however these sections do not specifically provide a comparison of actual against predicted impacts.	In future Annual Reviews ensure that for each category of impact presented in the EA, that an assessment of actual impacts against predicted impacts are reported.	Agreed. Northparkes will ensure that reporting period data is analysed against predicted impacts and reported in the Annual Review.	30 Oct 21	In progress	9443
Administrative Non-compliance Schedule 6 Condition 4(e)	<b>Non-compliance:</b> The Annual Reviews do not specifically provide a comparison of actual against predicted impacts					
Administrative Non-compliance Schedule 6 Condition 11(a)	<b>Non-compliance:</b> Copies of all approved plans and strategies are provided on the website (under Environmental Management Plans, Programs and Reports) with the exception of the Rehabilitation Management Plan.	Upload a copy of the current Rehabilitation Management Plan onto the Northparkes website.	Agreed.	30 Oct 21	In progress	9445

Environmental Protection Licence 4784						
Medium Non-compliance Condition L1.1	<p><b>Non-compliance:</b> On 15 April 2019 slurry from the Secondary Crusher discharged into Goonumbla Creek. The creek was dry at the time of the incident and the slurry was successfully removed. No water pollution occurred as a result of this incident. Note however, that the EPA issued an official caution as a result of the incident. The incident investigation undertaken by Northparkes identified operator error as the cause and implemented further training in materials management.</p>	<p>The incident has been investigated and appropriate action taken. No further action required.</p>	<p>Noted. No further action required.</p>	-	-	-

Mining Lease 1247						
Administrative Non-compliance Condition 5	<p><b>Non-compliance:</b> A written incident report was provided to the EPA on 17 April (two days after the initial notification), however a report was not provided to the Resource Regulator.</p>	<p>Ensure that the Resources Regulator is notified of any reportable environmental incident in accordance with Mining Lease Condition 5.</p>	<p>Noted.</p>	-	-	-

Observations						
<p>Administrative Improvement</p> <p>Development Consent 11_0060 Schedule 3 Condition 25</p>	<p><b>Observation:</b> The revegetation of the Limestone National Forest Off-set area is detailed in Limestone National Forest Offset Area Revegetation Plan. The offset area was transferred back to DPI in 2009. The last monitoring was undertaken in 2020 by DnA Environmental in the Limestone National Forest Offset. DnA found that some of the performance indicators had not been met and concluded that the drought conditions experienced during most of the audit period has impacted revegetation. Northparkes are reviewing the findings of the 2020 DnA monitoring report and at the time of this IEA were considering what actions are necessary to take as this land is no longer under Northparkes Control.</p> <p><b>Observation:</b> The Annual Reviews do not provide any information on the status of the Limestone National Forest Offset.</p>	<p>Under the Biodiversity section of the Annual Reviews, include a section on the monitoring and status of the Limestone National Forest Off-set area.</p>	<p>Noted. Northparkes will consider this when preparing the next Annual Review.</p>	<p>31 Dec 21</p>	<p>Complete</p>	<p>9435</p>
<p>Administrative Improvement</p> <p>Development Consent 11_0060 Schedule 3 Condition 34</p>	<p><b>Observation:</b> The McClintocks Lane site access road works including the road crossing over Goonumbla Creek was approved by Parkes Shire Council on 29 April 2015 (CC 201466). Not verified – NPM was unable to provide evidence of consultation with the then NSW Office of Water (now DPI Water) regarding the design of the site access road crossing over Goonumbla Creek.</p> <p>This is an historic non-compliance and was not triggered in this Audit period.</p>	<p>Request that this condition removed during next Modification of Development Consent.</p>	<p>Agree. Northparkes will seek to remove condition during MOD 6 assessment</p>	<p>31 Dec 21</p>	<p>In progress</p>	<p>9436</p>
<p>Administrative Improvement</p> <p>Development Consent 11_0060 Schedule 6 Condition 3(g)</p>	<p><b>Observation:</b> Regular reviews of all management plans have been undertaken. Details of the review triggers are listed in each management plan revision table.</p> <p><b>Observation 1</b> – the revision table of the Environmental Management Strategy does not record the revision dates.</p> <p><b>Observation 2</b> – the Groundwater Management Plan version number is incorrect.</p> <p><b>Observation 3</b> – the Surface Water Management Plan version number is incorrect.</p>	<p>Update the revision table of the Environmental Management Strategy with the relevant revision dates.</p> <p>Update the Groundwater Management Plan and Surface Water Management Plan version numbers.</p>	<p>Agreed. Northparkes will update during next review of the management plans.</p>	<p>-</p>	<p>Complete</p>	<p>9444</p>