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Department of Regional NSW



Compliance audit program

EL7974 Sofala Polymetallic Exploration Project

Wattle Resources Pty Ltd

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1. Introduction

1.1. Background

Exploration licence 7974 (1992) (EL7974) was granted to Wattle Resources N. L. now known as Wattle Resources Pty Limited (Wattle Resources) on 11 October 2012. The exploration area centres over Wattle Flat in central NSW.

Exploration operations on EL7974 were managed by MinRex Resources Limited (MinRex) who was the operator of the title. MinRex had a registered joint-venture and farm-in arrangement with Wattle Resources for EL7974.

As part of the compliance audit program, an audit of the exploration activities associated with the Wattle Flat exploration project within EL7974 was undertaken on 13 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 Wattle Resources exploration activities against the requirements of the *Mining Act 1992* and the conditions of the exploration licences 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 Wattle Flat exploration project including:
 - exploration activities within EL7974 including a selected sample of exploration drillholes
 - borehole sealing and rehabilitation activities for selected drilling activities undertaken since January 2020
- a review of documents and records pertaining to the exploration activities
- the assessment of compliance for the period commencing 1 June 2021 and ending 13 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 EL7974 (granted 11 October 2012 and last renewed 11 January 2021).
- Exploration activities application (ESF4) dated 26 June 2020 for 10 angled RC holes, and associated approval dated 20 July 2020 (MAAG0007554) as modified by:
 - exploration activities application (ESF4) dated 14 September 2020 for an additional RC hole, and associated approval dated 17 September 2020 (MAAG0008494)
 - exploration activities application (ESF4) dated 7 April 2021 to extend the depth of the approved holes and seek approval for an additional 15 holes, and associated approval dated 20 April 2021 (MAAG0010599).
- 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 NSW Resources Regulator’s website consistent with:

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

2. Audit methods

The audit process involved interviewing 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 13 September 2023. The audit team was introduced, and the scope of their responsibilities 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 on the day of the audit process were reviewed electronically. Several documents were unable to be reviewed and were provided after the audit.

Where possible, all information obtained during the audit process was verified by the audit team. For example, statements made by site personnel were verified by viewing documentation and records, including site photographs. 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:

- Reverse circulation (RC) drill hole WFRC010, partially rehabilitated
- RC drill hole WFRC019 and WFRC006 and WFRC006a, partially rehabilitated
- RC drill hole WFRC007, partially rehabilitated
- RC drill hole WFRC009 and WFRC008, partially rehabilitated
- RC drill hole WFRC003, WFRC016 and WFRC0017, partially rehabilitated
- RC drill hole WFRC002 and WFRC013, partially rehabilitated
- RC drill hole WFRC-P02, partially rehabilitated
- RC drill hole WFRC004, partially rehabilitated
- RC drill hole WFRC005 and WFRC026, partially rehabilitated
- RC drill hole WFRC024 and WFRC011, partially rehabilitated.

2.3. Closing meeting

A closing meeting was held onsite on 13 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: insufficient information on the file relating to the period covered by the audit or insufficient evidence collected to reach a conclusion</p>

Assessment	Criteria
	<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>
<p>Not applicable</p>	<p>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).</p> <p>An invoking element in the criteria was not activated within the scope of the audit.</p>

2.5. Reporting

After 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 Wattle Resources representatives 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 EL7974 required the licence holder to carry out the operations described in the approved work program. Work program WP-EL7974-2020-2023 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 EL7974. Exploration completed included:

- review of soil samples previously collected
- reverse circulation percussion drilling of 14 holes for 794m
- interpretation of high-resolution magnetics
- rock chip sampling
- compilation of comprehensive historic database
- rehabilitation work at the Wiles Prospect, targeting removal of weeds along cleared tracks.

Wattle Resources representatives indicated that they conducted an annual review of the work program to track progress. In addition, the work program was reviewed as part of preparing licence renewal application documentation.

An external provider was used to provide a geological database management solution. Geological data was submitted to Mining, Exploration and Geoscience (MEG) with the annual activity reports.

3.2. Access arrangements

Section 140 of the *Mining Act 1992* states, '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 EL7974.

3.3. Native title and exempted areas

Condition 2 of EL7974 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.

Wattle Resources stated that exploration activities were conducted on freehold property within EL7974. A review of mapping data confirmed that no drill holes had been drilled in any exempted areas within EL7974. No further approvals under section 30 of the *Mining Act 1992* were required.

3.4. Community consultation

Condition 3 of EL7974 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 the 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.

Wattle Resources demonstrated that a community activity impact assessment had been completed (in accordance with the guidance material in Appendix 12 of the code of practice) and provided to the department with the rehabilitation objectives and completion criteria. It was noted no further risk assessment was conducted. This was raised as observation of concern No. 1.

Before starting further exploration activities, it was recommended a more comprehensive risk assessment be completed. This should focus on the risks that need to be managed for effective and inclusive 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.

Wattle Resources indicated that record keeping has historically been poor and whilst there was reference to a community consultation strategy having previously been developed, it was not produced as part of this audit. This was raised as non-compliance No. 1.

Wattle Resources indicated that a consultant was engaged to develop a community engagement strategy.

Before commencing any activity authorised by a prospecting title, Wattle Resources must prepare a community consultation strategy for the exploration operations on EL7974 that addresses the requirements of mandatory requirement 3 of the code of practice. The strategy must include:

- objectives for consultation
- a detailed description and analysis of potential community stakeholders
- a description of how community consultation will be undertaken
- mechanisms for reviewing and revising the strategy, including an analysis of the results and outcomes of the consultation process.

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 demonstrate that Wattle Resources' representatives maintained records of community consultation, which was primarily focused on liaison with landholders within EL7974.

Before the change to the code of practice in October 2022, annual community consultation reports were prepared and submitted by Wattle Resources, generally in accordance with the reporting guidance in Appendix 2 of the code of practice.

It was noted that records of consultation activities were maintained electronically in a consultation register. The register included a log of interactions with landholders and other stakeholders.

3.5. Exploration activity approvals

Section 23A of the *Mining Act 1992* requires the holder of an exploration licence to obtain an activity approval prior to 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:

- exploration activities application (ESF4) dated 26 June 2020 for 10 angled RC holes, and associated approval dated 20 July 2020 (MAAG0007554) as modified by:
 - exploration activities application (ESF4) dated 14 September 2020 for an additional RC hole, and associated approval dated 17 September 2020 (MAAG0008494)
 - exploration activities application (ESF4) dated 7 April 2021 to extend the depth of the approved holes and seek approval for an additional 15 holes, and associated approval dated 20 April 2021 (MAAG0010599).

Annual Reporting indicated that 6 drill holes were drilled in 2020 and 14 drill holes were drilled in 2021 within EL7974. The audit review indicated that two of the drill holes drilled in 2021 were drilled in different locations to that approved. This was raised as non-compliance No. 2.

3.6. Environmental management

Condition 4 of EL7974 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.

A full assessment against mandatory requirements 1 to 11 of the Exploration code of practice: Environmental Management was not completed. It was noted that Wattle Resources had not carried out exploration activities within EL7974 since 2021. The following general observations were made:

- No evidence of hydrocarbon spillage or chemical contamination was observed at any of the sites inspected.
- No wastes were observed at any of the sites inspected.

- The drill pads have not been re-shaped to pre-disturbance landform. The landholder has given permission for the access tracks to remain.
- The landholder has cited concerns regarding weeds, and a Wattle Resources representatives had arranged for weed spraying to be conducted.

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 changed, to implement revised environmental management controls.

No evidence was provided to demonstrate a documented environmental risk assessment was conducted for the exploration operations on EL7974. It was noted during discussions with Wattle Resources' representatives that environmental controls were generally implemented for the exploration activities, despite the lack of a documented environmental risk assessment.

The failure to undertake a documented environmental risk assessment was raised as non-compliance No. 3. Wattle Resources must undertake and document a risk assessment to identify and manage environmental risks associated with the exploration operations on EL7974.

3.7. Security deposit

Condition 5 of EL7974 requires the licence holder to provide a security deposit to secure funding for the fulfilment of obligations under the licence.

The security amount required for EL7974 was \$10,000, which department records confirmed was held. The application for assessable prospecting operations for EL7974 was noted to include a review of the security deposit. However, the application and subsequent approval did not trigger an increase in security.

3.8. Rehabilitation

Condition 6 of EL7974 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.

No evidence was provided to demonstrate a risk assessment was conducted 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. This was raised as non-compliance No. 4.

Wattle Resources must document a rehabilitation risk assessment in accordance with mandatory requirements 1 and 6 of the code of practice. To facilitate the risk assessment, Wattle Resources should consider identifying and relating rehabilitation risks to the rehabilitation objectives and completion criteria to provide a robust framework for managing rehabilitation risks.

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 Wattle Resources indicated limited total surface disturbance (less than 5 hectares). The drilling programs did not fall within the definition of a high 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 each drilling program as part of the application for assessable prospecting operations.

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.

A rehabilitation program checklist was provided with the assessable prospecting operation application in 2020. This included assessments and controls prior, during and at the completion of exploration activities. The checklist was adapted from Appendix 3 Example rehabilitation program checklist of the Exploration code of practice: Rehabilitation.

A photographic record was maintained for each hole with before, during and after drilling photos maintained. Wattle Resources representatives said that rehabilitation typically commenced within 3 to 4 months of drilling.

During the audit, drill sites which were completed in 2020 and 2021 were inspected at the Wiles Prospect. The drill sites were partly rehabilitated, with all waste and samples removed from site and drill collars cut and plugged beneath the surface. The drill pads and access tracks were retained. An application to seek formal confirmation from the Regulator that rehabilitation has been successful was lodged in August 2021, and was pending determination.

Representatives of Wattle Resources said that weed spraying activities were to be undertaken following consultation with the landowner.

Figure 1, Figure 2, Figure 3, and Figure 4 show a selection of the drill holes inspected.



Figure 1: location of drill hole WFR009 and WFR008



Figure 2: location of drill hole WFR007



Figure 3: location of drill hole WFR004



Figure 4: location of drill hole WFR024 and WFR011

3.9. Annual activity reporting

Section 163C of the *Mining Act 1992*, clause 59 of the *Mining Regulation 2016* and condition 8 of EL7974 required the licence holder to submit an activity report annually within one calendar month following the 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, Wattle Resources 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 Resources 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.

Wattle Resources representatives said that chip samples from exploration drilling programs were stored at a location in Trunkey Creek. The sample storage was not inspected during the audit.

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 a period of four 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 that Wattle Resources had generally maintained records as required by the licence conditions and the exploration codes of practice. Records maintained included:

- land access agreements and records of negotiation with the landholder
- rehabilitation objectives and completion criteria
- rehabilitation checklists
- photographs of pre, during and post exploration activities
- mapping records
- annual activity reporting.

It was noted that a database management system, rock solid data, is used for the storage of geological data.

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
- organisational commitments including those 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).

Wattle Resources engaged a titles agent to assist with identifying and tracking compliance obligations under the Mining Act, title conditions and exploration codes of practice. It was noted that Wattle Resources were found to be generally compliant with reporting obligations for exploration operations. The non-compliances identified during the audit relate to the obligations set out in the exploration codes of practice and the specific commitments set out in exploration activity application and approval.

As suggestion for improvement No.1, Wattle Resources should develop a more robust compliance management system to identify compliance requirements and track completion status. Wattle Resources may consider using tools such as the Regulator's self-audit checklist for explorers, to increase familiarity with the compliance obligations and undertake its own compliance assessment.

4.2. Subcontractor management

Contractors are often used to undertake specialist tasks such as exploration drilling. Whilst 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.

Wattle Resources are a small company and used contract drillers, geologists, and field staff to complete exploration drilling programs which were last completed in 2021. A review of the contractor management arrangements was not undertaken as part of the audit.

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 that controls may be ineffective.

Wattle Resources indicated that processes for inspection, monitoring, and evaluation focused primarily on safety with elements of environmental management such as waste management, chemical storage, and erosion and sediment control.

As suggestion for improvement No. 2, Wattle Resources should consider the development of a comprehensive inspection and monitoring program for exploration operations. The inspection and monitoring program should be designed to confirm the implementation of identified risk controls and assess compliance to the requirements for exploration operations.

5. Audit conclusions

From the evidence reviewed during the audit and observations made on site, it was concluded that the exploration operations undertaken by Wattle Resources were not compliant with all the requirements of the exploration licence, particularly in relation to conducting risks assessments as required by the exploration codes of practice.

Wattle Resources had not conducted on-ground exploration activities since mid-2021, which limited the scope of the audit particularly in relation to environmental management.

It was noted that Wattle Resources had, prior to the audit, identified several areas of improvement particularly in relation to community consultation.

Four non-compliances, 1 observation of concern and 2 suggestions for improvement were identified during the audit as summarised in Table 2, Table 3 and Table 4.

Table 2 Summary of non-compliances

Non-compliance No.	Description of issue	Recommendation
1	There was no evidence provided to demonstrate that Wattle Resources prepared a community consultation strategy for the Wattle Flat project on EL7974, as required by mandatory requirements 2 and 3 of the Exploration code of practice: Community consultation.	<p>Wattle Resources must prepare a community consultation strategy for the exploration operations on EL7974 that addresses the requirements of mandatory requirement 3 of the code of practice. The strategy must include:</p> <ul style="list-style-type: none"> objectives for consultation a detailed description and analysis of potential community stakeholders describe how community consultation will be undertaken mechanisms for reviewing and revising the strategy, including an analysis of the results and outcomes of the consultation process.
2	Annual reporting indicates that two drill holes on EL7974 were not located within approved locations.	Wattle Resources obtain departmental approval accordance with the legislation and guidelines where changes to drill locations are required in the future.

Non-compliance No.	Description of issue	Recommendation
3	No evidence was provided to demonstrate a documented environmental risk assessment was conducted for the exploration operations on EL7974, as required by mandatory requirement 12 of the Exploration code of practice: Environmental management.	Wattle Resources must undertake and document a risk assessment to identify and manage environmental risks associated with the exploration operations on EL7974.
4	No evidence was provided to demonstrate a risk assessment was conducted 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 as required by mandatory requirement 1 of the Exploration code of practice: Rehabilitation.	Wattle Resources must document a rehabilitation risk assessment in accordance with mandatory requirements 1 and 6 of the code of practice.

Table 3 Summary of observations of concern

Observation of Concern	Description of Issue	Recommendation
1	Wattle Resources demonstrated that a community activity impact assessment had been completed (in accordance with the guidance material in Appendix 12 of the code of practice) and provided to the department with the rehabilitation objectives and completion criteria. It was noted no further risk assessment was conducted.	Wattle Resources should undertake a formal site-specific community consultation risk assessment for exploration operations on EL7974. It is recommended that the risk assessment be completed with reference to the objectives for consultation (ie 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).

Table 4 Summary of suggestion for improvement

Suggestion for Improvement No.	Description of Issue
1	Wattle Resources should consider using tools such as the Regulator's self-audit checklist for explorers, to increase familiarity with the compliance obligations and undertake its own compliance assessment.
2	Wattle Resources should consider the development of a comprehensive inspection and monitoring program for exploration operations. The inspection and monitoring program should be designed to confirm the implementation of identified risk controls and assess compliance to the requirements for exploration operations.