

Annual Environmental Compliance Report - 2025

Rum Jungle Rehabilitation Project

29-May-2026
EP2023/022 & EPBC 2016/7730
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Annual Environmental Compliance Report - 2025

Rum Jungle Rehabilitation Project

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			Todd Mitchell Site Auditor (RJRP) <i>(Environmental Auditor - s68 of the Waste Management & Pollution Control Act)</i>	

Acknowledgment of Country

AECOM acknowledges Kungarakan and Warai people as the Traditional Owners of the project land and we acknowledge their connections to the environment and community. We recognise that Traditional Owners have occupied and cared for this country over countless generations and that the land is culturally significant.

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Executive Summary

AECOM Australia Pty Ltd (AECOM) was commissioned by the Northern Territory Department of Industry, Tourism and Trade (DITT), now Department of Mining & Energy (DME) as the independent auditor for the Rum Jungle Rehabilitation Project. The engagement encompasses both contaminated land and compliance auditing.

This report provides the findings of the 2025 annual compliance audit.

Mineral exploration, mining and milling occurred at Rum Jungle from 1953 to 1971 across the main site and at two satellite sites (Mt Burton and Mt Fitch). The mining and mineral processing at Rum Jungle caused significant environmental impacts, primarily elevated dissolved copper from Acid and Metalliferous Drainage (AMD) which polluted the East Branch of the Finnis River (EBFR). Rehabilitation works were undertaken from 1982 to 1986. Whilst historical rehabilitation works were initially successful, further rehabilitation is now required to mitigate against risks to human health and the environment from hazards such as contaminated land and groundwater, radiation and asbestos.

In his Finnis River Land Claim No. 39 report (1981), Justice Toohey found that Kungarakan and Warai are the joint traditional owners of land defined in that report. In the early 1990s the land recommended for grant was largely vested in the Finnis River Aboriginal Land Trust (FRALT). Land that is the former Rum Jungle mine site is also proposed to be vested to the FRALT pending rehabilitation and other negotiations. This is not a matter for the Auditor.

Kungarakan and Warai desire that Rum Jungle will be returned to a natural, living environment that also provides for a return to traditional ceremony, culture and subsistence use of natural resources.

Environmental Impact Statement (EIS) submissions resulted in the Northern Territory Environmental Approval (EP2023/022, 29 March 2023) and Commonwealth Environmental Approval (EPBC 2016/7730, 7 July 2023). These approvals contain various conditions which have been assessed as part of this compliance report.

The 2025 compliance audit has included an evaluation of compliance with approval conditions, review of documents, data, plans and drawings as well as site inspections and meetings with project stakeholders.

The findings of the compliance audit are as follows:

	NT Approval			
	2024 Status	2025 Change	Total Current	% Current
Compliant	68	+45	113	56
Non Compliant	0	+5	5	2
Observation	24	-18	6	3
Not Applicable	109	-32	77	38
Total	201	-	201	100

* Percentages are rounded

	Commonwealth Approval			
	2024 Status	2025 Change	Total Current	% Current
Compliant	12	+2	14	18
Non Compliant	0	+1	1	1
Observation	5	0	5	7
Not Applicable	59	-3	56	74
Total	76	-	76	100

* Percentages are rounded

Based on reviews undertaken, consultation, meetings, site inspections and findings detailed in this report, the Auditor concludes that the Approval Holder is generally compliant with the NT and Commonwealth Environmental Approval Conditions for the 2025 reporting period. A number of non-compliant items and other observations have been made. Further detail of the Auditors assessment is provided herein.

1.0 The Project

1.1 The Approval Holder

The Approval Holder is:

Department of Mining & Energy (DME)
Chief Executive Officer (CEO)
Level 3, 38 Cavenagh Street
Darwin NT 0800

1.2 Northern Territory Environmental Approval

On 29 March 2023, the Minister for Environment, Climate Change and Water Security (*the Minister*) issued the Northern Territory Environmental Approval (EP2023/022). Herein this approval is referred to as the NT Approval (consistent with referencing in the Commonwealth Approval). The Northern Territory Department of Environment, Parks and Water Security (DEPWS) – now called the Department of Land, Planning & Environment (DLPE) is responsible for the administration of the approval.

On 25 July 2023, the Minister provided confirmation in writing that future correspondence regarding the approval could be made to environmentalregulation@nt.gov.au

On 20 February 2024 DEPWS (now DLPE) further confirmed that submissions to the Minister are considered to have been made via delegation to environmentalregulation@nt.gov.au and for large files, to a file transfer page that would be available for each large submission.

1.3 Commonwealth Environmental Approval

On 7 July 2023, the Department of Climate Change, Energy, the Environment and Water (DCCEEW) issued the Commonwealth Environmental Approval (EPBC 2016/7730). Herein this approval is referred to as the Commonwealth Approval.

It is noted that Condition 1 of the Commonwealth Approval is a requirement for DME to also comply with the conditions of the NT Approval (hence the annual compliance reporting is a combined document).

1.4 Overview of the Action

The Action is defined in the Commonwealth Approval as:

Rehabilitation of the 650 hectare Rum Jungle mine site, including the satellite operations of Mount Burton and Mount Fitch, located approximately 7km north-west of Bachelor, Northern Territory, subject to the variation of the Action accepted by the Minister under section 156B on Thursday, 24 October 2019.

The Action is defined in the NT Approval as:

Rehabilitate the former Rum Jungle mine site and associated satellite sites (Mt Fitch and Mt Burton) located 6 km north of Batchelor in the Northern Territory (NT) to address legacy site contamination issues:

- *a construction phase followed by a monitoring and stabilisation phase*
- *clearing of up to 490.9 hectares (ha) of native vegetation including 4.5 ha sensitive or significant vegetation (4 ha riparian and 0.5 ha vine forest)*
- *excavation and relocation of -6.1 million cubic metres (Mm³) mine waste material from existing sulfidic waste rock dumps and contaminated soil areas*
- *extraction and treatment of contaminated groundwater and pit lake water*
- *point source discharge of water to the East Branch of the Finniss River (EBFR)*
- *construction of two new waste storage facilities (WSF) to contain mine waste material that is potentially acid forming (PAF) and/or radioactive and/or contains asbestos*
- *backfilling and capping of Main Pit to contain 1.5 Mm³ mine waste*

- *containment and disposal of waste generated by the water treatment plant*
- *potential realignment of the EBFR through Main Pit and Intermediate Pit*
- *rehabilitation and revegetation of disturbed land.*

1.5 Commencement of the Action

The Commonwealth Approval definition for Commencement of the Action has the meaning,

*the date on which the first instance of any activity associated with the action (including **clearing and construction**) is undertaken. This does not include minor physical disturbance necessary to:*

- Undertake pre-clearance surveys or monitoring programs.*
- Install signage and /or temporary fencing to prevent unapproved use of the project area.*
- Protect environmental and property assets from fire, **weeds**, and **invasive fauna**, including use of existing surface access tracks.*
- Install temporary site facilities for persons undertaking pre-commencement activities so long as these are located where they do not **harm the Black-Footed Tree Rat, Partridge Pigeon, Darwin Cycad, White Paperbark or Vine thicket.***
- Construct the southern portions of the haul road and EBFR diversion crossing.*
- Undertake alignment verification for the **seepage interception system bore installation.***

On the basis of the above definition, the Action had not commenced within the 2024 audit period. On 13 May 2025, DME issued to DCCEEW its letter of notification (ref. 58-F25-2051) that it intended to commence the Action on 14 May 2025.

The NT Approval contains Condition 26-2 which describes commencement of the Action as “substantial implementation”, which is defined as “the commencement of any ground disturbing activity undertaken to carry out the action”. On the basis that the Site Auditor endorsed Preliminary Remediation Action Plan (PRAP) includes scope consisting of ground disturbing activities (construction of site compound, construction of southern haul road and East Branch Finniss River (EBFR) diversion crossing) the Action is considered to have commenced.

For the sake of this compliance report, the Commencement of the Action is considered to be 1 October 2023 (a date following the endorsement of the Preliminary RAP [27 September 2023] and prior to contractor mobilisation to the site).

1.6 Audit Period

The period for which this compliance audit applies is 1 January 2025 to 31 December 2025.

1.7 Dates for Annual Audit & Reporting

The first compliance report is required to be produced within 6 months following commencement of the action (NT Approval, c31-1(1)). The Audit period 1 October to 31 December 2023 complied with this requirement.

Annual compliance audits will be conducted on a calendar year basis (1 January to 31 December) consistent with the requirement for subsequent annual reporting for the life of the action.

Provision of the Compliance report to the Minister within 90 days of report completion is an NT compliance requirement.

The Commonwealth Approval (c21) requires an annual compliance for each 12 months from the date of the approval (7 July 2023). The first compliance report was issued 26 March 2024 for the period 7 July 2023 to 31 December 2023. The second compliance report was issued 31 March 2025 for the period 1

January 2024 to 31 December 2024. The intention was to align the reporting for both the NT and Commonwealth Approvals. The departure from the Commonwealth Approval was identified at the very early stage of the project and communicated to both DME and DCCEEW. However, amongst the various many project activities and changes to DME team members, a clarification or amendment was not sought by DME from DCCEEW. Subsequently, in a Request for Information letter (DCCEEW, 10 March 2026) this reporting matter was identified as a potential non-compliance. DME responded to DCCEEW who then issued its Notification of Non-compliance on 8 April 2026. This letter recommended that DME apply to the Minister for the reporting period to be amended. DME subsequently submitted an application to the Minister for an amendment to be made. At the time of report production a response had not been received.

On the basis that DCCEEW has identified this matter as a non-compliance, the Auditor has also nominated a finding of Non-compliant.

Delays relating to the above matters and in obtaining certain pieces of evidence from DME has resulted in a delay in issuing the 2025 Compliance Report, which was originally expected to be end-March 2026. This departure is not considered material in terms of the auditing of project compliance with the relevant approvals on the basis that no period of time has been excluded from auditing.

1.8 Compliance Report to Satisfy Regulatory Bodies

As provided for in s1.1 of the *Annual Compliance Report Guidelines* (DCCEEW, 2023), the Approval Holder may be required to prepare compliance reports to satisfy other regulatory bodies. The NT Approval (Condition 31) also requires annual compliance reporting. This Compliance Report has been developed in a manner that is considered to meet the minimum requirements of both the Commonwealth and Northern Territory Environmental Approvals.

1.9 Compliance Report Does Not Include

A Waste Discharge Licence (WDL252-01) has also been issued for the discharge of water to the EBFR. Please note that reporting against this does not fall within the scope of compliance auditing for the purpose of this report.

The WDL requires an Annual Return and (separately) an annual Monitoring Report.

The Commonwealth Approval requires an annual Monitoring Report to be based on a Monitoring Plan that is to be prepared at least 12 months prior to the completion of Stage 3. The plan and report are documents that will be provided under separate cover.

The Commonwealth Approval requires an Independent Audit every 5 years following commencement of the Action.

This compliance audit and report is not an audit of the approval holders environmental, safety or management systems.

2.0 Auditors and Audit Team

The audit team comprises suitably qualified and experienced persons (SQEP) from various disciplines as listed in Table 1 below. All auditors and support staff are AECOM employees. Additional AECOM resources will be provided on an as-required basis.

Table 1 Audit Team

Role	Name and Position	AECOM Base	Summary Qualifications	Yrs' Exp
Auditors				
Independent Auditor	Kelly Cleary Principal Environmental Consultant	Rockhampton, QLD	<ul style="list-style-type: none"> Bachelor of Biomolecular Science (Advanced), Griffith University Integrated Management System Lead Auditor (Exemplar Global 14410446-9586807) 13 September 2023 	14

Role	Name and Position	AECOM Base	Summary Qualifications	Yrs' Exp
Site Auditor	Todd Mitchell Technical Director	Melbourne, VIC	<ul style="list-style-type: none"> BEd. Environmental Science MEng. Cleaner Production CEnvP (Site Contamination Specialist) Environmental Auditor VIC (<i>Environment Protection Act 2017</i>) Environmental Auditor NT (<i>Waste Management & Pollution Control Act 1998</i>) 	33
Audit Support Team				
Mine Rehabilitation Management	Lisa Yenne Principal Engineer Manager, Mining	Denver, Colorado	<ul style="list-style-type: none"> BSc. Civil Engineering MSc. Civil Engineering Professional Engineer Mine-site closure and reclamation Tailings and waste rock management 	31
Flora & Fauna Management	William Riddell Snr Env Scientist Natural Resource	Darwin, NT	<ul style="list-style-type: none"> BSc. Science MSc. Environment Senior Ecologist 	18
Water Management	Krystal Nichols Mine Water Management Lead	Brisbane, QLD	<ul style="list-style-type: none"> BSc. Hydrogeology QLD Board Member (IAH) 	21
Water Treatment	Shahzad Sandu Principal Water & Wastewater Engineer	Newcastle, NSW	<ul style="list-style-type: none"> BSME, Wayne State University, USA CPEng Chartered by Engineers Aust. <ul style="list-style-type: none"> Mech Eng, Chem Eng and Leadership & Management. Water Treatment Process Lead Wastewater Treatment Process/Hydraulics Lead 	20
Cultural Heritage Management	Josh Loyd First Nations Director	Melbourne, VIC	<ul style="list-style-type: none"> BEng Civil & Environmental MIEAust (Indigenous Engineers Group), Engineers Australia Member, Green Star Building Council of Australia Nature & Biodiversity Expert Reference Panel Wajarri Yamaji Traditional Owner Fmr Heritage Field and Compliance Officer (Fortescue Metals - Pilbara Ops) 	16
	Perri Braithwaite Senior Heritage Specialist	Townsville, QLD	<ul style="list-style-type: none"> BA. Extended Major in Archaeology BA (Hons). Archaeology Member, Australian Archaeological Association 	10

Role	Name and Position	AECOM Base	Summary Qualifications	Yrs' Exp
Health & Environmental Risk	Michael Archer Technical Director	Newcastle, NSW	<ul style="list-style-type: none"> • Doctor of Philosophy, Environmental Chemistry • BSc Agriculture (Hons 1) 	24
Erosion and Sediment Control	Kelly Cleary Senior Environmental Consultant (ESC)	Rockhampton, QLD	<ul style="list-style-type: none"> • Certified professional in erosion and sediment control, CPESC 00014986 – Envirocert International • Bachelor of Biomolecular Science (Advanced), Griffith University 	12
Radiation Management	Kevin Taylor Manager, Nuclear and Radiological Services	Greenville, South Carolina	<ul style="list-style-type: none"> • BSc. Physics • MSc. Physics • Certified Health Physicist - American Board of Health Physics (2001-current) • Professional Engineer 	31

2.1 Auditors to be Approved by Minister and CEO

The NT Approval requires the Site Auditor to be approved by the Minister for Environment, Climate Change and Water Security. Such approval of the Site Auditor (Todd Mitchell) was provided by letter on 25 July 2023.

The NT Approval requires an Independent Qualified Person (c. 31-1(1)) to prepare the annual compliance report, and for that person to be approved by the CEO. There is some confusion regarding the meaning of CEO within the NT Approval. The Auditor has been advised by DEPWS (now DLPE) that there appears to be some carry-over of terminology from the draft of the NT Approval.

It is noted that amendments to the *Environment Protection Act* commenced on 1 March 2024 relating to the capacity to make administrative amendments to environmental approvals.

3.0 Traditional Owners as Beneficiaries

Rum Jungle forms part of the approved Finnis River Land Claim. Kungarakan and Warai Peoples are the Traditional Aboriginal Owners of the land which is administered by the Finnis River Land Trust. Rum Jungle currently sits outside of this arrangement because of the significant residual contamination.

Kungarakan and Warai desire that Rum Jungle will be returned to a natural, living environment that also provides for a return to traditional ceremony, culture and subsistence use of natural resources.

Rehabilitation works will seek to restore land and water to enable the long-term safe use of the site for the various purposes that Kungarakan and Warai so desire.

This compliance report is not intended to contemplate any arrangements or mechanisms relating to future administration of the site.

4.0 Remediation Action Plan to Control the Approved Action

It is noted that the Remediation Action Plan (RAP) is intended to control the rehabilitation of the site. The rehabilitation may be conducted in stages and the RAP may be prepared in stages to support this strategy.

The RAP process has now been adjusted by DME to include a Master RAP that includes all of the background and foundational matters relating to the rehabilitation works. Detail is then included in separate Work Package RAPs that are intended to provide more specific details. The Auditor is

satisfied that this revised process is a suitable solution to enable better engagement with Traditional Aboriginal Owners (TAOs), the Northern Land Council (NLC) and the Auditor.

All plans, procedures, specifications, forms and drawings are subordinate to the RAP.

For the reporting period, the following documents were active and endorsed by the Auditor:

SLR Consulting (25 March 2025) – *Master Remediation Action Plan: Rum Jungle Mine Site Rehabilitation*

SLR Consulting (25 March 2025) – *Remediation Action Plan – Work Package B: Groundwater Bore Installation Program (v3.0)*

- Auditor endorsement: 25 March 2025 (RJ-Audit-AE-005)

SLR Consulting (12 September 2025) – *Remediation Action Plan – Work Package B: Groundwater Bore Installation Program (v3.1) – amended to include an additional co-disposal location*

- Auditor endorsement: 29 September 2025 (RJ-Audit-AE-010)

SLR Consulting (7 May 2025) – *RAP – Work Package C: Water Treatment Plants, Pipeline Network, and Front Access Road Upgrade (v2.1)*

- Auditor endorsement: 9 May 2025 (RJ-Audit-AE-006)

SLR Consulting (25 March 2025) – *RAP – Work Package D: Surface Water Treatment Plant Operation (v1.0)*

- Auditor endorsement: 13 August 2025 (RJ-Audit-AE-007)

SLR Consulting (12 September 2025) – *RAP – Work Package D: Surface Water Treatment Plant Operation (v2.0) – amended to include the additional of a Main Pit diversion plug*

- Auditor endorsement: 25 September 2025 (RJ-Audit-AE-009)

Department of Mining & Energy (7 May 2025) - *Cultural Heritage Management Plan – Rum Jungle Rehabilitation Project [Version 1.2]*

- Auditor endorsement: 9 May 2025 (RJ-Audit-AE-003)

5.0 No New Environmental Risks

Section 3.9 of the *Annual Compliance Report Guidelines* (DCCEEW, 2023) states that the compliance report must discuss any new environmental risks.

No new environmental risks have become apparent during the reporting period.

6.0 Audit Scope

6.1 Audit Guidelines

6.1.1 Northern Territory Guidelines

The NT Approval does not specify any specific compliance audit guidelines.

6.1.2 Commonwealth Guidelines

The Commonwealth Approval specifies the following audit guidelines:

Commonwealth of Australia (2014) - *Annual Compliance Report Guidelines*

The Auditor notes that a 2023 revision has been published and has completed the audit with reference to this publication. The updated reference is:

Department of Climate Change, Energy, the Environment and Water (2023) - *Annual Compliance Report Guidelines*

6.2 Addressing all Approval Conditions

Section 3.5 of the *Annual Compliance Report Guidelines* (DCCEEW, 2023) requires that all approval conditions have been considered and addressed, that an evaluation of compliance is provided and, if management plans are a requirement of the condition/s, that an assessment of compliance with the management plans is also required.

The Auditor has assessed all conditions of both the NT and Commonwealth Approvals. The Auditor has reviewed all of the management plans relevant to this stage of the project. The Auditor has applied a risk-based approach to auditing against the requirements of the management plans.

6.3 Addressing Evidentiary Requirements

Section 3.6 of the *Annual Compliance Report Guidelines* (DCCEEW, 2023) states that supporting data such as flora and fauna surveys, photographic monitoring and groundwater monitoring data should be provided as appendices. Where necessary, the Auditor has made reference to letters, plans and drawings. Monitoring data is expected to be provided in the annual monitoring report (c6 of the Commonwealth Approval) and a requirement of the NT Waste Discharge Licence.

Evidence provided by DME to the Auditor is included as appendices to this report.

6.4 Duty to Report & Declaration of Accuracy

For the purpose of meeting the Commonwealth Approval requirements, the Annual Compliance Report must be submitted to DCCEEW via email (size pending) to epbcmonitoring@dcceew.gov.au. The Annual Compliance Report must be accompanied by a declaration of accuracy from the Approval Holder. The format of such a declaration is found in s3.1 of the *Annual Compliance Report Guidelines* (DCCEEW, 2023). It is expected that the CEO of the Approval Holder (or a person so delegated to do so) would sign the declaration.

For the purpose of meeting the NT Approval requirements, the Annual Compliance Report must be submitted to the Minister for Environment, Climate Change and Water Security (the Minister) within 90 days of completion of the report. The report must be endorsed by the CEO of the Approval Holder (or a person so delegated to do so). It is noted that, on 27 July 2023, the Minister, in a letter to DITT, stated that correspondence regarding the approval may be made to environmentalregulation@nt.gov.au. On 20 February 2024 DEPWS wrote to DITT further confirming that submissions to the Minister can be considered to have been made via delegation to environmentalregulation@nt.gov.au and for large files, to a file transfer page that would be available for each large submission.

It is expected that the Commonwealth declaration and the Northern Territory endorsement would be separate documents. It is noted that the 2024 Annual Compliance Report was submitted separately to NT EPA and DCCEEW on 2 July 2025 accompanied by the appropriate documentation.

6.5 Duty to Publish Annual Compliance Report

Condition 24 of the Commonwealth Approval requires the compliance report to be published on the DITT (DME) website. The Auditor expects that the Approval Holder will so publish all annual compliance reports.

The 2024 Compliance Audit report was published to the DME (Rum Jungle) website and may be found at [Annual Environmental Compliance Report - 2024](#)

7.0 Audit Methodology

7.1 Consultation and Site Inspections

The audit team has consulted during the 2025 reporting period. Such consultation has included:

- Correspondence (written and verbal) and meetings (on-line and in person) with:
 - The Approval Holder team (DME)

- The NT Regulator team (DLPE)
- Northern Land Council (NLC)
- Traditional Aboriginal Owners (Kungarakana and Warai through the Rum Jungle Technical Working Group [TWG] and Cultural Oversight Group [COG])
- The Consultant team (SLR)
- The Independent Peer Reviewer (Mark Stuckey, EESI)
- Site inspections
 - 27 February 2025
 - 27 May 2025 (refer photographs included in Appendix A)
 - 12 August 2025 (refer photographs included in Appendix A)
 - 2 September 2025

7.2 Compliance Audit Register / Table

Section 3.6 of the *Annual Compliance Report Guidelines* (DCCEEW, 2023) states that a compliance table (or similar) is required. The table must include condition numbering, full wording, designation of compliance and summary evidence.

The Auditor has separately produced a compliance register for the NT Approval (Appendix B) and the Commonwealth Approval (Appendix C).

7.3 Assessment Designations

The system used for describing the findings of the compliance audit is set out in Table 2.

Table 2 Compliance Designations

Finding	Description
Not Applicable	The requirement to comply with the specific condition was not applicable for the reporting period.
Compliant	The Auditor has assessed the Approval Holder to be fully compliant with the requirements of the Condition.
Non-compliant	The Auditor has assessed that the Approval Holder is not compliant with the requirement of the Condition. Further notes and corrective actions* are provided.
Observation	The Auditor has assessed that the Approval Holder is generally compliant, or that an Alternate Solution has achieved compliance with the Condition. Generally, notes or preventative actions* are also provided.

Notes: * NT Approval Condition 31-2(3) requires the annual compliance report to “identify all non-compliance and describe corrective and preventative actions”.

8.0 Audit Findings

8.1 Summary

A summary of the Auditors compliance assessment is provided in Table 3.

Table 3 Summary Audit Outcome

The findings of the compliance audit are as follows:

	NT Approval			
	2024 Status	2025 Change	Total Current	% Current
Compliant	68	+45	113	56
Non Compliant	0	+5	5	2
Observation	24	-18	6	3
Not Applicable	109	-32	77	38
Total	201	-	201	100

* Percentages are rounded

	Commonwealth Approval			
	2024 Status	2025 Change	Total Current	% Current
Compliant	12	+2	14	18
Non Compliant	0	+1	1	1
Observation	5	0	5	7
Not Applicable	59	-3	56	74
Total	76	-	76	100

* Percentages are rounded

8.2 Compliance – NT Approval

An assessment of the compliance against existing Observations and Corrective Actions are provided in Table 4.

A summary of the 2025 audit outcome against the NT Approval is provided in Table 5.

Table 5 provides the observations and corrective actions which the Approval Holder must consider in improving their systems and performance for the 2026 reporting period.

Table 4 NT Approval – Status of existing compliance matters

Item	Audit ID	Clause	Requirement	Evidence	Determination	2024 Corrective or Preventative Actions	2025 Audit Assessment	Status
A001	NTA053 And NTA096	9-4(2) And 15-1	As part of the RAP required by condition 9-1 the approval holder must include the following: (2) Long-term environmental management plan (see condition 15)	A Long-term Environmental Management Plan (LTEMP) was not provided as part of the PRAP. DITT (17/06/2022) - Draft Environmental Monitoring Plan was provided and is active.	The LTEMP is a document to inform waste storage facility (WSF) post construction monitoring. A LTEMP is not required for the preliminary works undertaken.	DME had prepared a draft Integrated Monitoring Plan within the reporting period, however, this had not been finalised within 2024. One will be required for further stages of the works.	DME had revised and were undertaking monitoring in accordance their <i>Integrated Environmental Monitoring Plan</i> . Further revision/s are likely as the project progresses.	Closed
A002	NTA054	9-4(3)	As part of the RAP required by condition 9-1 the approval holder must include the following: (3) Erosion and sediment control plan (see condition 16)	SLR (28/02/2023) - <i>Erosion and Sediment Control Measures</i> report was observed.	The PRAP references the ESCM report which is considered suitable for the preliminary RAP phase of works.	An updated ESCP will be required for new stages of works.	There is no single document entitled “Erosion and Sediment Control Plan”. In order to meet its obligations on this matter each RAP Work Package has been prepared to include erosion and sediment control specifics.	Closed
A003	NTA055	9-4(4)	As part of the RAP required by condition 9-1 the approval holder must include the following: (4) Revegetation management plan (see condition 17)	DITT (27/01/2022) - <i>Revegetation Management Plan</i> was observed.	The Auditor accepts that a revised RvMP was not required for this phase of works	A revised RvMP will be required for the next stage of works	DME did issue a revised RvMP during the audit period. The Auditor notes that several consultation events and information sharing have occurred with the intention of finalising a further revision to the RvMP	Closed
A004	NTA056	9-4(5)	As part of the RAP required by condition 9-1 the	A REMP was not provided as part of the PRAP. DITT	The Auditor accepts that a REMP is not	DME had prepared a draft Integrated Monitoring Plan within the reporting period,	DME had revised and were undertaking monitoring in accordance their revised	Closed

Item	Audit ID	Clause	Requirement	Evidence	Determination	2024 Corrective or Preventative Actions	2025 Audit Assessment	Status
			approval holder must include the following: (5) Receiving environment monitoring program (see condition 20)	(17/06/2022) - Draft Environmental Monitoring Plan was provided and is active.	required for this phase of works	however, this had not been finalised within 2024. One will be required for further stages of the works.	<i>Integrated Environmental Monitoring Plan</i> . Further revision/s are likely as the project progresses.	
A005	NTA057	9-4(6)	As part of the RAP required by condition 9-1 the approval holder must include the following: (6) Water management plan (see condition 21)	DITT (27/11/2019) - Water Management Plan and updated version DITT (14/06/2023) Water Management Plan (Preliminary) was observed	A finalised WMP is not required for this phase of works, existing reports are suitable for preliminary phase	A revised WMP will be required for future stages of the works	A revised WMP was prepared and issued to the Auditor as draft for review (WRM, 2 June 2025). Review comments were provided on 9 July 2025.	Closed
A006	NTA115 to NTA122	17-1	Refer register for exact wording relating to Revegetation management.	Draft RvMP v0.4, DITT 27/01/22 observed	PRAP did not explicitly include a RvMP, however, the draft RvMP does contain the required elements of Condition 17-1.	A Draft RvMP has been prepared by DITT and was provided to the Auditor. On the basis that the preliminary works did not involve any activity that required revegetation one was not explicitly linked to the PRAP. One must be linked to new versions of the RAP.	he Auditor observed Revegetation Management Plan (v1.0) [DME, 10/02/25], a copy of which was provided to DLPE by DME on 27/03/25 with the Master RAP and Work Package B documents. The Auditor is of the opinion that further consultation with TAOs and NLC should occur as part of a RvMP revision.	Closed
A007	NTA140	20-2	Refer register for exact wording relating to Receiving	DITT (17/06/2022) - Draft Environmental Monitoring Plan was provided and is active.	The Draft EMP is suitable for this phase of the preliminary works	No remediation was undertaken in 2024	DME had revised and were undertaking monitoring in accordance their <i>Integrated Environmental Monitoring Plan</i> . Further revision/s are	Closed

Item	Audit ID	Clause	Requirement	Evidence	Determination	2024 Corrective or Preventative Actions	2025 Audit Assessment	Status
			Environment Monitoring				likely as the project progresses.	
A008	NTA149	21-1	The RAP required by condition 9-1 must include a revised and updated version of the water management plan (Appendix 3 of the Draft EIS - Water Management Plan Stage 3 Rum Jungle Rehabilitation Project version 4 dated 27 November 2019);	The Auditor observed an updated WMP being, McMahon Services (14 June 2023) - Water Management Plan (Preliminary) EC1 Phase 1.	The Auditor is satisfied that an updated WMP was prepared, however, only for the preliminary scope of works.	An updated version will be required for subsequent phases of work	A revised WMP was prepared and issued to the Auditor as draft for review (WRM, 2 June 2025). Review comments were provided on 9 July 2025. Whilst a revised WMP has been prepared, it appears to remain as "Draft"	Open (Ob)
A009	NTA175 to NTA180	25	Refer to register for exact wording on "Public reporting to the community"	DME operates a project website https://nt.gov.au/industry/mining/legacy-mines-remediation/remediation-projects/rum-jungle-rehabilitation	The requirement to address each of the Condition elements had not been fully developed for the preliminary stage of works	Further development of the DME website to incorporate these compliance elements is required (note - the Auditor is aware that such improvements are currently being made).	The Auditor notes modifications to the web-site. Generally, there are not specific "pages" for each of the six sub-elements. Particularly with respect to c25-1(5), the Auditor is of the opinion that this is a non-compliance. Although there is a "Contact" section, the web-site does not appear to include requirements relating to "actions to record, respond to, and manage community complaints".	Open (NC)

Item	Audit ID	Clause	Requirement	Evidence	Determination	2024 Corrective or Preventative Actions	2025 Audit Assessment	Status
A0010	NTA185	29-1	All plans, modelling and monitoring programs required by the conditions of this approval must be certified by a suitably qualified and experienced person.	Certification not provided	The Auditor did not sight "certificates" or "Certification" per-se, and is currently developing an Alternate Solution.	The Auditor is consulting with DME and DLPE regarding an appropriate form of "certification" that would provide the outcome expected of the Approval.	The Auditor has been consulting with DME and DLPE regarding an appropriate form of "certification" that would provide the outcome expected of the Approval. This has not been formalised. In the interim, the Auditor considers this to be a non-compliance.	Open (NC)

Table 5 NT Approval – New Observations & Non-compliances

Item	Audit ID	Clause	Requirement	Evidence	Determination	Corrective Actions
A011	NTA017	5-1(ii)	CHMP to be prepared by a suitably qualified and experienced person.	Refer to Audit Register for full explanation.	Observation	Whilst for the purpose of this Audit, DME is considered to be generally compliant with this requirement, it is understood that a further review of the CHMP will be undertaken by a qualified heritage consultant who is independent from the persons involved in the current version.
A012	NTA060	10-3	The Peer Reviewer is to provide advice relating to the RAP.	Refer to Audit Register for full explanation.	Non Compliant	The Auditor has spoken to DME regarding this matter which is considered to be a minor oversight and rectified on 1 May 2026 (the Auditor was Cced into an email to DLPE containing the revised RAPs, Auditor endorsements and the IPRs written advice).
A013	NTA064	10-4(i)	The written advice of the peer reviewer to be provided to the Minister	The Auditor has observed the DME submissions to DLPE (which meet these requirements), however, it is noted that RAP-B v3.1 and RAP-D v2.0 were not submitted within the reporting period.	Non Compliant	The Auditor has spoken to DME regarding this matter which is considered to be a minor oversight and rectified on 1 May 2026 (the Auditor was Cced into an email to DLPE containing the revised RAPs, Auditor endorsements and the IPRs written advice).

Item	Audit ID	Clause	Requirement	Evidence	Determination	Corrective Actions
A014	NTA065	10-4(ii)	Details of how the approval holder has addressed any inadequacies or recommendations raised in the peer review.	The Auditor has observed the DME submissions to DLPE (which meet these requirements), however, it is noted that RAP-B v3.1 and RAP-D v2.0 were not submitted within the reporting period.	Non Compliant	The Auditor has spoken to DME regarding this matter which is considered to be a minor oversight and rectified on 1 May 2026 (the Auditor was Cced into an email to DLPE containing the revised RAPs, Auditor endorsements and the IPRs written advice).
A015	NTA151	21-2(ii)	The WMP must be revised and updated to the satisfaction of the Auditor.	The Auditor is satisfied that the updated WMP (2313-01-B5-Draft) meets the requirements of the NT Approval, however, remains in DRAFT	Observation	Finalise the Water Management Plan
A016	NTA159	21-4	The WMP must be updated every 12 months	The Auditor is of the opinion that the revised version of the WMP more closely meets the requirements of the NT Approval, however, was still draft at the end of the audit period	Observation	Finalise the Water Management Plan
A017	NTA160	21-5	The approval holder must continue to implement the last approved version of the water management plan required by condition 21-1 until the site auditor provides confirmation in writing that a revised version is approved.	DME and its contractors are implementing the requirements of the WMP, however, it remains in draft.	Observation	Finalise the Water Management Plan
A018	NTA197	31-2(2)	Compliance report endorsement to include a statement as to whether DME has complied with the	The Auditor is aware that the Rum Jungle Project Team (including Directors), Board, and Department CEO are aware of the contents of the 2024 compliance report. It would not be possible	Observation	No action

Item	Audit ID	Clause	Requirement	Evidence	Determination	Corrective Actions
			conditions of the Approval.	for the CEO to make a statement that the approval holder has "complied with the conditions of this approval" on the basis that many of the conditions are currently "Not Applicable" and for some conditions the Auditor has made an "Observation". For that reason, this Condition will be marked as an Observation only.		

8.3 Compliance – Commonwealth Approval

An assessment of the compliance against existing Observations and Corrective Actions are provided in Table 4.

A summary of the 2025 audit outcome against the Commonwealth Approval is provided in Table 5.

Table 5 provides the observations and corrective actions which the Approval Holder must consider in improving their systems and performance for the 2026 reporting period.

Table 6 Commonwealth Approval – Status of existing compliance matters

Item	Audit ID	Clause	Requirement	Evidence	Determination	Corrective Actions	2025 Audit Assessment	Status
A011	CA001	1	The approval holder must undertake the action in accordance with conditions 1, 2, 3, 4, 5, 6, 7, 8, 9-1, 9-2, 9-4, 14, 15, 16, 17, 19, 20, 21, 22, 23 of the NT Approval .	Refer to NT Approval compliance audit register (Appendix B) and Table 4 of this report	Various "Observations" apply to the assessment of compliance	Various recommendations for corrective action listed in Table 4 above.	DME is generally undertaking works in accordance with the NT Approval, however, a number of Observations and Non-compliances have been identified.	Open (Obs)
A012	CA009	3a	Paraphrase – Monitoring Plan to be prepared by ISQE	Not observed	The "Definitions" section of the CA defines an ISQE as the Site Auditor - this seems incorrect - it should really be Independent (defined) Suitably Qualified Person (defined) - or preferably just SQP (to enable DME to draft the monitoring plan) - and then be endorsed by the Site Auditor / ISQE. The Auditor will produce a Discussion Document to better articulate the various roles for suitably qualified persons on this project (and seek consultation from NT-DLPE and DCCEEW).		This matter has not been resolved.	Open (Obs)
A013	CA025	6	The approval holder must submit a report on the outcomes of the approved monitoring plan to the department and the Supervising Scientist every 12 months from commencement of Stage 4 of the action. The	Monitoring Plan not yet approved	The "Definitions" section of the CA defines an ISQE as the Site Auditor - this seems incorrect - it should really be Independent (defined) Suitably Qualified Person (defined) - or preferably just SQP (to enable DITT to draft the monitoring plan) - and then be endorsed by the Site Auditor / ISQE. The Auditor will produce a Discussion Document to better articulate the various roles for suitably qualified persons on this project (and seek consultation from NT-DEPWS and DCCEEW). It is further expected that an		The Auditor did produce a Discussion Document, however, this matter has not yet been resolved.	Open (Obs)

Item	Audit ID	Clause	Requirement	Evidence	Determination	Corrective Actions	2025 Audit Assessment	Status
			monitoring plan report must be prepared by an independent suitably qualified expert. The monitoring plan report must include information to demonstrate how the approval holder has consulted with First Nations people through the implementation of the monitoring plan, including:			annual Monitoring Report will be produced during Stage 3 by DITT. It is also noted that (in Condition 20), the approval holder is to submit monitoring data within 12 months of the date of the Approval and thereafter annually.		
A014	CA045 and CA047	23 (a) and (c)	Paraphrase – Compliance report to be produced within 12 months of date of approval.		Not clear how an annual compliance report is produced on a monitoring plan that isn't required until the end of construction		Not resolved.	Open

Table 7 Commonwealth Approval – New Observations & Non-compliances

Item	Audit ID	Clause	Requirement	Evidence	Determination	Corrective Actions
A019	CA043	21	The approval holder must prepare a compliance report for each 12-month period following the date of this approval, or as otherwise agreed to in writing by the Minister.	AECOM (31 March 2025) Annual Environmental Compliance Report - 2024, Rum Jungle Rehabilitation Project. It is noted that DCCEEW, on 10/03/2026, issued a compliance assessment letter to DME. This correspondence specifically	Non Compliant	DME has applied to DCCEEW for an amendment to modify the dates for compliance reporting.

Item	Audit ID	Clause	Requirement	Evidence	Determination	Corrective Actions
				queried the dates for annual reporting. DME responded to this letter and DCCEEW issued a further letter (dated 08/04/2026) stating that they were of the opinion that this is a non compliance and that DME should make an application to the Minister for the Approval to be amended such that the reporting period could align with the NT Reporting Period. For this reason, and for consistency with DCCEEWs position, this Condition will be marked as "Non Compliant".		

8.4 Auditing of Management Plans

8.4.1 NT Approval

A variety of management plans are specifically required of the NT Approval. Assessment of compliance can be found within the Compliance Register (Appendix B) and as discussed below.

- **Remediation Action Plan/s**
 - Auditor approval obtained to produce this document in stages which consists of a Master Remediation Action Plan and subordinate Work Package RAPs
 - Section 4 lists all of the documents which sit under this requirement.
- **Cultural Heritage Management Plan**
 - *Department of Mining & Energy (7 May 2025) - Cultural Heritage Management Plan – Rum Jungle Rehabilitation Project [Version 1.2]*
 - Auditor endorsement: 9 May 2025 (RJ-Audit-AE-003)
 - The Auditor conducted a site inspection (on 12 August 2025) with DME and Warai TAOs at the Rum Jungle Recreational Area and Borrow Area A. The inspection is recorded in the Field Audit report RJ-Audit-FA-110825 (AECOM, 10 September 2025). A Preventative Action was raised (PA008) in relation to the Work Area Clearance process (s5.5 and Attachment E of the CHMP) wherein it was observed that the Cultural Oversight Group had not been adequately engaged to provide advice regarding the most appropriate TAO persons to be involved in clearance activity.
 - The Auditor's representative conducted a site inspection and review of records (on 2 September 2025) and specifically audited compliance with induction procedures of the CHMP. This was requested by TAOs on the basis that it appeared to be an area of non-compliance. The Field Audit report was issued on 18 September 2025 (AECOM, RJ-Audit-FA-020925). The Auditor considered that processes were non-compliant with the requirements of s6.1 of the CHMP and issued a Corrective Action (CA001).
- **Long-term Environmental Management Plan**
 - Auditor approval obtained to combine into a single Integrated Environmental Monitoring Plan
 - The Auditor is not required to endorse or approve this document, the NT Approval requires the Auditor to be 'satisfied'.
- **Erosion and Sediment Control Plan**
 - An Erosion and Sediment Control Measures report exists, however the Auditor was not satisfied that this met all of the requirements of the NT Approval and requires each RAP Work Package to include erosion and sediment control details.
 - The Auditor is not required to endorse or approve this document, the NT Approval requires the Auditor to be 'satisfied'.
- **Revegetation Management Plan**
 - *Department of Mining & Energy (10 February 2025) - Revegetation Management Plan – Rum Jungle Rehabilitation Project [Version 1.0]*
 - The Auditor is not required to endorse or approve this document.
 - The Auditor is not satisfied that the RvMP had been adequately consulted with TAOs and NLC and views had not been integrated into this plan. On that basis, DME has been actively sharing information at TWGs regarding elements relating to current and proposed vegetation management. The Auditor expects a revised document to be finalised prior to any works that would require revegetation (such as excavation of borrow pits).
- **Receiving Environment Monitoring Program**
 - Auditor approval obtained to combine into a single Integrated Environmental Monitoring Plan

- **Water Management Plan**

- WRM (2 June 2025) – *Rum Jungle Rehabilitation Project Stage 3A Water Management Plan (2313-01-B4-Draft)*
 - This document replaced a 2024 version by DME.
 - There are various Observations and Non-compliance assessments relating to the WMP
 - Although the NT Approval does not explicitly require the WMP to be endorsed by the Auditor, Condition 21-5 does require the revised WMP to be 'approved'. The Auditor has not yet approved the revised WMP.

- **Other plan/s**

- The Auditor is aware that both DME and its sub-contractors have produced other management plans and procedures to mitigate risks to human health and the environment and provide guidance to their activities. These are not specified in the environmental approvals and have not been subject to review or endorsement by the Auditor.

8.4.2 Commonwealth Approval

- **Monitoring Plan**

- In accordance with Condition 3, the monitoring plan is not required to be prepared and submitted until "at least 12 months prior to the completion of Stage 3". This is understood to be a number of years off. Despite this requirement, DME has prepared its Integrated Environmental Monitoring Plan (as required of the NT Approval) and is undertaking monitoring in accordance with this document. Refer also to the NT Compliance Register (Appendix B).

9.0 Conclusion

AECOM Australia Pty Ltd (AECOM) was commissioned by the Northern Territory Department of Mining & Energy (DME) as the independent auditor for the Rum Jungle Rehabilitation Project.

This report documents the findings of the 2025 annual compliance audit.

The 2025 compliance audit has included an evaluation of compliance with approval conditions, review of documents, data, plans and drawings as well as site inspections and meetings with project stakeholders.

The findings of the compliance audit are as follows:

	NT Approval			
	2024 Status	2025 Change	Total Current	% Current
Compliant	68	+45	113	56
Non Compliant	0	+5	5	2
Observation	24	-18	6	3
Not Applicable	109	-32	77	38
Total	201	-	201	100

* Percentages are rounded

	Commonwealth Approval			
	2024 Status	2025 Change	Total Current	% Current
Compliant	12	+2	14	18
Non Compliant	0	+1	1	1
Observation	5	0	5	7
Not Applicable	59	-3	56	74
Total	76	-	76	100

* Percentages are rounded

Based on reviews undertaken, consultation, meetings, site inspections and findings detailed in this report, the Auditor concludes that the Approval Holder and its operations are generally compliant with the NT and Commonwealth Environmental Approval Conditions for the 2025 reporting period. A series of non-compliances and observations have been made and corrective actions provided. Evidence of consideration of the recommended corrective actions will be assessed during the 2026 reporting period.

10.0 Report Limitations

This audit was conducted in accordance with industry relevant standards and guides and professional judgement, experience and training of the environmental auditor and their specialist support staff. Every effort has been made to ensure that all relevant matters relating to compliance have been addressed in the audit. To our knowledge, this was achieved; however, we do not take responsibility if information was withheld by the auditee or not available at the time the audit was undertaken.

This document was prepared for the sole use of Department of Industry, Tourism and Trade (DITT) – now Department of Mining & Energy (DME) and the regulatory agencies that are directly involved in this project, the only intended beneficiaries of our work. No other party should rely on the information contained herein without the prior written consent of AECOM Australia Pty Limited (AECOM) and DITT/DME. Any advice, opinions or recommendations contained in this document should be read and relied upon only in the context of the document as a whole and are considered current to the date of this document.

11.0 References

Department of Climate Change, Energy, the Environment and Water (DCCEEW), 7 July 2023 – *Notification of Approval – Rehabilitation of the former Rum Jungle mine site, near Batchelor, NT (EPBC 2016/7730)*

DCCEEW, 2023 - *Annual Compliance Report Guidelines*

Minister for Environment, Climate Change and Water Security (DECCWS), 29 March 2023 - *Northern Territory Environmental Approval (EP2023/022)*

SLR Consulting, 27 September 2023 – *Preliminary Remediation Action Plan Stage 3 Early Works – Rum Jungle Mine Site*

Appendix A

Plates

Appendix A Photographs – Auditor Inspection 27 May 2025



Plate 1 Intersection upgrade works (corner Rum Jungle Road and entry road to site)



Plate 2 Signage (multiple examples of these observed about the site)



Plate 3 Erosion protection at the EBDC crossing appears to remain intact or has been appropriately repaired.



Plate 4 Contractor facilities

Photographs – Auditor Inspection 12 August 2025



Plate 5 Rum Jungle Lake car-park with Rum Jungle South new waste storage facility in background



Plate 6 Steel post and wire fence demarcating the Rum Jungle South (Borrow Area A)



Plate 7 Co-disposal pit on Main Waste Rock Dump



Plate 8 Part of the Surface Water Treatment Plant



Plate 9 Part of the Surface Water Treatment Plant



Plate 10 Proposed location and exclusion bunting for surface water discharge to EBFR

Appendix B

NT Approval Compliance Register

Appendix B NT Approval Compliance Register

Audit ID	L1	L2	L3	L4	L5	Condition Requirement	Method of Verification	Evidence & Documents	Auditors Determination	Finding	Notes / Corrective Actions
	1					Limitations and extent of action					
		1-1				When implementing the action, the approval holder must ensure the action does not exceed the extents shown in Table 1.					
NTA001					i	Rum Jungle (Figure 2) - No more than 276.5 ha in total to be cleared within the approved extent	Data or drawings confirming areas of clearance within approved extents (may include verifiable estimated extents and/or survey plans)	DME provided the Auditor with an xls register of clearance extents which has been converted to a PDF and is attached as Appendix D of this report. DME provided geopackaged GPKG shapefiles to support the data contained with the register. Evidence is attached in Appendix D including a basic export of the GPKG file.	A total of 43.33 ha is stated to have been cleared. This value does not exceed the allowable limit.	Compliant	
NTA002					ii	Mt Burton (Figure 3) - No more than 1.2 ha in total to be cleared within the approved extent		DME (or its subcontractors) did not undertake any clearance	Complies	Compliant	
NTA003					iii	Mt Fitch (Figure 4) - No more than 1.3 ha in total to be cleared within the approved extent		DME (or its subcontractors) did not undertake any clearance	Complies	Compliant	
NTA004					iv	Borrow Area A (Figure 5) - No more than 66.6 ha in total to be cleared within the approved extent		DME (or its subcontractors) did not undertake any clearance	Complies	Compliant	
NTA005					v	Borrow Area B (Figure 6) - No more than 145.3 ha in total to be cleared within the approved extent		DME (or its subcontractors) did not undertake any clearance	Complies	Compliant	
NTA006					vi	Total clearing (Figure 1) - No more than 490.9 ha within the approved extent		DME provided the Auditor with an xls register of clearance extents which has been converted to a PDF and is attached as Appendix D of this report. DME provided geopackaged GPKG shapefiles to support the data contained with the register. Evidence is attached in Appendix D including a basic export of the GPKG file.	A total of 43.33 ha is stated to have been cleared. This value does not exceed the allowable limit.	Compliant	
	2					Overarching objectives					
		2-1				The approval holder must implement the action to meet the following environmental objectives:					
NTA007			(1)			Improve environmental conditions onsite to support long-term improvement in the downstream aquatic ecosystem condition; and	Post construction Site Audit Report confirming same	NA	NA	Not Applicable	
NTA008			(2)			Improve environmental conditions onsite to support future use of the land for traditional ceremony, culture and subsistence use of natural resources.		NA	NA	Not Applicable	
	3					Cultural heritage outcomes					
		3-1				The approval holder shall implement the action to meet the following environmental outcomes:					
NTA009			(1)			avoid where possible, and otherwise mitigate, further impacts on Aboriginal sacred sites within the approved extent;	Refer obligations within the Cultural Heritage Management Plan	Auditors observations & DME confirmation - no works occurred within registered sacred sites.	Registered sacred sites were avoided.	Compliant	The Main Pit is listed as a Recorded Sacred Site. Works (such as dewatering have occurred in the Main Pit).
NTA010			(2)		avoid, where possible, and otherwise mitigate, further impacts to Aboriginal archaeological places and objects within the approved extent;	Auditors observations & DME confirmation - archaeological places were avoided.		Archaeological places were avoided.	Compliant	For areas of clearance, archaeological surveys and TAO inspections have occurred in accordance with the relevant Work Area Clearance Process.	
NTA011			(3)			remediate contamination to aid in achieving improvements to cultural values associated with the approved extent.		Remediation (of contamination) has not commenced	NA	Not Applicable	

Audit ID	L1	L2	L3	L4	L5	Condition Requirement	Method of Verification	Evidence & Documents	Auditors Determination	Finding	Notes / Corrective Actions
		4				Consultation with traditional owners					
		4-1				The approval holder must consult with, and have regard to the views of, traditional owners and the NLC.					
NTA012			(1)			prior to the finalisation and implementation of the RAP required by condition 9-1;	Correspondence with TAOs/NLC and documentation indicating consultation has occurred	A DME register (provided to the Auditor) includes a list of consultation with Wajari and Kungarakan TAOs and NLC. A DME register (provided to the Auditor) includes a list of views expressed by TAOs and NLC. The register includes DMEs position on each view expressed. The Auditor has also attended all Rum Jungle Technical Working Group (RJTWG) meetings and Rum Jungle Cultural Oversight Group (RJCOG) meetings which are generally held on a monthly basis. Minutes have been provided and are circulated to participants. The Auditor is also aware that these registers have been provided to the working group Chair, Dr Chris Brady.	DME has consulted with and considered the views of TAOs and NLC.	Compliant	The Master RAP was endorsed on 25/03/2025. Work Package RAP-B was endorsed on 25/03/2025. Work Package RAP-B (v3.1) was endorsed on 29/09/25. CHMP (v1.2) was endorsed on 09/05/25. Work Package RAP-C was endorsed 09/05/25. Work Package RAP-D (v1.0) was endorsed on 13/08/25. Work Package RAP-D (v2.0) was endorsed on 25/09/25.
NTA013			(2)		prior to the finalisation of the site audit report required by condition 13-1; and	NA		NA	NA	Not Applicable	
NTA014				(3)		throughout implementation of the action.		The Auditor has observed that consultation is ongoing and has observed the DME register of consultation.	Considered to comply for the purposes of this audit period	Compliant	
NTA015		4-2				If the RAP is prepared in stages, the consultation required by condition 4-1 must be undertaken for each stage.		As an invited member of the RJTWG and RJCOG, and having been Coed to emails, the Auditor has observed that consultation for each stage has occurred.	Considered to comply for the purposes of this audit period	Compliant	
		5				Cultural Heritage Management Plan (CHMP)					
NTA016		5-1		i		The RAP that the approval holder is required to prepare under condition 9-1, must include a CHMP	Approved CHMP	The endorsed version of the CHMP is v1.2 (dated 07/05/25).	Complies.	Compliant	
NTA017				ii		that has been prepared by a suitably qualified and experienced person.	Confirm that authors are SQEP	<p>The endorsed CHMP is based on a document entitled RUM JUNGLE MINE REHABILITATION: STAGE 2A CULTURAL HERITAGE CHMP (received on 25 July 2024) which is stated to be authored by Karen Martin-Stone (in Depth Archaeology) and Silvano Jung (Eilengowan Enterprises) and contains a Document Control page confirming that the plan had also been reviewed by individuals within NLC and NTG.</p> <p>The Auditor and the Auditors Specialist Support, Josh Loyd (Wajari Yamaji Traditional Owner, AECOM First Nations Director) undertook a review of this document and provided those comments to NTG on 31 July 2024.</p> <p>The Auditor and Specialist Support also reviewed the CHMP draft preceding the current version.</p> <p>The Auditor is aware that the draft CHMP was also provided to the NT Heritage Branch (DLPE) on 24/09/24. Review comments were provided on 01/10/24 and amendments subsequently made.</p> <p>The Auditor is aware that copies of the CHMP were provided electronically to TAOs and NLC and as hard-copy in workshops, and that the CHMP was discussed at various workshops.</p> <p>The Auditor is aware that NTG has made amendments to procedures for cultural heritage management based on feedback from TAOs and from NLC.</p> <p>Within my CHMP endorsement (9 May 2025) I also state:</p> <p>The CHMP was prepared by multiple persons who are collectively considered to be suitably qualified and experienced. These persons include</p> <ul style="list-style-type: none"> -Karen Martin-Stone (inDepth Archaeology) and Silvano Jung (Eilengowan Enterprises) who are archaeologists and who's surveys and reports have informed relevant sections of the CHMP; -Lynley Wallis (Wallis Heritage Consulting) who has synthesised previous archaeological reports and provided further feedback for improvement to the CHMP; -NLC (various staff have been involved in development and review); -Kate Turner (DME, who has experience regarding cultural heritage management and consultation through her role as Parks Australia Branch Head for Kakadu); and -NT Heritage Branch who have also reviewed the draft of the document. <p>In the Annual Environmental Compliance report for 2023 it was identified as an Observation that Condition 5-1 is not fully compliant. I furthermore state that future CHM documents must acknowledge preparation by SQEP/s.</p>	Generally complies	Observation	Whilst for the purpose of this Audit, DME is considered to be generally compliant with this requirement, it is understood that a further review of the CHMP will be undertaken by a qualified heritage consultant who is independent from the persons involved in the current version.

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NTA018					iii	in consultation with traditional owners and the NLC,	Obtain evidence of consultation	The Auditor has attended the RJTWG meetings and RJCOG meetings, observed minutes and has been Coed into email correspondence to TAOs and NLC. The Auditor has been provided with the Consultation Register.	Complies	Compliant	
NTA019					iv	and must be endorsed by the site auditor.	Observe endorsement	RJ-Audit-AE-003_09/05/25	Complies	Compliant	
NTA020		5-2				If the RAP is prepared in stages, the consultation on the CHMP required by condition 51 must be undertaken for each stage.	Evidence of consultation	Consultation is ingoing and undertaken at RJTWG and RJCOG meetings for each proposed RAP Work Package.	Complies	Compliant	It is noted that the Auditor does not interpret the Approval Conditions as requiring a separate or new CHMP for each new Work Package.
		5-3				The CHMP must include measures to provide for:					
NTA021			(1)			protection of sacred sites within the approved extent and compliance with Authority Certificates issued to the approval holder under the Northern Territory Aboriginal Sacred Sites Act 1989;		Section 3 and 5.1 of RAP (v1.2)	Complies	Compliant	
NTA022			(2)			protection of known heritage places and objects within the approved extent and compliance with any statutory authorisations issued to the approval holder under the Heritage Act 2011;		Section 3 and 5.2 of RAP (v1.2)	Complies	Compliant	
NTA023			(3)			cultural heritage induction procedures for site personnel;		Section 6 of RAP (v1.2)	Complies	Compliant	
NTA024			(4)			an internal approval process prior to ground disturbing activities and use of visual barriers and signs where appropriate;		Section 5.5 and RJ3-PR-507 of RAP (v1.2)	Complies	Compliant	
NTA025			(5)			further archaeological survey and assessment where required;	Evidence to be contained within the CHMP	DME has confirmed that further archaeological survey is (and has been) required as part of the Work Area Clearance processes and is consulting with Kungarakan and Warai regarding this.	Complies	Compliant	
NTA026			(6)			procedures to mitigate risks to unidentified heritage places and objects;		Section 3 and 9 of RAP (v1.2)	Complies	Compliant	
NTA027			(7)			stop work procedures to follow in the event suspected or actual unidentified human remains, or Aboriginal archaeological places or objects are encountered;		Section 4 and Attachment C and D of RAP (v1.2)	Complies	Compliant	
NTA028			(8)			measures for effective consultation and engagement with stakeholders, including traditional owners and the NLC; and		Section 8 of RAP (v1.2)	Complies	Compliant	
NTA029			(9)			detail of how compliance would be monitored and reported and how the outcomes of investigative and/or adaptive management actions would be notified to the relevant government authorities.		Section 3.4 of RAP (v1.2)	Complies	Compliant	
NTA030		5-4				The approval holder must implement the CHMP for the life of the action with the objective of ensuring that the outcomes under condition 2-1 are achieved.	Evidence of implementation	On the basis of observations made, discussions with DME, attendance at workshops and field audits conducted, the Auditor is of the opinion that the CHMP is being implemented.	The Auditor is satisfied that implementation is occurring.	Compliant	
NTA031		5-5			i	The approval holder may review and revise the CHMP in consultation with stakeholders, including traditional owners.	Observation	The Auditor has observed that consultation on a revision to the CHMP is occurring.	Complies	Compliant	
NTA032					ii	If the CHMP is revised, the revised version must be provided to the site auditor for their written endorsement.	Endorsement document	NA	Not applicable to this reporting period	Not Applicable	
NTA033					iii	Within 10 business days after obtaining written endorsement from the site auditor the endorsed version of the CHMP must be submitted to the Minister.	Evidence that CHMP has been submitted	The Auditor has observed an email from DME to DLPE (dated 09/05/25) containing CHMP (v1.2) and the Auditors endorsement (RJ-Audit-AE-003).	The submission was made within 10 days and contained the necessary elements	Compliant	
NTA034		5-6				The approval holder shall implement, review and revise the CHMP as and when directed by the site auditor or the Minister by notice in writing, and in consultation with stakeholders.	Observation	NA	Not applicable to this reporting period	Not Applicable	
		6				Post-remediation land use					
NTA035			6-1			The approval holder must verify through the site audit report required by condition 13-1, whether any post-remediation land use restrictions would be required, including on traditional Aboriginal practices and land use such as hunting and gathering activities for native fauna and flora as bush foods within the proposal area and Zones 3, 4, 6 and 7 of the downstream aquatic ecosystem (Figure 7).	Site Audit Report confirming same	NA	NA	Not Applicable	
NTA036			6-2		i	The site audit report must address potential impacts to human health with consideration of exposure to radiation and toxicants,	Site Audit Report confirming same	NA	NA	Not Applicable	
NTA037					ii	informed by the advice of a suitably qualified and experienced person with demonstrated expertise in radiation protection.	The Site Auditors expert support team must include a radiation specialist	The Site Auditors team includes Kevin Taylor (AECOM Manager, Nuclear and Radiological Services & Global Radiological Services Technical Practice Group leader) (BSc (Physics), MSc (Nuclear Engineering), PEng, Certified Health Physicist) who has +23 years experience.	Kevin Taylor is assessed as being an SQEP.	Not Applicable	Advice has not been required or provided as at the compliance date of this audit.

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		7				Remediation works					
		7-1				To support achieving the outcomes under condition 2-1, remediation works must be carried out:					
			(1)			In accordance with:					
NTA038				(a)		the design specifications, criteria, requirements and quality assurance/quality control procedures detailed in the endorsed remediation action plan (RAP) required by condition 9-1;	Compliance audit	The Auditor notes that 2025 activity did not consist of "remediation works" per-se. Endorsed Work Packages consisted of RAP-B (Installation of groundwater extraction bores), RAP-C (Water Treatment Plant construction, pipeline network and front access road upgrade), RAP-D (Surface water treatment plant operation and construction of a diversion plug). Based on observations, discussions with DME and based on field audits conducted, the Auditor considers that the works are carried out in accordance with the endorsed documents.	Complies	Compliant	
NTA039				(b)		the National Environment Protection (Assessment of Site Contamination) Measure 1999 (ASC NEPM); and	Compliance audit	Planning for and delivery of the limited remediation works are considered to be in general compliance with the requirements of the NEPM	Complies	Compliant	
NTA040				(c)		the relevant guidelines produced under the National Remediation Framework (NRF);	Compliance audit	Planning for and delivery of the limited remediation works are considered to be in general compliance with the requirements of the NRF	NA	Compliant	
NTA041			(2)			to the satisfaction of the site auditor required by condition 8-1.	Compliance audit	For the audit period, the works are to the satisfaction of the Auditor, noting that compliance feedback has been provided to DME (particularly in relation to the CHMP).	NA	Compliant	
		8				Site auditor					
		8-1				Prior to the commencement of remediation works, the approval holder must:					
NTA042			(1)			appoint a site auditor to independently review and endorse:	Confirmation of engagement	NTG Notice of Acceptance dated 25/08/2023	The site auditor was appointed by DITT prior to the commencement of preliminary works	Compliant	
NTA043				(a)		the remediation action plan required by condition 9-1; and	Observe review comments & letter of endorsement	The Master RAP was endorsed on 25/03/2025. Work Package RAP-B was endorsed on 25/03/2025. CHMP (v1.2) was endorsed on 09/05/25. Work Package RAP-C was endorsed 09/05/25. Work Package RAP-D (v1.0) was endorsed on 13/08/25. Work Package RAP-D (v2.0) was endorsed on 25/09/25.	Complies	Compliant	
NTA044				(b)		the implementation and validation of the remediation works carried out under the RAP.	Validation works	NA	NA	Not Applicable	It is noted that water quality monitoring is undertaken by DME and its sub-contractors
NTA045			(2)			The appointment of the site auditor required by condition 8-1 must be agreed to by the Minister in writing.	Seek letter/s of approval	NT Minister for ECC&WS, 25/07/2023.	Document meets the requirement of the condition	Compliant	However, note that in "Definitions" the final bullet point states that approval is to be obtained from the CEO. It is not clear who's CEO this is to be from.
		9				Remediation action plan					
NTA046		9-1				Prior to the commencement of remediation works, the approval holder must engage a suitably qualified and experienced person to prepare a RAP detailing the remediation objectives, work required to meet the remediation objectives, performance criteria for the remediation works, and corresponding contingency actions.	Confirm engagement of SQEP	SLR prepared the Master RAP and Work Package documents which were reviewed and authorised by DME.	SLR (their staff) is considered to be SQEP within the meaning provided in "Definitions"	Compliant	
		9-2				The RAP required by condition 9-1 must:					
NTA047			(1)			be informed by a health risk assessment and environmental risk assessment;	Observe a HERA	Section 10 and Appendix C (Health, Safety and Environmental Risk Register)	Complies	Compliant	
NTA048			(2)			be prepared in accordance with the relevant guidelines produced or approved under the ASC NEPM and NRF; and	RAP to be prepared in accordance with the relevant sections of the NEPM and NRF	Master RAP (supported by the relevant Work Packages endorsed at the time).	The Auditor considers that the Master RAP and relevant Work Packages were prepared in general accordance to the relevant sections of the NEPM and NRF	Compliant	
NTA049			(3)			be reviewed and endorsed in writing by the site auditor appointed under condition 8-1	Observe review comments & letter of endorsement	The Auditor has reviewed each of the Master RAP and Work Package RAPs, provided written feedback and has been satisfied that adequate amendments have been made. DME has forwarded all endorsements to DLPE.	Complies	Compliant	
NTA050			(4)			be revised to address any comments of the independent peer review required by condition 10-1, and approved by the site auditor.	Observe IPR comments	The Auditor has observed each of the IPR review comments and letters confirming that the comments have been addressed. Correspondence from the IPR is provided to DLPE (the Auditor has been Coed).	Complies	Compliant	
NTA051		9-3				The approval holder must implement the RAP that has been approved by the site auditor under condition 9-2(4).	Site inspection and consultation with DME	The Auditor has spoken with DME and has attended site to undertake compliance audits (27/02/25, 27/05/25, 12/08/25)	Complies	Compliant	
		9-4				As part of the RAP required by condition 9-1 the approval holder must include the following:					

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NTA052			(1)			Cultural heritage management plan (see condition 5);	Endorsed CHMP	CHMP (v1.2) is endorsed	Complies	Compliant	A revised version of the CHMP is understood to be in preparation.
NTA053			(2)			Long-term environmental management plan (see condition 15);	Observe an endorsed LTEMP	DME has produced various revisions to its <i>Integrated Environmental Monitoring Plan</i> . At the end of the reporting period this document was v1.2 (7 October 2025). There has been 2 further revisions in 2026.	Complies	Compliant	
NTA054			(3)			Erosion and sediment control plan (see condition 16);	Observe an endorsed ESCP	SLR (28/02/2023) - <i>Erosion and Sediment Control Measures</i> report was observed (it is noted that the 2020 revision of this document was provided to DLPE by DME). On the basis that the ESCM report did not meet all of the requisite requirements, the Auditor is satisfied that the Work Package RAPs will need to include the relevant details relating to erosion and sediment control.	Considered to comply on the basis that Work Packages do contain information relevant to erosion and sediment control.	Compliant	
NTA055			(4)			Revegetation management plan (see condition 17);	Observe an endorsed RvMP	DME (10/02/25) - <i>Revegetation Management Plan</i> was observed (a copy of which has been provided to DLPE by DME).	The Auditor accepts that a revised RvMP was not required for this phase of works	Compliant	A revised RvMP will be required (and further consultation with TAOs and NLC should occur) for works that require revegetation.
NTA056			(5)			Receiving environment monitoring program (see condition 20); and	Observe an endorsed REMP	DME has produced various revisions to its <i>Integrated Environmental Monitoring Plan</i> . At the end of the reporting period this document was v1.2 (7 October 2025). There has been 2 further revisions in 2026.	Complies	Compliant	
NTA057			(6)			Water management plan (see condition 21).	Observe an endorsed WMP	DME (20/12/24) - <i>Water Management Plan</i> was observed (a copy of which has been provided to DLPE by DME).	Complies	Compliant	See also c21 as an updated WMP is not considered finalised.
	10					Independent peer review of endorsed RAP					
NTA058		10-1				Prior to the commencement of remediation works the approval holder must appoint a peer reviewer to undertake an independent peer review of the site auditor endorsed RAP.	Confirmation of appointment documentation	IPR confirmed that NTG Notice of Acceptance dated 16/06/2023 was received	Mark Stuckey of Environmental Earth Sciences International (EESI) has been appointed by DITT/DME	Compliant	
NTA059		10-2				The appointment of the peer reviewer required by condition 10-1 must be agreed to by the Minister in writing.	Observe Ministers letter of approval	NT Minister for ECC&WS, 25/07/2023.	The DECCWS Minister has approved Mark Stuckey to be the IPR	Compliant	
NTA060		10-3				The peer reviewer must provide written advice to the approval holder on whether the site auditor endorsed RAP.	Observe IPRs written advice	The IPR has made such statements in his correspondence on the Master RAP (DME attached this to its submission email on 27/03/25), RAP-B (submitted on 25/02/25), RAP-C (submitted on 09/05/25) and RAP-D v1.0 (submitted on 20/08/25). It is noted that RAP-B was subsequently amended (to v3.1) to include a provision for a secondary co-disposal pit and RAP-D was amended (to v2.0) to include the construction of a diversion plug. Neither of these amended documents were provided to DLPE within the audit period. Upon enquiry by the Auditor, the IPR did produce written advice (dated 29 April 2026) on both of these revised documents which falls outside of the 2025 audit period.	The Auditor had not observed the written advice for RAP-B v3.1 or RAP-D v2.0 within the audit period.	Non Compliant	The Auditor has spoken to DME regarding this matter which is considered to be a minor oversight and rectified on 1 May 2026 (the Auditor was Coed into an email to DLPE containing the revised RAPs, Auditor endorsements and the IPRs written advice).
NTA061		(1)				is suitable for the scope of remediation for the proposed action;			Complies	Compliant	
NTA062		(2)				is technically sound, based on appropriate data, and supported by the conclusions of investigations and studies presented in the EIS; and			Complies	Compliant	
NTA063		(3)				is consistent with best practice standards in line with the NRF.			Complies	Compliant	
NTA064		10-4			i	The written advice of the peer reviewer must be submitted to the Minister together with the approved RAP	Confirm that the IPRs written advice was submitted to the Minister	As stated above, the Auditor has observed the DME submissions to DLPE (which meet these requirements), however, it is noted that RAP-B v3.1 and RAP-D v2.0 were not submitted within the reporting period.	Does not comply	Non Compliant	The Auditor has spoken to DME regarding this matter which is considered to be a minor oversight and rectified on 1 May 2026 (the Auditor was Coed into an email to DLPE containing the revised RAPs, Auditor endorsements and the IPRs written advice).
NTA065					ii	and details of how the approval holder has addressed any inadequacies or recommendations raised in the peer review.	Confirm such details were included			Non Compliant	The Auditor has spoken to DME regarding this matter which is considered to be a minor oversight and rectified on 1 May 2026 (the Auditor was Coed into an email to DLPE containing the revised RAPs, Auditor endorsements and the IPRs written advice).
	11					Validation of remediation works					
NTA066		11-1				Prior to the commencement of remediation works, the approval holder must appoint a suitably qualified and experienced person to:		SLR is the appointed consultant	SLR is considered to be a SQEP.	Compliant	
NTA067		(1)				document and validate the remediation works to demonstrate compliance with the RAP; and	Confirmation that a SQEP has been appointed for these purposes	There are currently no "remediation works" to document or validate, however, it is noted that various forms of water monitoring is undertaken (including groundwater, surface water and water into and discharging from the Surface Water Treatment Plant)	NA	Not Applicable	
NTA068		(2)				prepare the validation report required by condition 12-1		A validation report is expected	NA	Not Applicable	
NTA069		11-2				The suitably qualified and experienced person required by condition 11-1 must be certified under the CEnvP(SC) or CPSS/CSAM scheme, or be accredited under section 68 of the Waste Management and Pollution Control Act 1998.	The SLR Team must have a signatory that meets these requirements	Seek confirmation at appropriate time of project	NA	Not Applicable	

Audit ID	L1	L2	L3	L4	L5	Condition Requirement	Method of Verification	Evidence & Documents	Auditors Determination	Finding	Notes / Corrective Actions
						Validation report					
NTA070		12-1				Following completion of remediation works the approval holder must submit a validation report to the Minister.	Observe validation report	NA	NA	Not Applicable	
		12-2				The validation report must:				Not Applicable	
NTA071			(1)		i	be prepared by the suitably qualified and experienced person required by condition 11-2 and	Ensure report prepared by a SQEP	NA	NA	Not Applicable	
NTA072					ii	endorsed by the site auditor;	Ensure validation report is endorsed by the Auditor	NA	NA	Not Applicable	
NTA073			(2)			be prepared in accordance with the relevant guidelines produced or approved under the ASC NEPM and NRF;	Ensure validation report prepared in accordance with the relevant sections of the NEPM and NRF	NA	NA	Not Applicable	
NTA074			(3)			describe the remediation works, the validation carried out and the final condition of the site as informed by at least 12 months of post-construction monitoring data, collected in accordance with the REMP required by condition 20-2, and LTEMP required by condition 15-1;	Seek evidence	NA	NA	Not Applicable	
NTA075			(4)			validate the remediation works against the remediation criteria set out in the RAP.	Seek evidence (including risk assessment)	NA	NA	Not Applicable	
						Site audit report					
NTA076		13-1				Within six months of submission of the validation report required by condition 12-1, or within a timeframe as otherwise agreed by the Minister, the approval holder must submit a site audit report to the Minister.	Audit Report to be submitted to Minister	NA	NA	Not Applicable	
NTA077			13-2			The site audit report must be prepared by the site auditor in accordance with the relevant guidelines produced or approved under the NRF and must:	Audit report to be prepared in accordance with relevant guidelines	NA	NA	Not Applicable	The Auditor will consider the NRF, and produce the site audit report in accordance with jurisdictional obligations, references, standards and guidelines.
NTA078			(1)			summarise the information reviewed by the site auditor during the audit;	Audit report to summarise information sources	NA	NA	Not Applicable	
NTA079			(2)			include the site auditor's written findings, evaluations and conclusions, including but not limited to:	Audit report to include evaluation of risk to the relevant environmental values of the proposed land uses.	NA	NA	Not Applicable	
NTA080			(a)			whether remediation works have been completed in accordance with the RAP and the risks to human health and the environment have been addressed in accordance with the objectives in the RAP;	Audit report to evaluate the Consultants assessment of risk	NA	NA	Not Applicable	
NTA081			(b)			an evaluation of the suitability of the site for the intended future land uses, with or without recommended conditions on the use of the site; and	Audit report to include evaluation of risk to the relevant environmental values of the proposed land uses.	NA	NA	Not Applicable	
NTA082			(c)			an evaluation of the suitability of the LTEMP required by condition 15-1 to manage the mine waste storages.	Observe Auditors endorsement of LTEMP (or Integrated Environmental Monitoring Plan)	NA	NA	Not Applicable	
NTA083			13-3			The approval holder may progressively submit the site audit report required by condition 13-1 as series of reports for stages of the action, if the remediation works have been completed in accordance with the RAP for those stages of the action.	If completed, observe Audit report in stages	NA	NA	Not Applicable	
NTA084			13-4			If the site audit report is submitted progressively as the remediation works for stages of the action are completed, the final site audit report is not required to cover those stages of the action for which site audit reports have already been submitted. However, the final site audit report must otherwise comply with the requirements under condition 13-2.	Noted	NA	NA	Not Applicable	

Audit ID	L1	L2	L3	L4	L5	Condition Requirement	Method of Verification	Evidence & Documents	Auditors Determination	Finding	Notes / Corrective Actions
		14				Certifying design and construction plans for mine waste storages					
			14-1			Prior to construction of the mine waste storages, the approval holder must:					
NTA085				(1)		engage a suitably qualified and experienced person with demonstrated expertise in mine waste engineering, to prepare the design plans for the mine waste storages in accordance with an appropriate engineering standard and consistent with internationally accepted contemporary best practice guidance;	WSF must be designed by a SQEP	NA	NA	Not Applicable	
NTA086				(2)		obtain certification of the design plans for the mine waste storages from the site auditor; and	Observe MWS Design Certification	NA	NA	Not Applicable	
NTA087				(3)		submit the certified design plans for the mine waste storages to the Minister.	MWS/WSF Design submission to Minister (via delegation)	NA	NA	Not Applicable	
NTA088			14-2			When the construction of the mine waste storages is complete, the environmental approval holder must:	Seek certification of WSF completion (or similar)	NA	NA	Not Applicable	
NTA089				(1)	i	obtain written verification from the suitably qualified and experienced person required by condition 14-1, that the construction of the mine waste storages is in accordance with the certified design plans,	Observe validation report	NA	NA	Not Applicable	
NTA090					ii	and submit the written verification to the site auditor;	Observe verification	NA	NA	Not Applicable	
NTA091				(2)		obtain certification from the site auditor that the construction of the mine waste storages is in accordance with the certified design plans; and	Sight Auditors certification (or similar)	NA	NA	Not Applicable	
NTA092				(3)		submit the construction certification to the Minister.	Observe submission	NA	NA	Not Applicable	
NTA093			14-3			The suitably qualified and experienced person required by conditions 14-1 and 14-2, must be a professional engineer who is a member of Engineers Australia and has either a Chartered or National Engineering Register credential in civil, structural, and/or geotechnical engineering or holds equivalent professional qualifications and has the following:	Noted	NA	NA	Not Applicable	
NTA094				(1)		knowledge of engineering principles related to the structures, geomechanics, hydrology, hydraulics, chemistry and environmental impact of mine waste landforms; and	Noted	NA	NA	Not Applicable	
NTA095				(2)		at least a total of ten years of suitable experience and demonstrated expertise in the design, construction, operation and maintenance of mine waste landforms; geomechanics with particular emphasis on stability, geology and geochemistry; hydrology, sediment transport and deposition; erosion control; and hydrogeology with particular reference to seepage, groundwater, and solute transport processes and monitoring.	Noted	NA	NA	Not Applicable	
						15					
						Long-term environmental management plan (LTEMP)					
NTA096			15-1		i	The RAP required by condition 9-1, must include an LTEMP for the mine waste storages detailing the long-term management objectives,	Observe LTEMP (or Integrated Monitoring Plan if prepared)	DME (10/02/25) - <i>Integrated Environmental Monitoring Plan</i> (a copy of which has been provided to DLPE by DME),	Complies	Compliant	
NTA097					ii	work required to achieve the long-term objectives,	Must include	Section 7 and Section 8 of IEMP	Complies	Compliant	
NTA098					iii	monitoring and performance criteria, and	Must include	Section 5 (Early Works Monitoring), Section 6 (Construction Monitoring) and Section 7 (Stabilisation Monitoring)	NA	Compliant	
NTA099					iv	corresponding contingency actions.	Must include	Section 4	NA	Compliant	
			15-2			The LTEMP required by condition 15-1 must:					
NTA100				(a)		be prepared by a suitably qualified and experienced person to the satisfaction of the site auditor required by condition 8-1;	Ensure authors are SQEPs	The Auditor is satisfied that the authors and reviewers listed on the Document Control page of the IEMP are suitably qualified and experienced, noting the Auditor has also reviewed and provided comment on draft versions of the document.	Complies	Compliant	
NTA101				(b)		be prepared in accordance with the relevant guidelines produced or approved under the ASC NEPM and NRF	Must include	As appropriate, the IEMP has been prepared in general accordance with the relevant sections of the NEPM and NRF.	Complies	Compliant	
				(c)		include but not be limited to:					
NTA102				i		identification of all relevant statutory and other obligations, including all approvals, licences, agreements and financial arrangements;	Must include	Section 1.4 and Section 8.2.2 (noting that for confidentiality reasons, the IEMP does not include financial arrangement).	Complies	Compliant	
NTA103				ii		details of ongoing management roles and responsibilities;	Must include	Section 2. It is noted that post-construction roles and responsibilities have not been defined at this early stage of the project. The Auditor does not consider this to be a non-compliance.	Complies	Compliant	

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NTA104					iii	details of all monitoring, inspections, environmental controls, requirements and measures to manage the ongoing integrity and performance of the mine waste storages;	Must include	Section 7 and 8 are considered to be adequate for this phase of the project. Post-stabilisation monitoring, inspection and controls are not well articulated. The Auditor does not consider this to be a non-compliance.	Complies	Compliant	
NTA105					iv	details of the contingency measures and responses to be implemented for any identified issues with the mine waste storages;	Must include		Complies	Compliant	
NTA106					v	mechanisms for performance reporting and auditing in line with the relevant legislation and guidelines; and	Must include	Section 3 (Review, Reporting and Auditing)	Complies	Compliant	
NTA107					vi	a program for ongoing review of the LTEMP to ensure it remains contemporary with relevant environmental standards.	Must include	The Auditor expects DME to at least review the IEMP annually. It is noted that the next review date is stated to be May 2025. This may be a typographical error being so close to the publication date of 10/02/25. The Auditor is aware that a revision to the IEMP was made in March 2026.	Complies	Compliant	
	15-3					Upon completion of the construction of the mine waste storages, the approval holder must:					
NTA108				(a)		implement the approved LTEMP; and	Confirm that the LTEMP (or Integrated Environmental Monitoring Plan, if prepared) is being implemented	NA	NA	Not Applicable	
NTA109				(b)		manage the mine waste storages in accordance with the approved LTEMP.	Confirm all management requirements are being implemented	NA	NA	Not Applicable	
16						Erosion and sediment control					
NTA110		16-1			i	The RAP required by condition 9-1, must include an ESCP prepared by a suitably qualified and experienced CPESC,	Confirm qualifications of SQEP (CPESC)	SLR (28/2/2022) - Site Erosion and Sediment Control Measures was (per s13) reviewed and approved by Duncan Barnes (CPESC 00008494).	The Auditor accepts that review and approval by Duncan Barnes would meet the requirements of this condition, having confirmed on the Envirocert International website that he is certified.	Compliant	An Alternate Solution is reached - Technically speaking, the ESCP was not "prepared" by a CPESC.
NTA111					ii	to the satisfaction of the site auditor;	Auditor to be satisfied with the ESCP	SLR (28/2/2022) - Site Erosion and Sediment Control Measures	Is satisfactory for the 2025 scope of works	Compliant	The Audit team includes a Envirocert Int. certified CPESC (Kelly Cleary).
NTA112		16-2				The ESCP required by condition 16-1 must include measures to minimise erosion and the release of sediment to receiving waters and contamination of stormwater, and be implemented for all stages of the action;	Auditor to be satisfied with the ESCP	SLR (28/2/2022) - Site Erosion and Sediment Control Measures	Is satisfactory for the 2025 scope of works	Compliant	
NTA113		16-3				The erosion and sediment control measures detailed in the ESCP required by condition 16-1 must be installed and maintained in accordance with the International Erosion Control Association Australasia (IECA) Best Practice Erosion and Sediment Control (BPESC) document;	Seek evidence that ESC measures were installed	The Auditor observed the construction of ESC measures (and material proposed to be used, such as geofabric and rock) during site inspections.	The Auditor considers that this condition has been adequately addressed for the 2025 works.	Compliant	
NTA114		16-4				The ESCP required by condition 16-1 must be revised annually by a suitably qualified and experienced CPESC prior to commencement of the wet season or at more frequent intervals if site conditions significantly change.	Seek evidence of annual updating	The Erosion and Sediment Control Plan has not been updated annually (although it is noted that, for example, Work Package C did contain specific measures for erosion and sediment control).	The Auditor considers that the provision of task specific erosion and sediment control measures within Work Package RAPs does meet the intention of this Condition.	Compliant	
17						Revegetation					
NTA115		17-1				The RAP required by condition 9-1 must include a revegetation management plan that requires that the approval holder:	Observe RvMP	The Auditor observed Revegetation Management Plan (v1.0) [DME, 10/02/25], a copy of which was provided to DLPE by DME on 27/03/25 with the Master RAP and Work Package B documents.	The Auditor is of the opinion that further consultation with TAOs and NLC should occur as part of a RvMP revision. This item will be marked as "Compliant".	Compliant	
NTA116		(1)				revegetate land disturbed by the action where exposed soil areas would remain following completion of remediation works;	Confirm by review of Revised RvMP	RvMP does include this requirement		Compliant	Since the date of RvMP (v1.0), the Auditor has observed that DME has further consulted with TAOs and NLC with respect to species composition, salvage, replanting, transplanting and other matters relating to revegetation management. This consultation has included provision of survey information and attendance at a RJTWG workshop by Boronia Sagers from Top End Seeds (a sub-contractor to DME).
NTA117		(2)				revegetate land disturbed by the action to achieve a species composition, structure and diversity that is consistent with surrounding undisturbed vegetation;	Confirm by review of Revised RvMP	RvMP does include this requirement		Compliant	
NTA118		(3)				use suitable local native plant species in the revegetation, taking into account as practicable;	Confirm by review of Revised RvMP	RvMP does include this requirement		Compliant	
NTA119		(a)				predicted changes in climate;	Confirm by review of Revised RvMP	RvMP does consider this requirement		Compliant	
NTA120		(b)				cultural significance;	Confirm by review of Revised RvMP	RvMP does include this requirement		Compliant	
NTA121		(c)				the potential effects of revegetation on the long-term stability of mine waste storages; and	Confirm by review of Revised RvMP	RvMP does include this requirement		Compliant	
NTA122		(4)				implement adaptive management measures to ensure revegetation supports long-term landform stability and integrity.	Confirm by review of Revised RvMP	RvMP does include this requirement		Compliant	

Audit ID	L1	L2	L3	L4	L5	Condition Requirement	Method of Verification	Evidence & Documents	Auditors Determination	Finding	Notes / Corrective Actions
NTA123		17-2				Within 12 months after the completion of revegetation works, and within every 12 months thereafter for the life of the action, the approval holder must engage a suitably qualified and experienced person to:	Confirm a SQEP has been engaged	NA	NA	Not Applicable	
NTA124			(1)			undertake an assessment of the performance of the revegetated areas against the revegetation performance criteria in the revegetation management plan;	Annual post construction vegetation assessment	NA	NA	Not Applicable	
NTA125			(2)			identify any measures that should be implemented to improve the performance of revegetation within rehabilitation areas; and	Seek evidence in annual report	NA	NA	Not Applicable	
NTA126			(3)			if the revegetation completion criteria have not been met, or are not adequately trending towards being met, recommend additional measures to ensure that revegetation is sufficient to meet design criteria.	Seek evidence in annual report	NA	NA	Not Applicable	
NTA127		17-3			i	If the assessment by the suitably qualified and experienced person required by condition 17-2 recommends implementation of additional measures for revegetation, the approval holder must, within 6 months of completion of the assessment, implement the recommended measures.	Seek evidence of implementation	NA	NA	Not Applicable	
NTA128					ii	to the satisfaction of the site auditor required by condition 17-2.	Seek evidence of Auditor consultation on acceptability	NA	NA	Not Applicable	
NTA129		17-4				The suitably qualified and experienced person required by condition 17-2 must have suitable regional experience and demonstrated expertise in mine site revegetation and rehabilitation.	Confirm same with SQEP assessment	NA	NA	Not Applicable	
18						Environmental outcome					
		18-1				The approval holder must implement the action to meet the following environmental outcome:					
NTA130			(1)			Over the long-term, improve the quality and hydrological regimes of groundwater and surface water to the maximum extent practicable to support the restoration of environmental values including ecological health, land uses and the welfare and amenity of people.	Annual reporting	NA	At some level this will be documented in the Site Audit Report (as the audit report likely to be completed following 12 mths of monitoring required of the approval after construction is completed)	Not Applicable	
19						Discharge water quality					
NTA131		19-1				The approval holder must ensure that point source discharge from the action causes no decline in downstream water quality in the Finnis River during implementation of the action consistent with condition 18-1.	Evidence in Annual Monitoring report	The Auditor observed DME (30/06/25) - Annual Environmental Monitoring Report 2024-2025. For the reporting period, discharge was not occurring.		Not Applicable	
		19-2				In meeting the requirements under condition 19-1, the approval holder must ensure that:					
NTA132			(1)			point source discharge from the action to the EBFR does not exceed the water quality discharge requirements stated in Table 2 at end-of-pipe;	Evidence in Annual Monitoring report	For the reporting period, discharge was not occurring.		Not Applicable	
NTA133			(2)			site-specific trigger values for discharge water quality are developed for pH, dissolved oxygen, turbidity and total dissolved solids (as required in Table 3), to the satisfaction of the Minister, and implemented prior to any discharge of water from the action to the EBFR;	SSTVs to be developed	Refer Waste Discharge Licence (WDL252-01 - 7 May 2024). WDL252-01 does specify values for pH, DO, turbidity and electrical conductivity. For TDS, "no limit" is defined.	Considered to comply with the objective of this Condition.	Compliant	It is noted that point source discharge from the Surface Water Treatment Plant did not occur until after the Auditors Endorsement of RAP-D on 13 August 2025. The Annual Environmental Monitoring Report (which would contain discharge monitoring data) for the Waste Discharge Licence is based on a reporting period 1 July 2025 to 30 June 2026.
NTA134			(3)		point source discharge from the action to the EBFR does not exceed the site specific guideline values stated in Table 3 at end-of-pipe;	Evidence in Annual Monitoring report	For the reporting period, discharge was not occurring.	NA	Not Applicable		
NTA135			(4)		stream flow gauging stations are installed, operated and maintained to determine and record stream flows in each of the Zones 2, 3, 4, 6 and 7 (as shown in Figure 7) of the EBFR and Finnis River continuously (minimum daily recording frequency);	Evidence of gauging stations	For the reporting period, discharge was not occurring. Based on correspondence from DME, stream flow gauges have been installed or upgraded (as required).	Complies	Compliant		
NTA136			(5)		the rate of point source discharge to the EBFR is limited and controlled such that there is no decline in downstream water quality in Zones 6 and 7 (Figure 7) of the Finnis River;	WTP specification	For the reporting period, discharge was not occurring.	NA	Not Applicable		
NTA137			(6)		the daily quantity of water discharged from each discharge point is measured and recorded; and	Daily monitoring data	For the reporting period, discharge was not occurring.	NA	Not Applicable		
NTA138			(7)		discharges to receiving waters are undertaken so as not to cause erosion of the bed and banks of the receiving waters, or cause a material build-up of sediment in such waters, in line with condition 16-4.	Inspection forms	For the reporting period, discharge was not occurring.	NA	Not Applicable		

Audit ID	L1	L2	L3	L4	L5	Condition Requirement	Method of Verification	Evidence & Documents	Auditors Determination	Finding	Notes / Corrective Actions
		20				Receiving environment monitoring program (REMP)					
NTA139		20-1				The approval holder must monitor downstream water quality for the life of the action to identify changes in water quality and flow compared to the pre-construction aquatic ecosystem condition.	Seek evidence that downstream monitoring is occurring.	The Auditor observed DME (30/06/25) - <i>Annual Environmental Monitoring Report 2024-2025</i> . For the reporting period, discharge was not occurring, however, environmental monitoring was occurring.	Considered to comply	Compliant	Future monitoring must be undertaken in accordance with an updated IEMP.
NTA140		20-2				The RAP required by condition 9-1 must include a REMF which has been prepared by a suitably qualified and experienced person. The REMF must be implemented by the approval holder for the life of the action to monitor and record the effects of the discharge and seepage of contaminants from the action on the receiving environment, with the aims of identifying and describing the extent of any adverse impacts to local environmental values, and monitoring any changes in the downstream waters of the EBFR and the Finness River.	Seek evidence that a REMF (or Integrated Environmental Monitoring Plan) has been prepared	DME (10/02/25) - <i>Integrated Environmental Monitoring Plan</i> (a copy of which has been provided to DLPE by DME).	Considered to comply	Compliant	It is noted that a revised IEMP has been prepared outside of the 2025 reporting period.
NTA141		20-3			i	A report outlining the findings of the REMF, including all monitoring results and interpretations for the period from 1 April to 31 March the following year (the reporting period).	Observe Annual Report	The Auditor observed DME (30/06/25) - <i>Annual Environmental Monitoring Report 2024-2025</i> . For the reporting period, discharge was not occurring, however, environmental monitoring was occurring.	Considered to comply	Compliant	
NTA142					ii	must be prepared by a suitably qualified and experienced person and	Confirm completed by a SQEP	It is stated that DME (30/06/25) - <i>Annual Environmental Monitoring Report 2024-2025</i> was prepared by S. Fynn and approved by Ian Harvey. The Auditor is familiar with these individuals and are considered suitably qualified and experienced. The Auditor reviewed and commented on the draft.	Considered to comply	Compliant	
NTA143					iii	submitted to the site auditor by 30 June each year;	Annual report to be provided to the Auditor	The annual report is dated 30 June 2025.	Considered to comply	Compliant	The annual report was uploaded to the DME website
		20-4				The report required by condition 20-3 must include:					
NTA144		(1)				an assessment of background water quality;	Noted	Section 1.3 of the report refers to "baseline water quality"	Considered to comply	Compliant	
NTA145		(2)				any detected impact associated with contaminant point source discharge; and seepage from the action;	Noted	NA	NA	Not Applicable	No point source discharge occurred in the reporting period
NTA146		(3)				an assessment of the suitability of contaminant point source discharge limits required by condition 19-2 to maintain or improve environmental values.	Noted	NA	NA	Not Applicable	No point source discharge occurred in the reporting period
NTA147		20-5				For the purpose of conditions 20 and 20-1, an improvement or decline in downstream water quality may be measured as a statistically significant change from preconstruction water quality and the level of species protection in each of the downstream zones (3,4,6 and 7) described in the Main Document of the Draft EIS (section 5.5.6)	Noted	NA	NA	Not Applicable	No point source discharge occurred in the reporting period
NTA148		20-6				The monitoring report required by condition 20-3 must include time series trend analysis of water quality data collected using appropriate monitoring techniques in the receiving environment, to determine the extent and duration of any improvement or decline in the ecosystem condition and whether the change is attributable to the action.	Noted	Section 2.2.3 of the report states that, on the basis that no discharge occurred, time series trend analysis was not undertaken.	NA	Not Applicable	
		21				Water management plan					
NTA149		21-1				The RAP required by condition 9-1 must include a revised and updated version of the water management plan (Appendix 3 of the Draft EIS - Water Management Plan Stage 3 Rum Jungle Rehabilitation Project version 4 dated 27 November 2019);	Seek evidence that the WMP has been revised	The Auditor observed DME (20/12/2024) - Water Management Plan and subsequently, WRM (2 June 2025) – Rum Jungle Rehabilitation Project Stage 3A Water Management Plan (2313-01-B4-Draft) and following auditor review comments, a further revision WRM (18 December 2025) – Rum Jungle Rehabilitation Project Stage 3A Water Management Plan (2313-01-B5-Draft) was produced.	Whilst a revised WMP has been prepared, it appears to remain as "Draft"	Observation	Finalise the WMP
NTA150		21-2			i	The approval holder must ensure that the water management plan required by condition 21-1 is revised and updated by a suitably qualified and experienced person,	Seek evidence of SQEP	The latest draft of the WMP states that the report was prepared by Julian Orth (Director / Senior Principal Engineer). Qualifications are provided. The Auditor has further obtained information on experience.	The Author is considered to be a SQEP.	Compliant	
NTA151					ii	to the satisfaction of the site auditor;	Auditor to be satisfied with the WMP	The Auditor is satisfied that the updated WMP (2313-01-B5-Draft) meets the requirements of the NT Approval, however, remains in DRAFT	Generally complies	Observation	Finalise the WMP

Audit ID	L1	L2	L3	L4	L5	Condition Requirement	Method of Verification	Evidence & Documents	Auditors Determination	Finding	Notes / Corrective Actions
NTA152		21-3				The water management plan must provide for effective water management of actual and potential environmental impacts resulting from water management associated with the activities carried out under this environmental approval and must include at least the following components:	Noted	NA	NA	Not Applicable	
NTA153			(1)			study of the source on contaminants	Noted	Sources are mentioned throughout the WMP	Considered to generally comply	Compliant	
NTA154			(2)			a water balance model for the site	Noted	A water and load balance model is included as Section 6 and Appendix D	Complies	Compliant	
NTA155			(3)			a water management system for the site	Noted	Water management is included as s5 of the WMP	Complies	Compliant	
NTA156			(4)			measures to manage and prevent acid, metalliferous and/or saline drainage	Noted	The Auditor is satisfied that sufficient information is included in the WMP.	Complies	Compliant	
NTA157			(5)			contingency procedures for incidents and emergencies	Noted	The current version of the WMP does not include contingency measures.	Complies	Compliant	
NTA158			(6)			a program for monitoring and review of the effectiveness of the water management plan.	Noted	Section 9 of the revised WMP	Complies	Compliant	
NTA159		21-4				The approved water management plan required by condition 21-1 must be revised, to the satisfaction of the site auditor, within every 12 months after the date of approval by the site auditor and implemented for the life of the action, or as otherwise agreed by the site auditor, and	WMP to be revised annually or as agreed with Auditor	The Auditor is of the opinion that the revised version of the WMP more closely meets the requirements of the NT Approval, however, was still draft at the end of the audit period	WMP not finalised	Observation	Finalise the WMP
NTA160		21-5				The approval holder must continue to implement the last approved version of the water management plan required by condition 21-1 until the site auditor provides confirmation in writing that a revised version is approved.	Noted	DME and its contractors are implementing the requirements of the WMP, however, it remains in draft.	WMP not finalised	Observation	Finalise the WMP
		22				Modelling impact on water resources					
			22-1			Unless otherwise specified in a water licence or permit issued under the Water Act 1992, the approval holder must undertake the following:					
NTA161						No later than 2 years after the commencement of remediation works, the proponent must review the adequacy of the groundwater and surface water modelling and update the groundwater and surface water models (Supplement to the draft EIS, Appendix 28 parts A and B; and Draft EIS Appendix Robertson GeoConsultants 2019 Groundwater and Surface Water Modelling Report, Rum Jungle Stage 2A Report 183008/1, November 2019) predicting changes in groundwater levels and surface water flow rates as a result of the action.	Observe such a review	The Auditor has not been provided with an updated model, however, notes that a period of 2 years from the commencement of "remediation works" has not expired.	Is not yet applicable	Not Applicable	The Auditor has been advised that Robertson Geoconsultants was updating the models during the reporting period.
NTA162			(1)			The updated model required by condition 22-1 must incorporate the results of the monitoring program required by condition 20.	Seek evidence	NA	NA	Not Applicable	
NTA163			(2)			The updated model required by condition 22-1 must be reviewed by a suitably qualified and experienced person to the satisfaction of the site auditor, to evaluate the appropriateness of the model used, evaluate the accuracy of the predicted changes in groundwater levels and surface water flow rates and recommend actions to ensure the accuracy of the model predictions.	Seek evidence of preparation by SQEP and satisfaction of Auditor	NA	NA	Not Applicable	
NTA164			(3)			No later than 2 years after the commencement of remediation works, a report on the model amendments and accuracy (including any recommendations) of the updated model must be submitted to the site auditor.	Report to be submitted to Auditor	NA	NA	Not Applicable	
			(4)			The groundwater and surface water models referred to in condition 22-1 must be updated at the following times:					
NTA165			(a)			every five years from the commencement of remediation works; or	Ensure model is updated after 5 years	NA	NA	Not Applicable	
NTA166			(b)			at appropriate intervals specified by the site auditor in writing, when the observed water levels and surface water flow rates measured in accordance with condition 20 are not consistent with the groundwater levels and surface water flow rates predicted in the groundwater and surface water model.	Update every 5 years or as agreed with Auditor	NA	NA	Not Applicable	
NTA167			(5)			Within three months of completion, a model update (required by condition and a report interpreting the results from the updated model must be submitted to the site auditor.	Report to be submitted to Auditor	NA	NA	Not Applicable	Missing ID cross-reference, probably 22-1

Audit ID	L1	L2	L3	L4	L5	Condition Requirement	Method of Verification	Evidence & Documents	Auditors Determination	Finding	Notes / Corrective Actions
						EBFR realignment					
NTA168		23-1				The realignment of any portion of EBFR flow through the backfilled Main Pit by the approval holder must not cause a decline in the downstream water quality in Zone 6 and Zone 7 of the Finnis River (Figure 7) at any time during the life of the action;	Downstream water quality must improve	NA	NA	Not Applicable	No realignment occurred during the reporting period
NTA169		23-2				The approval holder must verify through the site audit report required by condition 13-1, that:	EBFR realignment to be included in Audit report	NA	NA	Not Applicable	
NTA170		(1)				the construction of the permanent EBFR diversion is consistent with the functional design/s that formed a part of the EIS for the action.	Seek validation report and Auditor to confirm acceptance	NA	NA	Not Applicable	
NTA171		(2)				the permanent EBFR diversion has been constructed to prevent the release of contaminants from backfilled mine waste to the receiving environment.	Seek validation report and Auditor to confirm acceptance	NA	NA	Not Applicable	
						Community and economy outcomes					
		24-1				The approval holder shall implement the action to meet the following environmental outcomes:					
NTA172		(1)				minimise negative impacts to potentially affected communities from the action; and	Auditor review complaints register and consultation	NA	NA	Not Applicable	
NTA173		(2)				maximise benefits for traditional owners, and local and regional communities and businesses.	Seek verification from DME	The Auditor is aware of commitments made to traditional owners, however, these matters are understood to be confidential.	Considered to comply	Compliant	It is further noted that DME, NLC and TAOs are still consulting on who may access country to perform works.
						Public reporting to the community					
NTA174		25-1				The approval holder must develop and maintain a website to communicate regularly with the community. On the website the approval holder must publicly report on the:	Confirm that DME operates a website that contains project specific page/s.		DME so operates such a website (page/s).	Compliant	
NTA175		(1)				actions to enhance local employment, training and development opportunities;			A segment on "Procurement" is included.	Compliant	
NTA176		(2)				actions to avoid, manage or mitigate action-related social impacts on local community services, infrastructure and community safety and wellbeing;			Although, specifically this wording is not used, is generally considered to comply	Compliant	
NTA177		(3)				actions and adaptive management strategies to avoid, mitigate or manage action-related impacts on local and regional housing and accommodation markets;			Although, specifically this wording is not used, is generally considered to comply	Compliant	
NTA178		(4)				actions to inform the community and stakeholders, including traditional owners, about action-related impacts and show that community and stakeholder advice and concerns about action-related impacts have been taken into account when reaching decisions;	Observe website page/s that meet these requirements	https://nt.gov.au/industry/mining/legacy-mines-remediation/remediation-projects/rum-jungle-rehabilitation	Although, specifically this wording is not used, is generally considered to comply	Compliant	In general there are opportunities for improvement to the website to better articulate the NT Approval requirements
NTA179		(5)				actions to record, respond to, and manage community complaints; and			Although there is a "Contact" section, the web-site does not appear to include such requirements.	Non Compliant	
NTA180		(6)				results and outcomes of the monitoring and annual reporting required by the REMP under condition 20, including time series trend analysis of downstream water quality over time.			Annual Compliance Reports and Annual Monitoring Reports are published to the web-site	Compliant	
						Commencement of action					
NTA181		26-1				This approval expires five (5) years after the date on which it is granted, unless substantial implementation has commenced on or before that date.	Assess whether substantial implementation has occurred within 5 years of 29/03/2023.	Enquiries made and observations (including site inspection 12 December 2023).	On the basis of observations and enquiries made by the Site Auditor, substantial implementation has occurred and the action has commenced	Compliant	
NTA182		26-2				Within 10 business days of substantial implementation of the action the approval holder must provide notification in writing to the Minister.	Observe such notification	The Auditor has produced Discussion Document RJ-Audit-DD-001 to further articulate the assessment of compliance.	Considered to comply via the Alternate Solution presented in RJ Audit-DD-001 and Section 1.5 of the Compliance Report	Compliant	
						Completion of the action					
NTA183		27-1				The approval holder must provide notification in writing to the Minister within 10 business days of completion of the action.	Observe such notification	NA	NA	Not Applicable	
						Change of contact details					
NTA184		28-1				The approval holder must provide notification in writing to the Minister of any change of its name, physical address or postal address for the serving of notices or other correspondence within 10 business days of such change.	Observe such notification	The Auditor is aware that the Approval Holder advised the Regulator of changes, particularly following the 2024 Territory election and change of name from DITT to DME.	Considered to comply	Compliant	

Audit ID	L1	L2	L3	L4	L5	Condition Requirement	Method of Verification	Evidence & Documents	Auditors Determination	Finding	Notes / Corrective Actions
		29				Plans, modelling and monitoring programs					
NTA185		29-1				All plans, modelling and monitoring programs required by the conditions of this approval must be certified by a suitably qualified and experienced person.	SQEP must certify plans	Documents are not specifically "certified", however, have, in the Auditors opinion, been prepared by suitably qualified and experienced person or persons.	The Auditor did not sight "certificates" or "Certification" perse.	Non Compliant	The Auditor has been consulting with DME and DLPE regarding an appropriate form of "certification" that would provide the outcome expected of the Approval.
NTA186		29-2				All plans and monitoring programs required under these conditions must be implemented.	Seek evidence of implementation	Auditors observations	The Auditor is of the opinion that the RAP and relevant Work Packages have been	Compliant	
NTA187		29-3				All plans, modelling and monitoring programs required by the conditions of this approval must be provided to the Minister on request.	Evidence of provision	NA	The Minister (or delegate) has not requested any materials.	Not Applicable	
NTA188		29-4				All plans, modelling and monitoring programs required by the conditions of this approval must be updated as and when requested by the Minister.	Evidence of updating following Ministers request	NA	The Minister (or delegate) has not requested any updates.	Not Applicable	
		30				Staging, combining and updating plans or programs					
		30-1				With the approval of the site auditor, the approval holder may:					
NTA189			(1)			prepare and submit any plan or program required by this approval on a staged basis (if a clear description is provided as to the specific stage and scope of the action to which the plan or program applies, the relationship of the stage to any future stages and the trigger for updating the plan or program);	Observe Auditors approval to undertake the works in stages	RJ-Audit-AA-001b, 30/08/2023	Such approval was provided	Compliant	
NTA190			(2)			combine any plan or program required by this approval (if a clear relationship is demonstrated between the plans or programs that are proposed to be combined) and;	Observe Auditors approval to combine plans	RJ-Audit-AA-005, 29/02/2024	Such approval was provided	Compliant	
NTA191			(3)			update any plan or program required by this approval (to ensure the plans and programs required under this approval are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the action)	Observe Auditors approval to update a plan	The Auditor does approve of revisions and updating of plans to better reflect contemporary conditions, lessons learnt and feedback from stakeholders.	Considered to comply	Compliant	The Site Auditor expects at least an annual review of the appropriateness of all plans and for the plans to be amended and re-endorsed as required.
NTA192		30-2				If approved by the site auditor, updated plans or programs supersede the previous versions of them and must be implemented in accordance with the conditions of this approval that require the plan or program.	Noted	DME so agrees with this requirement	Considered to comply	Compliant	
		31				Compliance reporting					
		31-1				The approval holder must:					
NTA193			(1)			within six months of substantial disturbance, obtain from an independent qualified person, a report on compliance with the conditions of this environmental approval,	A 2023 Compliance Audit Report	AECOM (26/03/2024) - Annual Environmental Compliance Report - 2023 [for the period "commencement of the Action until 31 December 2023]	Complies	Compliant	
NTA194			(2)			obtain further such reports at regular intervals not exceeding 12 months from the report referred to in condition 31-1(1), for the life of the action; and	Subsequent Annual Compliance Reports	AECOM (31/03/2025) - Annual Environmental Compliance Report - 2024 [for the period 1 January 2024 until 31 December 2024]	Complies	Compliant	
NTA195			(3)			submit each report required under condition 31-1(1) to the Minister within 90 days of its completion.	Compliance Audit report to be submitted to the Minister	The Auditor was advised that the 2024 Compliance report was submitted to the Minister (via the Regulator) by DME.	Complies	Compliant	Report is also loaded to DME website
		31-2				The reports required by conditions 31-1(1) and 31-1(2) must:					
NTA196			(1)			be endorsed by the approval holder's Chief Executive Officer or a person delegated to sign on the approval holder's Chief Executive Officer's behalf;		The Auditor has been provided with a copy of the letter from DME (signed by CEO, Alister Trier) to DLPE (dated 30 June 2025) endorsing the 2024 Annual Environmental Compliance Report. The letter and report was attached within an email and submitted together.	Complies	Compliant	
NTA197			(2)			include a statement as to whether the approval holder has complied with the conditions of this approval; and	Obtain letter of endorsement from DITT CEO with required information	Endorsement letter does not contain such a statement	The Auditor is aware that the Rum Jungle Project Team (including Directors), Board, and Department CEO are aware of the contents of the 2024 compliance report. It would not be possible for the CEO to make a statement that the approval holder has "complied with the conditions of this approval" on the basis that many of the conditions are currently "Not Applicable" and for some conditions the Auditor has made an "Observation". For that reason, this Condition will be marked as an Observation only.	Observation	
NTA198			(3)			identify all non-compliances and describe corrective and preventative actions taken.		There were no "Non-Compliances" to identify in the 2024 Annual Environmental Compliance Report.	Considered to comply	Compliant	

Audit ID	L1	L2	L3	L4	L5	Condition Requirement	Method of Verification	Evidence & Documents	Auditors Determination	Finding	Notes / Corrective Actions
	32					Provision of environmental data					
NTA199		32-1				All environmental monitoring data, surveys, maps and other spatial and metadata (including sensitive data) required to be collected or obtained under this environmental approval must be retained by the approval holder for a period of not less than 50 years commencing from the date that the data is collected or obtained.	Noted	The Auditor is aware that DME is retaining data.	Complies	Compliant	
NTA200		32-2				The approval holder must, as and when directed by the Minister, provide any validated environmental monitoring data (including sampling design, sampling methodologies, empirical data and derived information products), surveys, maps and other spatial and metadata (including sensitive data) relevant to the assessment of the action and implementation of this environmental approval, to the Minister in the form and manner, and at the intervals specified, in the direction. Culturally sensitive data held by the approval holder may be subject to access terms and conditions imposed by traditional owners which the approval holder is required to maintain.	Noted	NA	The Minister has not requested	Not Applicable	

Count Compliant	113
Count Non-compliant	5
Count Observation	6
Count Not Applicable	77
Total	201

Appendix C

Commonwealth Approval Compliance Register

Appendix C Commonwealth Approval Compliance Register

Audit ID	L1	L2	L3	Condition Requirement	Method of Verification	Evidence & Documents	Auditors Determination	Finding	Notes / Corrective Actions
CONDITIONS SPECIFIC TO THE ACTION									
CA001	1)			The approval holder must undertake the action in accordance with conditions 1, 2, 3, 4, 5, 6, 7, 8, 9-1, 9-2, 9-4, 14, 15, 16, 17, 19, 20, 21, 22, 23 of the NT Approval .	Refer to NT Approval compliance audit register and discussion within the body of the compliance audit report			Observation	There are no "Non-compliant" audit elements of the NT Approval listed in the 2024 Compliance Audit Report, there are some observations.
	2)			To avoid and reduce harm to the EPBC listed threatened species Black-Footed Tree Rat and Partridge Pigeon , and the environment which includes the Darwin Cycad , White Paperbark and Vine thicket , the approval holder must:					
CA002		a)		Not clear more than 90 hectares of Black-Footed Tree Rat habitat and Partridge Pigeon habitat within the development envelope ,	Obtain and review Flora & Fauna Habitat Protection report, data or drawings (or similar)	DME provided the Auditor with an xls register of clearance extents which has been converted to a PDF and is attached as Appendix D of this report. DME provided geopackaged GPKG shapefiles to support the data contained with the register. Evidence is attached in Appendix D including a basic export of the GPKG file.	A total of 5.62 ha is stated to have been cleared. This value does not exceed the allowable limit.	Compliant	
CA003		b)		Not clear more than 16 hectares of White Paperbark habitat and Vine thicket within the development envelope ,	Obtain and review Flora & Fauna Habitat Protection report, data or drawings (or similar)		A total of 0.45 ha is stated to have been cleared. This value does not exceed the allowable limit.	Compliant	
CA004		c)		Ensure all multi-stemmed Darwin Cycad individuals within the development envelope have been salvaged in accordance with the Management Program for Cycads in the Northern Territory 2009-2014 ,	Obtain and review Darwin Cycad Salvage report, data or drawings (or similar)	Data regarding cycad management for 2025 was provided to the Auditor for review. Files includes a Cycad translocation summary table, figure, geopackage GPKG shapefile and summary reports. Attached as Appendix E.	The file set does not specifically "ensure" that all cycads within the development area have been salvaged, but does confirm that salvage is being (or has been) conducted.	Compliant	
CA005		d)		Implement seasonal fire management measures to reduce the effects of wildfire on the Black-Footed Tree Rat , Partridge Pigeon , Darwin Cycad , White Paperbark and Vine thicket ,	Obtain and review Annual Fire Management report, data or drawings (or similar)	DME provided the Auditor with evidence relating to 2025 burns. This included burn plan documents, summary burn table (App F), geopackage GPKG shapefile and extracted burn maps (App F). RJ3-4-MP-027 (Fire Management Plan) was active.	Compliant for the reporting period	Compliant	
CA006		e)		Ensure the presence and health of the vine thicket located within the development envelope at commencement of the action is maintained, and	Obtain and review Flora & Fauna Habitat Protection report, data or drawings (or similar)	Access to the vine thicket is prohibited to project personnel other than females acceptable to the COG. Monitoring via LIDAR is understood to occur.	No clearance of vine thicket has occurred	Compliant	Interpreted to mean the presence and health of vine thicket within the development envelope, other than the <16 hectares permitted to be cleared as an approval of the action.
CA007		f)		Prevent, reduce and/or eradicate any weeds and invasive fauna within the development envelope to an acceptable level .	Obtain and review Annual Invasive Plants & Animals report, data or drawings (or similar)	DME provided a body of evidence relating to weed management at the mine and borrow areas. An example export of the geopackage shapefile is contained in Appendix G as is a summary table for 2025. RJ3-4-MP-011 (Weed Management Plan) was active. RJ3-4-MP-008 (Feral Animal Management Plan) was active, however limited evidence was provided.	Compliant for the reporting period	Compliant	

Audit ID	L1	L2	L3	Condition Requirement	Method of Verification	Evidence & Documents	Auditors Determination	Finding	Notes / Corrective Actions
CA008	3)			To demonstrate whether the action is progressing towards, or has achieved, the State of the Environment , the approval holder must develop and submit a monitoring plan to the department , at least 12 months prior to completion of Stage 3 of the action, for approval by the Minister . The monitoring plan must:	Obtain and review Monitoring Plan	There is no Monitoring Plan specifically required at this stage.	The Auditor is aware (and observed at site inspections) that a monitoring program is in place and is understood to be in accordance with the IEMP	Not Applicable	The project is not yet at 12 months from completion of Stage 3.
CA009		a)		be prepared by an independent suitably qualified expert ,			The "Definitions" section of the CA defines an ISQE as the Site Auditor - this seems incorrect - it should really be Independent (defined) Suitably Qualified Person (defined) - or preferably just SQP (to enable DME and its subconsultants to draft the monitoring plan) - and then be endorsed by the Site Auditor / ISQE. The Auditor produced a Discussion Document to better articulate the various roles for suitably qualified persons on this project (further consultation from NT-DLPE and DCCEEW is required).	Observation	
CA010		b)		include details of measurable and timebound management measures, including measures which integrate both biophysical and First Nations people objectives, to achieve the State of the Environment .	Report must contain such content			Not Applicable	
CA011		c)		specify measurable and timebound performance criteria which:	Report to include measurable elements and timebound requirements			Not Applicable	
CA012			i)	are designed to determine the success of the management measures, and will trigger contingency measures which must be implemented if performance criteria are not achieved, or are unlikely to be achieved, and	Report to include triggers and contingency actions			Not Applicable	
CA013			ii)	are quantitative and accompanied by a monitoring protocol to evaluate performance against each criterion at an appropriate frequency, but not less than annually.	Performance to be assessed annually			Not Applicable	
CA014		d)		be developed in collaboration with First Nations people ;	Seek evidence of consultation			Not Applicable	
CA015		e)		include consideration of both tangible and intangible cultural heritage values;	Report must contain such content			Not Applicable	
CA016		f)		include measures for the protection and management of cultural heritage;	Report must contain such content			Not Applicable	
CA017		g)		include information to demonstrate how the approval holder has consulted with First Nations people through the development of the monitoring plan . The information provided to demonstrate this engagement must include:	Report must contain such content			Not Applicable	
CA018			i)	steps taken to inform the First Nations people about the project and engage with them in development of the monitoring plan ;	Report must contain such content			Not Applicable	
CA019			ii)	evidence and outcomes of consultation with First Nations people ;	Report must contain such content			Not Applicable	
CA020			iii)	information on how First Nations people views have been incorporated in the monitoring plan ;	Report must contain such content			Not Applicable	
CA021			iv)	an indication of any feedback provided by First Nations people that has not been addressed in the monitoring plan and the reasons for not doing so; and	Report must contain such content			Not Applicable	
CA022			v)	how the consultation that has been undertaken with First Nations people is consistent with the requirements of the Interim Engaging with First Nations People and Communities on Assessments and Approvals under the EPBC Act or any First Nations engagement standard (if one is in force) .	Report must contain such content			Not Applicable	
CA023	4)			If the monitoring plan has not been approved by the Minister in writing within 12 months of submission, and/or the Minister notifies the approval holder that the monitoring plan is not suitable for approval, the Minister may approve a version of the monitoring plan revised by the Department .	Noted			Not Applicable	
CA024	5)			The approval holder must implement the approved monitoring plan .	Noted			Not Applicable	

A Monitoring Plan meeting these requirements has not yet been prepared.

Audit ID	L1	L2	L3	Condition Requirement	Method of Verification	Evidence & Documents	Auditors Determination	Finding	Notes / Corrective Actions
CA025	6)			The approval holder must submit a report on the outcomes of the approved monitoring plan to the department and the Supervising Scientist every 12 months from commencement of Stage 4 of the action. The monitoring plan report must be prepared by an independent suitably qualified expert . The monitoring plan report must include information to demonstrate how the approval holder has consulted with First Nations people through the implementation of the monitoring plan , including:		The "Definitions" section of the CA defines an ISQE as the Site Auditor - this seems incorrect - it should really be independent (defined) Suitably Qualified Person (defined) - or preferably just SQP (to enable DME and its subconsultants to draft the monitoring plan) - and then be endorsed by the Site Auditor / ISQE. The Auditor produced a Discussion Document to better articulate the various roles for suitably qualified persons on this project (further consultation from NT-DLPE and DCCEEW is required). It is further expected that an annual Monitoring Report will be produced during Stage 3 by DME. It is also noted that (in Condition 20), the approval holder is to submit monitoring data within 12 months of the data of the Approval and thereafter annually. This inconsistency should be resolved.		Observation	
CA026		a)		steps taken to inform the First Nations people about the project and engage with them in the implementation of the monitoring plan;	Report must contain such content	A Monitoring Plan meeting these requirements has not yet been prepared.		Not Applicable	
CA027		b)	evidence and outcomes of consultation with First Nations people ;	Report must contain such content			Not Applicable		
CA028		c)	how the consultation that has been undertaken with First Nations people is consistent with the requirements of the Interim Engaging with First Nations People and Communities on Assessments and Approvals under the EPBC Act or any First Nations engagement standard (if one is in force).	Report must contain such content			Not Applicable		
CA029	7)		The approval holder must publish the monitoring plan report within 10 days of submitting the monitoring plan report to the department .	Observe publication on DITT website			Not Applicable		
CA030	8)		The approval holder must keep all published monitoring plan reports required by these conditions on the website .	Noted			Not Applicable		
				REVISION OF THE MONITORING PLAN					
CA031	9)			The approval holder may, at any time, apply to the Minister for a variation to the approved monitoring plan originally approved by the Minister or as subsequently revised in accordance with these conditions, by submitting an application, in accordance with the requirements of section 143A of the EPBC Act . If the Minister approves a revised monitoring plan , from the date specified by the Minister , the revised monitoring plan is the approved monitoring plan which must be implemented under condition 5.	Noted	A revision is not currently applicable		Not Applicable	
				SUBMISSION AND PUBLICATION OF PLANS					
CA032	10)			The approval holder must submit the monitoring plan required by these conditions electronically to the department .	Obtain evidence of electronic submission	A Monitoring Plan meeting these requirements has not yet been prepared.		Not Applicable	
CA033	11)		Unless otherwise agreed to in writing by the Minister , the approval holder must publish the monitoring plan on the website within 15 business days of the date the monitoring plan , or any subsequent version, is approved by the Minister .	Observe publication on DME website			Not Applicable		
CA034	12)		The approval holder must keep the approved monitoring plan published on the website .	Observe publication on DME website			Not Applicable		
CA035	13)		The approval holder is required to exclude or redact sensitive ecological data from the monitoring plan published on the website or otherwise provided to a member of the public. If sensitive ecological data is excluded or redacted from the monitoring plan , the approval holder must notify the department in writing what exclusions and redactions have been made in the version published on the website .	Noted			Not Applicable		
				NOTIFICATION OF DATE OF COMMENCEMENT OF THE ACTION					
CA036	14)			The approval holder must notify the department electronically of the date of commencement of the action , within 10 business days of commencement of the action .	Observe such notification	The Auditor observed correspondence (letter) dated 13 May 2025 to Post Approvals, from Jackie Hartnett (Executive Director Rum Jungle Remediation) stating that DME intended to commence the Action from 14 May 2025.	Complies	Compliant	
CA037	15)			If the commencement of the action does not occur within 5 years from the date of this approval, then the approval holder must not commence the action without the prior written agreement of the Minister .	Noted	Commencement did occur within 5 years	Complies	Compliant	

Audit ID	L1	L2	L3	Condition Requirement	Method of Verification	Evidence & Documents	Auditors Determination	Finding	Notes / Corrective Actions
COMPLIANCE RECORDS									
CA038	16)			The approval holder must maintain accurate and complete compliance records .	Noted			Not Applicable	
CA039	17)			If the department makes a request in writing, the approval holder must provide electronic copies of compliance records to the department within the timeframe specified in the request.	Noted			Not Applicable	
CA040	18)			The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the <i>Guidelines for biological survey and mapped data</i> , Commonwealth of Australia 2018, or as otherwise specified by the Minister in writing.	Noted			Not Applicable	
CA041	19)			The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the <i>Guide to providing maps and boundary data for EPBC Act projects</i> , Commonwealth of Australia 2021, or as otherwise specified by the Minister in writing.	Noted			Not Applicable	
CA042	20)			The approval holder must submit all monitoring data (including sensitive ecological data), surveys, maps, other spatial and metadata and all species occurrence record data (sightings and evidence of presence) electronically to the department within 12 months of the approval or in accordance with the requirements of the monitoring plan.	Either annual submission of raw data is required, or DME will prepare and issue an Auditor endorsed annual Monitoring Report			Not Applicable	
ANNUAL COMPLIANCE REPORTING									
CA043	21)			The approval holder must prepare a compliance report for each 12-month period following the date of this approval, or as otherwise agreed to in writing by the Minister .	A compliance report is required annually from 7 July 2023	AECOM (31 March 2025) <i>Annual Environmental Compliance Report - 2024, Rum Jungle Rehabilitation Project</i> .	It is noted that DCCEEW, on 10/03/2026, issued a compliance assessment letter to DME. This correspondence specifically queried the dates for annual reporting. DME responded to this letter and DCCEEW issued a further letter (dated 08/04/2026) stating that they were of the opinion that this is a non compliance and that DME should make an application to the Minister for the Approval to be amended such that the reporting period could align with the NT Reporting Period. For this reason, and for consistency with DCCEEW's position, this Condition will be marked as "Non Compliant".	Non Compliant	The Auditor noted this inconsistency in the 2024 Compliance Report. DME has applied to DCCEEW for an amendment to modify the dates for compliance reporting.
CA044	22)			Each compliance report must be consistent with the <i>Annual Compliance Report Guidelines</i> , Commonwealth of Australia 2014.	Noted	The compliance report is considered to be consistent with the guidelines	Complies	Compliant	These guidelines are updated to 2023 revision
	23)			Each compliance report must include:					
CA045	a)			Accurate and complete details of compliance and any non-compliance with the conditions and the monitoring plan , and any incident .	Not clear how an annual compliance report is produced on a monitoring plan that isn't required until 12 months from the completion of Stage 3. Recommend DME clarify this with DCCEEW			Observation	
CA046	b)			One or more shapefile showing all clearing of any protected matters , and/or their habitat, undertaken within the 12-month period at the end of which that compliance report is prepared.	Compliance report to include figures	DME provided the Auditor with an xls register of clearance extents which has been converted to a PDF and is attached as Appendix D of this report. DME provided geopackaged GPKG shapefiles to support the data contained with the register. Evidence is attached in Appendix D including a basic export of the GPKG file.	Complies	Compliant	
CA047	c)			Accurate and complete details of how the monitoring plan is being implemented.	Not clear how an annual compliance report is produced on a monitoring plan that isn't required until 12 months from the completion of Stage 3. Recommend DME clarify this with DCCEEW			Observation	

Audit ID	L1	L2	L3	Condition Requirement	Method of Verification	Evidence & Documents	Auditors Determination	Finding	Notes / Corrective Actions
	24)			The approval holder must:					
CA048		a)		Publish each compliance report on the website within 60 business days following the end of the 12-month period for which that compliance report is required.	Observe publication on DME website	DME uploaded the 2024 Compliance Report to its website. DME notified DCCEEW on 3/7/2025 that it had done so. The Auditor can confirm that the compliance report is available on the DME Rum Jungle website at https://nt.gov.au/_media/docs/business-and-industry/mining/rum-jungle/environmental-impact-assessment-and-statement/2024-annual-environmental-compliance-report.pdf	Complies	Compliant	
CA049		b)		Notify the department electronically, within 5 business days of the date of publication that a compliance report has been published on the website .	Observe such notification	DME notified DCCEEW on 3/7/2025 that the report had been uploaded to the website. The Auditor confirmed that on the date of notification.	Complies	Compliant	
CA050		c)		Provide the weblink for the compliance report in the notification to the department .	Observe such notification	DME notified DCCEEW on 3/7/2025 that the report had been uploaded to the website and this notification did include a web-link	Complies	Compliant	
CA051		d)		Keep all published compliance reports required by these conditions on the website until completion date of the action .	Observe publication on DME website	The 2023 and 2024 Compliance Reports remain on the DME website as at the date of this audit report.	Complies	Compliant	
CA052		e)		Exclude or redact sensitive ecological data from compliance reports published on the website or otherwise provided to a member of the public.	Sensitive information may be redacted	No information was redacted from the 2024 Compliance Report	NA	Not Applicable	
CA053		f)		If sensitive ecological data is excluded or redacted from the published version, submit the full compliance report to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website .	Noted	No information was redacted from the 2024 Compliance Report	NA	Not Applicable	
REPORTING NON-COMPLIANCE									
CA054	25)			The approval holder must notify the department electronically, within 2 business days of becoming aware of any incident and/or potential non-compliance and/or actual noncompliance with the conditions or commitments made in the monitoring plan .	Observe such notification/s	No incidents or non-compliances have occurred in the reporting period.	NA	Not Applicable	
	26)			The approval holder must specify in the notification:				Not Applicable	
CA055		a)		Any condition or commitment made in the monitoring plan which has been or may have been breached.	Notification to include this element	No incidents or non-compliances have occurred in the reporting period. It is also noted that the monitoring plan is not required to be prepared and submitted until "at least 12 months prior to the completion of Stage 3". This is understood to be a number of years off. Despite this requirement, DME has prepared its Integrated Environmental Monitoring Plan (as required of the NT Approval) and is undertaking monitoring in accordance with this document.	NA	Not Applicable	
CA056		b)	A short description of the incident and/or potential non-compliance and/or actual noncompliance.	Notification to include this element	NA		Not Applicable		
CA057		c)	The location (including co-ordinates), date, and time of the incident and/or potential non-compliance and/or actual non-compliance.	Notification to include this element	NA		Not Applicable		
CA058	27)		The approval holder must provide to the department in writing, within 12 business days of becoming aware of any incident and/or potential non-compliance and/or actual noncompliance, the details of that incident and/or potential non-compliance and/or actual noncompliance with the conditions or commitments made in the monitoring plan . The approval holder must specify:	Observe the more detailed report	NA		Not Applicable		
CA059		a)	Any corrective action or investigation which the approval holder has already taken.	Report to include this element	NA		Not Applicable		
CA060		b)	The potential harm of the incident and/or non-compliance and/or non-compliance.	Report to include this element	NA	Not Applicable			
CA061		c)	The method and timing of any corrective action that will be undertaken by the approval holder.	Report to include this element	NA	Not Applicable			

Audit ID	L1	L2	L3	Condition Requirement	Method of Verification	Evidence & Documents	Auditors Determination	Finding	Notes / Corrective Actions
				INDEPENDENT AUDIT					
CA062	28)			The approval holder must ensure that an independent audit of compliance with the conditions is conducted for every five-year period following the commencement of the action , unless otherwise specified in writing by the Minister .				Not Applicable	
	29)			For each independent audit , the approval holder must:				Not Applicable	
CA063		a)		Provide the name and qualifications of the nominated independent auditor , the draft audit criteria, and proposed timeframe for submitting the audit report to the department prior to commencing the independent audit .				Not Applicable	
CA064		b)		Only commence the independent audit once the nominated independent auditor , audit criteria and timeframe for submitting the audit report have been approved in writing by the department .				Not Applicable	
CA065		c)		Submit the audit report to the department for approval within the timeframe specified and approved in writing by the department .				Not Applicable	
CA066		d)		Publish each audit report on the website within 15 business days of the date of the department's approval of the audit report .				Not Applicable	
CA067		e)		Keep every audit report published on the website .				Not Applicable	
CA068	30)			Each audit report must report for the five-year period preceding that audit report.				Not Applicable	
CA069	31)			Each audit report must be completed to the satisfaction of the Minister and be consistent with the <i>Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines</i> , Commonwealth of Australia 2019.				Not Applicable	
				COMPLETION OF THE ACTION					
CA070	32)			Within 20 business days after the completion date of the action , and, in any event, before this approval expires, the approval holder must notify the department electronically of the date of completion of the action and provide completion data . The approval holder must submit any spatial data that comprises completion data as a shapefile .				Not Applicable	
	33)			The approval holder must comply with conditions 1 to 28, 29(a)-(d), and 30 to 31 until the later of the following dates:				Not Applicable	
CA071		a)		The twentieth business day after the approval holder notifies the department of the completion date of the action ;				Not Applicable	
CA072		b)		The date on which the last of the completion data is provided to the department.				Not Applicable	
CA073	34)			To avoid doubt, the approval holder must comply with condition 29(e) until the expiry of the approval. The approval holder must keep every audit report published on the website until the expiry of the approval.				Not Applicable	
						A separate Independent Audit (conducted 5 yearly) is not yet relevant.			
						The project is not expected to meet the definition of "Completion date of the action" for many years. Not applicable to this compliance audit			

Count Compliant	14
Count Non-compliant	1
Count Observation	5
Count Not Applicable	56
Total	76

Appendix D

DME Register of Clearance Extents and Shapefiles

Appendix D DME Register of Clearance Extents and Shapefiles

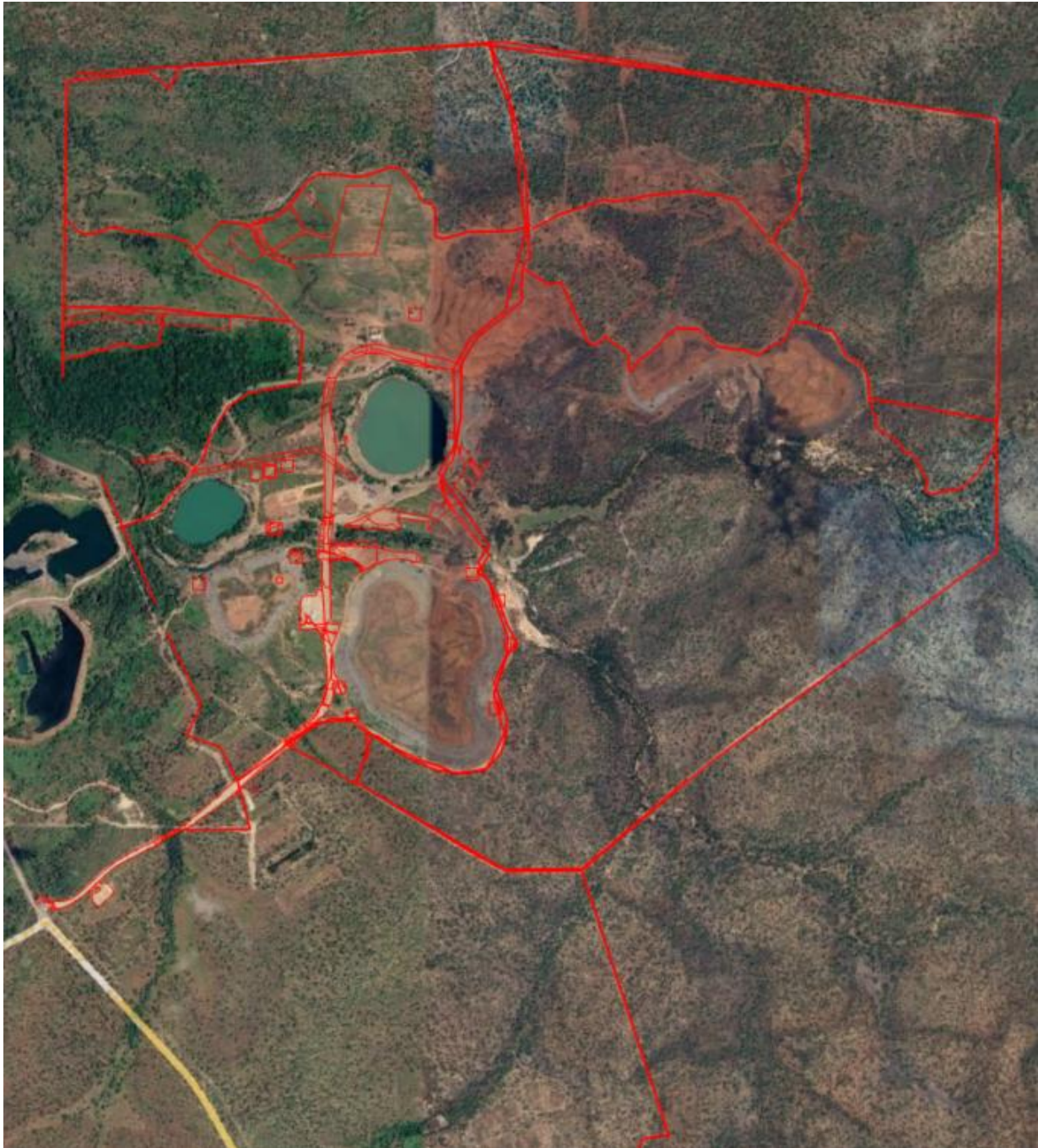
Ground Disturbance Permit	(All)
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Sum of Area (ha)	Column Labels									
Row Labels	Grassland (Disturbed)	Grassland (Intact)	Other (cleared, not surveyed, or water body)	Riparian zones and wetlands (Disturbed)	Riparian zones and wetlands (Intact)	Vine forest (Disturbed)	Vine forest (Intact)	Woodland (Disturbed)	Woodland (Intact)	Grand Total
Haul roads	6.44	0.29	9.67	0.88	0.36	0	0.08	3.59	4.47	25.78
Other	0.26		0.12					0.73	1.05	2.16
Revegetation	9.34		0.04					0.07		9.45
Water treatment	4.36		0.73	0.6	0.01			0.14	0.1	5.94
Grand Total	20.4	0.29	10.56	1.48	0.37	0	0.08	4.53	5.62	43.33

Represents White Paperbark habitat and Vine thicket (as per the EPBC Approval)

Represents Patridge Pigeon habitat and Black-Footed Tree Rat habitat (as per the EPBC Approval)

Snapshot of exported geo-package GPKG file provided by DME



Appendix E

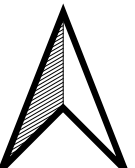
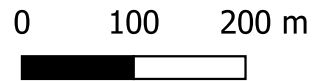
DME Register of Cycad Translocation





Appendix E DME Register of Cycad Translocation

Translocation of Cycads - 2025 Calendar Year

By	Month	Activities	Relocation			Evidence
			Source Site	Relocation Site	Number of Cycads	
Land Management Team (LMT)	Aug-25	Identification and marking of multi-stemmed cycads within the proposed Haul Road Stage 1 disturbance footprint for planned relocation activities	N/A. Identification and marking only			Excerpt from End Of Month - August Superintendent Report
Land Management Team (LMT)	Sep-25	LMT relocated multi-stemmed cycads from the approved disturbance footprint along the Haul Road Stage 1 alignment to designated relocation areas east of the laydown area.	Haul Road Stage 1 CH 0-CH 1650	East of Lay-down area	15	Excerpt from EOM- September Superintendent Report/Photos. GIS data for relocation site
Land Management Team (LMT)	Oct-25	LMT relocated 2 multi-stemmed cycads from bund plug alignment with assistance from MSA.	Bund Plug Footprint	Approx 30m. North of Bund-Plug	2	Excerpt from EOM- October Superintendent Report/Photos. GIS data for relocation site
					17 Total	Map displaying relocation position

Cycad	Lat	Long	Easting	Northing	Hemisphere	Zone
Relocated 01	-12.9885		131.0111	718136.8	8563275 South	52
Relocated 02	-12.9885		131.0111	718138.9	8563277 South	52
Relocated 03	-12.993		131.0057	717542.6	8562784 South	52
Relocated 04	-12.993		131.0056	717541.4	8562787 South	52
Relocated 05	-12.9929		131.0056	717540.5	8562792 South	52
Relocated 06	-12.9929		131.0056	717537.7	8562795 South	52
Relocated 07	-12.9929		131.0056	717537.3	8562796 South	52
Relocated 08	-12.9975		131.005	717464.7	8562288 South	52
Relocated 09	-12.9975		131.005	717468.1	8562289 South	52
Relocated 10	-12.9976		131.0048	717448.9	8562276 South	52
Relocated 11	-12.9976		131.0048	717448.9	8562276 South	52
Relocated 12	-12.9979		131.0045	717416.6	8562245 South	52
Relocated 13	-12.998		131.0043	717389.9	8562226 South	52
Relocated 14	-12.9981		131.0042	717378.4	8562220 South	52
Relocated 15	-12.9975		131.0044	717397.3	8562281 South	52
Relocated 16	-12.9976		131.0043	717389.2	8562278 South	52
Relocated 17	-12.9976		131.0043	717386.9	8562275 South	52



-  Rum Jungle property boundary
-  Relocated multi-stem cycads
-  Stage 1 haul road actual footprint
-  Diversion bund actual footprint

Note: All cycads are outside of the marked extent of stage 1 haul road despite appearances on map. See attached images for reference.

PART A – EXECUTIVE SUMMARY REPORT

Distribution List		
Joshua Curran	Rum Jungle Project, Dept Mining & Energy	Chief Executive Officer

August Highlights

	Highlights	Qtys Accomplished :	Resources Used/Man hours
LMT	<ul style="list-style-type: none"> ◆ Revegetation work – Various native plant seed collection. ◆ Weekly site inspection ◆ Water sampling with Steve Trudgeon ◆ Water monitoring stations inspection ◆ Planned Burn completed on Rum Jungle Lake-15.2ha and Rum Jungle Site- 184.3ha ◆ Identifying & marking multi-steamed on new Haul Road alignment for relocation 	Total Burn Area- 199.5 Hectares	

PART A – EXECUTIVE SUMMARY REPORT

Distribution List		
Joshua Curran	Rum Jungle Project, Dept Mining & Energy	Chief Executive Officer

September Highlights

	Highlights	Qtys Accomplished :	Resources Used/Man hours
LMT	<ul style="list-style-type: none"> ◆ Revegetation work Various native plant seed collection. Top End Seeds - Boronia on site 15th and 16th for seed collection/training. ◆ Heritage Sign installed along the Haul Road near MWRD and Bund Plug area ◆ Water sampling with Steve Trudgeon from LEMURS (training and execution) ◆ Marking and relocating multi-stemmed on new Haul Road alignment CH 0 to CH 1650 ◆ Installing erosion control at Northern boundary ◆ LMT have relocated 15 multi-stemmed cycads from new Haul Road alignment. 		

PART A – EXECUTIVE SUMMARY REPORT

Distribution List		
Joshua Curran	Rum Jungle Project, Dept Mining & Energy	Chief Executive Officer

October Highlights

	Highlights	Qtys Accomplished :	Resources Used/Man hours
LMT	<ul style="list-style-type: none"> ◆ Revegetation work Various native plant seed collection. Top End Seeds - Boronia on site 17th for seed collection/training. ◆ Water sampling with Steve Trudgeon from LEMURS (training and execution) ◆ Marking and relocating multi-steamed on Bund Plug Foot-Print area. 		
Other Activities	<ul style="list-style-type: none"> ◆ Archaeological Survey- Archaeologist Silvano Jung with TO's on 29th to 31st. ◆ Installation of Web plate at inlet of upstream and outlet of downstream of the main pit by MMC. ◆ Placement of Erosion Control measures on site by MSA. 		

Appendix F

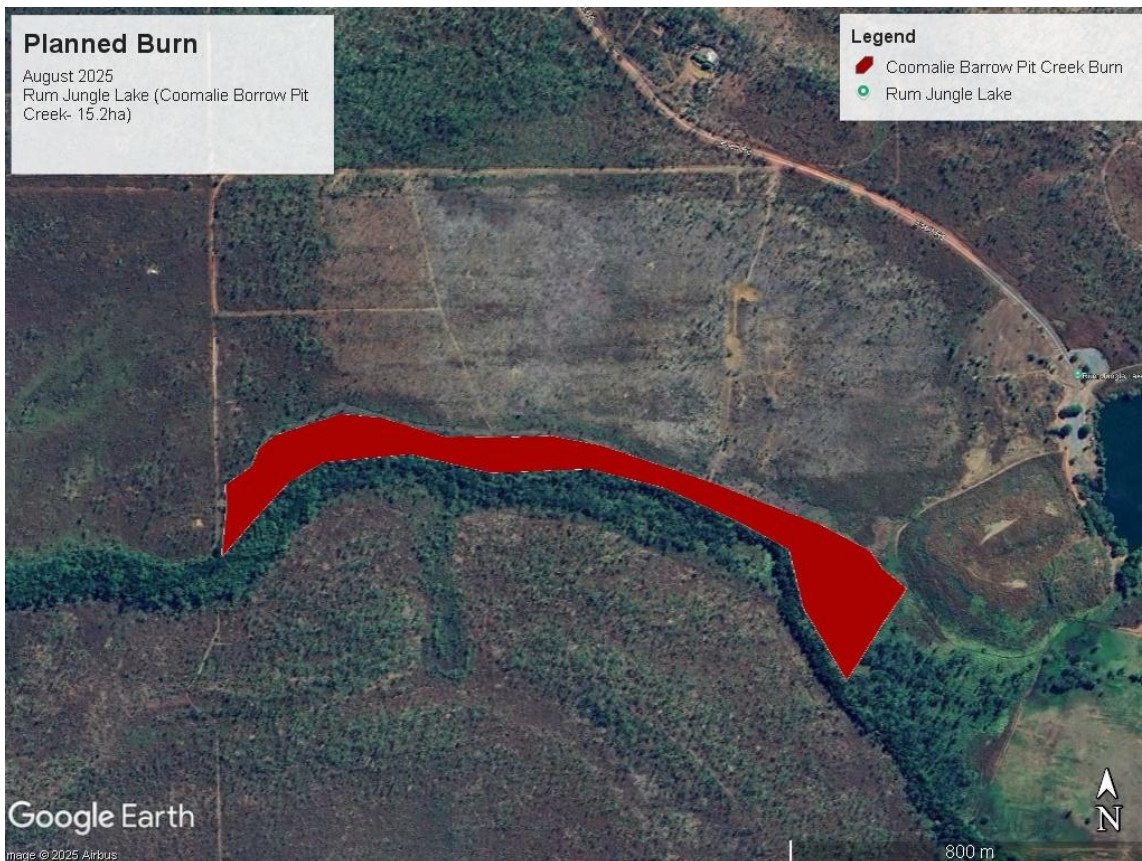
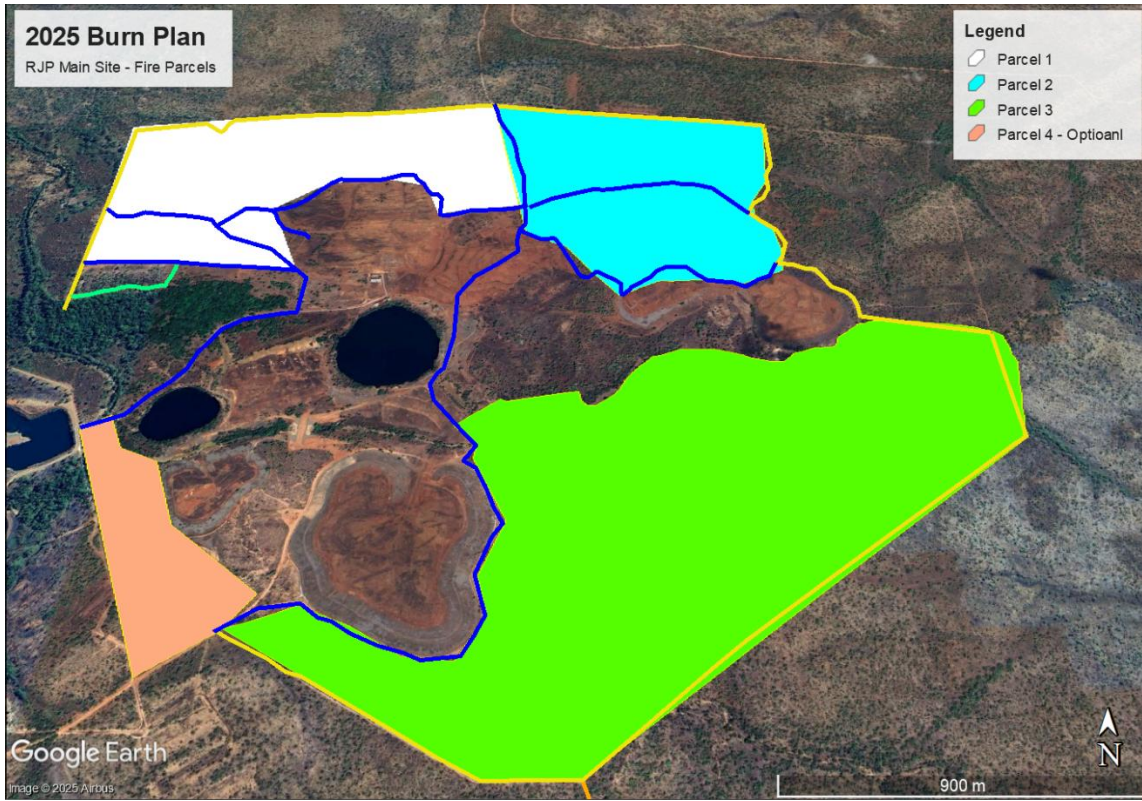
Burn Management Records

Appendix F DME Burn Management Records

Summary Table

Burn management activities 2025

Team	Month	Location	Area burnt (ha)	Evidence
Land Management Team (LMT)	Aug-25	Rum Jungle Main Site (across site)	15.2	Burn plan and shapefiles
Land Management Team (LMT)	Aug-25	Rum Jungle Main Site at Dysons WRD	89	Burn plan and shapefiles
Land Management Team (LMT)	Aug-25	Rum Jungle Main Site at Tower Hill	38.4	Burn plan and shapefiles
Land Management Team (LMT)	Aug-25	Rum Jungle Main Site at Eastern Boundary	56.9	Shapefiles
Land Management Team (LMT)	Jul-25	Rum Jungle Main Site at North-West Corner	93	Shapefiles
Land Management Team (LMT)	Jul-25	Rum Jungle Main Site at Parcel 2	82	Shapefiles
Land Management Team (LMT)	Aug-25	Rum Jungle Main Site firebreaks	13	Shapefiles



Appendix G

DME Weed Management

Appendix G DME Weed Management

Weed Spraying activities - 2025 Calendar Year			
Land Management Team (LMT)	Jan-25	14,800 Litres	Summary maps and shapefiles.
Northern Revegetation (Contractor)	Jan-25	29,800	Summary maps and shapefiles.
Aerial Spray	Jan-25	-	Area in summary maps and shapefiles.
Land Management Team (LMT)	Feb-25	11,200 Litres	Summary maps and shapefiles.
Northern Revegetation (Contractor)	Feb-25	40,200 Litres	Summary maps and shapefiles.
Land Management Team (LMT)	Mar-25	18,400 Litres	Summary maps and shapefiles.
Northern Revegetation (Contractor)	Mar-25	27,950 Litres	Summary maps and shapefiles.
Land Management Team (LMT)	Apr-25	4,000 Litres	Summary maps and shapefiles.
Northern Revegetation (Contractor)	Apr-25	26,00 Litres	Field summary sheet
Aerial Spray	Apr-25	-	Area in summary maps and shapefiles.
Land Management Team (LMT)	May-25	3200 Litres	Summary maps and shapefiles.
Northern Revegetation (Contractor)	May-25	28,400 Litres	Summary maps and shapefiles.
Land Management Team (LMT)	Jun-25	8,800 Litres	Summary maps and shapefiles.
Northern Revegetation (Contractor)	Jun-25	5,200 Litres	Summary maps and shapefiles.
Land Management Team (LMT)	Jul-25	1,600 Litres	Summary maps and shapefiles.
Northern Revegetation (Contractor)	Jul-25	1,800 Litres	Summary maps and shapefiles.
Land Management Team (LMT)	Aug-25	Nil	One day hand weeding. Excerpt from superintendent monthly report
Northern Revegetation (Contractor)	Aug-25	4,800 Lites	Excerpt from superintendent monthly report
Land Management Team (LMT)	Aug-25	Nil	Nil
Northern Revegetation (Contractor)	Aug-25	4,800 Litres	Summary maps and shapefiles.
Land Management Team (LMT)	Oct-25	Nil	Nil
Northern Revegetation (Contractor)	Oct-25	10,800 Litres	Summary maps and shapefiles.
Land Management Team (LMT)	Nov-25	Nil	Nil
Northern Revegetation (Contractor)	Nov-25	7,200 Litres	Summary maps and shapefiles.
Land Management Team (LMT)	Dec-25	Nil	Nil
Northern Revegetation (Contractor)	Dec-25	14,400 Litres	Summary maps and shapefiles.
Aerial Spray	Dec-25	-	Area in summary maps and shapefiles.

Shapefile exports (Example)

