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Department of Regional NSW



Compliance audit program

EL8994 Bauloora Mine and Mee Mar Exploration

Projects

Legacy Minerals Pty Ltd

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Table of Contents

1. Introduction.....	5
1.1. Background.....	5
1.2. Audit objectives.....	5
1.3. Audit scope.....	5
1.4. Audit criteria	5
1.5. Publishing and disclosure of information.....	6
2. Audit methods.....	7
2.1. Opening meeting.....	7
2.2. Site interviews and inspections.....	7
2.2.1. Data collection and verification	7
2.2.2. Site inspections	7
2.3. Closing meeting.....	7
2.4. Compliance assessment definitions	8
2.5. Reporting.....	9
3. Audit findings	10
3.1. Work program	10
3.2. Access arrangements.....	10
3.3. Native title and exempted areas	11
3.4. Community consultation	11
3.4.1. Risk assessment	11
3.4.2. Community consultation strategy	12
3.4.3. Implementation and reporting.....	12
3.5. Exploration activity approvals.....	12
3.6. Environmental management	13
3.6.1. Risk assessment	14
3.7. Security deposit	14
3.8. Rehabilitation	14
3.8.1. Risk assessment	14
3.8.2. Rehabilitation objectives and completion criteria.....	15
3.8.3. Rehabilitation program	15
3.9. Annual activity reporting	16

3.10. Core and sample storage.....	17
3.11. Record keeping.....	17
4. Compliance management.....	20
4.1. Identifying compliance obligations.....	20
4.2. Contractor management	20
4.3. Inspections, monitoring and evaluation	20
5. Audit conclusions.....	22

1. Introduction

1.1. Background

Exploration licence 8994 (EL8994) was granted to Legacy Minerals Pty Ltd on 4 August 2020. The exploration area is about 9 kilometres north-west of Cootamundra in central NSW.

As part of the compliance audit program, an audit of the exploration activities associated with the Bauloora Mine and Mee Mar exploration projects within EL8994 was undertaken on 5 September 2023 by the NSW Resources Regulator within the Department of Regional NSW.

1.2. Audit objectives

The objectives of the audit were to:

- undertake a compliance audit of the Legacy Minerals exploration activities against the requirements of the *Mining Act 1992* and the conditions of the exploration licence and activity approvals issued pursuant to that Act
- assess the operational performance of the exploration activities and the ability of the licence holder and/or its operator to implement management systems and controls to provide for sustainable management of the operations.

1.3. Audit scope

The scope of the audit included:

- the exploration activities associated with the Bauloora Mine, Mee Mar, and Breccia Sinter exploration projects including:
 - exploration activities within EL8994 including a selected sample of exploration drillholes
 - borehole sealing and rehabilitation activities for selected drilling activities undertaken since August 2020.
- a review of documents and records pertaining to the exploration operations for the period commencing 1 September 2021 and ending 5 September 2023.

1.4. Audit criteria

The audit criteria against which compliance was assessed included:

- *Mining Act 1992*, specifically, Sections 5, 30, 140, 163C to 163E, 163G, 378D
- Mining Regulation 2016, specifically clauses 59 to 68
- Conditions attached to EL8994 (granted 4 August 2020)
- Assessable prospecting operations application dated 18 August 2021 for up to 10 RC drill holes as part of the Bauloora Mine project, and associated approval dated 17 August 2021 (APO0001072)

- Assessable prospecting operations application dated 27 October 2022 for up to 15 diamond drill holes as part of the Mee Mar project, and associated approval dated 24 November 2022 (APO0001289)
- Assessable prospecting operations application dated 30 July 2023 for up to 10 diamond drill holes as part of the Breccia Sinter project, and associated approval dated 15 August 2023 (APO0001313)
- Exploration code of practice: Environmental Management (Version 4, June 2021 and Version 5, March 2022)
- Exploration code of practice: Rehabilitation (Version 4, June 2021 and Version 5, March 2022)
- Exploration code of practice: Community Consultation (Version 2.0, October 2022 and Version 2.1, May 2023)
- Exploration code of practice: Produced water management, storage and transfer (Version 3, September 2017, Version 4, June 2021 and Version 5, March 2022)
- Exploration Reporting: A guide for reporting on exploration and prospecting in New South Wales (Version 3, October 2021 and Version 4, January 2022)
- Exploration Guideline: Annual activity reporting for prospecting titles (Version 3.0, December 2020 and Version 4, October 2022) published by Department of Regional NSW

1.5. Publishing and disclosure of information

This audit report was published on the Regulator's website consistent with:

- Section 365 of the *Mining Act 1992*
- Resources Regulator's [Public comment policy](#)
- *Government Information (Public Access) Act 2009*.

2. Audit methods

The audit process involved the interview of site personnel, a review of documentation and samples of records provided by the licence holder and/or operator to determine the level of compliance of the operations and assess the status of the operational performance. The audit process and methodology are described in more detail in the sections below.

2.1. Opening meeting

An opening meeting was held onsite on 5 September 2023. The audit team was introduced, and the scope of their responsibilities was conveyed to the auditees. The objectives and scope of the audit were outlined. The methods to be used by the team to conduct the audit were explained, including the interview of personnel, review of documentation, examination of records and a site inspection to assess specific compliance requirements.

2.2. Site interviews and inspections

2.2.1. Data collection and verification

Where possible, documents and data provided during the audit process were reviewed electronically on the day. Several documents were unable to be reviewed on the day and were provided following the remote audit.

All information obtained during the audit process was verified by the audit team where possible. For example, statements made by site personnel were verified by viewing documentation and records, including site photographs, where possible. Where suitable verification could not be provided, this has been identified in the audit findings as not determined.

2.2.2. Site inspections

A site inspection was undertaken of the following exploration activities:

- Diamond drill hole MM008, drilled February 2023, rehabilitated
- Diamond drill hole MM002, drilled February 2023, rehabilitated
- Diamond drill hole MM005, drilled February 2023, rehabilitated
- Reverse circulation (RC) drill hole BM010, drilled January 2022, rehabilitated
- RC drill hole BM008, drilled January 2022, rehabilitated
- RC drill hole BM009, drilled January 2022, rehabilitated

2.3. Closing meeting

A closing meeting was held on site on 5 September 2023. The objectives of this meeting were to discuss any outstanding matters, present preliminary findings and outline the process for finalising the audit report.

2.4. Compliance assessment definitions

The reporting of results from the compliance audit was determined based on the definitions presented below in Table 1.

Table 1 Compliance assessment definitions

Assessment	Criteria
Compliance	Sufficient and appropriate evidence is available to demonstrate the particular requirement has been complied with.
Non-compliance	<p>Clear evidence has been collected to demonstrate the particular requirement has not been complied with. There are three subcategories of non-compliance reflecting the severity and level of risk associated with the non-compliance:</p> <p>NC1 – the absence of planning or implementation of a required operational element which has the potential to result in a significant risk.</p> <p>NC2 – an isolated lapse or absence of control in the implementation of an operational element which is unlikely to result in a significant risk.</p> <p>NC3 – an administrative or reporting non-compliance which does not have a direct environmental or safety significance.</p> <p>Note: The identification of a non-compliance in this audit may or may not constitute a breach of, or offence under, the <i>Mining Act 1992</i>. Non-compliances identified in this audit report may be further investigated by the Regulator and regulatory actions may be undertaken.</p>
Observation of concern	<p>Where an auditee may be compliant at the time of the audit but there are issues that exist that could result in the potential for future non-compliance if not addressed.</p> <p>Observation of concern was also used where an issue may not have particular compliance requirements, but which was not conducive to good management or best practice.</p>
Suggestion for improvement	Where changes in processes or activities inspected or evaluated at the time of the audit could deliver improvement in relation to risk minimisation, sustainable outcomes and management practices.
Not determined	<p>The necessary evidence has not been collected to enable an assessment of compliance to be made within the scope of the audit.</p> <p>Reasons why the audit team could not collect the required information include:</p> <p>insufficient information on the file relating to the period covered by the audit or insufficient evidence collected to reach a conclusion</p> <p>the wording on the criteria (approval condition) meant that no evidence could be gathered, or it was too difficult to gather the evidence.</p> <p>A ‘not determined’ assessment was also made where the condition was outside the scope of the audit.</p>
Not applicable	The circumstances of the authorisation or licence holder have changed and are no longer relevant (e.g. no longer mining, mining equipment and plant has been removed).

Assessment	Criteria
	An invoking element in the criteria was not activated within the scope of the audit.

2.5. Reporting

Following completion of the audit, the audit checklists were completed, and audit notes were reviewed to compile a list of outstanding matters to be noted in the audit report. This report was prepared to provide an overview of the operational performance of the site in relation to the exploration activities and identify any non-compliances or observations of concern noted by the auditors during the documentation review and interviews.

The draft audit findings were forwarded to Legacy Minerals for comment. Consideration was given to the representations made during the finalisation of the audit report as discussed in the audit findings.

3. Audit findings

3.1. Work program

Condition 1 of EL8994 required the licence holder to carry out the operations described in the approved work program. Work program, WP-EL8994-2020-2025, was in force during the audit period.

Evidence was available to confirm that exploration activities were progressing. Annual reports for the 2021, 2022 and 2023 reporting periods were reviewed for EL8994. Exploration completed included:

- 10 RC drill holes at the Mount Felstead prospect
- 10 diamond drill holes at the Mee Mar prospect
- soil geochemical sampling program consisting of 3,801 soil samples
- metallurgical testing of samples
- collection and assay of rock chip samples
- downhole electromagnetic surveys
- ground magnetic survey
- aero-magnetic and radiometric survey

Legacy Minerals exploration staff said a yearly tracking spreadsheet was used as part of the annual reporting process to review and monitor the approved work program. Monthly updates to the Legacy Minerals executive team and the joint venture partner, and quarterly board reporting were also used as a means of monitoring the progression of the exploration activities against the work program. Evidence was available to confirm the work program was progressing.

Exploration data was noted to be maintained by the Legacy Minerals geologists and submitted to Mining, Exploration and Geoscience (MEG) with the annual activity reports as required.

3.2. Access arrangements

Section 140 of the *Mining Act 1992* stated, 'the holder of a prospecting title must not carry out prospecting operations on any particular area of land except in accordance with an access arrangement or arrangements applying to that area of land'. The access arrangement was required to be agreed in writing between the holder of the prospecting title and each landholder of that area of land.

Evidence was provided to confirm that written land access agreements were in place for the exploration activities undertaken on EL8994. The land access agreements reviewed during the audit were generally noted to be prepared using a standard AMEC template. Some agreements noted additional conditions negotiated by the landholder (for example, specific requirements for notifying of site visits, and requirements for vehicles to be cleaned before entry).

3.3. Native title and exempted areas

Condition 2 of EL8994 required the licence holder to obtain the prior written consent of the Minister before carrying out any activities on land on which native title had not been extinguished. Similarly, Section 30 of the *Mining Act 1992* required the consent of the Minister before a licence holder undertook any activities within an exempted area.

Legacy Minerals staff advised that exploration activities were generally being conducted in areas of freehold land within EL8994. A review of mapping data showed that no holes had been drilled in any exempted areas within EL8994. No further approvals under section 30 of the *Mining Act 1992* were required. It was noted that Legacy Minerals was maintaining a Crown lands layer in its GIS to identify areas where further approvals may be required, or areas where drilling was to be excluded.

Legacy Minerals exploration staff advised that most of the licence area was under freehold title where native title had generally been extinguished. Although not a compliance requirement, confirmation of extinguishment had not been sought from MEG. No further approvals under Condition 2 of the licence were required for EL8994.

3.4. Community consultation

Condition 3 of EL8994 required the licence holder to carry out community consultation in relation to the planning and conduct of exploration activities. Community consultation was required to be carried out in accordance with the requirements of Exploration code of practice: Community consultation.

An assessment against the mandatory requirements of the code of practice was undertaken as documented in the following sections.

3.4.1. Risk assessment

Mandatory requirement 1 of the code of practice required the licence holder to conduct a risk assessment to identify and consider the range of opportunities and potential threats associated with community consultation and engagement.

Evidence was available to confirm that Legacy Minerals had assessed the activity impact level as low. The auditor concurred with this assessment. Although Legacy Minerals undertook an assessment of the activity impact level as described in the guidance material in the code of practice, it was noted no further site-specific risk assessment was undertaken to identify and consider the range of opportunities and threats associated with community engagement. This was raised as observation of concern no. 1. Legacy Minerals should undertake a formal site-specific community consultation risk assessment for exploration operations. As a suggestion for improvement No 1, it is suggested that the risk assessment be completed with reference to the objectives for consultation (i.e. the risk assessment needs to focus on what risks need to be managed in order for effective and inclusive consultation to take place to achieve the objectives for consultation).

3.4.2. Community consultation strategy

Mandatory requirement 2 required the preparation of a community consultation strategy to manage the risks identified in the risk assessment. Mandatory requirement 3 set out the requirements for preparation of the community consultation strategy.

Legacy Minerals prepared a community consultation strategy for its Mee Mar and Bauloora Mine projects. The strategy was noted to address the mandatory requirements of the code of practice, including:

- identifying objectives for community consultation
- stakeholder identification and analysis – a range of stakeholders were identified in Table 2
- methods for undertaking community consultation were documented – different communication methods were selected for different activities, reflecting a ‘one size fits all’ approach was not appropriate for all stakeholders
- processes for monitoring and responding to feedback or complaints were documented. Contact details were observed on the Legacy Minerals webpage.
- processes for review of the strategy were included.

Typically, Legacy Minerals prepared a consultation strategy for each exploration program. This included a planned landholder activity chart that outlined specific consultation activities for each landholder for each project.

3.4.3. Implementation and reporting

Mandatory requirement 4 required the licence holder to implement, monitor and report annually on the community consultation strategy.

Evidence was available to confirm that Legacy Minerals was undertaking community consultation generally in accordance with the methods outlined in the community consultation strategy. Given the location of exploration activities remote from sensitive receptors, liaison with landholders was the key consultation undertaken.

It was noted that records of consultation activities were maintained electronically in a consultation register.

Up until the change to the code of practice in October 2022, annual community consultation reports were prepared and submitted by Legacy Minerals, generally in accordance with the reporting guidance in Appendix 2 of the code of practice.

3.5. Exploration activity approvals

Section 23A of the *Mining Act 1992* required the holder of an exploration licence to obtain an activity approval before carrying out assessable prospecting operations.

Evidence was available to confirm that exploration activity approvals were sought and granted for exploration activities. Exploration activity approvals granted included:

- assessable prospecting operations application dated 18 August 2021 for up to 10 RC drill holes as part of the Bauloora Mine project, and associated approval dated 17 August 2021 (APO0001072)
- assessable prospecting operations application dated 27 October 2022 for up to 15 diamond drill holes as part of the Mee Mar project, and associated approval dated 24 November 2022 (APO0001289)
- assessable prospecting operations application dated 30 July 2023 for up to 10 diamond drill holes as part of the Breccia Sinter project, and associated approval dated 15 August 2023 (APO0001313).

Generally, evidence was provided to indicate that the exploration activities were carried out in accordance with the description provided in the applications and in accordance with the approvals given.

It was noted the Breccia Sinter project had not commenced at the time of the audit.

3.6. Environmental management

Condition 4 of EL8994 required the licence holder to prevent or minimise so far as is reasonably practicable, any harm to the environment arising from the activities carried out under the licence. Condition 2 of the exploration activity approval required the licence holder to carry out the activity in compliance with Part B of the Exploration code of practice: Environmental management.

No evidence of environmental harm was observed at the sites visited during the site inspection. The RC and diamond drilling programs were completed at the time of the audit and all plant and equipment had been removed from site. All holes were rehabilitated. An assessment against the Exploration code of practice: Environmental management was not completed but the following observations were made:

- No evidence of hydrocarbon spillage or chemical contamination was observed at any of the sites inspected.
- Aboveground sumps were used for diamond drilling operations.
- No wastes were observed at any of the sites inspected. Sumps were pumped out at the completion of drilling and disposed of at an approved waste management facility.
- All holes were observed to have been drilled in cleared paddock areas or areas under crops.
- Generally, existing farm tracks were used wherever possible. Legacy Minerals exploration staff said all access points and tracks were agreed with the landowner.
- Tracked drill rigs were used for the drilling programs. Landowners restricted access to sites during wet weather.
- Drill rigs were reported to be washed down prior to arrival on site and when moving between paddocks or land owned by different land holders. Legacy Minerals staff inspected the Regulator's vehicle before accessing the property where drilling was undertaken.

3.6.1. Risk assessment

Mandatory requirement 12.1 required the licence holder to monitor the risks associated with activities and, if the risk associated with an activity changes, implement revised environmental management controls.

Legacy Minerals prepared a comprehensive environmental risk management plan for its exploration operations which discussed the typical environmental risks associated with exploration activities. Where required, environmental controls were identified to mitigate any high and medium risks.

A range of risks was identified including, for example:

- surface water pollution
- air pollution, dust etc
- operational noise
- groundwater pollution
- weed control.

It was noted that suitable controls were detailed for each risk identified.

3.7. Security deposit

Condition 5 of EL8994 required the licence holder to provide a security deposit to secure funding for the fulfilment of obligations under the licence.

The security amount required for EL8994 was \$72,000, which department records confirmed was held. Observations made on site during the site inspection confirmed that the security held was adequate for the drilling programs completed.

3.8. Rehabilitation

Condition 6 of EL8994 required the licence holder to carry out rehabilitation of all disturbance caused by activities carried out under the licence in accordance with the requirements of the Exploration code of practice: Rehabilitation.

An assessment against the mandatory requirements of the code of practice was undertaken for the exploration activities as documented in the following sections.

3.8.1. Risk assessment

Mandatory requirement 1 required the licence holder to conduct a risk assessment to evaluate the range of potential threats and opportunities associated with rehabilitating disturbed areas to a condition that could support the intended final land use.

Legacy Minerals prepared a rehabilitation risk assessment, which was documented in the exploration environmental management strategy prepared for each project. Examples of risks included for the Bauloora Mine project included:

- adoption of inappropriate or inadequate rehabilitation techniques
- soil compaction from exploration activities

- weed infestation associated with introduction or poor control of weeds
- lack of rehabilitation care and maintenance.

It was noted that suitable controls were detailed for each risk identified.

3.8.2. Rehabilitation objectives and completion criteria

Mandatory requirement 2 required the licence holder, not later than 14 days before the commencement of surface disturbing activities, to provide to the Secretary a copy of clear, specific, achievable and measurable rehabilitation objectives and completion criteria (ROCC). For higher risk prospecting operations, a rehabilitation management plan was required to be prepared and submitted with the rehabilitation objectives and completion criteria.

The exploration activity approval applications lodged by Legacy Minerals indicated that the total surface disturbance area was less than five hectares. The drilling programs did not fall within the definition of a higher risk activity under the code of practice and a rehabilitation management plan was not required to be developed.

Evidence was available in department records to confirm that ROCCs were submitted for the drilling program as part of the application for assessable prospecting operations. It was noted that the ROCCs submitted were generally based on the template provided in Appendix 2 of the code of practice.

3.8.3. Rehabilitation program

Mandatory requirement 3 required the licence holder to develop, implement and complete a rehabilitation program (which includes a monitoring program) to rehabilitate disturbed areas to a condition that could support the intended final land use. Mandatory requirement 4 required the licence holder to commence rehabilitation of a site as soon as reasonably practicable following the completion of activities on that site.

Legacy Minerals exploration staff advised rehabilitation of drill sites included:

- removal of all exploration plant, equipment, associated infrastructure, sample bags, and waste
- drill collars cut off below cropping level
- RC holes capped and backfilled to the surface with drill cuttings
- diamond holes capped and backfilled to surface.

Three RC holes drilled in January 2022 and 3 diamond holes drilled in February 2023 were inspected during the audit. No issues of concern were identified at any of the sites. It was noted application for rehabilitation sign-off was lodged with the Regulator and was under consideration.

Legacy Minerals exploration staff said rehabilitation monitoring involved a site inspection and collection of photographs at one month, 3 months and 6 months after drilling. Inspections were noted to be documented on the rehabilitation and site monitoring checklist for each hole.

Evidence was available to confirm rehabilitation was commenced as soon as analysis and survey results were received, typically within a month of drilling.

Figure 1, Figure 2, Figure 3, and Figure 4 show examples of rehabilitation of the holes inspected.

Figure 1 Rehabilitation of diamond hole MM008



Figure 3 Rehabilitation and final land use of diamond hole MM002 (drilled 40 metres into cropped paddock)



Figure 2 Rehabilitation of RC hole BM010



Figure 4 Rehabilitation of RC hole BM008



3.9. Annual activity reporting

Section 163C of the *Mining Act 1992*, clause 59 of the Mining Regulation 2016 and condition 8 of EL8994 required the licence holder to submit an activity report annually within one calendar month following grant anniversary date. Annual activity reports were required to be prepared in accordance with the Exploration guideline: Annual activity reporting for prospecting titles.

During the audit scope period, Legacy Minerals submitted annual activity reports comprising:

- annual geological report
- environmental rehabilitation and compliance report
- community consultation report (up to October 2022).

Generally, reports were found to be in accordance with the MEG and/or Regulator templates and guidance material.

3.10. Core and sample storage

Clause 65 of the Mining Regulation 2016 required the holder of an authority to, so far as is reasonably practicable, collect, retain and preserve:

- all drill cores remaining after sampling
- characteristic samples of the rock or strata encountered in any drill holes.

All core and samples collected were required to be labelled, stored and managed in a manner that preserved the integrity of the core or samples.

It was observed sample storage was well managed by Legacy Minerals. Samples collected during exploration activities included:

- rock chip samples – labelled and stored on shelving racks (Figure 5)
- chip samples from RC drilling programs – stored in plastic chip trays labelled with hole number and depth (Figure 6 and Figure 7)
- core from diamond drilling programs – stored in plastic core trays in the core yard at Legacy Minerals Harden depot (Figure 8 and Figure 9). Each stack of trays was observed to have lids.

Figure 5 Storage of rock chip samples



Figure 7 Example of chip sample storage



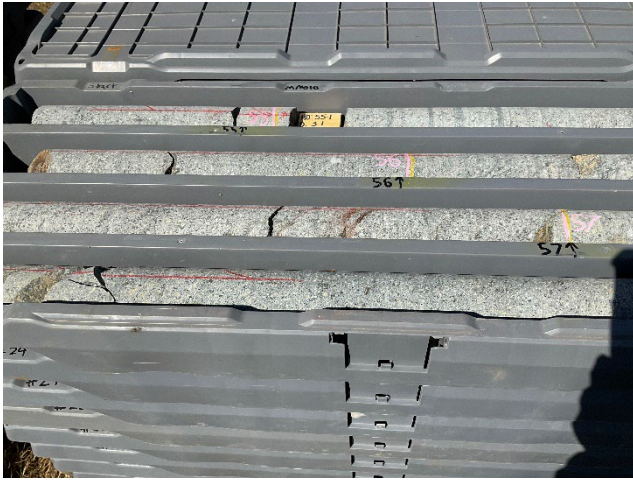
Figure 6 Storage and labelling of chip trays



Figure 8 Core tray storage in the core yard at Harden



Figure 10 Example of core storage and labelling



3.11. Record keeping

Sections 163D and 163E of the *Mining Act 1992* related to the creation and maintenance of records required under the Act, the regulations, or a condition of title. Records must be kept in a legible form for production to any inspector and must be maintained for 4 years after the expiry or cancellation of the title. Specific requirements for the types of records to be maintained for exploration activities were detailed in the mandatory requirements of the exploration codes of practice as follows:

- mandatory requirement 6 of the rehabilitation code of practice
- mandatory requirement 13.1 of the environmental management code of practice
- mandatory requirement 5 of the community consultation code of practice.

Records reviewed during the audit demonstrated Legacy Minerals generally maintained records as required by the licence conditions and the exploration codes of practice. It was noted relevant documents and records were readily retrievable upon request.

Examples of records reviewed included:

- work program yearly tracking spreadsheet
- land access agreements
- title searches
- GIS system
- exploration environmental management strategy
- drill site environmental monitoring sheet
- weekly rig inspection checklists
- waste management records
- rehabilitation objectives and completion criteria
- rehabilitation monitoring spreadsheet
- rehabilitation and site monitoring checklists

- pre, during and post drilling photos
- community consultation strategy
- community consultation register
- community consultation records
- annual activity reporting.

4. Compliance management

4.1. Identifying compliance obligations

Identifying compliance obligations is a critical step in the development of an effective compliance management system. Compliance obligations for an exploration project can include:

- regulatory requirements (for example, the *Mining Act 1992*)
- conditions imposed on the grant, renewal, or transfer of exploration licences
- exploration activity approvals
- exploration codes of practice
- specific commitments made by the organisation (for example, commitments made in the approved exploration activity application).

Once identified, compliance obligations should be reviewed periodically to identify any changes in those obligations (for example, changes in legislation).

The Legacy Minerals exploration staff generally had a good understanding of the compliance requirements for exploration. Comprehensive and robust systems and processes for managing compliance requirements were developed and implemented.

It was noted that records were generally being maintained to demonstrate compliance.

4.2. Contractor management

Contractors are often used to undertake specialist tasks, for example, exploration drilling. While the responsibility for compliance or the implementation of environmental controls is often passed to the contractor, the licence holder will retain accountability for compliance with its licence conditions and other compliance obligations. It is important that the licence holder exercises management control of its contractors by specifying contract requirements, providing oversight of contracted works, and evaluating the performance of the contractor during the contracted works.

Legacy Minerals used contract drillers to complete the exploration drilling program. Drilling was completed at the time of the audit and an assessment of the management of contractors was not undertaken.

4.3. Inspections, monitoring and evaluation

An effective inspection, monitoring and evaluation process is required to:

- monitor the implementation of the risk controls
- evaluate the effectiveness of those controls based on an assessment of inspection and monitoring data
- implement an adaptive management approach if monitoring shows controls may be ineffective.

Legacy Minerals exploration staff established an inspection and monitoring process that was suitable for the low impact nature of the exploration activities being conducted. These processes

were noted to include inspection of drill sites and rehabilitation to confirm works are completed in accordance with the controls identified in the risk assessments.

The environmental and rehabilitation risk assessments prepared by Legacy Minerals were noted to include risks related to exploration activities and environmental management controls were in place. Exploration staff said the process for checking the implementation and effectiveness of controls was informal and not documented. As suggestion for improvement No 2, Legacy Minerals should consider the development of a process to evaluate the effectiveness of the risk controls implemented, with revised controls identified where those risks changed, or controls were identified as being ineffective.

5. Audit conclusions

From the evidence reviewed during the audit, it was concluded that the exploration operations undertaken by Legacy Minerals were well managed. Evidence was available to demonstrate systems and processes were developed to identify and manage compliance requirements. It was observed that records were being maintained as required to demonstrate compliance.

Legacy Minerals was compliant with the requirements of the exploration licence, exploration activity approvals and the environmental management, rehabilitation, and community consultation exploration codes of practice, for the elements reviewed during the audit. No non-compliances were identified during the audit.

One observation of concern and 2 suggestions for improvement were identified as summarised in Table 2 and Table 3.

Table 2 Summary of observations of concern

Observation of concern No.	Description of issue	Recommendation
1	Although Legacy Minerals undertook an assessment of the activity impact level as described in the guidance material in the code of practice, it was noted that no further site-specific risk assessment was undertaken to identify and consider the range of opportunities and threats associated with community engagement.	Legacy Minerals should undertake a formal site-specific community consultation risk assessment for exploration operations.

Table 3 Summary of suggestions for improvement

Suggestion for Improvement No.	Description of issue
1	It is suggested the community consultation risk assessment be completed with reference to the objectives for consultation (i.e. the risk assessment needs to focus on what risks need to be managed for effective and inclusive consultation to take place to achieve the objectives for consultation).
2	Legacy Minerals should consider the development of a process to evaluate the effectiveness of the risk controls implemented, with revised controls identified where those risks changed, or controls were identified as being ineffective.