

## **Compliance audit program**

### EL8886 Generan exploration project

#### **FMG Resources Pty Ltd**

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# 1. Introduction

## 1.1. Background

Exploration licence 8886 (1992) was granted to FMG Resources Pty Ltd on 26 August 2019. The exploration area was about 23 kilometres north-west of Peak Hill in central NSW.

As part of the compliance audit program, an audit of the exploration activities associated with the Generan exploration project within EL8886 was undertaken on 17 April 2024 by the Resources Regulator within the Department of Primary Industries and Regional Development.

## 1.2. Audit objectives

The objectives of the audit were to:

- undertake a compliance audit of the FMG 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 Generan exploration project including:
  - exploration activities within EL8886 including a selected sample of exploration drillholes
  - borehole sealing and rehabilitation activities for selected drilling activities undertaken since April 2022
- a review of documents and records pertaining to the exploration activities
- the assessment of compliance for the period commencing 17 April 2022 and ending 17 April 2024.

## 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 EL8886 (granted 26 August 2019)
- Assessable prospecting operations application dated 10 January 2024 for up to 20 air core drill holes as part of the Generan project, and associated approval dated 13 February 2024 (APO0001671)

- Assessable prospecting operations application dated 10 January 2024 for up to 10 air core drill holes as part of the Generan project, and associated approval dated 13 February 2024 (APO0001672)
- 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 interviewing site personnel, reviewing 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 17 April 2024. 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. Where documents were unable to be reviewed on the day, they were provided following the 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 on EL8886:

- aircore drill hole GN0011 – drilled March 2024 and rehabilitated
- aircore drill hole GN0014 – drilled March 2024 and rehabilitated
- core and sample storage at FMG Resources Parkes base.

### 2.3. Closing meeting

A closing meeting was held on site on 17 April 2024. 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
<b>Compliance</b>	Sufficient and appropriate evidence is available to demonstrate the particular requirement has been complied with.
<b>Non-compliance</b>	<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>
<b>Observation of concern</b>	<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>
<b>Suggestion for improvement</b>	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.
<b>Not determined</b>	<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> <ul style="list-style-type: none"> <li>insufficient information on the file relating to the period covered by the audit or insufficient evidence collected to reach a conclusion</li> <li>the wording on the criteria (approval condition) meant that no evidence could be gathered, or it was too difficult to gather the evidence.</li> </ul> <p>A ‘not determined’ assessment was also made where the condition was outside the scope of the audit.</p>
<b>Not applicable</b>	<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

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 FMG Resources 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 EL8886 required the licence holder to carry out the operations described in the approved work program. Work program WP-EL8886-2019-2025 was in force during the audit period:

Evidence was available to confirm that exploration activities were progressing. Annual reports for the 2022 and 2023 reporting periods were reviewed for EL8886. Exploration activities completed included:

- historical data compilation and literature review
- passive seismic survey
- aeromagnetic/radiometric survey
- modelling and inversion of magnetic data.

FMG Resources exploration staff said the annual reporting process was used to review and monitor the approved work program. Work programs were also noted to be reviewed before each drilling program. Exploration data was noted to be maintained by the FMG Resources geologists and submitted to NSW Resources 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 EL8886. The land access agreements were generally negotiated for a defined period. For each exploration activity, FMG Resources negotiated a separate deed of entry which provided the land holder with more detail of the exploration activity and allowed for any site-specific conditions to be negotiated.

It was noted FMG Resources maintained a layer in its geographic information system (GIS) outlining the status of land access agreements over the licence area. When drilling was overlaid on the land access agreement layer, it was confirmed that drilling was undertaken on land to which a land access agreement was in place.

### 3.3. Native title and exempted areas

Condition 2 of EL8886 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 a state conservation area.

FMG Resources staff said that exploration activities were generally being conducted in areas of freehold land within EL8886. Mapping confirmed the exploration drilling programs were drilled on freehold land. No further approvals under Section 30 of the Mining Act were required.

It was noted FMG Resources had mapped Crown lands within the licence area as a layer in its GIS. Overlay of the drill hole layer confirmed holes were not drilled in exempted areas.

FMG Resources staff said 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 NSW Resources. No further approvals under Condition 2 of the licence were required for EL8886.

## 3.4. Community consultation

Condition 3 of EL8886 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.

FMG Resources prepared a comprehensive risk assessment across multiple tenements it operates in the area, including EL8886. The risk assessment covered a range of risks associated with consultation and engagement including:

- failure to gain social licence to operate
- community consultation strategy becomes inappropriate due to changes in planned exploration programs
- contrasting messages and approach to community
- third party groups spreading incorrect information.

Control measures were specified for each risk identified including:

- Constant reviews of community consultation strategy against updated exploration plans.
- Implementing additional engagement methods above the minimum requirement outline in the Exploration code of practice: Community consultation.
- Responding to feedback/concerns in a timely and appropriate manner, maintain contact with external groups to correct information as soon as possible if discovered.

### 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.

FMG Resources prepared a community consultation strategy for its Central Western NSW - JNVB Tenement Package, which included EL8886. The strategy was noted to follow the guidance material in the code of practice and included:

- objectives for consultation
- a description and analysis of community stakeholders and impacts
- a description of how consultation would be undertaken
- a process for review and amendment of the strategy when required.

Evidence was available to demonstrate the strategy was reviewed before each exploration program and amended where necessary. Consultation mechanisms were briefly outlined in the strategy as a broad-brush approach. As suggestion for improvement number 1, FMG Resources should consider documenting consultation mechanisms for each stakeholder group.

### 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 FMG Resources 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 community consultation register that detailed the type of consultation, with whom and a synopsis of what was discussed. Copies of community notices for exploration activities were noted to be included in the community consultation reports.

Up until the change to the code of practice in October 2022, annual community consultation reports were prepared and submitted by FMG Resources, generally in accordance with the reporting guidance in Appendix 2 of the code of practice. In 2023, a community consultation report was prepared but FMG Resources received no requests for the report from members of the community.

As suggestion for improvement 2, FMG Resources should consider undertaking an analysis of any community consultation outcomes and complaints to identify any common issues, emerging trends or key outcomes, and documenting this in the annual reports.

## 3.5. Exploration activity approvals

Section 23A of the *Mining Act 1992* required 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:

- assessable prospecting operations application dated 10 January 2024 for up to 20 air core drill holes as part of the Generan project, and associated approval dated 13 February 2024 (APO0001671)
- assessable prospecting operations application dated 10 January 2024 for up to 10 air core drill holes as part of the Generan project, and associated approval dated 13 February 2024 (APO0001672).

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.

### **3.6. Environmental management**

Condition 4 of EL8886 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 mud rotary and air core drilling programs were completed at the time of the audit and all plant and equipment had been removed from site. An assessment against the Exploration code of practice: Environmental management was not completed but the following observations were made:

- No wastes were observed at any of the sites inspected. Drill cuttings were returned downhole in reverse order and excess drill cuttings disposed at the local waste management facility.
- FMG Resources exploration staff described the controls for the outside return on the drill rig cyclone that minimised the generation of subsurface material at the surface during drilling.
- All holes were within cleared and/or ploughed paddock areas with minimal vegetation disturbance.
- Generally, existing farm tracks were used wherever possible. FMG Resources exploration staff said all access points and tracks were documented in the deed of entry agreed with the land holder before the start of drilling.
- Drilling activities stopped during heavy rain and site access was restricted to minimise the risk of damage to farm roads and tracks.
- Biosecurity controls were implemented with records of light vehicle wash recorded in the biosecurity register.

#### **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.

FMG Resources undertook a comprehensive environmental risk assessment for its exploration operations on EL8886. Risk controls were identified in the assessment. Risks and controls were generally consistent with the mandatory requirements of the environmental management code of practice. Examples of risks and controls included:

- unauthorised clearing outside land disturbance boundary – key controls included:
  - induct all personnel during site induction regarding unauthorised ground disturbance
  - obtain a CEA prior to commencing any ground disturbing activities
  - supervise clearing activities.
- introduction and spread of weeds from earthmoving equipment/vehicles results in weed establishment into undisturbed areas – key controls included:
  - vehicle hygiene procedures will be implemented to ensure vehicles are free of soil and vegetative matter on arrival to site
  - weed sprayers onsite from time to time
  - chemical handling training for exploration personnel to spray weeds.

Evidence was available to confirm that risk controls were implemented on site during exploration operations.

### **3.7. Security deposit**

Condition 5 of EL8886 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 EL8886 was \$10,000, which department records confirmed was held. It was noted the air core drilling program in 2024 on EL8886 did not trigger an increase in security.

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 EL8886 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.

FMG Resources documented a comprehensive rehabilitation risk assessment for the exploration operations. The risk controls identified for each risk referenced the FMG environmental management plan, FMG procedures, and various site inspection checklists. Examples of risks identified included:

- inappropriate topsoil removal and/or management
- no washdowns between sites resulting in weed infestation
- poor rehabilitation practices
- impacts of grazing animals on rehabilitation.

### **3.8.2. Rehabilitation objectives and completion criteria**

Mandatory requirement 2 required the licence holder, not later than 14 days prior to 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 FMG Resources indicated that the total surface disturbance area was less than 5 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.

FMG Resources exploration staff said rehabilitation of drill sites generally included:

- site cleaned of all remaining rubbish, equipment and drill samples
- all drill samples were backfilled down the drillhole in the sequence in which they were drilled and/or drill hole sufficiently grouted
- remaining samples were taken and disposed of at an offsite facility
- drill collars were removed (if any), and topsoil was returned to drill collar
- scarification and/or reseeded as required
- photos were taken before the site was distributed and after the site was rehabilitated.

FMG Resources exploration staff said rehabilitation monitoring involved a site inspection and collection of photographs at about 3 months, 6 months, and 12 months after the completion of rehabilitation.

Figure 1 shows an example of the rehabilitation of an aircore drill hole. The remaining drill holes were rehabilitated but were under crop (Figure 2). No inspection was undertaken of further drill holes at the request of the landholder to preserve the crops.

Figure 1 Aircore hole GN0011 drilled March 2024



Figure 2 Aircore hole GN0014 drilled March 2024 about 300 metres into ploughed and sown paddock



### 3.9. Annual activity reporting

Section 163C of the *Mining Act 1992*, clause 59 of the Mining Regulation 2016 and condition 8 of EL8886 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, FMG 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 NSW Resources 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.

Core and chip samples from drilling programs on EL8886 were observed to be stored in a large storage shed at the FMG Resources depot in Parkes. Chip samples for the air core holes inspected during the audit were readily available for viewing. Chip sample storage is shown in Figure 3. An example of typical chip samples for air core holes is shown in Figure 4.

Figure 3 Chip sample storage for Generan air core holes



Figure 4 Example of typical chip sample from air core drilling



### 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 FMG Resources had generally maintained records as required by the licence conditions and the exploration codes of practice.

Examples of records reviewed included:

- land access agreements
- GIS mapping
- BMS compliance management system records
- Acquire geological data management system

- drill site pre-mobilisation checklists
- NSW exploration drill site weekly inspection checklists
- risk assessments – environmental, rehabilitation and community consultation
- rehabilitation objectives and completion criteria
- rehabilitation checklists
- pre, during and post drilling photos
- community consultation strategy
- community consultation records
- annual activity reporting.

It was noted drilling data was stored in the Acquire geological data management system. As suggestion for improvement number 3, FMG should consider linking the relevant activity approvals to each drilled hole and its subsequent rehabilitation sign-off. This would create a complete record for each drill hole from approval to sign-off.

## 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 FMG Resources 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 records were generally being maintained to demonstrate compliance.

Compliance requirements were entered into the FMG Resources BMS compliance management system, including any commitments made in applications for activity approvals. GIS mapping was used to define exclusion zones for planning drill programs and identify any areas where further approvals may be required – for example, the Crown lands layer.

### 4.2. Contractor management

Contractors are often used to undertake specialist tasks, for example, 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.

FMG Resources used contract drillers to complete the exploration drilling program. Drilling was completed at the time of the audit and a review of contractor management activities 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 that controls may be ineffective.

FMG Resources 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.

Comprehensive inspection checklists were developed including:

- NSW exploration office approval pre-mobilisation checklist – checked activity approval and land access agreement in place, community notified, access and egress suitable for drilling vehicles, any planning required for environmental controls, and induction requirements for staff and contractors.
- NSW exploration MR-RC-diamond drill site pre-mobilisation checklist – included collar details and detailed hole plans provided to drillers, suitability of pad area and any required controls in place, any specific requirements for crops or livestock in the drilling area, biosecurity controls implemented, and any requirements for water management.
- NSW exploration drill site weekly inspection – checked the implementation and effectiveness of risk controls implemented on the drill site including chemical and spill management, waste management, water management, weeds etc.
- NSW exploration rehabilitation checklist mud rotary/diamond drilling – included identifying any specific landholder requirements for rehabilitation, checked all wastes and equipment removed from site, checked for compliance with biosecurity requirements, what methods were used for rehabilitation, etc.

## 5. Audit conclusions

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

FMG Resources were 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 or observations of concern were identified during the audit. Three suggestions for improvement were noted during the audit, as summarised in Table 2.

Table 2 Summary of suggestions for improvement

<b>Suggestion for Improvement No.</b>	<b>Description of Issue</b>
1	FMG Resources should consider documenting consultation mechanisms for each stakeholder group as part of the community consultation strategy.
2	FMG Resources should consider undertaking an analysis of any community consultation outcomes and complaints to identify any common issues, emerging trends or key outcomes, and documenting this in the annual community consultation reports.
3	FMG should consider linking the relevant activity approvals to each drilled hole and its subsequent rehabilitation sign-off in the Acquire geological data management system. This would create a complete record for each drill hole from approval to sign-off.