



DEPARTMENT OF INDUSTRY, TOURISM AND TRADE

Annual Environmental Performance Audit Report

McArthur River Mine, Independent Monitor



19 December 2024

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Executive summary

This Annual Environmental Performance Audit Report (AEPAR) presents findings on environmental regulatory compliance at the McArthur River Mine (Mine). It considers the activities of McArthur River Mining Pty Ltd (MRM) who are the Operator, and the Northern Territory (NT) Department of Industry, Tourism and Trade (DITT) during the audit period of 01 May 2023 to 30 April 2024.

The AEPAR is submitted to the NT Minister responsible for mining and is made available to the community. It provides an independent assessment of the Operator's and DITT's level of compliance, in relation to fulfilling and managing the Mine's environmental obligations and identifies areas for potential improvement in environmental performance.

The audit was conducted by the Independent Monitor (Worley Consulting Pty Ltd). The audit's scope included a review of activities undertaken by both the Operator and DITT to meet regulatory and non-regulatory obligations, based on information provided by each party. For this audit the Independent Monitor also conducted a targeted review of the Independent Certifying Engineer's (ICE) activities.

The Independent Monitor examined 939 conditions, requirements and individual elements contained in the Authorisation, Waste Discharge Licence (WDL) and the recommendations of the NT Environment Protection Authority (NT EPA) *Assessment Report 86*. The audit identified 518 active requirements; the balance of requirements will either be triggered in the future or are currently not relevant.

The AEPAR describes the Independent Monitor's findings and identifies opportunities that may support continuous improvement, noting these opportunities are not mandatory requirements. Accomplishments achieved by the Operator and DITT, that go beyond regulatory compliance and have contributed to improved environmental outcomes are also noted.

Operator compliance performance

Authorisation

The Independent Monitor reviewed the Operator's compliance across 433 Authorisation conditions. The Operator attained a high level of compliance (96%) with the Authorisation conditions across its key mining operational activities.

While overall compliance scores remain high, they decreased for the first time since compliance scoring began in 2020, refer Figure ES-5 below. Notwithstanding, there has been no significant change in environmental risk associated with the Operator's activity.

Key findings are examined in terms of Environmental Aspects and Operator Domains below.

Environmental Aspects

Environmental Aspects are the environmental or community receptors protected by Authorisation conditions or potentially impacted if the conditions are not met. Compliance scores for conditions grouped by Environmental Aspect are summarised in Figure ES-1.

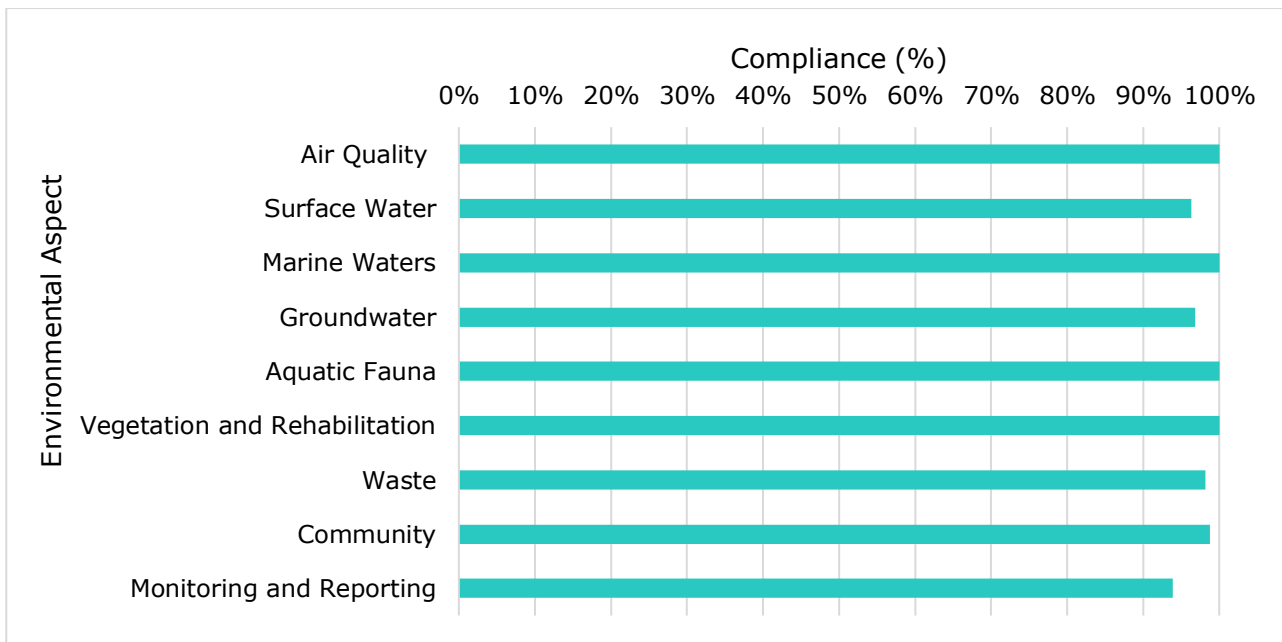


Figure ES-1: Authorisation – Operator compliance scores by Environmental Aspect

Operator Domains

Operator Domains are the areas of the Mine characterised by the operational activity undertaken. Compliance scores for conditions grouped by Operator Domain are summarised in Figure ES-2.

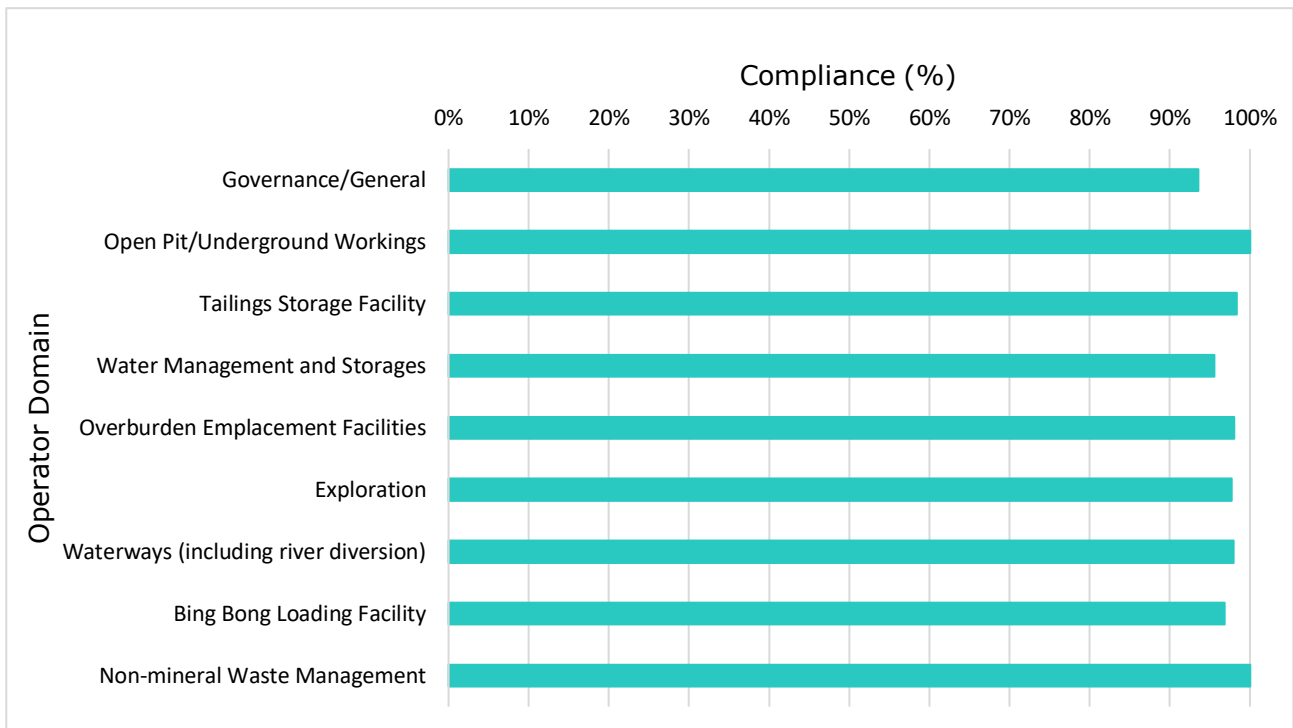


Figure ES-2: Authorisation – Operator compliance scores by Operator Domain

The Operator Domains *Overburden Emplacement Facilities* and *Tailings Storage Facility* have relatively high levels of potential environmental risk, if not managed correctly. Both of these Operator Domains achieved a compliance score of 98%. The Tailings Storage Facility Operator Domain achieved a part compliance due to two of the four Tailings Storage Facility (TSF) Quarterly Reports were not submitted. Part compliances for the *Overburden Emplacement Facilities* Operator Domain were related to:

- Incomplete implementation of the voluntary commitments.
- Lack of provision of a version of the approved Mining Management Plan (MMP) amendment without commercially sensitive information for publication on DITT’s website.
- Non-completion of some North Overburden Emplacement Facility (NOEF) Operations Inspection and Test Plans (ITPs) to enable the ICE review.

The ICE and Independent Tailings Review Board (ITRB) conditions are important for ensuring independent oversight of the TSF and Overburden Emplacement Facilities and there was a significant improvement in the compliance of these conditions in the audit period.

The *Governance/General* Operator Domain refers to procedural elements of the regulatory conditions. The Operator was assessed as achieving a compliance score of 94% for the *Governance/General* Operator Domain. Part compliances were related to missing the submission of annual environmental monitoring data and missing the submission of two out of the four TSF Quarterly Reports in the audit period.

Waste Discharge Licence

The audit assessed the Operator as having a high level of overall compliance with the WDL conditions. The compliance score of 96% represents a decrease of 3% relative to the 2023 AEPAR score (99%). Compliance scores for conditions grouped by WDL section are summarised in Figure ES-3.

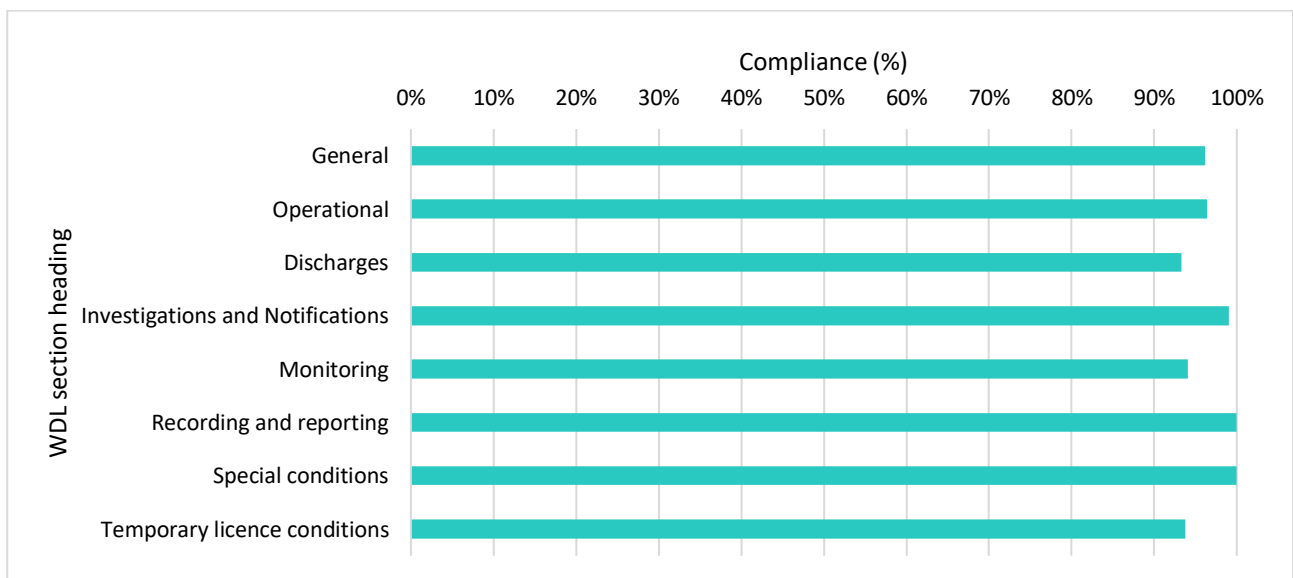


Figure ES-3: WDL – Operator compliance scores by section

A part compliance identified in the *Operational* section related to the minimisation of the likelihood of waste coming into contact with water associated with a waste management area adjacent to the Water Management Dam.

Part compliances in the *General* section were of an administrative nature, related to non-submission of the updated Emergency Response Plan to the NT Department of Environment, Parks and Water Security (DEPWS).

Part compliances for the *Monitoring* section were related to:

- Sampling occurring at Bing Bong Loading Facility where, for aluminium, the detection limit from the laboratory was higher than the trigger value.
- Evidence that the calibration of probes demonstrated they were not recording accurately but were still used.
- No evidence being provided for maintenance of monitoring probes or that the vessel used for monitoring was maintained and operational.
- No evidence of signage, and safe access and egress at all water quality monitoring locations.

Part compliances for the *Discharges* section were related to:

- An incident that occurred following ex-Tropical Cyclone Megan where seepage left the site.
- Limited evidence provided of measured or recorded flow volume, time, or duration of discharge at authorised discharge points (noting manual readings were taken from a flow meter during the audit period).

Voluntary commitments

Voluntary environmental commitments made by the Operator are included in the MMP and the annual Environmental Monitoring Report (EMR)¹. These commitments are not regulatory requirements but are voluntary actions and opportunities identified by the Operator to further improve environmental outcomes. The implementation status of each commitment is set out by the Operator in an annual register within the EMR.

The EMR contains 230 commitments, of which 155 commitments are identified as ongoing, 12 commitments are identified as complete and 63 commitments are identified as future requirements or not currently relevant. Six of the 155 ongoing commitments are identified in the 2024 AEPAR as being incomplete. Key opportunities for improvement in tracking and reporting on implementation of commitments include:

- Consolidation of the MMP's commitments into a single commitment register for reporting against future EMRs, and rationalisation of these commitments to avoid duplication.
- Provision of clear indication in the commitments register where a commitment is closed out with no further action proposed.

Reporting against commitments in the EMR 2024 was consistent with the previous audit period. Work activity related to several voluntary commitments has not occurred in accordance with timeframes reported in respective EMRs.

¹ The Environmental Monitoring Report prepared by the Operator to meet the requirements of Section 37(4) of the MMA.

Operator successes

Successes, achieved by the Operator during the audit period, which contribute to continuous environmental performance improvement include:

- Taking action ahead of the wet season and during ex-Tropical Cyclone Megan to handle a record volume of water released during this audit period. Water treatment at the NOEF and South-East Perimeter Runoff Dam was increased to enable treatment of double the water volume to meet the WDL water discharge standards. TSF water was transferred to the Open Pit to ensure no discharge of TSF water to the spillways and to protect the integrity of the TSF structure. The Operator managed the transfer of water, between the major dams and the open pit, to reduce potential risk to the environment.
- Monitoring of Freshwater Sawfish and Barramundi demonstrated that migratory fish can and do use the McArthur River diversion channel to travel upstream and downstream of the Mine.
- Quarterly Community Reference Group (CRG) meetings between local residents, business people and the Operator began in July 2023, addressing topics such as the Operator’s local employment and training program and impacts of the March 2024 flooding.
- Cane grass ‘clusters’ were planted in the upper McArthur River diversion channel to replace Purple Crowned Fairy Wren nesting habitats lost to natural bushfires in late 2022.

DITT compliance performance

Authorisation

DITT achieved a high level of overall compliance (91%) against the 82 active Authorisation conditions. The audit found DITT has maintained a strong focus on key environmental risks with a correspondingly high number of conditions related to the NOEF and the TSF. Compliance scores for conditions grouped by Authorisation section are summarised in Figure ES-4.

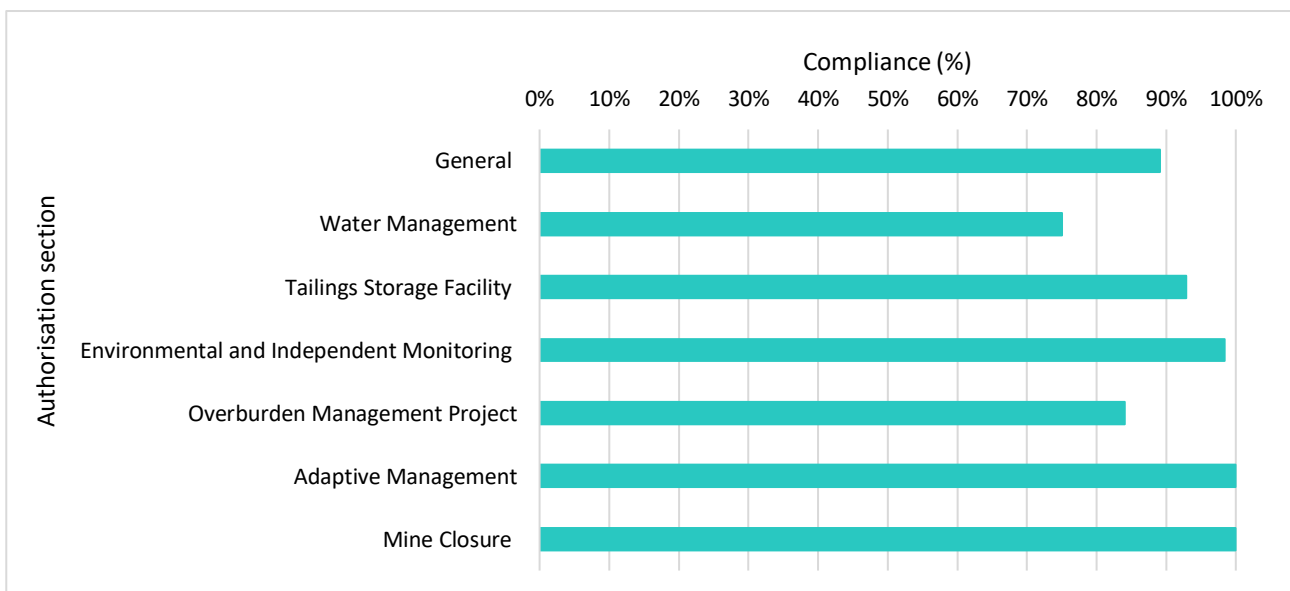


Figure ES-4: Authorisation – DITT compliance score by section

Part compliances for the *Environmental and Independent Monitoring* section were related to inaction following the Operator’s missed submission of monitoring data and not updating the Authorisation to reflect revised timeframes for which invoices must be paid by the Operator.

Part compliances for the *Tailings Storage Facility* section were related to:

- TSF Quarterly Reports not being reviewed in a timely fashion, as DITT have not formally reviewed and assessed TSF Quarterly Reports since November 2022.
- Inaction following the Operator's missed submission of the Annual Dam Safety Assessment and TSF Cell 1 Stage 5 and Cell 2 Stage 6 raises "as-constructed" construction reports.

NT EPA recommendations

DITT has effectively incorporated the NT EPA recommendations into the Authorisation as conditions and implemented relevant requirements, with an overall compliance score of 98%. DITT have maintained this high compliance score since 2022.

DITT successes

DITT successes identified through the audit period include:

- DITT enhanced Authorisation conditions by stipulating the preparation of an annual list of structures scheduled to be constructed and the associated "as-constructed" construction reports required to be submitted.
- A site inspection was conducted by DITT officers in the week immediately after the ex-Tropical Cyclone Megan flood event (March 2024), demonstrating a high level of responsiveness.
- The CRG was established, and the inaugural meeting held during the audit period.
- Regular communication between DITT and the Operator, including periodic meetings, continues to support an effective and valuable working relationship, which facilitates early resolution of potential regulatory issues.

Regulatory approach

Notable opportunities for improvement with respect to the regulatory approach include:

- DITT's process for monitoring the provision of "as-constructed" construction reports in a timely manner should be reviewed to enhance effectiveness.
- Some Operator activities are constrained until Independent Panels are established and therefore their establishment should be prioritised.

River health

The McArthur River and its tributaries are in good health. There are localised elevated levels of metals in Barney Creek and Surprise Creek, immediately adjacent to the Mine's processing area, within the mineral lease. These elevated levels only occur in areas not accessible to the public and will require ongoing monitoring and management.

Ongoing management actions, undertaken to control fugitive dust and remove potentially contaminated sediments from Barney Creek channel, contribute to protecting downstream beneficial uses and environmental values.

Data collected over the 2023-2024 monitoring program demonstrates that fish caught outside of the mineral lease boundary and throughout the McArthur River catchment, including Barramundi and Sooty Grunter, are safe to consume. The review of monitoring data to the end of the audit period indicates that there is an extremely low risk to human health from

consuming fish caught in the McArthur River catchment, in the vicinity or immediately downstream of the mineral lease boundary.

Ex-Tropical Cyclone Megan

Ex-Tropical Cyclone Megan caused intense rainfall and major flooding at the Mine in March 2024. Emergency response actions were implemented by the Operator to reduce the risk of environmental incidents associated with the severe flooding.

Damage from ex-Tropical Cyclone Megan contributed to the release of some NOEF seepage with the floodwaters. DITT officers inspected the flooding damage. An initial seepage investigation report prepared by the Operator (outside the audit period) was submitted to the NT Government and concluded that there was a low risk of environmental impact. The NT Government is awaiting a detailed seepage investigation report to be provided by the Operator.

Extreme weather events, such as ex-Tropical Cyclone Megan, periodically impact the McArthur River catchment, including the aquatic environment of areas adjacent to the Mine. Freshwater ecological monitoring programs have been ongoing through 2024, and the results of post-cyclone monitoring will be presented in the 2024 - 2025 EMR and assessed next audit period.

Independent Certifying Engineer

The role of the ICE is to oversee construction activities and to certify that the Mine meets design specifications. The ICE has continued to improve their performance during this audit period. The ICE has implemented clearer work processes and has provided additional on-site supervision resources.

The ICE consistently prepares NOEF daily, weekly and monthly construction reports with evidence of the details of construction. The ICE conducts TSF routine construction inspections (e.g., Daily Diary, Piezometer data analysis). Copies of "as-constructed" construction reports for the NOEF (2023) and TSF Cell 1 Stage 5 and Cell 2 Stage 6 raises were prepared by the ICE; however, the Operator had not submitted these reports to DITT at the end of the audit period.

The Independent Monitor has observed two ways the Operator could further assist the ICE to meet the obligations of their role. The Operator could support by:

- Providing ITPs ahead of construction in all work areas.
- Implementing and maintaining a register of the annual list of structures planned for construction completion and expected "as-constructed" construction reports to be completed.

Comparative analysis 2020 - 2024

The findings of five consecutive AEPARs (2020 - 2024) were examined to identify and assess improvement or deterioration in compliance scores for the Operator and DITT.

The graphs comparing the Operator compliance scores (refer Figure ES-5) show improvement trends in the years 2020 to 2023, but score reductions in 2024. The Operator's overall compliance with the Authorisation conditions and Waste Discharge Licence has decreased for

the first time since compliance scoring began in 2020. The Independent Monitor's assessment indicates that the lower scores this year are largely related to instances of incomplete compliance reporting.

The total number of Operator Opportunities for Improvement (OFIs) for the Authorisation and WDL combined was 24 in 2020, 28 in 2021, 22 in 2022, 14 in 2023 and 27 in the 2024 AEPAR.

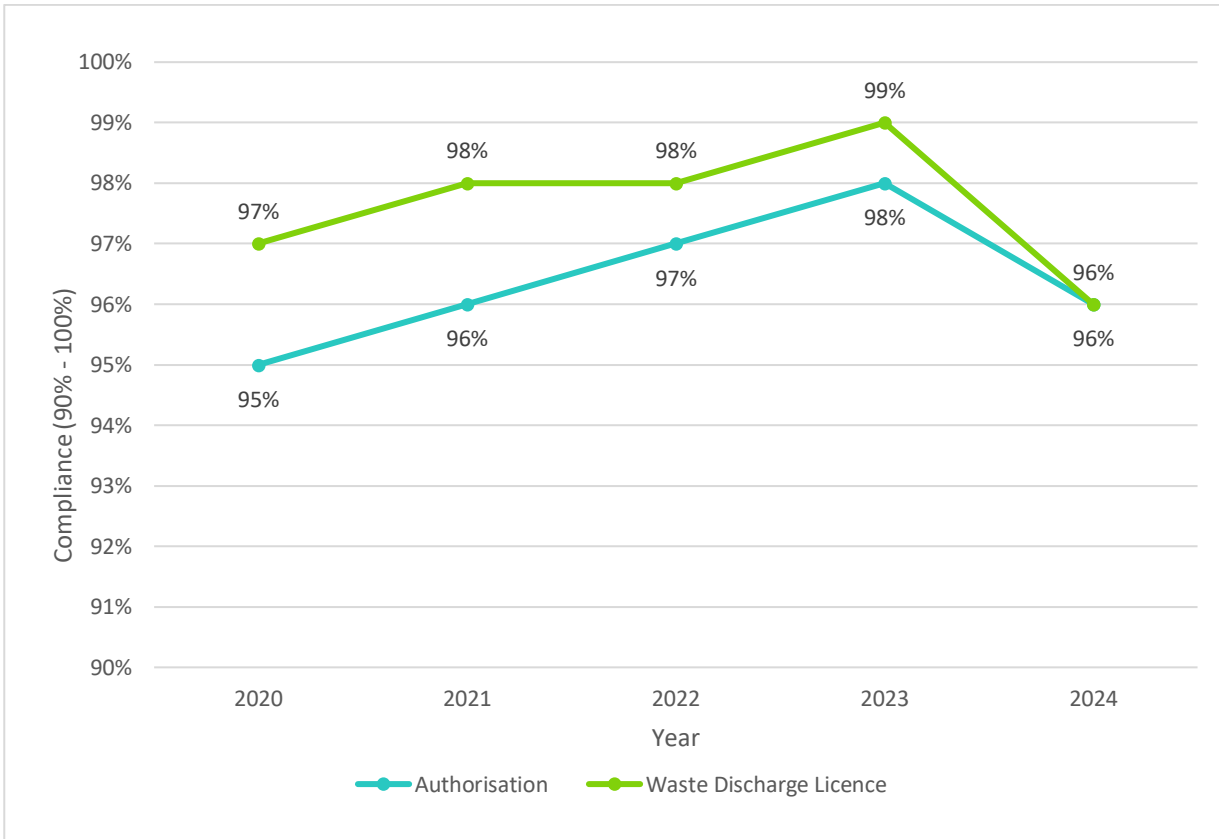


Figure ES-5: Authorisation and WDL – Operator compliance scores by year

DITT's overall compliance with the Authorisation conditions has decreased to its lowest score in the last five years, while a high level of compliance with NT EPA recommendations has been maintained (refer to Figure ES-6).

The total number of DITT OFIs was 12 in 2020, 19 in 2021, 17 in 2022, 12 in 2023 and 18 in the 2024 AEPAR.

Notwithstanding the general decrease in compliance scores for the Operator and DITT, it is notable that overall compliance scores remain high and there has been no significant change in environmental risk since last year.

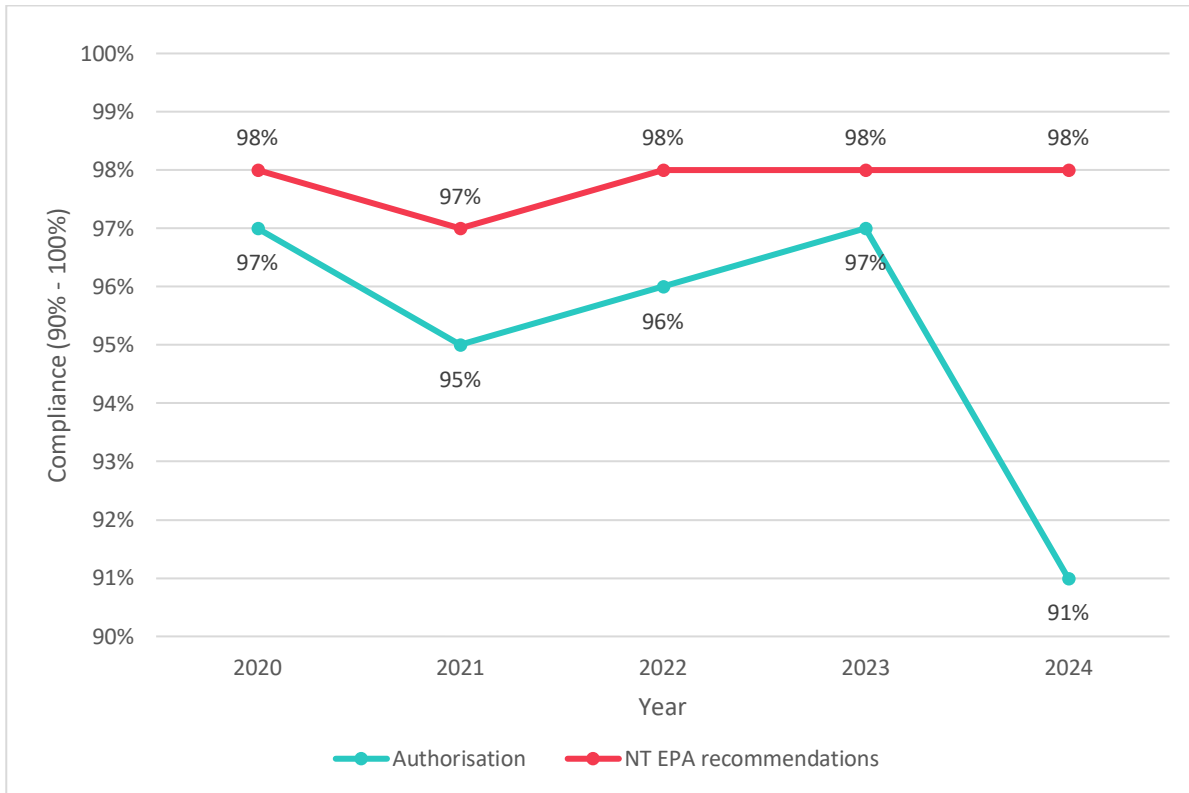


Figure ES-6: Authorisation and NT EPA recommendations – DITT compliance scores by year

Stakeholder engagement

The Independent Monitor stakeholder engagement team met with community members, in Borroloola and surrounds in October 2023, to communicate the findings of the 2023 AEPAR, ahead of its public release. A condensed and reader friendly version of the AEPAR is summarised in the Annual Report Card (ARC) and shared with the local Borroloola community. The team undertook engagement accompanied by a local Yanyuwa/Marra Traditional Owner.

The primary concern for stakeholders identified during engagement was the health of the environment, the McArthur River, and the fish.

Stakeholders expressed a positive sentiment toward seeing local people working for the Operator and this sentiment was greater when they saw images of local people in the ARC.

The topic of involving local people in environmental monitoring was a recurring theme in discussions with community members. The li-Anthawirriyarra Sea Rangers continue to be involved in the water monitoring and data collection activities particularly for marine waters.

The Independent Monitor also presented the AEPAR 2023 findings and answered questions face-to-face at the CRG group meeting held in Borroloola in February 2024.

Conclusion

The 2024 AEPAR found the continued focus on the management and monitoring of key environmental risk areas by the Operator has resulted in the maintenance of a high level of environmental performance during the audit period. The Operator's continued environmental performance across key operational domains is a reflection of high compliance with the Authorisation and WDL conditions. The Operator achieved an overall compliance score of 96% for the Authorisation (2% lower than the previous year) and 96% for the WDL (3% lower than the previous year).

Most part compliances identified for the Operator were of an administrative nature (e.g., relating to delays in the submission of monitoring data and reports, "as-constructed" reports, timely Operations ITPs, complete list of AMD storages).

DITT achieved an overall compliance score of 91% for the Authorisation (6% lower than the previous year) and maintained an overall compliance score of 98% for the implementation of the NT EPA recommendations. It was noted again in 2024, that timeframes for DITT's establishment of Independent Panels for the NOEF, TSF and Mine Closure have taken an unduly long time.

Consistent with river system health findings reported in the 2020-2023 AEPARs, the McArthur River and its tributaries are in good health in the 2024 audit period.

The audit did not identify any significant environmental issues or risks of concern that would require immediate attention or significant changes to the current environmental management and monitoring regime.

The environmental performance of both the Operator and DITT is fundamentally linked to the level of compliance achieved against Authorisation and WDL conditions, specifically designed to safeguard the environmental values of the McArthur River and protect the health of the McArthur River from the potential impacts of mining activities.

Based on the audit findings, the Operator has maintained a high level of compliance performance over the past five years. DITT adopts a practical approach to compliance and monitoring with a focus on key potential environmental issues. Where the audit found the Operator or DITT had attained part-compliance, the Independent Monitor has identified opportunities for potential improvements in environmental compliance and performance.

Acronyms and abbreviations

Acronym/abbreviation	Definition
AAPA	Aboriginal Areas Protection Authority
AEP	Annual Exceedance Probability
AEPAR	Annual Environmental Performance Audit Report
AGM	Annual General Meeting
AMD	Acidic and Metalliferous Drainage
AMP	Adaptive Management Plan
ANCOLD	Australian National Committee on Large Dams
AQMP	Air Quality Management Plan
Aspect	Environmental Aspect - environmental or community receptor e.g. air quality or surface water
Authorisation	Variation of Authorisation issued under the <i>Mining Management Act 2001</i> (NT)
ARC	Annual Report Card
BA	Bachelor of Arts
BBLF	Bing Bong Loading Facility
BGM	Bituminous Geomembrane
CCC	Cross Cultural Consultants
CCL	Compacted Clay Liner
CRG	Community Reference Group
DAWE	Department of Agriculture, Water and the Environment (Commonwealth), now the Department of Climate Change, Energy, the Environment and Water, and the Department of Agriculture, Fisheries and Forestry
DCCEEW	Department of Climate Change, Energy, the Environment and Water (since July 2022), formerly Department of Agriculture, Water and the Environment
DEPWS	Department of Environment, Parks and Water Security (NT)
DITT	Department of Industry, Tourism and Trade (NT)
DML	Deemed Mining Licence
Domain	Operator Domain – an operational area of the Mine, e.g. Tailings Storage Facility
EIS	Environmental Impact Statement
EMR	Environmental Monitoring Report
EoR	Engineer of Record
EPROD	Eastern Perimeter Run-Off Dam
ESDAT	DITT's environmental monitoring database system
GPS	Global Positioning Systems
HSEC	Health, Safety, Environment and Community
HVAS	High Volume Air Sampler
ICE	Independent Certifying Engineer
ILUA	Indigenous Land Use Agreement
ISO	International Organization for Standardization
ITP	Inspection and Test Plan
ITRB	Independent Tailings Review Board
LWD	Large Woody Debris

Acronym/abbreviation	Definition
Mine	McArthur River Mine
Minister	NT Minister for Mining
MMA	<i>Mining Management Act 2001</i> (NT)
MMP	Mining Management Plan
MRM	McArthur River Mining
NATA	National Association of Testing Authorities
NCR	Non-Compliance Report
NOEF	North Overburden Emplacement Facility
NT	Northern Territory
NT EPA	Northern Territory Environment Protection Authority
OBS	Observation
OFI	Opportunity for Improvement
OMP	Overburden Management Project
OMS Manual	Operations, Maintenance and Surveillance Manual
Operator	McArthur River Mining Pty Ltd
PAF	Potentially Acid Forming
PAF(RE)	Potentially Acid Forming reactive material
PbOx	Lead oxide
PCFW	Purple Crown Fairy Wren
QA	Quality Assurance
QC	Quality Control
RL	Reduced Level
RMP	Rehabilitation Management Plan
ROM	Run of Mine
SEPROD	South East Perimeter Run-Off Dam
SPROD	Southern Perimeter Run-Off Dam
SSTV	Site-Specific Trigger Value
TARP	Trigger Action Response Plan
TSF	Tailings Storage Facility
TWG	Technical Working Group
WDL	Waste Discharge Licence, issued under the <i>Water Act 1992</i> (NT)
WMD	Water Management Dam
WMP	Water Management Plan
WPROD	Western Perimeter Run-Off Dam

1. Introduction

1.1 Purpose and objective

This Annual Environmental Performance Audit Report (AEPAR) presents findings on the environmental regulatory compliance at the McArthur River Mine (the Mine) during the audit period, 01 May 2023 to 30 April 2024. This audit period coincides with the reporting period for the Environmental Monitoring Report 2024 (EMR 2024). The audit considers the activities of McArthur River Mining Pty Ltd (MRM), the Operator and the Northern Territory (NT) Department of Industry, Tourism and Trade (DITT). This AEPAR has been prepared by the Independent Monitor (Worley Consulting Pty Ltd (Worley Consulting)).

The AEPAR is submitted to the NT Minister responsible for mining and is made available to the community. It provides an independent assessment of the Operator and DITT level of compliance in relation to fulfilling and managing the Mine's environmental obligations and identifies areas for improvement in environmental performance.

1.2 McArthur River Mine overview

The Mine is located on one of the world's largest deposits of zinc and lead, approximately 970 kilometres (km) south-east of Darwin. The closest community is Borroloola, which is about 65 km north-east of the Mine. The McArthur River mining operation includes an open cut mine, processing plant, tailings storage, and overburden emplacement facilities. Zinc and lead are mined and processed at the Mine and trucked to the Bing Bong Loading Facility (BBLF) on the Gulf of Carpentaria. The mineral concentrate is loaded onto a barge and transported to deeper water for transferring onto bulk carrier export vessels.

1.3 Ex-Tropical Cyclone Megan

The severe ex-Tropical Cyclone Megan crossed the southwestern Gulf of Carpentaria coast of the Northern Territory on 18 March 2024. The Mine and surrounding districts experienced significant rainfall, major flooding and storm damage as a result of ex-Tropical Cyclone Megan passing through the region. Data provided by the Bureau of Meteorology indicated that the Mine received 335 millimetres (mm) of rainfall over a 48-hour period, estimated to be a 1 in 85 year event.

Major flood levels were recorded throughout the McArthur River catchment before recording stations went 'offline'. The rainfall intensity of this event resulted in a significant increase of Mine site water inventory. Flood flows in the McArthur River were up to approximately 7,200 cubic metres per second, with maximum river heights of up to 18 metres.

The McArthur River and local creeks broke their banks, and an emergency response by the Operator was necessary with the highway, local roads, the airport, and mobile phones all cut off.

During the flood event, the Operator mobilised significant resources to prevent uncontrolled releases from water storages and the Tailings Storage Facility (TSF) and avoid potential

environmental issues. The Operator transferred TSF water to the Open Pit to ensure no uncontrolled discharge over the TSF spillways and to protect the integrity of the TSF structure.

Excess water was transferred between the major dams and to the Open Pit, to ensure there were no uncontrolled releases from these major dams. Water treatment at the North Overburden Emplacement Facility (NOEF) and South East Perimeter Run-Off Dam (SEPROD) was increased to double the normal water volumes and still satisfy the Waste Discharge Licence (WDL) discharge water quality standards. Environment sampling, dilution calculations, and river flow monitoring stations were used by the Operator to inform the release of waters and protect the McArthur River.

Emergency discharge approval was received from Department of Environment, Parks and Water Security (DEPWS) during the flooding event, allowing a reduction in the site water inventory and enabling effective management of water during the foreseeable future high rainfall events.

Concentrated rainfall runoff caused extensive scouring and erosion along an access ramp roadway down the western side of the NOEF. A site inspection by a DITT officer in the week immediately after ex-Tropical Cyclone Megan found that the access ramp was constructed of clean waste rock materials and that the surface erosion had not affected the integrity of the NOEF structure or impacted the containment of potentially reactive overburden material stored deeper within the NOEF.

Flooding damage caused the failure of a section of the flood protection liner at the NOEF, which resulted in seepage being released from site in floodwaters and entering Emu Creek via a constructed water course known as the Clean Water Drain. The seepage water contained elevated concentrations of various analytes, in particular zinc. An earth walled sump was constructed to contain the seepage and the captured water was diverted to the Eastern Perimeter Run-Off Dam (EPROD) for treatment.

An initial seepage incident investigation report prepared by the Operator (outside the audit period) was submitted to the NT Government and concluded there was low environmental risk. Further investigation is currently being conducted to determine if any environmental impact occurred because of the seepage release. As part of that investigation (outside the audit period) the Operator continues to sample water, sediment and fauna within the affected section of Emu Creek, using similar methods to those used within the annual monitoring program. Reporting of the investigation will be submitted to the NT Government.

1.4 Audit methodology

The following actions were undertaken by the Independent Monitor in preparing this AEPAR:

- Audit of the level of compliance of the Operator and DITT against regulatory approval conditions in Authorisation 0059 (Authorisation), issued under the *Mining Management Act 2001* (MMA) (NT) and regulated by DITT (433 conditions and sub-conditions for the Operator and 243 conditions and sub-conditions for DITT).
- Audit of the level of compliance of the Operator against regulatory approval conditions in the Waste Discharge Licence (WDL) Number 174, issued under the *Water Act 1992 (NT)* and regulated by DEPWS (146 conditions and sub-conditions).

- Audit of DITT on the implementation of the Northern Territory Environment Protection Authority (NT EPA) recommendations provided in Assessment Report 86, McArthur River Mine Overburden Management Project (OMP), July 2018 (117 recommendations and sub-parts for DITT).
- Review of the Operator's implementation of other environmental commitments.
- Review of DITT's regulatory approach.
- Review of the health of the McArthur River system in the vicinity and downstream of the Mine.
- Comparative analysis of the compliance score results of the 2020 - 2024 AEPARs.
- Review of the status of the 2023 AEPAR Opportunity for Improvement (OFI) list for both the Operator and DITT.

In addition to the Independent Monitor's tasks above, this 2024 AEPAR included review of Independent Certifying Engineer (ICE) activities.

Stakeholder engagement with Borroloola community residents was completed by Cross Cultural Consultants Pty (CCC; hereafter referred to as the Independent Monitor stakeholder engagement team). The Independent Monitor stakeholder engagement team was supported by a Yanyuwa/Marra Traditional Owner who is a long-time Borroloola resident. The Independent Monitor also presented the AEPAR 2023 findings and answered questions face-to-face at the Community Reference Group (CRG) meeting held in Borroloola in February 2024. As part of these engagements, the Independent Monitor stakeholder engagement team gathered feedback on the face-to-face engagement approach and informed the Borroloola community of proposed engagement for the 2024 AEPAR.

The Independent Monitor audits are planned to occur annually. The detailed findings are reported in the AEPAR, with key findings presented in a visual 'Annual Report Card' (ARC). Both the AEPAR and ARC are made publicly available on the NT Government website.

1.5 Regulatory requirements

1.5.1 Authorisation

Authorisation 0059 issued under the MMA to the Operator for the Mine was the principal mechanism that enabled DITT to regulate the Mine's operation.

During the audit period of this AEPAR (01 May 2023 to 30 April 2024), two variations to the Authorisation dated 05 May 2022 and 17 May 2023 were active.

This audit focussed on compliance against the Authorisation in effect as of the 17 May 2023, as there were only minor revisions between the 2022 and 2023 Authorisations.

There were 239 Authorisation conditions, up from 178 in 2023, that were not triggered or that will only become relevant outside the audit period of this AEPAR. These have been noted as future requirements to assess in subsequent AEPARs.

1.5.2 Waste Discharge Licence

The WDL authorises the Operator to manage the controlled discharge of water to nominated water courses from specified discharge points. Discharge is to consist only of wastewater from

sources identified in the WDL. Water quality parameters are compared to the specified trigger values at nominated surface water monitoring locations. The WDL requires monitoring, measurement and reporting of water quality parameters at authorised monitoring points.

The WDL approval is under the *Water Act 1992* (NT) and is administered by DEPWS. The intention of the WDL is to regulate discharge activities so that the Operator, in conducting the activity "...does do all things reasonable and practicable to minimise adverse effects to any:

- *declared beneficial use, quality, standard or objectives declared under section 73 of the Water Act;*
- *sites of conservation significance; or*
- *designated Ramsar wetlands.*"²

In other words, the intention of the WDL is to regulate activities so that the Operator does all things reasonable and practical to ensure that the discharge of water from the Mine does not adversely affect the McArthur River system.

There were three WDLs active in the audit period. The conditions contained in WDL 174-13 (valid 25 May 2021 to 25 May 2023, amendment issued 10 March 2022), WDL 174-14 (valid date 26 May 2023, expiry date 25 May 2025) and WDL 174-15 (valid date 26 May 2023, amendment date 27 March 2024, expiry date 25 May 2025). The Operator's compliance against the 146 WDL conditions and sub-conditions are presented in Section 3.3.

WDL 174-15 was issued to the Operator following ex-Tropical Cyclone Megan, which impacted the area in March 2024. This included additional temporary release points and source waters to assist with reducing the Mine's overall water inventory following significant rainfall and flooding.

1.5.3 NT EPA recommendations

The NT EPA recommendations have a central aim of achieving the overarching environmental outcome that: "...requires the health of the McArthur River to be protected along its entire length at all times from Mine related impacts..."³

The NT EPA recommendations are non-statutory requirements but contain proposed actions for both the Operator and DITT. The NT EPA recommendations were provided in the NT EPA's *Assessment Report 86, McArthur River Mine Overburden Management Project*, dated July 2018. In accepting the NT EPA recommendations of *Assessment Report 86*, the Minister responsible for mining took responsibility for implementing the relevant NT EPA recommendations under the authority of the MMA.

The NT EPA recommendations, under the direct control of the Operator, have been adopted into statutory requirements as conditions of the Authorisation, dated 13 November 2020. As part of this audit, all NT EPA recommendations and sub-parts were reviewed against the relevant Authorisation conditions to confirm whether the recommendations had been transferred into the Authorisation.

² Waste Discharge Licence (WDL 174-15), Condition 19.

³ NT EPA Assessment Report 86, McArthur River Mine Overburden Management Project, July 2018, page 101, Recommendation No.3.



The NT EPA recommendations also provide matters for action by DITT, as the agency responsible for the administration of the MMA. This audit report reviews the levels of compliance of both the Operator and DITT in their implementation of the NT EPA recommendations.

2. Approach

2.1 Process

The audit was undertaken in alignment with the approach and principles of ISO 19011 (2018) Guidelines for auditing management systems. The key principles underpinning the audit included: integrity; fair presentation; due professional care; confidentiality; independence; and use of an evidence-based and risk-based approach.

The format of this audit had been designed to allow comparative evaluation between this AEPAR and previous and/or subsequent years to readily identify year-on-year compliance performance improvements and/or indicate trends that may need to be addressed.

A quantitative audit was undertaken to assess compliance against the Authorisation and WDL conditions, as well as implementation of the non-statutory NT EPA recommendations. A qualitative review was undertaken to provide an assessment of the Operator's commitments, DITT's regulatory approach, the overall health of the McArthur River system and the ICE activities. The methodology and scoring guide are described in Section 2.2.

2.2 Quantitative compliance audit

The following steps were conducted for the quantitative compliance audit, which assessed the level of compliance against the Authorisation conditions, WDL conditions and implementation of the NT EPA recommendations:

- All Authorisation and WDL conditions, sub-conditions and NT EPA recommendations were assigned to either the Operator, DITT or both, based on the party with the responsibility for meeting, or contributing to, each condition.
- All Authorisation and WDL conditions, sub-conditions and NT EPA recommendations were assigned a status of active or inactive, based on whether the requirement was triggered and/or active during the audit period. Conditions yet to be triggered have been noted as future requirements, assigned as inactive, and were scored as not applicable. The number of active conditions assessed in future audits will increase as additional time, activity and approval-based triggers occur.
- Compliance audits were conducted through a combination of audit interviews with representatives of the Operator and DITT, and a review of sample documentation and selected relevant information obtained by the Independent Monitor through a Request for Information process. The audit interviews, evidence collection and review processes were undertaken on-site and remotely during the period of March 2024 to November 2024.
- The level of compliance for each active condition, sub-condition and NT EPA recommendation was assessed and given a score between 0 to 4, using the scoring guidelines presented in Table 2-1. In cases where more than one score was applicable for a condition, the most conservative (lowest) score was applied. Only active conditions and sub-conditions were considered in the calculation of the compliance scores.
- The scores for each active condition, sub-condition and NT EPA recommendation were aggregated against the highest potential total score to calculate compliance scores (%) for the Authorisation, WDL and NT EPA recommendations respectively for both the Operator and DITT. Additional analysis of Operator compliance against Operator Domains and Environmental Aspects was also undertaken for the active Authorisation conditions. This is described in Section 3.2.1.

- OFIs and notable successes were documented and presented in Sections 3, 4 and 5. Typically, a non-compliance or part compliance finding will be accompanied by a related OFI; however, in some circumstances, an OFI has not been prepared because the situation has since been rectified or the requirement has been superseded.

Table 2-1: Compliance scores and guidelines

Score	Description	Guidelines
0	Non-Compliance	<ul style="list-style-type: none"> • Fails to meet all elements of the condition/requirement. • Negligible/no evidence of action. • Lack of plan to address condition/requirement. • Represents high risk to the environment, Operator and/or DITT.
1	Part Compliance (low)	<ul style="list-style-type: none"> • Fails to meet a majority of elements of the condition/requirement. • Limited evidence of action. • Limited plan to address condition/requirement. • Represents high risk to the environment, Operator and/or DITT.
2	Part Compliance (moderate)	<ul style="list-style-type: none"> • Fails to meet a number of elements of the condition/requirement. • Medium level of evidence of action. • Plan to address condition/requirement, but not fully implemented. • Represents medium risk to the environment, Operator and/or DITT.
3	Part Compliance (high)	<ul style="list-style-type: none"> • Fails to meet a small number of elements of the condition/requirement. • High level of evidence of action. • Implemented plan to address. • Represents low risk to the environment, Operator and/or DITT.
4	Full Compliance	<ul style="list-style-type: none"> • Full compliance based on sample evidence. • All elements of the condition/requirement are met. • High level of evidence of action. • Represents negligible risk to the environment, Operator and/or DITT.

2.3 Qualitative review

The qualitative reviews focussed on:

- The Operator’s implementation of the voluntary commitments (refer to Section 3.5).
- DITT’s regulatory approach (refer to Section 4.4).
- The McArthur River system’s overall health in the vicinity and downstream of the Mine (refer to Section 5).
- The Operator’s ICE activities (refer to Section 6).

As with the quantitative compliance audit, the qualitative reviews were conducted using a combination of audit interviews with representatives of the Operator and DITT, and a review of sample documentation and selected relevant information obtained through a Request for Information process. The Independent Monitor interviews, evidence collection and review processes were undertaken remotely during the period of March 2024 to November 2024 and supplemented with a Mine site visit in August 2024.

The findings of the qualitative reviews are presented as narratives in Sections 3.5, 4.4, 5 and 6. OFIs and notable successes are also documented in these sections.

2.4 Reference documents

The main reference documents considered during the AEPAR review are listed in Table 2-2.

Table 2-2: AEPAR 2024 key reference documents

No.	Reference document	Document source
1	Adaptive Management Plan, McArthur River Mine, Revision E, 13 May 2022	Operator
2	Adaptive Management Plan, Appendix A – Water Management Plan (WMP), 13 May 2022	Operator
3	Adaptive Management Plan, Appendix B – Air Quality Management Plan, 1 Oct 2021	Operator
4	Adaptive Management Plan, Appendix C – Rehabilitation Management Plan, 31 Mar 2021	Operator
5	Environmental Monitoring Report (EMR), 2022, 31 August 2023	Operator
6	Environmental Monitoring Report (EMR), 2023, 31 August 2024	Operator
7	Mining Management Plan, McArthur River Mine, 31 January 2020	Operator
8	Mining Management Plan, McArthur River Mine, Appendix G – North Overburden Emplacement Facility (NOEF) Management Plan, 31 January 2020	Operator
9	Mining Management Plan, McArthur River Mine, Appendix I - TSF Raising - General Specification for Design and Construction Document, 31 January 2020	Operator
10	NT EPA Assessment Report 86, McArthur River Mine Overburden Management Project, July 2018	NT EPA
11	Variation of Authorisation 0059, dated 05 May 2022	DITT
12	Variation of Authorisation 0059, dated 17 May 2023	DITT
13	Variation of Authorisation DML0059-01 dated, 23 July 2024	DITT
14	Waste Discharge Licence 174-13, commencement date 25 May 2021, amendment date 10 March 2022, expiry date 25 May 2023.	DEPWS
15	Waste Discharge Licence 174-14, commencement date 26 May 2023, expiry date 25 May 2025.	DEPWS
16	Waste Discharge Licence 174-15, commencement date 26 May 2023, amendment date 27 March 2024, expiry date 25 May 2025.	DEPWS

2.5 Review team

Worley Consulting (formerly Advisian Pty. Ltd.) was appointed to the Independent Monitor role in December 2019. Representatives of the Independent Monitor visited the Mine and the BBLF in March 2020 for project inception meetings and site orientation. Members of the Independent Monitor team conducted the following site visits in the current audit period:

- Surface Water Management audit (June 2023) included in the 2023 AEPAR.
- Stakeholder engagement, local community in Borroloola (October 2023)
- Community Reference Group meeting (February 2024)

A site audit visit to assess compliance with the Authorisation and WDL, plus interview the ICE was conducted in August 2024 (outside the audit period). Findings and evidence gathered during this visit to the Mine contributed to this 2024 AEPAR.

The AEPAR team consisted of staff from Worley Consulting and sub-consultants with relevant experience and qualifications, refer to Table 2-3.

Table 2-3: AEPAR 2024 review team members

Role	Qualifications	Number of years of experience
Lead Environmental Auditor	BEng(Civil), MEnvMgmt	33
Assistant Environmental Auditor	BEngEnv(Hons), MBA(TechMgmt)	24
Stakeholder Engagement Lead	BA(Soc)(Hons)	7
Community Engagement Lead	BA(IndigenousCommunityMgmt)	23
Technical Reviewer	BEng(Mining), MEnvMgmt(SustDev)	23
Reviewer	BA(SocSci), BAppSci(EnvSci), MAAPD	30
Aquatic Ecologist	BAquaSci(Hons), PhD(AquaSci)	24

2.6 Stakeholder engagement

A Stakeholder Engagement Plan was prepared to guide community and stakeholder engagement and communications for the Independent Monitor. An NT-based Aboriginal business, CCC, was appointed to facilitate community engagement throughout the Independent Monitor process. The Stakeholder Engagement Plan (September 2023) nominated community consultation activities to align with the key Independent Monitor outputs and activities. The stakeholder engagement activities and findings are discussed in Section 9.

3. Review of Operator

3.1 Objective

The objective of the review of the Operator is to assess the level of compliance of the Operator against the relevant conditions of the Authorisation (including NT EPA recommendations) and the WDL. It is also to review the performance of the Operator against relevant commitments contained in the MMP and EMR.

3.2 Authorisation – Operator compliance audit

3.2.1 Scope and approach

The audit considers the period between 1 May 2023 and 30 April 2024 and compliance evidence was gathered for this period.

The Operator was assessed against the regulatory conditions contained in the Authorisation (variations dated 5 May 2022 and 17 May 2023) for compliance during the audit period, using the quantitative audit approach and scoring criteria described in Section 2.2. An analysis of the Authorisations was conducted to determine which relevant conditions from each should be included in the Operator audit. Only minor updates were made to the conditions of the Authorisation between 2022 and 2023, which are listed in Table 3-1.

Table 3-1: Summary of Authorisation amendments 17 May 2023

Condition	Change made*
Condition 8	Was divided into two subconditions, with first requiring annual submission of a list of structures scheduled to be constructed in the coming year that will have an "as-constructed" construction report developed. The second requiring submission of the "as-constructed" construction reports within 60 days or an alternative date agreed to by the Department in writing, upon construction being finalised.
Condition 10	The security increased.
Condition 48	Retaining the requirement for the ICE to warrant and accept both the design and construction works but removing "without limitation on responsibility".
Condition 64	Subconditions removed NOEF East Drain Sump and added NOEF North East Bravo Sump, NOEF North West Stilling Basin, NOEF South West Stilling Basin and NOEF Diamond Sump.
Condition 67	Altered the coordinates for the McArthur River diversion channel Release Point.
Condition 75	Separated into two subconditions where the second subcondition required the submission of the construction report for the structure within 60 days rather than 30 days of construction being completed (and not dependent on if groundwater dewatering is necessary).
Condition 83	Added the option for the characterisation data from drilling to be submitted "in an alternative format as agreed with the Department".
Condition 91	Added the requirement for "provision of any required additional information (including but not limited to detailed designs) and written acceptance by the Department" prior to authorisation of dredging activities at Bing Bong Port Facility.
Condition 99	Added "unless otherwise agreed in writing by the Department", related to annual submission of an Unplanned Mine Closure Plan.
Schedule D Condition 3	Changed the requirement to install gauging stations from "must" to "is approved to" install.

Condition	Change made*
Schedule D Condition 4c	Allows for submission of logs of bore decommissioning activities in an alternative format as agreed with the Department rather than requiring them only in the EMR.

Note: *Legislation name or typographical changes are not stated in this table.

Another addition to the May 2023 Authorisation was that “completed” was added to some conditions with the associated meaning that “the respective condition has been satisfied at the time of issue of this variation of authorisation”.

Overall, there was little change as all other Authorisation conditions in the 5 May 2022 Authorisation remained identical in the 17 May 2023 Authorisation.

Further analysis of Operator Authorisation compliance was undertaken by categorising all conditions and sub-conditions into Environmental Aspects and/or Operator Domains. The Environmental Aspects and Operator Domains consider the same Authorisation conditions compliance findings; however, they facilitate deeper interpretation from different perspectives.

3.2.2 Findings

General findings

A summary of Authorisation compliance findings is shown in Table 3-2. Detailed audit findings, supporting evidence, part compliances and scores are contained in *Authorisation compliance workbook – Operator*, refer to Appendix A.

Table 3-2: Summary of Authorisation compliance - Operator

Description	No.
Total number of conditions and sub-conditions relevant to Operator	433
Number of active conditions and sub-conditions during the audit period	194
Number of full compliances	172
Number of part compliances (high)	15
Number of part compliances (moderate)	7
Overall compliance score of active conditions	96%

Environmental Aspects findings

Environmental Aspects are defined as environmental or community receptors that would be protected by relevant conditions or potentially impacted if the conditions are not met. The additional Aspect, *Monitoring and Reporting*, has also previously been part of the analyses. The Environmental Aspects are:

- Air Quality
- Surface Water (rivers, creeks, and artificial dams)
- Marine Waters (BBLF and marine sediments)
- Groundwater
- Aquatic Fauna
- Vegetation and Rehabilitation
- Waste (mining overburden and general waste)

- Community
- Monitoring and Reporting.

A summary of the Operator’s Authorisation compliance score for each Environmental Aspect is presented in Table 3-3 and Figure 3-1. The key findings in relation to Environmental Aspects are outlined below and detailed audit findings for compliance levels and OFIs for all Environmental Aspects are presented in Appendix A.

Table 3-3: Authorisation – Operator compliance scores by Environmental Aspect

Environmental Aspect	Total no. of conditions	No. of active conditions	Scores	Compliance (active conditions)
Air Quality	9	6	24	100%
Surface Water	171	81	312	96%
Marine Waters	6	5	20	100%
Groundwater	50	16	62	97%
Aquatic Fauna	42	2	8	100%
Vegetation and Rehabilitation	21	6	24	100%
Waste	122	55	216	98%
Community	37	20	79	99%
Monitoring and Reporting	241	86	323	94%

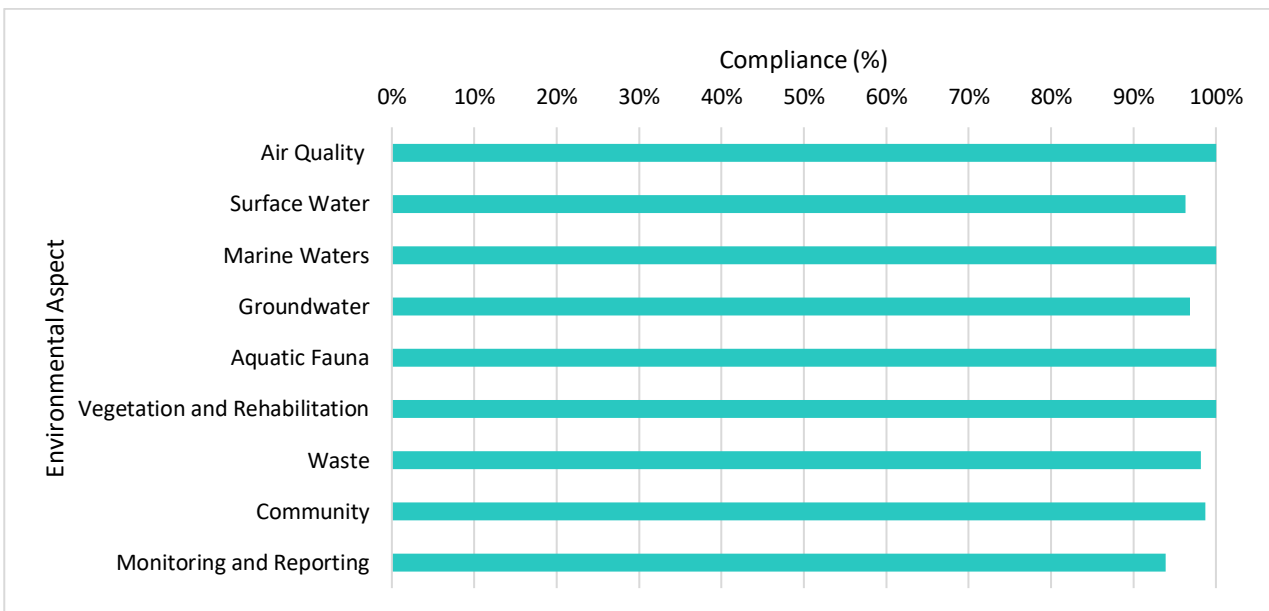


Figure 3-1: Authorisation – Operator compliance score by Environmental Aspect

The overall high level of compliance with the Authorisation conditions across the Environmental Aspects is an indicator of the level of fulfilment of regulatory requirements by the Operator. There were four environmental aspects that scored full compliance in 2024, which is equal with the 2023 AEPAR findings.

The *Air Quality*, *Marine Waters* and *Vegetation and Rehabilitation* Environmental Aspects all attained full compliance scores of 100% again. This was based on six, five and six active conditions respectively.

The *Aquatic Fauna* Environmental Aspect also attained a compliance score of 100% from two active conditions. This was an improvement from the score of 99% in the 2023 AEPAR where there were 37 active conditions. The reduction in conditions is mainly related to the Water Management Plan, Ecotoxicology Research and Investigation Program, and Aquatic Ecology Monitoring Plan content conditions being satisfied and marked complete in the 17 May 2023 Authorisation, and therefore not audited in 2024.

The *Community* Environmental Aspect scored 99% that is 1% lower than the score in the 2023 AEPAR. Of the 20 active conditions, the one part compliance (high) was related to a version of the amended MMP without commercially sensitive information not having been submitted to DITT for upload on their website.

The *Waste* Environmental Aspect includes the management of waste rock in the overburden emplacement facilities, an area of high potential environmental risk if management controls are not adequately implemented. Against the 55 active waste-related conditions, the Operator had a compliance score of 98% with three part compliances (high) and one part compliance (moderate). This is an increase on the 97% Waste score in the 2023 AEPAR. The part compliances were related to:

- The ICE was unable to warrant and accept both the design and construction works for the NOEF operations phase as all required documentation was not submitted to them.
- No submission of a final NOEF Geosynthetic Liner Cover System Plan for approval.
- Only two of the four TSF quarterly reports were submitted in the audit period.

The *Groundwater* Environmental Aspect attained a compliance score of 97% from 16 active conditions, with the one part compliance (moderate) related to lack of submission of TSF Quarterly Reports. This is a 1% drop in score from the 2023 AEPAR.

The *Surface Water* Environmental Aspect achieved a compliance score of 96% based on 81 active conditions, which is 2% less than the score in the 2023 AEPAR. There was one condition with a part compliance (moderate), related to only two of the four TSF quarterly reports being submitted in the audit period. There were ten conditions with part compliances (high) incorporating the following issues:

- Monthly inspection actions for Acidic and Metalliferous Drainage (AMD) water storage structures were not actioned in the audit period.
- No evidence was provided of progressing the outstanding actions in the Full Recommendations Register - Mine Dams, which is Appendix D of the *2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report McArthur River Mine 7 June 2024*.
- Diamond Sump was not listed in the 5 May 2022 Authorisation and therefore not approved for storage of AMD for the beginning of the audit period.
- Limited evidence regarding the process for measuring (rather than calculating) flow duration and volume of all water released from the Water Management Dam (WMD) into Little Barney Creek.
- Not sampling from SW06 (for cultural heritage reasons) but sampling from SW20 or SW19 instead. Advising DITT that SW20 would be sampled in lieu of SW06 rather than obtaining

agreement from DITT on this approach (and no reference to sampling from SW19) as required by the condition.

- The WMP and relevant monitoring schedule not being updated regarding the inability to monitor at SW06.
- The *NOEF Perimeter Runoff Dams Operations, Maintenance and Surveillance Manuals* and *NOEF Perimeter Runoff Dams Dam Safety Emergency Plan* remain in draft from October 2022 and include a different routine visual inspection frequency than what is occurring for the Southern Perimeter Runoff Dam (SPROD) and the Eastern Perimeter Run-Off Dam (EPROD).
- Overarching management of AMD water storage structures including no evidence of inspections for the North East Bravo Sump and NOEF South West Stilling Basin.

The lowest Environmental Aspect was *Monitoring and Reporting*, which achieved a compliance score of 94% from 86 active conditions, which is a 3% reduction from the 97% scored in the 2023 AEPAR. This aspect had 155 active conditions in the 2023 AEPAR and most of the reduction is due to 65 conditions related to content of plans having been satisfied in the previous audit period, and therefore no longer assessed in 2024. There were seven conditions with a part compliance (high) and seven with a part compliance (moderate). The part compliances (moderate) are related to lack of annual submission of environmental monitoring data, except for one related to only two of the four TSF quarterly reports being submitted in the audit period. Not submitting the "as-constructed" construction reports to DITT for the TSF Cell 1 Stage 5 and Cell 2 Stage 6 also contributed to a part compliance (moderate). The part compliances (high) were as follows:

- A version of the amended MMP without commercially sensitive information not having been submitted to DITT for upload on their website.
- ICE related part compliance for NOEF Operations Inspection and Test Plan (ITPs) to be completed sooner to allow the ICE to warrant and accept the construction works.
- Limited evidence regarding the process for measuring (rather than calculating) flow duration and volume of all water released from WMD into Little Barney Creek.
- Advising DITT that SW20 would be sampled for water quality in lieu of SW06 rather than obtaining agreement from DITT on this approach as required by the condition.
- Characterisation data from the drilling not being reported in the EMR or an alternative format as agreed with DITT.
- Lack of annual submission of environmental monitoring data for continuous flow.
- The WMP and relevant monitoring schedule not being updated regarding the inability to monitor at SW06.

Operator Domain findings

Operator Domains are defined as areas of the mineral lease that are distinguished by an operational activity and utilised by the Independent Monitor to examine different areas of the Mine. In general, the Operator Domain names used in this compliance audit align with those used by the Operator in management plans, monitoring programs and reporting. An additional Operator Domain, *Governance/General*, was added to categorise conditions which have overarching management oversight, and/or apply to multiple Operator Domains.

The Operator Domains are:

- Governance/General
- Open Pit/Underground Workings
- Tailings Storage Facility
- Water Management and Storages
- Overburden Emplacement Facilities
- Exploration
- Waterways (including river diversion)
- Bing Bong Loading Facility
- Non-Mineral Waste Management (waste).

A summary of the Operator's Authorisation compliance score for each Operator Domain is presented in Table 3-4.

Table 3-4: Authorisation – Operator compliance scores by Operator Domain

Operator Domain	Total no. of conditions	No. of active conditions	Scores	Compliance (active conditions)
Governance/General	180	74	277	94%
Open Pit/Underground Workings	3	1	4	100%
Tailings Storage Facility	65	30	118	98%
Water Management and Storages	96	51	195	96%
Overburden Emplacement Facilities	73	39	153	98%
Exploration	16	11	43	98%
Waterways (including river diversion)	91	37	145	98%
Bing Bong Loading Facility	9	8	31	97%
Non-mineral Waste Management	10	1	4	100%

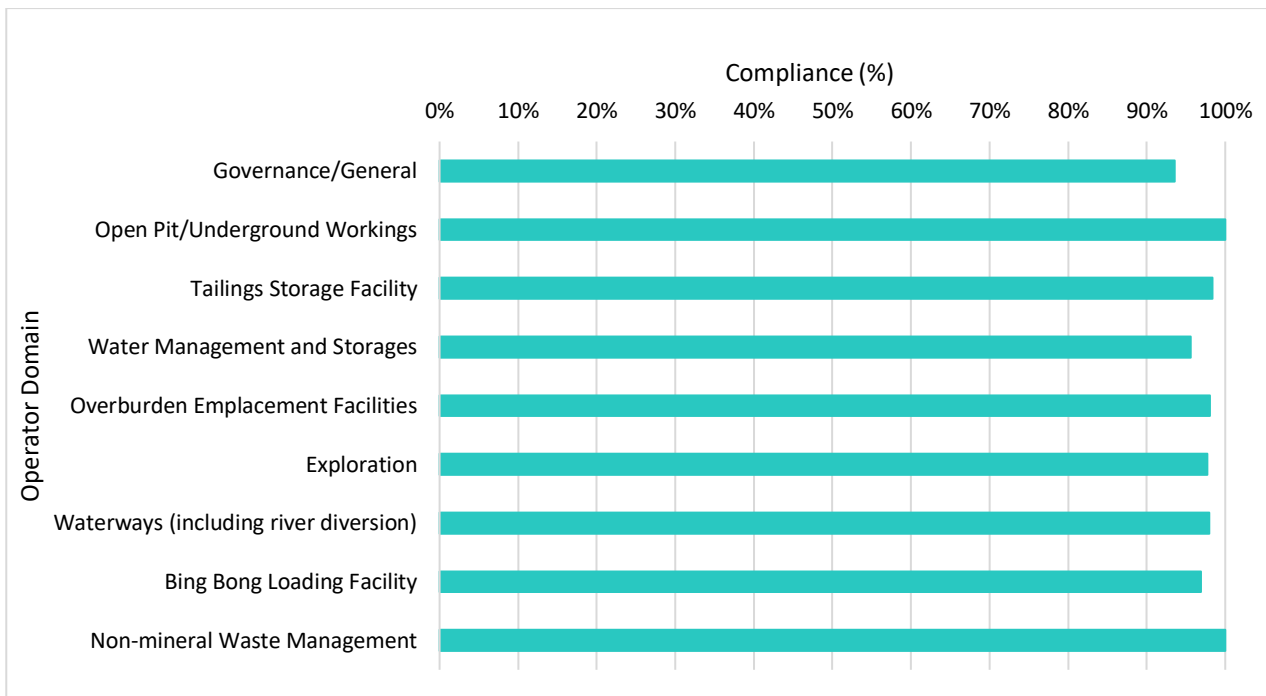


Figure 3-2: Authorisation – Operator compliance score by Operator Domain

The key findings in relation to Operator Domains are outlined below, and the detailed audit findings for compliance levels and opportunities for all Operator Domains are presented in *Authorisation compliance workbook – Operator*, refer Appendix A.

The *Open Pit/Underground Workings* and *Non-mineral Waste Management* Operator Domains were assessed as achieving the highest compliance (100%) with the Authorisation; however, this is based on only one condition each.

The *Overburden Emplacement Facilities* and *Tailings Storage Facility* Operator Domains have amongst the highest levels of potential environmental risk, and both achieved a compliance score of 98%. The *Overburden Emplacement Facilities* score is higher than the 97% score for the 2023 AEPAR. For the *Overburden Emplacement Facilities* Operator Domain 39 active conditions, there were three part compliances (high). One was related to the Reconciliation of Commitments and Actions Register, one was related to provision of a version of the approved MMP amendment without commercially sensitive information for publication on DITT’s website, and one was an ICE related part compliance for NOEF Operations ITPs to be completed sooner to allow the ICE to warrant and accept the construction works.

The *Tailings Storage Facility* score is higher than the 94% score for the 2023 AEPAR. For the *Tailings Storage Facility* Operator Domain 30 active conditions, there was one part compliance (moderate). It was related to lack of submission of two of the four TSF Quarterly Reports for the audit period. The ICE and the Independent Tailings Review Board (ITRB) conditions are important for ensuring independent oversight of the TSF and Overburden Emplacement Facilities and there was a significant improvement in the compliance of these conditions in the audit period.

The *Waterways* Operator Domain achieved a high compliance of 98% from 37 active conditions, which was the same compliance level as in the 2023 AEPAR. The three part

compliances (high) related to the WMP not being updated to reflect monitoring no longer permitted at SW06 and related to discharges from WMD into Little Barney Creek, the need to:

- Improve measuring and recording of flow duration and volume of all water released.
- Obtain formal agreement from DITT that the SW19 or SW20 monitoring locations are an acceptable alternative to SW06 for monitoring total loads of analytes from all controlled discharge activities entering McArthur River.

There were 11 active *Exploration* conditions which scored 98%, slightly lower than the 100% from the 2023 AEPAR. The one part compliance (high) was related to characterisation data from the geochemical and geotechnical drilling not being reported in the EMR or an alternative format as agreed with DITT.

The *Bing Bong Loading Facility* Operator Domain scored 97% an increase of 1% from 2023, from eight active conditions, one of which was a part compliance (high) related to overarching management of AMD water storage structures, not only at Bing Bong Loading Facility.

The *Water Management and Storages* Operator Domain achieved the same compliance score as the 2023 AEPAR score of 96%. This was from 51 active conditions and included the three part compliances (high) discussed under the *Waterways* Operator Domain in addition to six part compliances (high) related to the following:

- Overarching management of AMD water storage structures including inspections not conducted for the North East Bravo Sump and NOEF South West Stilling Basin.
- Monthly inspection actions for AMD water storage structures were not actioned in the audit period.
- No evidence of progressing the outstanding actions in the Full Recommendations Register - Mines Dams, which is Appendix D of the *2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report McArthur River Mine 7 June 2024*.
- Diamond Sump was not listed in the 5 May 2022 Authorisation and therefore not approved for storage of AMD for the beginning of the audit period.
- The *NOEF Perimeter Runoff Dams Operations, Maintenance and Surveillance Manuals*, and *NOEF Perimeter Runoff Dams Dam Safety Emergency Plan* remain in draft from October 2022 and include a different routine visual inspection frequency than what is occurring for the SPROD and EPROD.

Governance activities are the requirements and procedural elements of the regulatory conditions that provide an overarching means to achieve compliance and environmental performance outcomes. There are 180 conditions relevant to the *Governance/General* Operator Domain, 74 of which are currently active. The Operator was assessed as achieving a compliance score of 94% which was lower than the 2023 AEPAR score of 97%. There were seven part compliances (moderate) and five part compliances (high). The lack of submission of annual environmental monitoring data for two years counted as six part compliances (moderate) and one part compliance (high), which significantly lowered this compliance score. The second part compliance (moderate) was related to submission of only two out of the four TSF Quarterly Reports in the audit period. The remaining part compliances (high) are:

- Lack of implementing the Reconciliation of Commitments and Actions Register.
- That a version of the amended MMP without commercially sensitive information was not submitted to DITT for upload on their website.

- ICE related part compliance for NOEF Operations ITPs to be completed sooner to allow the ICE to warrant and accept the construction works.
- Monthly inspection actions for water storage structures were not actioned in the audit period.
- No evidence of progressing the outstanding actions in the Full Recommendations Register - Mines Dams, which is Appendix D of the *2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report McArthur River Mine 7 June 2024*.

Where relevant, OFIs have been developed for those conditions in all Operator Domains assessed as having less than full compliance, and these are outlined in Section 3.2.3.

3.2.3 Opportunities for improvement

Potential opportunities identified by the Independent Monitor that support continuous improvement are detailed in Table 3-5.

Table 3-5: Authorisation – Operator opportunities for improvement

OFI ref.	Authorisation condition No.	Opportunities for improvement
Mining management plan and reporting		
OFI-24-OP-AUTH-01	7a, b, c, d, e, f, g and Schedule D - 2.c	Submit all environmental monitoring data annually.
Overburden management project		
OFI-24-OP-AUTH-02	23	Submit a final NOEF Geosynthetic Liner Cover System Plan for approval.
OFI-24-OP-AUTH-03	42	For every approved MMP and MMP amendment, provide the approved document that removes commercially sensitive information, includes an overview and environmental section, and is suitable for publication on the NT Government's website, or provide written approval to make the complete documents publicly accessible.
Independent Certifying Engineer (ICE)		
OFI-24-OP-AUTH-04	48.a	The Operator to complete NOEF Operations ITPs in a timely manner to allow the ICE to warrant and accept the construction works.
Water management and storage		
OFI-24-OP-AUTH-05	64	Action and record evidence regarding addressing the outstanding actions in the Full Recommendations Register - Mines Dams, which is Appendix D of the <i>2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report McArthur River Mine 7 June 2024</i> .
OFI-24-OP-AUTH-06 [#]	64	For monthly inspection actions, provide further information to record progress status and close out of the inspection actions.
OFI-24-OP-AUTH-07 [#]	64.a and 64.d	Update and finalise the NOEF Perimeter Runoff Dams Operations, Maintenance and Surveillance Manuals (including but not limited to the recommended frequency of routine visual inspection for EPROD and SPROD, refer 2023 Mine Dam Inspection Report) and the NOEF Perimeter Runoff Dams Dam Safety Emergency Plan.
OFI-24-OP-AUTH-08 [#]	64.u, 64.w	Document operational activities for the North East Bravo Sump and NOEF South West Stilling Basin that demonstrate the potential for contaminants to enter the Receiving Environment is minimised (e.g., inspections).
OFI-24-	64.x	Review all structures on site that store AMD and ensure a complete list is

OFI ref.	Authorisation condition No.	Opportunities for improvement
OP-AUTH-9		included in the Authorisation and structures are inspected regularly.
OFI-24-OP-AUTH-10	64.x	To ensure consistency so a single name is used for each structure, review the list of AMD structures listed in the Authorisation against reporting records (e.g., inspection registers and monitoring sheets).
Water transfer and discharge		
OFI-24-OP-AUTH-11 [^]	69.e	The current process relies on manual entries to create records of flow start, stop, rate and volume. The flow volume is determined based on calculations rather than measurements. Explore opportunities to automate the measurement and recording of data capture for discharge events.
OFI-24-OP-AUTH-12	69.h	Seek formal agreement from DITT that SW19 or SW20 monitoring location is an acceptable alternative to SW06 related to monitoring during discharges from WMD into Little Barney Creek.
TSF management		
OFI-24-OP-AUTH-13**	80	Submit TSF quarterly reports to DITT quarterly.
OFI-24-OP-AUTH-14*	80	Submit TSF Cell 1 Stage 5 and Cell 2 Stage 6 raises "as-constructed" construction reports to DITT (dated March 2022 and May 2022 respectively).
Geochemical, geotechnical and hydrogeological assessments and investigation drilling		
OFI-24-OP-AUTH-15	83	Include characterisation data for geochemical and geotechnical exploration drilling in the EMR or an alternative format as agreed with DITT.
OFI-24-OP-AUTH-16	Schedule D - 6.a.i	Update the Water Management Plan and monitoring schedule regarding the use of SW20 and SW19 in lieu of SW06.

Note: *Indicates OFI was similar to an OFI from 2021 to 2023.
 #Indicates OFI was very similar to an OFI from 2023 AEPAR.
 **Indicates OFI was an OBS from 2023 AEPAR.
 ^Identical to an OFI for Condition 22.1 of the WDL.

Where there were observations of importance relating to a condition but a part compliance and OFI were not deemed warranted, these observations are included in the *Authorisation compliance workbook – Operator*, refer Appendix A, preceded by the text, 'OBS'. Key observations are included in Table 3-6.

Table 3-6: Authorisation – Operator observations

OBS ref.	Authorisation condition No.	Observations
General		
OBS-24-OP-AUTH-01	3	MMP amendments should include where the temporary 20 year ARI flood protection will be in place for more than 2 wet seasons or evidence of consultation and agreement on this with the regulator.
Mining management plan and reporting		
OBS-24-OP-AUTH-03	8.a	Changed circumstances that may emerge and impact the planned schedule of the list of structures to be constructed should be advised to the regulator and an updated list of structures and estimated completion dates provided.
OBS-24-OP-AUTH-04	8.a	Maintain a register of annual structures expected to have construction completed and expected date for construction completion (structure specific date based upon e.g. commissioning, practical completion) and expected date for "as-constructed" report to be completed. Maintain the register to capture

OBS ref.	Authorisation condition No.	Observations
		structures or "as-constructed" reports not completed in previous year/s until they are closed out.
OBS-24-OP-AUTH-05	8.a	Incorporate the "as-constructed" construction reports for stages of the NOEF (Projects Team and Operations Team) in the annual list of structures required by Condition 8.a.
Overburden management project		
OBS-24-OP-AUTH-06	19.b	Operator to prepare a written response to the satisfaction of DITT on the waste rock handling procedures audit findings following the establishment of the NOEF Independent Panel.
OBS-24-OP-AUTH-07	20	ITPs should be prepared prior to commencement of works to ensure requirements are aligned between Operator and ICE.
OBS-24-OP-AUTH-08*	27.c	Comments from the NT EPA should be considered for incorporation into the WMP.
OBS-24-OP-AUTH-09*	45.a.v	Further detail on potential contingency measures timelines for the implementation of management actions in Table 9 (Adaptive Management Plan (AMP) Revision E) should be provided.
OBS-24-OP-AUTH-10*	45.a.vi	Incorporate in the AMP further information on the processes to assess the effectiveness of the Monitoring Programs and enable adaptive adjustment, including further information on the interactions between the annual EMR and the AMP.
OBS-24-OP-AUTH-11#	46.c	Incorporate more detail on the timeframes for action/s if Trigger Action Response Plan (TARP) triggers are exceeded in the AMP.
OBS-24-OP-AUTH-12#	46.e	Incorporate more information to outline how transparency in monitoring, reporting and review is provided to show openness and accountability in the AMP.
Independent Tailings Review Board		
OBS-24-OP-AUTH-13	50.e.ii	It is recommended that the revised TSF OMS (revision 8 or later) is endorsed by the ITRB prior to the next audit.
Water management and storage		
OBS-24-OP-AUTH-14	64.d	Undertake and document the second stage of commissioning of EPROD (the reservoir to reach its Maximum Operating Level) under the Operations, Maintenance and Surveillance Manual and provide a formal report.
OBS-24-OP-AUTH-15	64.n	Consider documenting inspections of all structures listed to store AMD.
OBS-24-OP-AUTH-16	64.o, p, r, t, u	As sumps are converted to extraction towers, they should be renamed in the AMD storage structure list and be included in the monthly inspection program.
Water transfer and discharge		
OBS-24-OP-AUTH-17	69.g	Update the monitoring schedule and Water Management Plan to reflect that SW06 is an alternative to SW20 (and even SW19 if SW20 not available) ensuring the same sampling requirements as SW03.
Tailings storage facility management		
OBS-24-OP-AUTH-18	79	The routine inspection forms should be updated to incorporate the relevant requirements of the Authorisation.
OBS-24-OP-AUTH-	79	Table 7-2 (TSF Critical Operating Parameters) of the OMS Manual should be updated to be consistent with TARP Table 7-10 (Tailings density TARP) which

OBS ref.	Authorisation condition No.	Observations
19*		specifies density >50% as the target normal range (repeat from 2022/2023).
OBS-24-OP-AUTH-20	79	Obtain ITRB and ICE review of the following statement related to tailings density that is included in TSF Quarterly Reports "A density lower than 50% is not considered to be a material concern on a short-term basis" and if accurate include this concept in the TSF OMS.
OBS-24-OP-AUTH-21	79	Examine schedule for the preparation for TSF "as-constructed" construction reports so they are submitted within 60 days of completion of construction.
OBS-24-OP-AUTH-22*	80.d	Recommendations in the TSF Recommendation Instruction and Action Register should be closed out by the due date. Where actions are not completed by the due date, stating "overdue" rather than "incomplete" and using a different colour of shading in the TSF Recommendation Instruction and Action Register, may prove helpful.
Schedule D – Environmental monitoring and management		
OBS-24-OP-AUTH-23	Schedule D – 4.b	There appear to be bores that are damaged and unserviceable that should be maintained to keep the monitoring bores available for monitoring. In the event they can't be used, perhaps they should be maintained, rehabilitated (to repair a bore that has failed) or decommissioned.
OBS-24-OP-AUTH-24*	Schedule D – 5	Document weekly inspections of the cattle exclusion zone fence undertaken or amend the inspection schedule in the Cattle Management Plan to reflect what is practical.
OBS-24-OP-AUTH-25*	Schedule D - 6.a.i	Revise TARPs annually prior to each wet season to ensure they are up to date and the WMP should be updated accordingly.
OBS-24-OP-AUTH-26	Schedule D - 6.a.i	Consider addressing the <i>McArthur River Mining Pty Ltd Annual Groundwater Report 2023/2024</i> (Klohn Crippen Berger, August 2024) recommendations that remain unactioned from previous years.
OBS-24-OP-AUTH-27	Schedule D - 6.a.ii	Consider the opportunities raised in the <i>Ambient Air Monitoring Report McArthur River Mine and Bing Bong Loading Facility May 2023 – April 2024</i> (Todorski, 9 July 2024) to improve the monitoring.
OBS-24-OP-AUTH-28	Schedule D - 6.a.iii	Ensure that records of fortnightly visual inspections by a member of the Rehabilitation Team of the rehabilitation area are kept prior to their first wet season rainfall.
OBS-24-OP-AUTH-29	Schedule D - 6.b.	The Waste Management Plan should be updated to reflect the process occurring on site (quarterly rather than monthly) for submission of waste records and analysis against the previous quarter's data.
OBS-24-OP-AUTH-30	Schedule D - 8.b	Close out work orders related to bulk storage tank inspections including for pro-active items with evidence of them occurring.

Note *Was an OBS in 2023.
 #Was an OFI in 2023 but considered an OBS in 2024 as the condition was marked as complete in the 17 May 2023 Authorisation.

3.2.4 Conclusions

The high level of compliance with the Authorisation conditions across all key operational activities is an indicator of the fulfillment of relevant regulatory requirements achieved by the Operator. The Operator Authorisation audit findings identified 16 OFIs for the conditions assessed as having part compliance.

3.3 Waste Discharge Licence – Operator compliance audit

3.3.1 Scope and approach

The Operator was assessed against the relevant conditions contained in WDL 174-13 (valid 25 May 2021 to 25 May 2023, amendment issued 10 March 2022), WDL 174-14 (valid date 26 May 2023, expiry date 25 May 2025) and WDL 174-15 (valid date 26 May 2023, amendment date 27 March 2024, expiry date 25 May 2025). Compliance during the audit period was assessed using the quantitative audit approach and scoring criteria described in Section 2.2.

3.3.2 Findings

A summary of WDL findings is shown in Table 3-7. A summary of the Operator’s WDL compliance score for each WDL section is presented in

Table 3-8 and Figure 3-3.

Detailed audit findings, supporting evidence, part compliances and scores are contained in the *WDL compliance workbook – Operator*, refer to Appendix B.

Table 3-7: Summary of WDL compliance - Operator

Description	No.
Total number of conditions and sub-conditions relevant to Operator	146
Number of active conditions and sub-conditions during the audit period	126
Number of full compliances	108
Number of part compliances (high)	18
Overall compliance score of active conditions	96%

Table 3-8: WDL – Operator compliance scores by WDL section

WDL Sections	Total No. of conditions	No. of active conditions	Scores	Compliance (active conditions)
General	29	26	100	96%
Early surrender of licence	1	0	0	-
Operational	9	7	27	96%
Discharges	15	15	56	93%
Investigations and notifications	26	25	99	99%
Monitoring	24	21	79	94%
Recording and reporting	14	11	44	100%
Special conditions	11	9	36	100%
Temporary licence conditions	12	12	45	94%

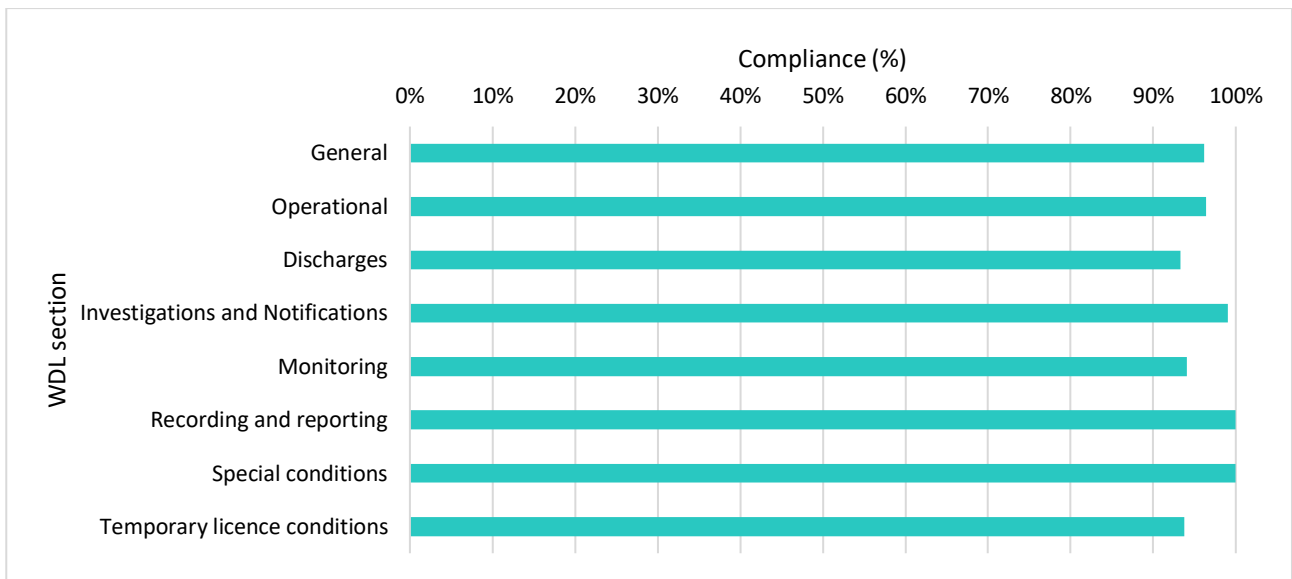


Figure 3-3: WDL – Operator compliance score by WDL section

The key findings in relation to the WDL compliance by the Operator are outlined below.

The *Recording and reporting* and *Special conditions* sections of the WDL achieved a score of 100% consistent with their compliance in the 2023 AEPAR.

A very high level of compliance reflected by a score of 99% was also achieved in the WDL section relating to *Investigations and notifications* with the one part compliance (high) related to an incident report not being provided to DEPWS within 10 days after an incident notification.

The *Operational* section achieved a compliance score of 96% from seven active conditions. The one part compliance (high) related to a waste management area adjacent to the Water Management Dam that appeared to not minimise the likelihood of waste coming into contact with water.

The WDL *General* section conditions were assessed as achieving lower compliance than the other WDL sections at a score of 96%. The part compliances in this section were of an administrative nature. They related to not submitting the updated Emergency Response Plan to DEPWS.

The *Temporary licence conditions* section achieved a compliance score of 94%. The three part compliances (high) were associated with limited record keeping related to monitoring (rather than calculating) volumes of discharges and not submitting all monitoring records (results that were pending from the laboratory at the time of initial submission were not subsequently submitted until the annual monitoring report).

The *Monitoring* section also scored 94%. The five part compliances (high) were related to:

- Sampling occurring at Bing Bong Loading Facility where, for aluminium, the detection limit from the laboratory was higher than the trigger value.
- Evidence that calibration of probes demonstrated they were not recording accurately but were still used.

- No evidence being provided for maintenance of monitoring probes or that the vessel used for monitoring was maintained and operational.
- No evidence of confirmation of signage, and safe access and egress at all water quality monitoring locations.

The WDL *Discharges* section conditions were assessed as achieving lower compliance than the other WDL sections at a score of 93% with 15 active conditions. This was related to:

- An incident that occurred following ex-Tropical Cyclone Megan where seepage left the site.
- Limited evidence provided of measured or recorded flow volume, time, or duration of discharge at authorised discharge points (noting manual readings were taken from a flow meter during the audit period).

Where relevant, OFIs have been developed for those conditions assessed as having less than full compliance, and these are outlined in Section 3.3.3.

3.3.3 Opportunities for improvement

Potential opportunities identified by the Independent Monitor that support continuous improvement are detailed in Table 3-9. In the 2023 AEPAR there were no Operator WDL OFIs identified which contrasts with 11 new OFIs in 2024.

Table 3-9: WDL – Operator opportunities for improvement

OFI ref.	WDL condition No.	Opportunities for improvement
OFI-24-OP-WDL-01	14, 14.1, 14.2 and 14.3	The Operator should issue the updated Emergency Response Plan to DEPWS along with a tabulated summary of the amendments, reasons for amendments and an assessment of environmental risk associated with the amendments.
OFI-24-OP-WDL-02	14	The Operator should have a system to ensure that changes are not made to the Emergency Response Plan without input from the environment team so that they are aware of when it needs to be resubmitted to the Administering Agency.
OFI-24-OP- WDL -03	18.1	The Operator should close and remediate the waste management area adjacent to the Water Management Dam and progress the planning and design of the purpose built waste management facility.
OFI-24-OP- WDL -04	20	Implement appropriate remediation and corrective actions to address potential impacts from the seepage incident, and to prevent recurrence.
OFI-24-OP- WDL -05	20	Continue the Emu Creek monitoring program for metals in sediment and aquatic fauna to confirm levels have returned to expected ranges.
OFI-24-OP- WDL -06 [^]	22.1, 22.2, 22.3 and 45.2	Explore opportunities to automate the measurement and recording of data capture for discharge events. The current process relies on manual entries to create records of flow start, stop, rate and volume. The flow volume is determined based on calculations rather than measurements.
OFI-24-OP- WDL -07	26	Submit incident investigations within 10 business days of notifying the Administering Agency of an incident.
OFI-24-OP- WDL -08	32.2	Confirm the laboratory's ability to measure with a detection limit for aluminium for the Bing Bong Dredge Discharge Point samples to a maximum of 0.5 mg/L and check the method for determining if SSTVs are exceeded.
OFI-24-OP- WDL -09	34.1, 34.2	Have spare probes on site for redundancy and if probes do not pass calibration, send them off site for maintenance.

OFI ref.	WDL condition No.	Opportunities for improvement
OFI-24-OP- WDL -10*	34.2	Document evidence of the monitoring vessel provider's maintenance and management records.
OFI-24-OP- WDL -11	36.1 and 36.2	Undertake an annual inspection of land based monitoring points for signage and safe access.

Note: * Indicates OFI was an OBS from 2023 AEPAR.
 ^ Identical to an OFI for Condition 69.e of the Authorisation.

In circumstances where audit findings related to a condition, but a part compliance and OFI were not deemed warranted, an observation was recorded. These observations may assist to maintain compliance or enhance performance and are included in the *WDL compliance workbook – Operator*, comments column, refer to Appendix B, preceded by the text, 'OBS'. Key observations are included below in Table 3-10.

Table 3-10: WDL - Operator observations

OBS ref.	WDL condition No.	Observations
OBS-24-OP-WDL-01	11 and 12	The Operator should ensure that correspondence is emailed to environmentalregulation@nt.gov.au as required by the condition.
OBS-24-OP-WDL-02	17.4 and 17.7	Update the complaints/grievances register in Borealis to include a prompt to capture the time of the event and the nature of event(s) leading to the complaint.
OBS-24-OP- WDL -03	25	Ensure that notifications of incidents to DEPWS occur within 24 hours.
OBS-24-OP- WDL -04	25.1, 25.2, 25.3, 25.4 and 25.5	Improve the incident notifications by ensuring who detected the incident, the timing of the incident (or stating unknown if that is the case), whether discharge is still occurring and a date for submission of the investigation report are included in the submission to DEPWS.
OBS-24-OP- WDL -05	29.1 and 30	Consider opportunities to request amendments on the requirements for daily monitoring.
OBS-24-OP- WDL -06	29.1 and 30	Continue to consider opportunities for alternative sampling methods that are safe while still meeting the requirements of this approval (e.g., use of drones, automatic samplers).
OBS-24-OP- WDL -07	30	Ensure that when water sampling procedures are amended all team members are trained in the changes with records retained.
OBS-24-OP- WDL -08	40.1	Improve the WDL Monitoring Report's level of fulfillment of the requirements of the Guideline for Reporting on Environmental Monitoring.
OBS-24-OP- WDL -09	43 (3) Item 15: Special conditions	If limited previous results are available, provide adequate data to establish pre-incident conditions.

3.3.4 Conclusions

The audit review has assessed the Operator as having a high level of overall compliance (score of 96%) with active WDL conditions, which is a reduction from the 2023 AEPAR (score of 99%).

The WDL audit identified 11 OFIs.

3.4 NT EPA Recommendations – Operator compliance audit

In accepting the NT EPA recommendations of Assessment Report 86, the then Minister for Primary Industries and Resources took responsibility for implementing the recommendations that apply under the authority of the MMA.

Consistent with the previous AEPARs the NT EPA recommendations have been included as Authorisation conditions. The high level of Operator compliance with the conditions of Authorisation (score of 96%), refer to Section 3.2 and Appendix A, corresponds to the high level of Operator compliance with the NT EPA recommendations.

3.5 Voluntary commitments

3.5.1 Scope and approach

In addition to the Authorisation and WDL conditions, the Operator has made a number of commitments to support improved outcomes across the Mine operation. These commitments have been identified and adopted by the Operator from the Overburden Management Project (OMP) Environmental Impact Statement (EIS), and others have been set out in the MMP. The EMR contains a reconciliation of environmental commitments, with the commitments register providing a status update against the commitments set out in the MMP based on activity undertaken in the Operator's monitoring period.

The Independent Monitor reviewed the commitments set out in the MMP. The MMP Section 5.3 describes commitments and refers to two sets of commitments:

- relevant OMP EIS commitments (Appendix M)
- key commitments developed since the OMP EIS (2018) (Appendix L).

The Operator previously clarified that the MMP's 'EIS Commitments Register' (Appendix M) was adapted from the OMP EIS Commitments (Appendix AB) and that MMP's 'Commitments contained within the MMP' (Appendix L) included commitments relating to regulatory approvals and actions that had not been included in the OMP's EIS Commitments Register. Furthermore, the Operator indicated that the two registers were current, with neither superseding the other.

As the commitments are not necessarily regulatory requirements, the scorecard approach adopted for the audit of the Authorisation and WDL (as described in Section 2.2) was not used. Instead, and consistent with the approach undertaken for recent AEPAR, a qualitative review of the commitments was undertaken (as described in Section 2.3), with general commentary and OFIs provided.

Both sets of MMP commitments were reviewed (Appendix L and Appendix M), along with the reconciliation of commitments contained within the EMR (Appendix B). Consideration was given to whether the commitments set out in the MMP were addressed in the EMR, and whether they were complete, ongoing, or not currently relevant because they related to later stages of operation at the Mine. For review of the reconciliation of commitments contained within the EMR, consideration was also given to whether the EMR 2024 effectively addressed the

commitments. It is noted that the wording of a number of commitments is non-specific and as such, review of performance against these is not quantifiable.

3.5.2 Findings

The review identified that all the OMP EIS commitments provided in the MMP (Appendix M) were addressed in the EMR. Other commitments identified in the MMP (Appendix L) were not addressed in the EMR. Notwithstanding, from the 13 commitments identified in the MMP (Appendix L), all appear to be addressed to some extent within the OMP EIS commitments, apart from one commitment, i.e., *'Install additional groundwater monitoring at Bing Bong'*.

In total, 230 commitments were identified in the EMR. Of these, 155 commitments were identified to be ongoing (i.e., relating to ongoing committed activity at the Mine), 12 commitments were identified to be complete (i.e., no further action required), and 63 commitments were identified to be not currently relevant (e.g., commitments relating to specific actions during the Mine closure).

Of the 155 ongoing commitments, the EMR 2024 provided by the Operator indicated that six commitments may be incompletely addressed. These related to the following activities:

- Geochemical investigations had not been undertaken for the BBLF and geochemical analysis for the WOEf remains incomplete noting this commitment was also identified as incompletely addressed in the 2021, 2022 and 2023 AEPARs.
- A water level gauging station on the Glyde River was not operational, observing that planning continued regarding the recommissioning of the Amelia Yard gauging station on the Glyde River and noting this commitment was also identified as incompletely addressed in the 2022 and 2023 AEPARs.
- A waterway model was not progressed in the reporting period, noting the EMR 2024 indicated there is currently no plan for the construction of any low-flow monitoring stations, and this commitment was also incompletely addressed in the 2022 and 2023 AEPARs.
- A Gouldian Finch Monitoring Program is to be prepared by 2025 in accordance with a Commonwealth approval, noting this commitment was also identified as incompletely addressed in the 2021, 2022 and 2023 AEPARs.
- The Gudanji Ranger Group was not established noting the Operator is in negotiations with the Gudanji Yanyuwa Garrawa Marra Aboriginal Corporation for an Indigenous Land Use Agreement (ILUA) and Cooperation Agreement and this includes discussion on a Gudanji Ranger Program within this framework.
- The Operator indicated intention to continue to conduct internal corporate Health Safety Environment and Community (HSEC) audits for the Mine, rather than undertake both internal and external audits noting this commitment was also identified as incompletely addressed in the 2021, 2022 and 2023 AEPARs.

Reporting against commitments in the EMR 2024 was consistent with the previous audit period. It is notable that some work activity related to several commitments has not occurred in accordance with timeframes reported in respective EMRs. These include:

- Conducting geomorphology investigations to provide supporting information for further development of site specific trigger values (SSTVs), noting the Operator's response indicates no progress has been made over several years (i.e. 2022/2023 or 2023/2024) for a pit lake sedimentation and erosion assessment or a bioaccumulation impact assessment.
- Implementation of rehabilitation trials on NOEF were expected to occur in 2021, then 2022, then 2023 and now 2024, noting this is related to the placement of a final cover system.

- Monitoring groundwater quality in the water-bearing formations that support base flow discharge to Djirrinmini waterhole, noting the Operator reported in 2023/2023 and 2023/2024 that continuous groundwater level monitoring was undertaken while groundwater quality monitoring required approval prior to implementation.
- A kinetic leaching experiment was expected to occur in 2022, then 2023, and now 2024 relevant to geochemical and hydrological modelling of the NOEF).
- Installation of long-term monitoring system (relevant to net percolation and gases below the cover system) was deferred from 2022 to 2023, then 2024, noting this is related to delays in development of the NOEF.

3.5.3 Opportunities for improvement

Opportunities to support continuous improvement of the implementation, tracking and reporting of commitments are detailed in Table 3-11, noting the opportunities are not mandatory requirements. It is also notable that these opportunities are replicates of those identified for the previous audit period.

Table 3-11: Voluntary commitments - Operator opportunities for improvement

OFI ref.	Opportunities for improvement
OFI-24-OP-COM-01^^	Provide detail and address the outstanding commitments from the MMP (Appendix L), along with the six incomplete actions for the commitments reported in the EMR (Appendix B).
OFI-24-OP-COM-02^^	Incorporate the commitments from the MMP (Appendix L and Appendix M) into a single commitment register for reporting against in future EMRs and rationalise the commitments to avoid duplication.
OFI-24-OP-COM-03^^	Provide additional information in the commitments register to identify where a commitment is closed out with no further action proposed. Provide details of close-out actions to confirm commitments are complete, e.g., date completed, brief description of action completed, reference to relevant supporting report/ data/ documentation.
OFI-24-OP-COM-04^^	Provide a unique reference number to each commitment to facilitate tracking and reporting.

Note: ^^ indicates OFI was carried over or replicated from 2021, 2022 and 2023 AEPAR.

3.5.4 Conclusions

The majority of the Operator’s reported commitments are adequately addressed through the EMR. In line with the 2023 AEPAR, commitment management would benefit from consolidation and rationalisation of the commitment register, along with clearer tracking and reporting of commitments.

Steady progress continues to be made on commitments to support improved outcomes across the Mine operation. The planned implementation of some commitments has been repeatedly reported in consecutive EMRs as these have not occurred in accordance with stated timeframes.

3.6 Operator success

The audit and review process identified some noteworthy successes achieved by the Operator during the audit period which have contributed to continuous environmental improvement. These Operator successes are summarised below:

Managed Water releases

A record volume of managed release water was discharged to the receiving environment in accordance with conditions of the Waste Discharge Licence (WDL). The volume released was approximately 3.9 gigalitres (GL), with the previous release record being approximately 2.7 GL. The record volume was released to help mitigate the risks from an increased site water inventory caused by extreme rainfall associated with the ex-Tropical Cyclone Megan. Prior to discharge, water underwent treatment and the Operator used a variety of systems, including environment sampling, dilution calculations, and river flow monitoring stations, to manage the release of waters and protect the receiving environment and the values of the McArthur River.

Ex-Tropical Cyclone Megan flood event water management

During the ex-Tropical Cyclone Megan and the subsequent flood event, the Operator utilised significant resources and efforts to prevent the potential risk of environmental harm resulting from uncontrolled release of water storages (dams) and the Tailings Storage Facility (TSF). The Operator transferred TSF water to the Open Pit to ensure no discharge of TSF water to the spillways and to protect the integrity of the TSF structure. Additionally, managed transfer of water between the major dams and the open pit reduced potential risk to the environment. Water treatment at the NOEF SEPROD was also increased to enable treatment of double the water volume to meet the WDL water discharge standards. Emergency discharge approval was received during the event, enabling a reduction in the site water inventory to create capacity for management of more rainfall and runoff water arriving during the foreseeable high rainfall events that followed the flood event.

McArthur River diversion channel rehabilitation

Over 1,000,000 tube stock have been planted in the McArthur River diversion channel since 2010. A total of 143,000 tube stock sourced from the Mine's onsite nursery were planted in 2023 ahead of the wet season.

Revegetation monitoring

The number of McArthur River diversion channel sites at which all revegetation completion criteria were met increased from 13% in 2022 to 25% in 2023. The Operator advised that the number of sites at which no intervention is needed increased from 29% to 46%. This indicates that revegetation is establishing and progressing.

To monitor the large areas of revegetation the Operator has incorporated the analysis of high-resolution multispectral aerial imagery into the monitoring program. Results indicated that adequate perennial vegetation cover (trees and shrubs), had been successfully established across 45% of the McArthur River diversion channel revegetation area, and highlighted areas lacking vegetation cover and where revegetation efforts should be focused.

Purple Crowned Fairy Wren (PCFW) habitat improvements

Intense bushfires burnt through the PCFW translocation area in November 2022, causing significant damage to cane grass clumps in which the PCFW nest. The fire also damaged the riparian vegetation surrounding the cane grass forcing the PCFW to seek shelter in unusual areas outside of the home territories following the fire. In 2023-2024 targeted cane grass

“cluster” plantings in the upper reaches of the McArthur River diversion channel have been installed along with an irrigation system with the goal of providing suitable habitat for colonisation by PCFW.

Monitoring of impacted area in November 2023 found that there had been strong recovery in cane grass distribution with total cane grass area exceeding pre fire coverage by 2100m². PCFW populations are recovering, demonstrating resilience within the PCFW translocation habitat, as well as within the population of translocated birds. Breeding habitat resilience and PCFW population numbers are key factors indicating success of the PCFW translocation program.

Large Woody Debris

A majority of large woody debris (LWD) piles installed during the 2022 dry season have survived wet season flows and contributed to improving the complexity and condition of aquatic fauna habitat within the McArthur River diversion channel during 2023. A large amount of LWD was stockpiled for future placement within the diversion channel. LWD is sourced from areas where clearing and mine development is undertaken, the conservation of LWD during the clearing process is critical in ensuring that this valuable resource is utilised effectively as part of the McArthur River Diversion rehabilitation project.

Barney Creek sediment management

Dust impact to the surface water system is an important driver of fluvial sediment quality and concentrations of metals in biota. This is being addressed through ongoing remediation of Barney Creek including physical removal of sediment. The Barney Creek area under the haul road bridges and adjacent to the Mill were desilted in October and November 2023 respectively to remove sediment.

Acoustic Monitoring of the Freshwater Sawfish

Two Freshwater Sawfish were recorded upstream of the Mine and one within the diversion channel in 2023. Consequently, the McArthur River diversion channel or activities occurring within the Mine were not considered to be restricting freshwater sawfish movement through the McArthur River Catchment. An acoustically tagged Barramundi was detected moving from upstream of the McArthur River diversion channel, downstream out to the estuarine/marine environment.

Community Reference Group (CRG) commencement

The CRG meetings are facilitated by the Operator and creates a forum to communicate the Operator’s performance. The forums elevate engagement between the local residents, local business people and the Operator. The inaugural CRG meeting was held at the mine site on 27 July 2023, and the following meeting was held at Mabunji Boardroom, Borrooloola on 29 February 2024. The CRG meets quarterly and a regular agenda includes discussion on complaints and incidents, operational updates and updates from the regulator, as well as an opportunity to answer local community questions and concerns. In February 2024, the Independent Monitor had the opportunity to engage directly with the CRG to present findings from the 2023 Report. Other CRG discussions have included the Operator’s local employment

and training program, impacts from the March 2024 flooding and how to engage better with the community beyond the Borroloola region. CRG members have responsibilities in providing input into closure planning and have asked that this topic be included in all future meeting agendas so that members can gain a full understanding of closure options.

Sea Ranger Unit monitoring assistance

The li-Anthawirriyarra (people of the sea) Sea Ranger Unit assisted the Operator's Environment Team in marine water quality sampling during the 2023 -2024 period. The Sea Rangers are employed by Mabunji Aboriginal Resource Indigenous Corporation through a funding program and will continue to assist with future marine water quality sampling events.

4. Review of DITT

4.1 Objective

The objective of the audit was to assess DITT’s level of compliance against the relevant Authorisation conditions and the implementation of NT EPA recommendations and also to conduct a review of DITT’S regulatory procedures.

4.2 Authorisation – DITT compliance audit

4.2.1 Scope and approach

DITT’s performance was assessed against the regulatory conditions contained in the Authorisations in effect (dated 5 May 2022 and 17 May 2023) during the audit period using the quantitative audit approach and scoring criteria described in Section 2.2.

Consistent with the approach for the audit of the Operator, an analysis of the two Authorisations was conducted to determine which relevant conditions from each should be included in the DITT audit as discussed in Section 3.2.1.

Following determination of the conditions to be audited, each condition was reviewed to confirm if it had a DITT action or not. DITT performance was only assessed against conditions with an explicit or implied action required by DITT.

4.2.2 Findings

A summary of findings is shown in Table 4-1. Detailed audit findings, supporting evidence, part compliances and scores are contained in *Authorisation compliance workbook – DITT*, refer to Appendix C.

Table 4-1: Authorisation – DITT summary of compliance

Description	No.
Total number of conditions and sub-conditions relevant to DITT	243
Number of active conditions and sub-conditions during the audit period	82
Number of full compliances	55
Number of part compliances (high)	26
Number of part compliances (moderate)	1
Overall compliance score of active conditions	91%

Further analysis was undertaken by assessing conditions and sub-conditions under Authorisation sections, generally aligned with the section headings in the Authorisation. As noted below, some of the section headings have been amalgamated under related Authorisation sections.

- *General* - incorporates MMP and reporting, security and levy, exploration, non-mineral waste management and geochemical, geotechnical and hydrogeological assessment, and investigation drilling.

- *Waste rock management* – permanent placement of non-benign waste.
- *Water management* - incorporates storage, transfer and discharge.
- *Tailings storage facility* - incorporates ITRB.
- *Environmental and independent monitoring* - incorporates two conditions related to dredging at BBLF.
- *Overburden Management Project* - incorporates conditions to reflect the NT EPA recommendations.
- *Adaptive management* – incorporates requirements for a revised AMP.
- *Mine closure* - incorporating unplanned closure.

A summary of DITT’s Authorisation compliance score for each Authorisation Section is presented in Table 4-2 and Figure 4-1.

Table 4-2: Authorisation - DITT compliance scores by section

Authorisation sections	No. of conditions	No. of active conditions	Scores	Compliance
General	21	16	57	89%
Waste Rock Management	3	0	0	-
Water Management	8	3	9	75%
Tailings Storage Facility	10	7	26	93%
Environmental and Independent Monitoring	72	32	126	98%
Overburden Management Project	115	22	74	84%
Adaptive Management	7	1	4	100%
Mine Closure	7	1	4	100%

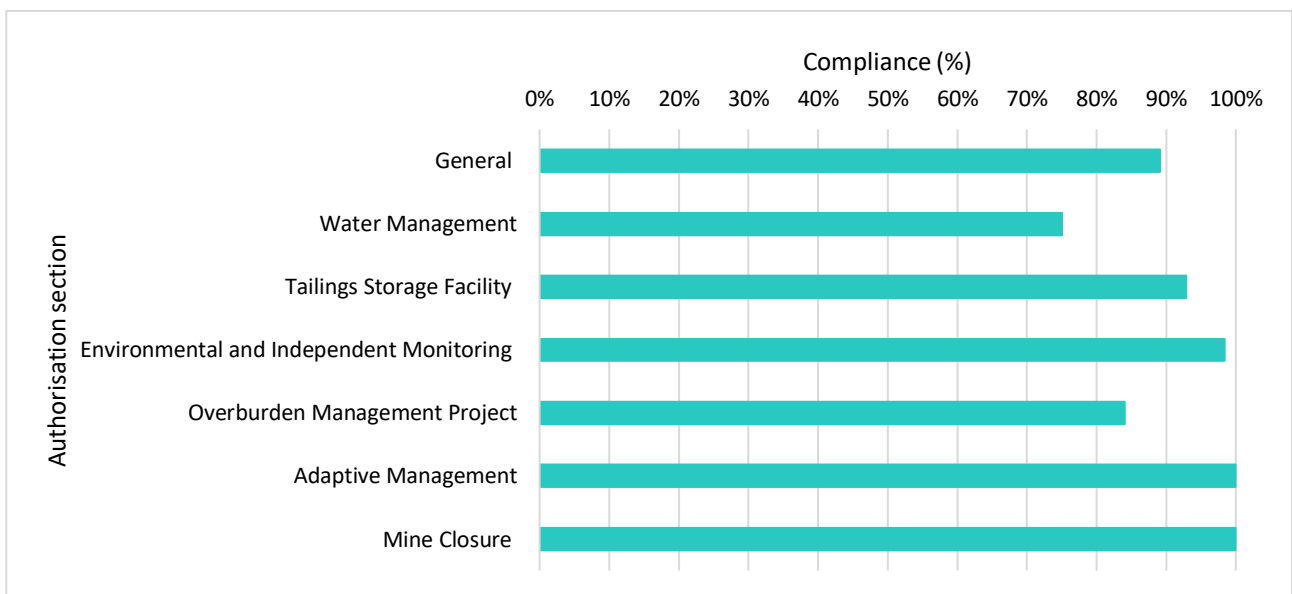


Figure 4-1: Authorisation – DITT compliance score by Authorisation section

The *Adaptive Management* and *Mine Closure* Sections both had a compliance score of 100% although this is from only one active condition each.

The *Environmental and Independent Monitoring* Section also had a very high score of 98% from 32 active conditions. The two part compliances (high) were related to not following up with the Operator on the lack of annual submission of continuous monitoring data and not updating the Authorisation to reflect the revised timeframe in which invoices must be paid by the Operator.

The *Tailings Storage Facility* section compliance score was the same as the 2023 AEPAR at 93% based on seven active conditions. The score was a result of the following part compliances (moderate):

- TSF Quarterly Reports not being reviewed in a timely fashion, specifically DITT had not formally reviewed and assessed TSF Quarterly Reports received after November 2022.
- DITT not having followed up with the Operator regarding the lack of submission of the Annual Dam Safety Assessment and TSF Cell 1 Stage 5 and Cell 2 Stage 6 raises “as-constructed” construction reports.

The *General* section achieved an 89% compliance score with 16 active conditions. For the *General* section 1 part compliance (high) was due to DITT not following up with the Operator regarding their lack of geochemical and geotechnical characterisation data from drilling in the EMR and 6 of the part compliances (high) related to DITT not discussing with the Operator their lack of submission of annual environmental monitoring data.

The *Overburden Management Project* section had 22 active conditions with a compliance score of 84%. This was based on 14 part compliances (high) related to the following topics:

- Lack of formal approval of the Aquatic Ecology Management Plan and WMP.
- DITT had not requested the final NOEF geosynthetic liner cover system plan for their review and approval; however, the conditions regarding content of the plan are marked as completed in the Authorisation.
- No evidence was provided of a version of the MMP amendment approved 17 May 2023 on DITT's website.
- Delayed establishment of the CRG and independent expert panels for NOEF, TSF, and Mine Closure.
- No evidence to demonstrate that DITT had approached the Operator regarding their plan to update the AMP based on the Independent Monitor's review comments or to obtain inputs from the CRG on the AMP.

The *Water Management* section has the lowest compliance score of 75%. This score was from three active conditions that each had a part compliance (high) related to the below:

- No evidence was provided regarding the DITT review of the Eastern Perimeter Runoff Dam Construction Report (EPROD Construction Report) or discussion with the Operator on the conclusions and recommendations in that report.
- No evidence of either agreement or discussion with the Operator regarding if the SW19 or SW20 monitoring location is an acceptable alternative to SW06 related to monitoring during discharges from WMD into Little Barney Creek.
- No discussion with the Chief Health Officer (CHO) of the Northern Territory about the adequacy of the Operator's warning signage at the Bing Bong Loading Facility.

OFls have been developed for those conditions assessed as attaining part compliance and are outlined in Section 4.2.3.

4.2.3 Opportunities for improvement

Potential opportunities to support continuous improvement identified by the Independent Monitor through the review and audit process are detailed in Table 4-3, noting these are not mandatory requirements.

Table 4-3: Authorisation – DITT opportunities for improvement

OFI ref.	Authorisation condition No.	Opportunities for improvement
Mining management plan and reporting		
OFI-24-DE-AUTH-01	7a, b, c, d, e, f, g and 80 and Schedule D - 2.c	Liaise with the Operator on submissions that are due including annual environmental monitoring data and TSF quarterly reports to ensure timely delivery.
Overburden Management Project		
OFI-24-DE-AUTH-02 [^]	16.e, 17.b, 27.e, 27.g.iii, 29.c, 36.e, 37.d	Provide more timely responses from DITT on review/approval of submitted documents.
OFI-24-DE-AUTH-03 [#]	21, 27.d	Prioritise and provide oversight to the establishment of the operation of the Independent Panels (NOEF and TSF) as soon as practical to enable the approval requirements, dependent on the Independent Panels operation, to progress.
OFI-24-DE-AUTH-04 ^{**}	22	DITT to establish the Independent Panel (NOEF), or use an alternative expert review in the interim, to assess requirement for the NOEF seepage interception trench and recovery system.
OFI-24-DE-AUTH-05	23.e	DITT should request the final NOEF geosynthetic liner cover system plan for their review and approval.
OFI-24-DE-AUTH-06	42	DITT to follow-up with operator and government webservices to ensure most recently approved MMP is publicly available.
OFI-24-DE-AUTH-07	45.b, 45.c	DITT to follow up with the Operator to update the AMP based on the Independent Monitor's review comments and obtaining inputs from the CRG (when available).
Water management and storage		
OFI-24-DE-AUTH-08	62.c.iii.d	DITT to liaise with Chief Health Officer to obtain relevant correspondence and agreement for approach to erecting warning signage at the Bing Bong Loading Facility.
Water transfer and discharge		
OFI-24-DE-AUTH-9	69.h	Provide formal agreement that SW19 or SW20 monitoring location is an acceptable alternative to SW06 related to monitoring during discharges from WMD into Little Barney Creek or liaise with the Operator on the requirement to monitor at SW06.
Perimeter run-off dams - SPROD, SEPROD, WPROD and EPROD		
OFI-24-DE-AUTH-10	75.(2)	Review the Eastern Perimeter Runoff Dam Construction Report (EPROD Construction Report) dated November 2022 and discuss the conclusions and recommendations with the Operator.
TSF management		
OFI-24-DE-AUTH-11 [*]	80	DITT to formally review and assess TSF Quarterly Reports in a more timely fashion.
OFI-24-DE-AUTH-12 [*]	80	DITT to formally review and assess TSF Quarterly Reports received after November 2022 and advise the Operator in writing when reports are accepted.

OFI ref.	Authorisation condition No.	Opportunities for improvement
OFI-24-DE-AUTH-13 ^{**^}	80	DITT to follow up with the Operator regarding submission of the Annual Dam Safety Assessment and TSF Cell 1 Stage 5 and Cell 2 Stage 6 raises "as-constructed" construction reports.
Geochemical, geotechnical and hydrogeological assessments and investigation drilling		
OFI-24-DE-AUTH-14	83	Request the Operator to provide characterisation data from the drilling.
SCHEDULE C - Independent monitoring assessment conditions		
OFI-24-DE-AUTH-15	Schedule C - 28	Given invoices are not due within 7 days, update the condition to reflect the actual invoice payment timeframe.

Note: ^^ Indicates OFI was similar to OFI from 2021 AEPAR.
 * Indicates OFI was very similar to an OFI from 2022 and 2023 AEPAR.
 # Indicates OFI was very similar to an OFI from 2023 AEPAR.
 ^ Indicates OFI was carried over from 2023 AEPAR
 ** Indicates OFI was carried over from 2022 and 2023 AEPAR

In circumstances where audit findings related to a condition, but a part compliance and OFI were not deemed warranted, an observation was recorded. These observations may assist to maintain compliance or enhance performance and are included in the *Authorisation compliance workbook – DITT*, comments column, refer to Appendix C, preceded by the text, 'OBS'. Key observations are included below in Table 4-4.

Table 4-4: Authorisation – DITT observations

OBS ref.	Authorisation condition No.	Observations
Mining management plan and reporting		
OBS-24-DE-AUTH-01	8.a, 75.(2)	DITT could add the list of structures to be constructed and progress as a standing agenda item for meetings with the Operator.
OBS-24-DE-AUTH-02	8.a	Update Condition 48.g. so that "as-constructed" construction reports for stages of the NOEF are required annually.
Overburden Management Project		
OBS-24-DE-AUTH-03	19.b	DITT should ensure the Operator prepares a written response to the satisfaction of DITT on the waste rock handling procedures audit findings following the establishment of the NOEF Independent Panel.
OBS-24-DE-AUTH-04	27.c	DITT to create a mechanism or prompt (e.g., ongoing meetings with the Operator) to ensure that the WMP is updated based on the NT EPA input (that was provided in the previous audit period).
OBS-24-DE-AUTH-05 [^]	38.b	Delays in establishing the independent panels, and therefore the Operator's ability to develop the environmental objectives for a Care and Maintenance Plan, will delay implementation of approved measures to manage environmental risks.
OBS-24-DE-AUTH-06 [^]	41.b	DITT should consider changing condition wording if reapproval of acceptance of the qualified person to undertake the independent third-party assessment of the security is not required.
Independent Tailings Review Board		
OBS-24-DE-AUTH-	50.c	DITT to consider a standing agenda item for meetings with the Operator regarding ITRB matters to provide oversight of ITRB activities (e.g., design

OBS ref.	Authorisation condition No.	Observations
07*		changes to the Cell 2 Stage 7 raise buttressing).
TSF Management		
OBS-24-DE-AUTH-08^	80.d	DITT should consider if the TSF Recommendation, Instruction and Action Register should identify actions that are overdue (rather than calling them incomplete) and if ongoing actions beyond their due date are acceptable.
SCHEDULE C - Independent Monitoring Assessment Conditions		
OBS-24-DE-AUTH-09	Schedule C - 5	DITT acknowledged the Independent Monitor assessment was in addition to DITT obligations and statutory responsibilities. During the assessment period it was obvious that DITT staff resourcing was a significant constraint on DITT team member's availability and to the provision of audit evidence.
OBS-24-DE-AUTH-10	Schedule C - 17.b	DITT provided all necessary information and documents to the Independent Monitor; however, based upon the level of collaboration in previous years it was apparent DITT staff resourcing and reduced availability was a significant constraint on DITT's capacity to collate and provide audit evidence.

Note * Indicates OBS was very similar to an OFI from 2023 AEPAR.
 ^ Indicates OBS was carried over from 2023 AEPAR.

4.2.4 Conclusions

The level of compliance with the Authorisation conditions across all key activities is an indicator of the fulfillment of the DITT regulatory role. The DITT Authorisation audit findings identified 15 OFIs for the conditions assessed as having part compliance.

4.3 NT EPA Recommendations – DITT compliance audit

4.3.1 Scope and approach

In accepting the NT EPA recommendations of Assessment Report 86, the Minister for Mining took responsibility for implementing the recommendations that apply under the authority of the MMA. The NT EPA recommendations adopted as Authorisation conditions became enforceable under the MMA.

DITT was assessed against the implementation of the NT EPA recommendations over the audit period using the quantitative audit approach and scoring criteria described in Section 2.2. There were 116 NT EPA recommendations and sub-parts considered relevant to DITT. DITT's task is to ensure that the intent of the NT EPA recommendations has been transferred to the Authorisation conditions.

The audit of DITT's compliance with the NT EPA recommendations was considered in two parts:

- The extent to which the intent of the NT EPA recommendations had been adopted in the wording of the Authorisation conditions.
- The extent to which the intent of the NT EPA recommendations had been implemented.

4.3.2 Findings

A summary of findings is shown in Table 4-5.

Table 4-5: Summary of NT EPA recommendations implementation compliance – DITT

Description	No.
Total number of recommendations (including sub-parts) relevant to DITT to incorporate into the Authorisation	117
Number of active recommendations (including sub-parts) relevant to DITT to incorporate into the Authorisation	116
Number of full compliances	107
Number of part compliances (high)	9
Overall compliance score of active conditions	98%

Detailed audit findings, supporting evidence, part compliances and scores are contained in *NT EPA Recommendations compliance workbook – DITT* refer to Appendix D. Appendix D also references which Authorisation conditions correspond to the NT EPA recommendation and sub-part.

Of the 117 NT EPA recommendations, very few have implementation requirements for DITT. Those that were relevant, generally involved the receipt and review of the Operator’s monitoring programs, management plans and reports, and the establishment of the CRG and Independent Panels of experts. Most NT EPA recommendation requirements are implementation tasks for the Operator.

The six part compliances (high) from the 2023 AEPAR remained part compliances (high) in this AEPAR, along with an additional three new part compliances (high) identified this year.

4.3.3 Opportunities for improvement

Potential opportunities to support continuous improvement identified by the Independent Monitor through the review and audit process are detailed in Table 4-6, noting these are not mandatory requirements.

Table 4-6: NT EPA recommendations – DITT opportunities for improvement

OFI ref.	NT EPA recommendation no.	Opportunities for improvement
OFI-24-DE-REC-01	13 continued	DITT to approve the Water Management Plan which triggers the requirement for the Operator to publish results of the program on Operator's website.
OFI-24-DE-REC-02	20.ii	DITT should formally approve the Aquatic Ecology Monitoring Plan, to trigger the requirement for public reporting.
OFI-24-DE-REC-03***	27	DITT to incorporate a mechanism for the revised monitoring program (assume Water Monitoring Program) to be reviewed by the Independent Panel(s) and Independent Monitor and then be approved by the relevant regulators, e.g. DITT.

Note: *** Indicates OFI was very similar to an OFI from 2020 AEPAR onwards.

DITT had achieved a significant reduction in the number of OFIs, from nine in 2022 to just one in 2023; however, in 2024 there are three OFIs. OFIs were not identified for six part compliances because they:

- Are addressed through their incorporation as tasks in the approved terms of reference for the Mine Closure Independent Panel.
- Are included in the Independent Monitor's scope of work (three-year Air Quality (sulphur dioxide) review by the Independent Monitor).
- Have been addressed by the Operator related to:
 - Development of a non-lethal monitoring program for sawfish, including trigger threshold for investigation and management measures, that was commenced in 2016.
 - Ecotoxicological Program findings and negotiation with regulators (DEPWS) to amend some local water quality trigger levels was completed in 2022.
 - Implementation of the Aquatic Ecology Monitoring Program with the results reported annually to DITT and DCCEEW.

In circumstances where audit findings related to a condition, but a part compliance and OFI were not deemed warranted, an observation was recorded. These observations may assist to maintain compliance or enhance performance and are included in the *Authorisation compliance workbook – DITT*, comments column, refer to F, preceded by the text, 'OBS'. The key observations are included below in Table 4-7.

Table 4-7: NT EPA recommendations - DITT observations

OFI ref.	NT EPA recommendation no.	Observations
OBS-24-DE-REC-01	8 continued	The establishment of the Independent Panel(s) of experts has taken an unduly long time. Not having an Independent Panel in place is now impacting on the ability to fulfil Authorisation conditions where the Panel's involvement is a prerequisite.
OBS-24-DE-REC-02	9	Independent Panel not yet established and unable to review the report and provide an assessment on need and timing for NOEF Interception Trench. (Note: Independent Panel review is not an Authorisation requirement).
OBS-24-DE-REC-03	9	DITT response to Operator's NOEF Groundwater Seepage and Recovery System report submission is unduly slow and alternative expert advice could be sought rather than awaiting the establishment of the NOEF Independent Panel.
OBS-24-DE-REC-04	9 continued	The establishment of the Independent Panel(s) of experts has taken an unduly long time. Not having an Independent Panel in place is now impacting on the ability to fulfil groundwater interception and recovery system Authorisation conditions where the panel's involvement is a prerequisite.
OBS-24-DE-REC-05	20.ii	It may be of benefit to make publicly available the results of monitoring in relation to aquatic fauna obtained from the McArthur River, including at appropriate locations in the region, to communicate river health.
OBS-24-DE-REC-06	22	The establishment of the Mine Closure Independent Panel/s and Community Reference Group has taken an unduly long time and consultation on environmental objectives for a Care and Maintenance Plan with CRG prior to regulator approval has been delayed.

4.3.4 Conclusions

Based on the documentation reviewed, the audit identified that DITT has effectively incorporated the NT EPA recommendations into the Authorisation conditions with an overall compliance score of 98%. DITT have maintained a 98% compliance score for the NT EPA recommendations over the past three years.

The six part compliances (high) from the 2023 AEPAR remained part compliances (high) in this AEPAR, along with an additional three new part compliances (high) identified this year.

The audit process identified three OFIs for the NT EPA recommendations.

4.4 Regulatory approach – DITT review

4.4.1 Scope and approach

A review of DITT's performance and regulatory approach was conducted by examining the following key regulatory activities:

- compliance tracking
- environmental incident notifications
- environmental monitoring
- compliance framework
- Technical Working Group
- establishment of the Community Reference Group
- establishment of the Independent Panel(s) of Experts.

Through interviews and assessment of relevant documents and samples of information, the review considered performance indicators (such as timeliness of actions completed, environmental risk profile and adequacy of response, environmental protection outcomes, follow up/close out of actions, achievements, and OFIs). The review focussed on key environmental issues, environmental risk management processes, challenges and communication.

4.4.2 Findings

Compliance tracking

During the audit period DITT continued to work on targeted improvements to the Authorisation conditions. Compliance tracking is made simpler with the addition of an acknowledgement of 'Completed' added for certain Conditions. Forty-two Authorisation Conditions and sub conditions have been marked as 'Completed' to indicate that compliance with these requirements has been satisfied.

An enhancement to existing Authorisation Condition 8 specified the preparation of an annual list of structures scheduled to be constructed in the coming year and the associated "as-constructed" reports required to be submitted to the Department within 60 days upon construction being finalised. In August 2023 the Operator provided a list of five structures scheduled to be constructed in the coming year that were estimated to have "as-constructed" reports submitted prior to Quarter 1 2024. It is acknowledged that construction timeframes do frequently change; however, none of the listed structures had "as-constructed" reports submitted in the audit period. There appears to be ambiguity around what constitutes an individual structure's construction being finalised, whether that is construction completion, stage completion, commissioning, practical completion or another completion milestone. This situation contributes to "as-constructed" reports remaining not submitted months after the original date anticipated. The TSF Cell 1 Stage 5 and Cell 2 Stage 6 raises "as-constructed"

construction reports were prepared in March 2022 and remained unsubmitted to DITT in the current audit period. The process for monitoring and receiving “as-constructed” construction reports in a timely manner should be reviewed to make it more comprehensive and effective.

In early 2022 DITT commenced development of a draft Compliance Tracking Register pilot project to assist, anticipate and track regulator actions in response to Authorisation requirements. Limited progress in the development of the compliance register has occurred in 2024 but the achievement of a comprehensive and effective compliance tracking register remains a valuable DITT objective.

DITT’s approval of the terms of reference for the Independent Expert Panel for Mine Closure in June 2023 has addressed residual NT EPA recommendations not explicitly incorporated in the Authorisation conditions. This will assist tracking and actioning fulfilment of the finer details of the remaining NT EPA recommendations.

Environmental incident notifications

The Department advised that four environmental incident notifications under Section 29 of the MMA were received during the audit period. The Department advised two incidents related to concentrate spills from road train transportation on the Carpentaria Highway in July 2023 and in August 2023. The Department advised the other two Section 29 matters were notified on the same day in March 2024 relating to flood event impacts and a NOEF seepage incident. The flood event related impacts were inundation of sumps and a pond and damage to facilities that have since been rectified and advised by the Operator to DITT as low risk to the environment.

Flooding damage at the NOEF northeastern flood levee and an electricity supply failure to an extraction tower during high rainfall contributed to the NOEF seepage incident. Some seepage was released from site with floodwaters, and subsequently an embankment was constructed to contain and divert seepage to EPROD for treatment. An initial seepage investigation report prepared by the Operator (and submitted to the NT Government) concluded there was low environmental risk. DITT and DEPWS officers conducted a site visit immediately after the flooding event, including an inspection of the seepage incident location. The NT Government is awaiting a detailed seepage investigation report to be provided by the Operator.

No enforcement notices were issued by DITT to the Operator during the audit period. This indicates there were no serious environmental incidents that triggered DITT regulatory enforcement action.

Environmental monitoring

In March 2024 a site inspection was conducted by DITT officers during the audit period. The site inspection by DITT officers occurred in the week immediately after the ex-Tropical Cyclone Megan flood event. In arranging a site visit soon after the cyclone DITT was highly responsive to potential environmental issues associated with the flooding.

The number of days DITT officers spend on-site is a key performance indicator for DITT that is measured and tracked. Regular site inspections by DITT are beneficial as they allow first-hand observation and assessment of the Mine’s condition to verify evidence of progress against the monitoring programs, reporting, Authorisation, AMP and EMR. DITT advised that given available resources, mine site visits, inspections and audits are conducted based on priority.

Visits are prioritised based on relative risk considerations across all projects regulated under the MMA with the intention to visit high priority sites annually.

Compliance framework

The Mine's primary approval has been granted under the MMA and is administered by DITT. As the lead regulator DITT regularly provides compliance support to other agencies in the form of consultation with NT DEPWS (WDL under the Water Act).

Some historic Authorisation Conditions are written in a manner that is ambiguous and does not match the Condition's intent. DITT has adopted a pragmatic approach to working with the Operator to seek agreement on what is acceptable to fulfil condition requirements.

Maintenance dredging at the BBLF swing basin and channel is expected to be required in the next few years. In anticipation of the first maintenance dredging since the BBLF was constructed DITT has assessed dredging as part of a revised MMP submitted in early 2024. It was advised that BBLF dredging has received 'in principle' approval subject to the detailed design and a Dredge Spoil Management Plan being submitted prior to commencement of dredging activities.

New regulatory framework pending

On 01 July 2024 (outside the audit period) a new environmental licensing framework for managing environmental impacts of mining activities was transferred to the amended *Environment Protection Act 2019* (EP Act) and the MMA was repealed. During the audit period DITT was preparing to transition regulation of mining activities to the new environmental (mining) licensing framework. Effective 01 July 2024, regulation of the Mine became subject to deemed mining licence (DML) 0059-01 comprising the conditions of the Authorisation and mining management plan approved under the MMA. Under the EP Act, DMLs:

- cannot be varied (except as provided under s306 of the EP Act),
- have a maximum validity period of 4 years (expiring 30 June 2028) and
- are not transferrable.

To continue mining beyond 1 July 2028, the Operator will need to apply for an environmental mining licence prior to the expiry date.

Technical Working Group

The Technical Working Group (TWG) is a forum that meets regularly, typically monthly, for DITT and the Operator to discuss regulatory matters, review project progress, consider and proactively resolve potential concerns and plan upcoming environmental management programs or activities. The Independent Monitor views the TWG as a valuable regular communication opportunity to facilitate review of environmental issues and to enhance environmental performance at the Mine, through fostering and maintaining an effective working relationship. The TWG enables emerging issues to be addressed in a timely manner rather than waiting for quarterly or annual reporting of monitoring results.

Establishment of the Community Reference Group

DITT is responsible for facilitating the establishment and operation of a CRG, with the support of the Operator. The CRG was established during the audit period with the primary purpose to communicate the McArthur River Mine's performance to the local and broader NT community.

The CRG's Independent Chair and 12 members (local residents and local business people) were appointed by the Minister on the 06 June 2023. The CRG's terms of reference were endorsed by the NT EPA and are published on the NT Government CRG website.

The CRG's inaugural meeting was a site familiarisation visit held on 27 July 2023 and the second CRG meeting held 29 February 2024 at the Mabunji Boardroom in Borroloola. The Independent Monitor attended the February 2024 CRG meeting to present the 2023 audit findings. Future CRG meetings are anticipated to occur quarterly and it is anticipated that DITT will be invited to present.

Establishment of Independent Panels of Experts

DITT, with the support of the Operator, is to establish and operate an Independent Panel of Experts to advise on the NOEF, TSF and Mine Closure. Independent panels are to provide oversight and review of key technical issues culminating in reporting to DITT and the Operator at three-yearly intervals. The panels will each convene once every three years for 12 months (i.e., year 1 is the NOEF panel, year 2 is the TSF panel, year 3 is the Mine Closure panel with this three-yearly pattern repeated). DITT is responsible for coordinating distribution to relevant government agencies, any reviews by the Independent Monitor and the publication of the Independent Panel reports on the NT Government website.

None of the Independent Panels of Experts have yet been established. A Chairperson was appointed to the Independent Expert Panel for the NOEF and the TSF in January 2024. It is anticipated the Independent Panels for the NOEF and TSF will commence in 2025.

The Mine Closure Independent Expert Panel terms of reference were approved by the Minister in June 2023 and this Panel will provide advice on planning for closure of the Mine. DITT issued a second call for nominations for a Mine Closure Panel Chairperson in March 2024.

Authorisation conditions for independent review of some of the Operator's monitoring programs and associated reporting are not triggered (and are constrained from commencing) until the establishment of the Independent Panels. The Authorisation does not stipulate any timeframes for the establishment of the Independent Panels as this is the responsibility of DITT.

4.4.3 Opportunities for improvement

Potential opportunities to support continuous improvement identified by the Independent Monitor through the review process are detailed in Table 4-8, which applies to the regulatory approach, noting these are not mandatory requirements.

Table 4-8: DITT's regulatory approach – opportunities for improvement

OFI ref.	Opportunities for improvement
OFI-24-DE-REG-01^^	DITT to prioritise the establishment of the Independent Panel of Experts for TSF and NOEF to facilitate independent reviews of the Operator's monitoring program and reporting.
OFI-24-DE-REG-02^^	DITT to facilitate an internal review to examine the annual EMR process, tasks and outputs with a view to streamline the activity. As part of this review, examine what is sufficient for regulatory requirements and responding to community expectations, as well as how the annual process could be more efficient.
OFI-24-DE-REG-03^	DITT to prepare an internal procedure for the regulation of the Authorisation conditions and NT EPA recommendations to document the processes, timing, due dates, overdue submissions, approvals, decisions, public /community communication and records requirements to assist managing the complex regulatory requirements relating to DITT activities.
OFI-24-DE-REG-04^	DITT to reduce reliance on key individuals within DITT to ensure consistency and continuity of compliance and performance.
OFI-24-DE-REG-05	DITT to prioritise the establishment of the Independent Panel of Experts for Mine Closure including appointment of the Chairperson and panel members.
OFI-24-DE-REG-06	DITT to provide a definition of 'construction being finalised' to clarify timing for when "as-constructed" reports should be submitted.
OFI-24-DE-REG-07	DITT to set up process for tracking submissions by Operator and subsequent acknowledgement, review, information request (as relevant) and approval (or otherwise) of submitted documents by DITT. This may include register and work program to set out forecast activity timeframes and dates, which are updated regularly as actual progress is made.

Note: ^ indicates OFI carried over from 2020 regulatory approach DITT review.
 ^^ indicates OFI carried over from 2020, 2021, 2022 and 2022 regulatory approach review.

4.5 DITT success

The audit and review processes identified some noteworthy successes achieved by DITT during the audit period and have contributed to continuous improvement (refer to Table 4-9).

Table 4-9: DITT's successes

No.	DITT successes
1	Established the Community Reference Group (CRG). The first CRG meeting was held at the Mine on 27 July 2023. The quarterly CRG meetings provide an opportunity to the local community to directly communicate with the Mine.
2	DITT conducted a site inspection in the week after the cyclone flooding to assess any potential environmental impacts at the Mine site and facilities. This action demonstrates the DITT's initiative and responsiveness to examine potential environmental incidents.
3	The Mine Closure Independent Expert Panel terms of reference were approved by the Minister in June 2023 and this Panel will provide advice on planning for closure of the Mine. A second call for nomination for Mine Closure Panel Chairperson was issued by the Minister in March 2024.
4	A Chairperson was appointed to the Independent Expert Panels for the North Overburden Emplacement Facility and the Tailings Storage Facility in January 2024. These Panels will provide technical advice on Mine management to protect the McArthur River from any Mine related impacts.
5	A new Authorisation condition established an annual process for "as-constructed" documentation to be provided by the Operator to certify construction works meet the design and specifications.
6	Regular communication between DITT and the Operator, continues to support an effective and valuable working relationship that facilitates early resolution of potential regulatory issues.
7	The continued strong focus on key environmental areas that could be high risk if adequate risk controls were not in place (e.g., high number of conditions on NOEF and TSF), and a practical approach to compliance and monitoring.
8	The high levels of regulatory compliance by the Operator can be attributed, at least in part, to the processes and approach developed and adopted by DITT for the Mine.

5. Review of river system health

5.1 Objective

The objectives of the review of river system health were to:

- Assess relevant freshwater aquatic ecology monitoring programs and management actions developed by the Operator to meet the Authorisation conditions.
- Provide an assessment of the monitoring program and general river system health, based on documentation provided by the Operator.

5.2 Scope and approach

The scope of this review included reviewing the freshwater aquatic ecology-related environmental assessments and monitoring activities undertaken during the audit period, by the Operator and subcontractors engaged by the Operator. An assessment was undertaken of the McArthur River health monitoring program that covers a large, but defined area, in the vicinity and downstream of the Mine. The monitoring program and this review does not provide information on the larger catchment area.

The river health and freshwater aquatic ecology assessment was undertaken by Independent Monitor sub-consultant, Freshwater Ecology Pty Ltd, and included:

- Reviewing the conditions of Authorisation relevant to the freshwater aquatic ecology assessment.
- Reviewing monitoring programs and management actions developed to meet the Authorisation conditions and environmental objectives stated in the approved MMP.
- Assessing the Operator's implementation of management and monitoring programs during the audit period including conclusions drawn.
- Undertaking a general assessment of the health of the McArthur River system in the vicinity and downstream of the Mine based on the information provided by the Operator.

This review focused on the monitoring report documentation provided by the Operator for the audit period in consideration of the Authorisation conditions' requirements, the MMP and Appendices (specifically the management plans). Documents dated prior to 2018 were not reviewed, except for the Freshwater Sawfish Management and Monitoring Plan.

5.3 Findings

5.3.1 Context

The significance of river health is reflected in the overarching environmental management objectives for the Mine, as set out in the MMP, which includes:

- Objective 1: Protect the McArthur River's beneficial uses and community values from mining impacts.
- Objective 2: Facilitate development of the ecosystems and their functions along the McArthur River diversion channel for terrestrial and aquatic flora and fauna.

Management actions and monitoring programs for freshwater aquatic ecology relevant to these objectives are discussed below, followed by a description of the efficacy of these actions and

programs in addressing the objectives. A summary discussion of river system health is subsequently provided.

5.3.2 Management actions

As set out in the MMP, the Operator undertakes various activities as part of the management of potential mining impacts on freshwater aquatic ecology and for protection of river health, including:

- implementation of design and operational controls
- application of adaptive management
- rehabilitation.

Design and Operational Controls

Design and operational controls relevant to the management of impacts to freshwater aquatic ecology and protection of river health include:

- A water management system to prevent contaminated water from entering the river system.
- Dust emission controls to prevent contamination of waterways.
- Stipulated conditions under which good quality water, following storage and treatment, may be released into the surrounding waterways and not impact the environmental values (as detailed in the WDL).
- Detailed design for the NOEF, which includes various quality control checks, including the requirement for independent oversight by the ICE.
- Detailed design for the TSF, which includes various quality control checks including the requirement for independent oversight by the ICE and ITRB.
- Seepage-capture ponds and sumps to prevent contaminated seepage from entering waterways.
- Routine inspections and monitoring of infrastructure.

Adaptive Management

A central component of the Operator's Environmental Management Framework is the AMP, a document that facilitates management and decision-making over time, in response to evolving knowledge, environmental performance, and changing circumstances. TARPs are implemented by the Operator as part of the AMP to manage potential adverse environmental conditions, mitigate environmental impacts, inform mitigation options where required, and to assess performance against overarching environmental objectives.

The TARP structure consists of three levels which each have specific triggers, actions and responses. Level 1 is when a trigger value suggests the performance is achieving its environmental objective, and Level 2 is when a performance indicator is above the Level 1 trigger value (indicating that performance is within expected, predicted and/or conditional levels) and the environmental objective is still being met; however, further investigation of the trend is warranted. Level 3 is when a performance indicator is above the Level 2 trigger value (indicating that performance is outside expected, predicated and/or conditioned levels) and further investigation is needed to determine if additional controls are required to continue to meet environmental objectives. For Level 1, TARPs monitoring, and management continue as

per the MMP, whereas for Levels 2 and 3, TARPs additional monitoring and mitigation controls are required.

TARPs relevant to the management of impacts to freshwater aquatic ecology and protection of river health include:

- presence of freshwater sawfish and migratory species diversity
- macroinvertebrate species richness/assemblage
- aquatic fauna species diversity and relative abundance
- metal concentrations in aquatic fauna
- progress of revegetation along the McArthur River diversion channel.

Ongoing management actions are undertaken by the Operator as part of adaptive management to support achievement of the overarching environmental management objectives. Relevant to the assessment of river health during the audit period is the Operator's removal of potentially contaminated sediments from a tributary to McArthur River (e.g., Barney Creek channel) within the mineral lease boundary. Within the audit period sediment was removed from a section of Barney Creek underneath haul road bridges in late October 2023 and another section of Barney Creek adjacent the mill in mid-November 2023.

Rehabilitation

The Rehabilitation Management Plan (RMP), prepared by the Operator, details a rehabilitation management and monitoring system that enables the progress of rehabilitation towards closure objectives. The key rehabilitation activities relevant for freshwater aquatic ecology are:

- Revegetation along the McArthur River and Barney Creek diversion channels.
- The introduction of instream woody debris along the McArthur River diversion channel.

Revegetation of the diversion channels has been ongoing since 2007. The key objectives of revegetation are to:

- Increase bank stability.
- Provide shading within the river channel.
- Provide a source of carbon for freshwater aquatic ecosystems.
- Provide a long-term source of instream woody debris.

To date, the focus has been on replanting the upper sections of the diversion channels in accordance with the schedule in the RMP.

Installation of Large Woody Debris (LWD) in the diversion channels has been undertaken since 2010, with the key objectives of LWD introduction being to:

- Increase meso and micro habitat diversity within the channel.
- Alleviate bank erosion.
- Provide a source of carbon for freshwater aquatic ecosystems.
- Provide refuge holes for migrating fish.

To supplement the LWD program, small and medium-sized woody debris has been added to the McArthur River diversion channel. The aim of this is to provide additional organic matter to the channel to improve macroinvertebrate assemblages.

5.3.3 Freshwater ecology monitoring programs

The Operator undertakes several freshwater ecology monitoring programs to support assessment of the efficacy of management actions and associated outcomes relevant to the overarching environmental management objectives, including:

- Freshwater macroinvertebrate monitoring.
- Freshwater aquatic fauna diversity and abundance.
- Freshwater Sawfish and Barramundi acoustic monitoring.
- Metals in freshwater aquatic fauna.

During the reporting period the monitoring programs were conducted in full for the third time since COVID-19 restrictions commenced in early 2020. The only exception was for the Robinson River upstream site as access is still restricted. This site is used as a reference and an alternative site on the Wearyan River (previously used as a reference prior to 2015) was again used.

5.3.4 Environmental management objectives

For each of the overarching environmental management objectives for the Mine (described below), consideration is given to the relevant management actions and monitoring programs.

Objective 1. Protect the McArthur River beneficial uses and community values from mining impacts

The current monitoring programs are considered suitable and sufficiently well-designed to assess potential impacts on the McArthur River freshwater ecosystems and beneficial uses. AEPAR Appendix E, Table E-1 provides a summary of the applicability of each monitoring program relevant to this objective that was undertaken during the audit period and the key conclusions drawn.

For each of the monitoring programs, the 2024 EMR assesses compliance against the relevant performance triggers. The performance indicators and SSTVs provide clear direction and actions to mitigate potential impacts when, and if, they occur. Level 1 performance was achieved for all freshwater aquatic ecology monitoring categories relevant to this objective.

It is notable that, with respect to waterway sediment samples, several sites were identified at trigger level 2a⁴; namely sites within Barney Creek and Surprise Creek. Two waterway sediment sample sites, one within Barney Creek and one within Surprise Creek, were considered to be at trigger level 2b. These results were comparable with the 2021-2022 and 2022-2023 audit periods. There is a relationship between waterway sediment metal concentrations and tissue metal concentrations in fauna, albeit the ephemeral nature of Barney Creek and Surprise Creek is likely to reduce the exposure of aquatic fauna to periods in which

⁴ The TARP for fluvial sediment has two stages at level 2; 2a which requires an investigation to determine if additional controls or management actions can be taken to reduce analyte concentrations, and 2b requires both the same investigation as well as sampling frequency to be increased from annually to quarterly.

water persists. Higher analyte levels of lead and zinc recorded during the 2022-2023 audit period were shown to have decreased in the 2023-2024 audit, supporting the assertion previously made that these were due to the poor wet season and limited flushing of these systems in 2021-2022, which had contributed to the accumulation of enriched sediment.

The Independent Monitor agrees with the conclusions of the Operator's external expert's assessment that the adaptive management action undertaken, to remove potentially contaminated sediments from a tributary to McArthur River (e.g., Barney Creek channel) and the construction of silt traps to capture runoff, have contributed to protecting downstream beneficial uses and environmental values. Results of sediment analysis show reductions in cadmium, arsenic, lead, and zinc concentrations, compared with those recorded in 2018, with cadmium and arsenic no longer in exceedance of the relevant sediment quality guideline value.

Small numbers of the freshwater mussel, *Velesunio angasi*, were collected due to their limited abundance in the environment. Tissue metal concentrations were highly variable across the study area but consistent with results of previous sampling, where very high concentrations of naturally occurring analytes, including aluminium, manganese, iron, and total arsenic have been consistently recorded in this species throughout the region, including for catchments outside of the Mine's area of operations.

Analysis of metals in aquatic fauna (fish species) during the audit period showed there were several exceedances of Maximum Permitted Concentrations (Australia New Zealand Food Standards Code, Standard 1.4.1, Schedule 19) for lead in tissue concentrations for two fish species at three sites immediately adjacent to the Mine, noting the data suggests little measurable effect on tissue metal concentrations in the McArthur River and downstream environments. Continuation of the implementation, review and improvement of management actions (described in Section 5.3.2) including for removal of potentially contaminated sediments from affected waterways and review of operations to control fugitive dust is considered important for the ongoing management of potential impact on aquatic fauna.

Data collected over the 2023-2024 monitoring program demonstrated that all other fish caught throughout the McArthur River catchment were considered safe to consume. This includes commonly consumed species such as *Lates calcarifer* (Barramundi) and *Hephaestus fuliginosus* (Sooty Grunter).

Objective 2. Facilitate development of the ecosystems and their functions along the McArthur River diversion channel for terrestrial and aquatic flora and fauna

The current monitoring programs are considered by the Independent Monitor to be suitable and sufficiently well-designed to monitor the development of ecosystems and their functions along the McArthur River diversion channel.

The management actions to revegetate the stream banks and to introduce instream LWD are appropriate for facilitating the development of the ecosystems and their functions along the McArthur River diversion channel. While the McArthur River diversion channel appears to offer a lower level of quality aquatic habitat in edge habitats than the natural river channel, evidence suggests there is a trajectory of increasing ecosystem diversity and resilience. Results for macroinvertebrate sampling in the 2022-2023 period showed a deviation from this trend; however, the deviation was not evident in results from 2023-2024, supporting attribution of the results from the 2022-2023 period to the low flows during that sampling

period having created a physical separation between the edge habitats from riparian buffer zones.

AEPAR Appendix Table E-2 provides a summary of the applicability of each monitoring program (relevant to this objective) that was undertaken during the audit period and the key conclusions drawn.

For each of the monitoring programs, the 2024 EMR assesses compliance against the relevant performance triggers. The performance indicators and trigger values provide clear direction and actions to mitigate potential impacts when and if they occur. Level 1 performance was achieved for all freshwater aquatic ecology monitoring categories relevant to this objective.

The management action to revegetate banks along the diversion channels is providing short-term benefits in the form of bank stabilisation, and long-term benefits through providing organic input, increased shading, and a natural source of instream woody debris recruitment. The Independent Monitor agrees that the development of a functional riparian vegetation community will facilitate the development of the ecosystems along the diversion channels.

The management action, which introduced instream woody debris, is providing a short to medium term benefit of providing habitat, increasing mesohabitat and habitat diversity, and provides organic input for aquatic ecosystems. The Independent Monitor agrees with the results of the Operator's external expert's assessment, that the introduction of instream woody debris is most likely contributing to increased macroinvertebrate assemblage development and resilience.

While the objectives of the monitoring programs have been met (i.e., assessing responses of *Macrobrachium* species and fish assemblages, and the effectiveness of adding woody debris), as was identified in previous audit periods it would be useful to assess and quantify the extent of rehabilitation along the entire McArthur River diversion channel. Such an assessment would provide an indication of the reach scale trajectory of rehabilitation for fish habitat. A reach-scale assessment may be undertaken at a coarse level and provide a measure of the success of the riparian revegetation combined with introduced woody debris over time.

The Largetooth Sawfish (*Pristis pristis*) is a species listed as Vulnerable under the *Environment Protection and Biodiversity Conservation Act 1999* and the focus of an acoustic monitoring program in the McArthur River diversion channel. Three juvenile sawfish were recorded either within, or upstream of the McArthur River diversion channel in the 2023-2024 sampling. The recording of eight individuals moving through the diversion channel since 2017 supports the assertion that fish passage for this species is not impaired and exceeds the minimum requirement of demonstrating movement of sawfish through the McArthur River diversion channel once every five years.

5.3.5 River system health

The Operator has classified the condition of the McArthur River within the Mine area as a slightly to moderately-disturbed ecosystem, in accordance with Australian and New Zealand guidelines for fresh and marine water quality (2018). Slightly to moderately-disturbed systems (95% biodiversity protection) are ecosystems in which aquatic biological diversity may have been slightly adversely affected by human activity; however, biological communities remain in a healthy condition and ecosystem integrity is largely retained.

Overall, the monitoring results obtained from the Operator indicate the aquatic ecosystems of the McArthur River and its tributaries are in good condition. The notable exceptions are related to creeks within the Mine's mineral lease adjacent to the NOEF and TSF (e.g., Barney Creek and Surprise Creek with limited exceedances of metals in some sediment samples). These watercourses are highly ephemeral and retain little water for much of the year. As described above, analysis of metals in aquatic fauna (fish species) during the audit period showed several exceedances of Maximum Permitted Concentrations (Australia New Zealand Food Standards Code, Standard 1.4.1, Schedule 19) in tissue concentrations for two fish species at three sites immediately adjacent to the Mine, noting the data suggests little measurable effect on tissue metal concentrations in the McArthur River and downstream environments.

Data collected over the 2023-2024 monitoring program demonstrated that all other fish caught throughout the McArthur River catchment, including commonly consumed species such as Barramundi and Sooty Grunter, were safe to consume. The review of monitoring data to date indicates there is an extremely low risk to human health from consuming the monitored fish species caught in the McArthur River catchment in the vicinity or immediately downstream of the Mine.

Consistent with previous sampling results, concentrations of metal in freshwater mussel tissue were highly variable and commonly included high concentrations of naturally occurring analytes, including aluminium, manganese, iron, and total arsenic, across the area monitored; this includes catchments not affected by the Mine. It is considered unlikely that enough mussels could be collected and consumed by an individual to exceed an intake of metals that would have a detrimental health effect; however, due to the high levels of metals found naturally in the mussels in the region, it is suggested that their consumption be limited.

The McArthur River diversion channel was constructed over the 2008-2009 wet season to enable the Mine's transition from an underground to an open pit operation. While it does not provide the same habitat as naturally formed river channels, there have been significant and ongoing efforts to reinstate habitat conditions typical of natural river channels. This is primarily development of the riparian vegetation and the introduction of instream woody debris. The monitoring data collected to date suggests these actions have improved and are likely to continue to improve the aquatic habitat along the McArthur River diversion channel.

The current monitoring programs have been undertaken for several years and it is apparent the preceding wet season is a significant driver on aquatic ecosystems, primarily through recruitment of key species and connectivity of the system to allow upstream passage of estuarine/marine dependent species. The 2023-2024 monitoring report incorporated a high-level analysis of the influence of flow magnitude on fish assemblages within the McArthur River catchment. This provided insights into the influence of flow variability on fish assemblages catchment-wide; however, it would be useful to extend analysis to include a separate assessment of a subset of the data within the vicinity of the Mine. Analysis of a subset of data would assist to elucidate the influence of flow variability on fish assemblages in the vicinity of the Mine.

The flood event (associated with ex-Tropical Cyclone Megan) experienced at the Mine in early 2024 impacted the aquatic environment of areas adjacent to the Mine, noting the aquatic ecosystems of the McArthur River periodically experience extreme weather conditions. Preliminary investigations suggest the event reduced the extent of riparian vegetation through

the McArthur River diversion channel and it is likely the flooding caused other changes, including to instream woody debris; however, these matters have been and will be further investigated, with outcomes reported in the 2024 - 2025 EMR.

The Independent Monitor understands there have been no changes to the freshwater ecology monitoring programs as a result of the weather event; however, some monitoring sites became inaccessible due to the flood, and in such cases alternative sites have been utilised. These matters will be reported in the 2024 - 2025 EMR.

5.4 Opportunities for improvement

Potential opportunities to support continuous improvement identified for river system health through the review and audit process are detailed in Table 5-1, noting these are not mandatory requirements.

Table 5-1: River health system opportunities for improvement

OFI ref.	Monitoring program / management action	Opportunities for improvement
OFI-24-OP-RH-01 ⁺	Diversity and Abundance of Freshwater Aquatic Fauna	The Operator should undertake a reach-scale assessment to measure the extent of rehabilitation along the entire McArthur River diversion channel and provide an indication of the reach scale trajectory of rehabilitation for fish habitat. This may be undertaken at a coarse level and provide a measure of riparian revegetation success combined with introduced woody debris over time.
OFI-24-OP-RH-02	All freshwater aquatic ecology monitoring programs	Extend analysis of wet season magnitude and extent on fish assemblages in the McArthur River to include assessment of a subset of the data within the vicinity of the Mine. Undertake analysis of a subset of data to elucidate the influence of flow variability on fish assemblages in the vicinity of the Mine.

Note: + indicates OFI carried over or replicated from 2022 and 2023 AEPAR.

5.5 Conclusions

The Operator has a broad range of aquatic ecosystem monitoring programs and management actions that have been developed over the Mine’s life to meet the environmental objectives. During the audit period, these were well-implemented and where impacts were noted, they were adequately described, and mitigation actions recommended. The review supports the continuation of the current aquatic ecology monitoring programs as these activities are appropriate and effective to achieve the river system health objectives.

The McArthur River and its tributaries are in good health. There are localised elevated levels of metals in Barney Creek and Surprise Creek immediately adjacent to the Mine’s processing area, within the mineral lease. These elevated levels only occur in areas not accessible to the public and will require ongoing monitoring and management.

The ongoing management actions undertaken to control fugitive dust and remove potentially contaminated sediments from Barney Creek channel contribute to protecting downstream beneficial uses and environmental values.

Consistent with previous sampling results, concentrations of metal in freshwater mussel tissue were highly variable and commonly included high concentrations of naturally occurring analytes across the area monitored which includes catchments not affected by the Mine. It is considered unlikely that enough mussels could be collected and consumed by an individual to exceed an intake of metals that would have a detrimental health effect; however, it is suggested that their consumption be limited.

Data collected over the 2023-2024 monitoring program demonstrates that fish caught outside of the Mine's mineral lease boundary and throughout the McArthur River catchment, including Barramundi and Sooty Grunter, are safe to consume. The review of monitoring data to-date indicates there is an extremely low risk from consuming fish caught in the McArthur River catchment in the vicinity or immediately downstream of the Mine's mineral lease boundary.

Monitoring of the McArthur River diversion channel suggests that the management actions to vegetate the riparian zone and introduce instream woody debris are facilitating the development of the ecosystems and their functions.

Extreme weather events, such as ex-Tropical Cyclone Megan in early 2024, periodically impact the McArthur River catchment, including the aquatic environment of areas adjacent to the Mine. Freshwater ecological monitoring programs have been ongoing through 2024, and the results of post-cyclone monitoring will be presented in the 2024 - 2025 EMR.

6. Independent Certifying Engineer review

6.1 Objective

In this audit period review of the environmental performance of the Operator included conducting an audit of the ICE. The objective of the ICE audit was to assess the adequacy and implementation of the ICE's activities to oversee construction and to certify that the works meet design specifications.

6.2 Scope and approach

The Independent Monitor's approach to the audit was to review the Authorisation conditions relevant to the ICE requirements. Additionally, a site visit was conducted on 19-20 August 2024 and the on-site ICE audit tasks included an interview with:

- The Operator's Superintendent - Environment.
- The ICE – Senior Dam and Geotechnical Engineer.

The scope of this ICE audit focused on the adequacy of implementation of ICE activities. The regulatory requirements in relation to the ICE are prescribed in Authorisation Conditions 48, 49, 51, 54, 56, 63, 75, 76 and 78. Refer to Section 2.3 for the compliance audit findings for the ICE's performance against the Authorisation.

Background

The Authorisation conditions detail the obligations and deliverables in relation to the ICE activities. The Operator is required to appoint an ICE to conduct activities including to:

- Be present during all phases of construction.
- Oversee and certify that construction works meet design specifications.
- Approve changes to design during construction.
- Verify any monitoring equipment installed as part of construction.
- Provide certified "as-constructed" reports detailing all works undertaken, including:
 - 'hold point' sign offs
 - testing carried out
 - compliance of test results with the acceptance criteria
 - justification that demonstrates in the event of any deviations to the plan, that the design intent and performance of the structure is still met.
- Verify the suitability of the Potentially Acid Forming (PAF) material placement methodology.

The Operator's Engineering team appoint and work with the ICE whose responsibility is to oversee construction to warrant and accept both design and construction works through providing ICE certification that the works meet the design specifications.

The ICE site activities are organised by two distinct work domains, one for the NOEF and the other for the TSF. The NOEF is designed, constructed and operated by the Mine and the ICE is responsible for certifying that the NOEF is built and operated according to the design specifications. The ICE oversees the Operator's NOEF Projects Team who undertake the civil

construction, along with the Operator's NOEF Operations Team who are responsible for the placement of the overburden.

A NOEF organisational chart, to illustrate the various ICE roles and responsibilities, was provided.

The TSF design and certification of "as-constructed" construction reports is provided by the ICE.

6.3 Findings

The key findings in relation to the ICE review are outlined below. The detailed review findings and identified opportunities for improvement are provided in a separate Independent Monitor report.

The ICE team is comprised of approximately seven people who work back-to-back shifts on-site to provide full time equivalent presence during all phases of both the NOEF and TSF construction. It is understood that in 2023-2024 this represents an increased number of ICE on-site 'deputies' which improves back up capacity to ensure full time coverage, which was not always the case in the past. The ICE on-site staff work between the NOEF and TSF roles to facilitate transfer of information and knowledge between the NOEF and TSF, providing flexibility in staff resourcing. The ICE site personnel are supported by office-based ICE discipline specialists in geotechnical, hydrology, hydrogeology, geochemistry, closure and geosynthetics.

It was more evident this year that a collaborative and effective working relationship continues to develop between the ICE and the Operator. The Operator are responsive to ICE requests for information (e.g., drone footage or dam level data) and it was advised that the Operator are receptive to new ideas and suggestions that the ICE contributes.

6.3.1 North Overburden Emplacement Facility

The ICE role includes warranting and accepting the design as required by Condition 48 of the Authorisation. *NW Foundation Design ICE Review* and *NOEF NW Stage Wedge Construction ICE Review* were received in the previous audit period. The most recent example provided was the *NOEF North East Bravo Stage Foundation Design ICE Review Letter* dated August 2024, after the audit period.

Condition 48 of the Authorisation also required the ICE to warrant and accept the construction works. In 2024 the Independent Monitor was provided examples of the full suite of various construction reports prepared by the ICE to document oversight and progressive certification that construction work meets the specifications and design intent.

There is a hierarchy of interrelated construction reports for the NOEF and examples sighted include:

- **Daily Site Inspection Reports** – including a daily diary and photographs of placement and volumes of material data is entered into ITPs and information collated into the weekly report.
- **Weekly Construction Report** – prepared by the ICE and the Mine's short term NOEF planning team, titled "*NOEF Weekly Overburden Placement Report*", providing collation of

Daily Reports information and scans illustrating the type and location of placed material. Weekly Construction report information is used for the ITP Register in the Monthly Construction Report.

- **Monthly Construction Reports** – summarises the status of construction and operations work progressed at the NOEF, provides detail of the Quality Assurance/Quality Control (QA/QC) requirements, test result approval, survey results, reviewing hold points and witness points, weekly ITP review and approval for each area, ITP Register, ICE sign off (or not), including construction progress, test results, survey results, RFIs, technical queries, Non-Compliance Reports (NCRs), rework required to rectify any faults, and resolution of NCRs.
- **Annual Construction Reports** – annual performance review, includes all ITPs.
- **“As-Constructed” Report** – certified report at the completion of construction.

During this audit period more evidence of the ICE’s oversight and certification for various construction was provided than for any year since 2020. The completion and sign off process for ITPs for handover from the Operator’s NOEF Projects Team to the Operator’s NOEF Operations Team prior to the placement of rock is well understood and implemented.

The ICE is required to be present during all phases of construction where prescribed in the MMP, including hold points. The hold point sign off and reporting is required for the test and survey results by the ICE and the Operator before work continues. Examples of NOEF foundation hold points include:

- compaction testing results (avoid reworks)
- proof-roll of foundation (unsuitable material replaced before proceeding)
- placement of geofabric prior to rockfill.

The ICE also signs off witness points, which are inspections or tests which, unlike hold points, allow work to continue. Witness points are defined in the Project Quality Plan e.g. material testing for the compacted clay liner (CCL).

The audit team were advised that the ICE has weekly meetings with the Operator’s NOEF short term planning team and is involved with the Operator’s review of NOEF performance which examines issues such as the performance of underdrains, bituminous geomembrane and Potentially Acid Forming reactive material PAF(RE) Trial. The ICE is apparently also involved with the Operator in stage design reviews, including risk reviews.

A new initiative is the proposal to develop a digital twin model of the NOEF. The 3D model combined with GIS would be developed as a new data management platform. A digital twin model would create a powerful tool to organise layers of data such as ITPs, test results, survey data, cover and Bituminous Geomembrane (BGM) system monitoring, for data analysis and interpretation of the NOEF performance.

6.3.1.1 Annual NOEF Construction Report

In previous years, the ICE’s NOEF Construction Report has not been completed in the audit period immediately following the year of work completion. An improvement observed this audit period is that the ICE completed the 2023 NOEF construction report and the report includes a construction activity register which provides a prompt to revise and check incomplete work in the following year.

The 2023 NOEF as-constructed report, entitled “*Peer Review of NOEF, Annual Construction Report 2023*”, dated 13 August 2024, was prepared and signed by the ICE to provide details of the construction progressed within the NOEF in 2023. The report covers both the Projects and Operator’s NOEF Operations Teams’ construction works within the NOEF.

The majority of the Operator Projects Team civil works undertaken during the reporting year of 2023 were completed within the North East Bravo (NEb) Stage and the South East Alpha (SEa) Stage. Project construction works were undertaken on a total of five stages including Central East Bravo (CEb), North East Alpha (NEa), the extraction towers (located at both CEb and NEa), North West (NW) and South East Alpha (SEa). Works undertaken within all stages throughout the year included subgrade preparation, compacted clay liner construction, underdrain works and flood levee construction.

The Operator’s NOEF Operations Team carried out placement of overburden within the NOEF throughout 2023. The works included the transportation and emplacement of specified materials in the locations as per the design plans, with construction of the Core Zone, Wedge Zone, Halo and advection barriers.

The onsite laboratory completed geochemical analysis of selected samples to compare to site specification requirements for material classification. The Operator’s survey team carried out surveying of design compliance for inclusion into the weekly ITPs. The progress of overburden placement within the NOEF was conveyed to the ICE through the weekly ITP process such that a conformance review against the design specifications could be undertaken. Several ITPs were not received throughout the year; hence a complete review of the Operator’s NOEF Operations Team’s work could not be completed at the time of drafting the 2023 Annual ICE Construction Report.

6.3.1.2 Inspection and Test Plan (ITPs)

The Operator’s NOEF Operations Team utilises a weekly ITP quality control process to document the construction works undertaken across the varying zones within the NOEF. For each area of work undertaken within a zone over a weekly period, the Operator’s NOEF Operations Team submits an ITP detailing the “as-constructed” details of the works completed.

Daily construction inspections are conducted by the ICE and are guided by ITPs prepared by the Operator for the ICE to review and verify construction activities. It is notable that ITPs for some NOEF work areas are up to eight weeks behind. Such delays present a risk that construction works undertaken outpace design and may not be completed in accordance with the ITP (yet to be prepared) for that work area. A weekly check is undertaken to identify any ITPs not submitted. Any missing ITPs or ITP issues are escalated in a Non-Compliance Report (NCR) to identify matters of concern between the ICE and the Operator.

The Independent Monitor was advised that the number of outstanding ITPs has reduced in the 2023/2024 period. This improvement has 27 ITPs out of 2,983 open (9.6%). It was advised that the Operator’s NOEF Operation Planning Team has a process underway to recruit 3 FTE staff to assist to clear the 2024 ITP backlog.

6.3.2 Tailings Storage Facility

The design and construction of TSF cell raises is required to be overseen and certified by the ICE under Condition 48.g and 8.b of the Authorisation. TSF Construction Reports to satisfy the “as-constructed” construction reports were prepared for Cell 1 Stage 5 (dated March 2022) and Cell 2 Stage 6 (dated 6 May 2022) by the ICE but were not submitted to DITT by the Operator by the end of the current audit period, which represents a delay of over two years. It was noted that the ICE role was removed from the later dated report, *TSF Cell 2, Stage 6, Appendix B, Project Quality Plan, Section 4 Role and Responsibility and the Organisation Chart*.

The ICE conducts TSF routine construction supervision inspections (e.g., Daily Diary, Piezometer data analysis). ICE audits and inspections completed during the construction reporting periods were:

- Supervision of the TSF Cell 2 Intermediate Buttress construction.
- Supervision of the TSF Cell 1 Stage 6 Raise construction.
- Supervision of the TSF Cell 2 Stage 8 Raise construction.
- Monthly TSF and WMD visual inspections.

Stability of the TSF structure continues to be monitored with oversight of the ICE utilising the vibrating wire piezometer network. Piezometer data was monitored over the reporting period using a combination of telemetry and manual downloads from data loggers. The ICE’s review of the piezometer data concluded that “the majority of the piezometer instruments exhibited pore pressure profiles consistent with satisfactory factors of safety using peak shear strength for the current configuration of embankment, based on existing stability models”.

The pore pressure results assessed by the ICE are reported in the quarterly TSF report prepared by the Operator and submitted to DITT.

Overall, based on the ICE’s and the Operator’s review of the available TSF monitoring data and trends, it is concluded that the key environmental performance objectives relevant to the TSF are being met, and no trends of concern for the stability of the TSF embankment have been identified.

A consultant prepared the *TSF Cell 2 Stage 8 Raise to RL100064, Detailed Design Report*, dated 31 August 2023. The engineering design presented for Cell 2, is Stage 8 which includes a 1.0 m crest raise, modifications to the buttress and raise of the emergency spillway. The Engineer of Record (term used interchangeably with ICE for the TSF) conducted a review of the TSF Cell 2 Stage 8 Raise Design, as reported in a letter dated 29 August 2023. It is noted there is no mention of the ICE in this design report and one reference to the Engineer of Record. There should be greater clarity on the ICE role in the design and certification of the TSF, specifically in relation to the relevant conditions of the Authorisation.

6.3.3 As-constructed reports – other structures

The Operator is required to annually submit to DITT, a list of structures scheduled to be constructed in the coming year. On completion of construction the ICE is to provide certification of the “as-constructed” construction report as per Condition 48(g).

In accordance with the Authorisation Condition 8(a) the Operator provided a list of structures and estimated dates for completion of construction and dates for “as-constructed” reports

(dated 30 August 2023), refer Table 6-1 below. It is noted that the construction timeframes provided by the Operator were subject to change.

Table 6-1: Forecast construction schedule submitted to DITT 30 August 2023 by the Operator

Structure name	Construction and commissioning completion estimated date	As-constructed construction report completion estimated date
East Perimeter Run-off Dam	Q3, 2023	Q4, 2023
Water Management Dam Upgrade	Q3, 2023	Q4, 2023
TSF Intermediate Buttress	Q3, 2023	Q1, 2024
TSF Cell 2 Raise to 10064m	Q4, 2023	Q1, 2024
TSF Cell 1 Raise to 10061m	Q4, 2023	Q1, 2024

Note: Construction timeframes may be subject to change.

The Southern Sediment Dam was under construction during the audit period but was not included on the list of structures submitted on 30 August 2023. The 2023 NOEF report indicates that the Southern Sediment Dam would be completed Q3, 2024 with a recommendation it be completed before the 2024/2025 wet season. It is notable that construction stages of the NOEF project construction or NOEF overburden emplacement operational areas are not listed as structures being constructed.

None of the five structures on the annual list of structures anticipated to have a certified "as-constructed" construction report completed in the audit period had an "as-constructed" report provided. Condition 8b of the Authorisation states that "as-constructed" construction reports for each structure are to be submitted to the Department within 60 days upon construction being finalised.

A register of the list of structures updated with all the structures for construction would assist to manage and to maintain the historical list of "as-constructed" reports not completed in the previous year, so these structures are tracked until completion. It is also recommended that stages of NOEF construction areas (e.g. CCL, foundation, underdrain, extraction towers) and NOEF operations overburden emplacement construction work are also added to provide a more comprehensive annual structure "as-constructed" list.

Clear definition of completion (e.g. construction work completed, commissioning, hand-over, practical completion etc) for each structure would assist to understand when the "as-constructed" construction report is due.

6.3.3.1 Water Management Dam

The WMD was dewatered in May 2022 to enable construction to commence on planned upgrades to the primary dam embankment. These works included construction of a new clay cut-off trench to assist in seepage management and improve the long-term structural integrity and safety. The dam wall was also raised by 2m to increase the capacity of the existing spillway. Embankment upgrade works were completed in January 2023, and final upgrade works to the downstream spillway channel were to be completed in the fourth quarter (Q4) of 2023.

Commissioning of the WMD began in February 2023 in accordance with the ICE commissioning plan, this included maximum fill rates, regular inspections and data collection of monitoring instrumentation, to ensure stability and monitor performance.

No "as-constructed" construction report has been completed for the WMD Upgrade. The WMD Upgrade included the raising of the dam wall crest which was completed in early 2023; however, spillway works were ongoing at end of the audit period (April 2024). It was advised that the ICE will prepare a certified "as-constructed" construction report on completion of WMD construction but no definitive date was provided.

6.4 Conclusions

The role of the ICE is to oversee construction activities and to certify that the Mine meets design specifications. The ICE has continued to improve their performance during this audit period. The ICE is better organised, has implemented clearer work processes and has provided more on-site supervision staff resources.

Warranting and accepting the design of the NOEF and TSF are part of the role of the ICE. The ICE consistently prepares NOEF daily, weekly, monthly construction reports with evidence of the details of construction. The ICE conducts TSF routine construction supervision inspections (e.g., Daily Diary, Piezometer data analysis).

The 2023 NOEF as-constructed report, entitled "Peer Review of NOEF, Annual Construction Report 2023", dated 13 August 2024, was prepared and signed by the ICE and was the first occasion that an annual NOEF as-constructed construction report was completed since at least 2020.

TSF Construction Reports to satisfy the "as-constructed" construction reports were prepared for Cell 1 Stage 5 (dated March 2022) and Cell 2 Stage 6 (dated 6 May 2022) by the ICE but were not submitted to DITT by the Operator by the end of the current audit period, which represents a delay of over two years.

The Independent Monitor has observed two ways the Operator could further assist the ICE to meet the obligations of their role. The Operator could support by:

- Providing ITPs ahead of construction in all work areas.
- Implement and maintain a register of the annual list of structures planned for construction completion and expected "as-constructed" construction reports to be completed.

Observations for the Operator that will assist to improve the performance of the ICE are included in Table 3-6.

7. Comparative analysis 2020 – 2024

7.1 Objective

The objective of the comparative analysis of the AEPAR findings for 2020 - 2024 is to assess trends in environmental performance as it relates to the Authorisation, WDL, NT EPA recommendations and river system health.

7.2 Scope and approach

The scope of this comparative analysis involved:

- For the Operator, a quantitative comparison of the AEPAR findings for 2020 - 2024 relating to the Authorisation and WDL.
- For DITT, a quantitative comparison of the AEPAR findings for 2020 - 2024 relating to the Authorisation and NT EPA recommendations.
- A review of OFI action status considered if OFIs raised in the 2020 - 2024 AEPAR for both Operator and DITT have been closed or are still to be addressed.
- A review of the river system health findings for the current audit compared to those of the 2023 AEPAR.

7.3 General findings

The overall Operator 2024 AEPAR compliance scores compared to the 2023 AEPAR have declined by 2% for the Authorisation (down to 96%) and declined by 3% for the WDL (down to 96%).

This AEPAR examined 939 conditions and sub condition requirements contained in the Authorisation, WDL and NT EPA recommendations and identified 518 active conditions. This number of active conditions was a decrease on the 610 active conditions in 2023. Out of the active requirements, 40 part compliances for the Operator and 36 part compliances for DITT were identified.

The comparative findings are discussed in the relevant sections below, grouped by Operator, DITT and river system health.

7.3.1 Operator

Authorisation

The Operator has achieved a high level of overall Authorisation compliance at 96%, with a 2% decline in score since the 2023 AEPAR (98%). The lack of submission of two years of environmental monitoring data significantly impacted the Operator's overall compliance score given it led to six part compliances (moderate) and one part compliance (high).

The Operator's Authorisation audit process identified 21 OFIs in 2020, 21 OFIs in 2021, 18 OFIs in 2022, 14 OFIs in 2023 and 16 OFIs in 2024. There had been a year-on-year reduction trend in the number of OFIs that was not sustained in 2024. Three OFIs are very similar to OFIs in the 2023 AEPAR while one is very similar to an OFI from 2021 to 2023. One of the

Authorisation OFIs relating to measuring and recording discharge duration and volume is identical to an OFI in the WDL. One OBS from 2023 became an OFI in 2024. This audit finding indicates that some OFIs are challenging to implement and have not yet been addressed.

The comparison between the 2020 - 2024 Operator Authorisation audit condition numbers, active condition numbers and overall compliance scores is illustrated in Figure 7-1.

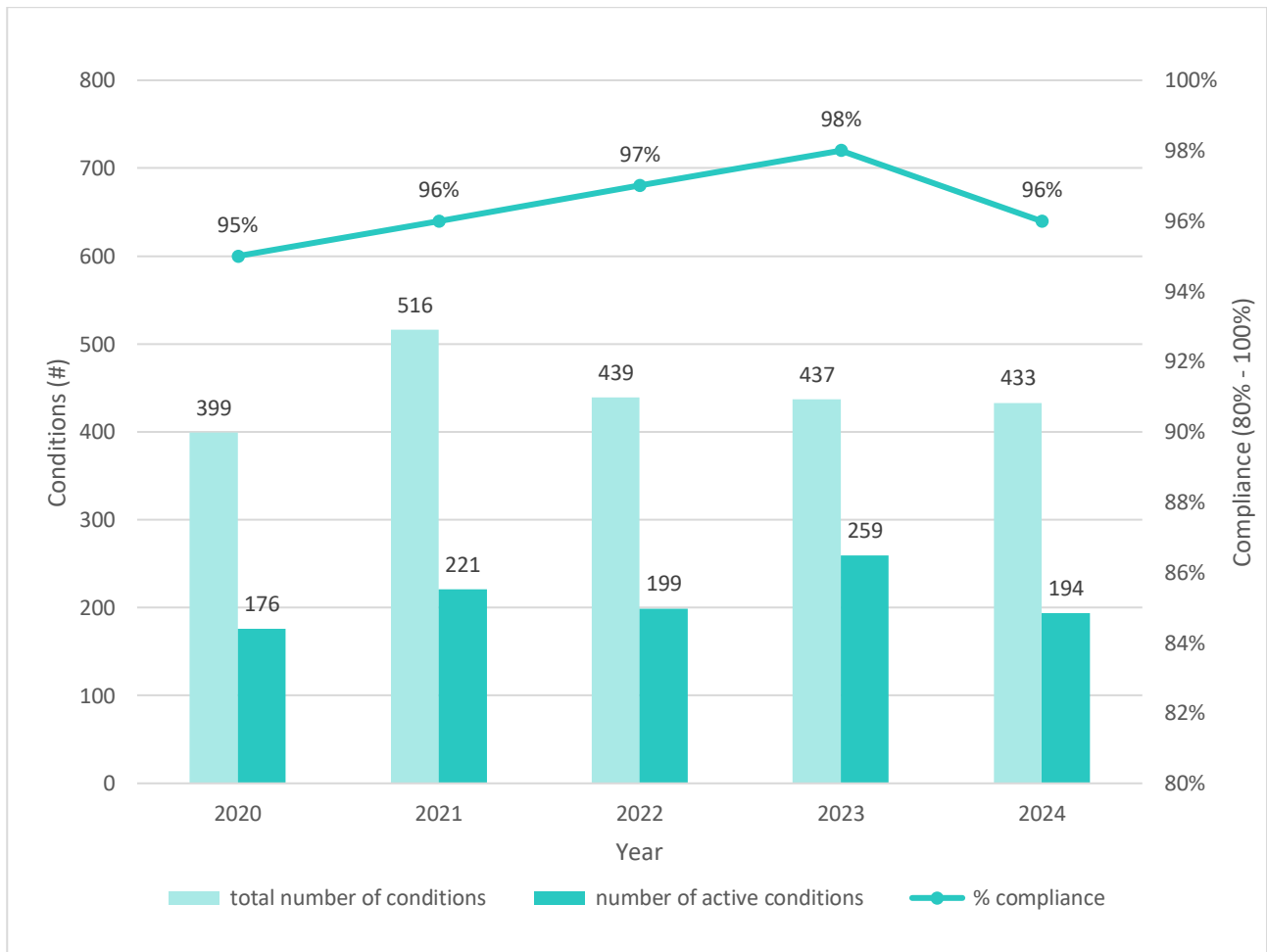


Figure 7-1: Authorisation – Operator findings 2020 – 2024 (by year, by conditions)

Waste Discharge Licence

Against the WDL, the Operator has achieved the lowest level of overall compliance across the five years of data, scoring 96% in the current audit period (due to 18 part compliances). This represents a 3% decrease from the 2023 AEPAR score. Administrative part compliances include not submitting the amended Emergency Response Plan to DEPWS, which equated to four part compliances alone.

The Operator had achieved a reduction in OFIs from eight in 2021 to four in 2022 and to none in 2023; however, that trend has not continued with 11 OFIs in 2024. One of the OBS from 2023 became an OFI in 2024. One of the WDL OFIs relating to measuring and recording discharge duration and volume is identical to an OFI in the Authorisation.

The comparison between the 2020 - 2024 Operator WDL audit condition numbers, active condition numbers and compliance scores is shown in Figure 7-2.



Figure 7-2: WDL- Operator findings 2020 – 2024 (by year, by conditions)

The trends in the Operator’s Authorisation and WDL compliance scores attained in recent years are illustrated in Figure 7-3.

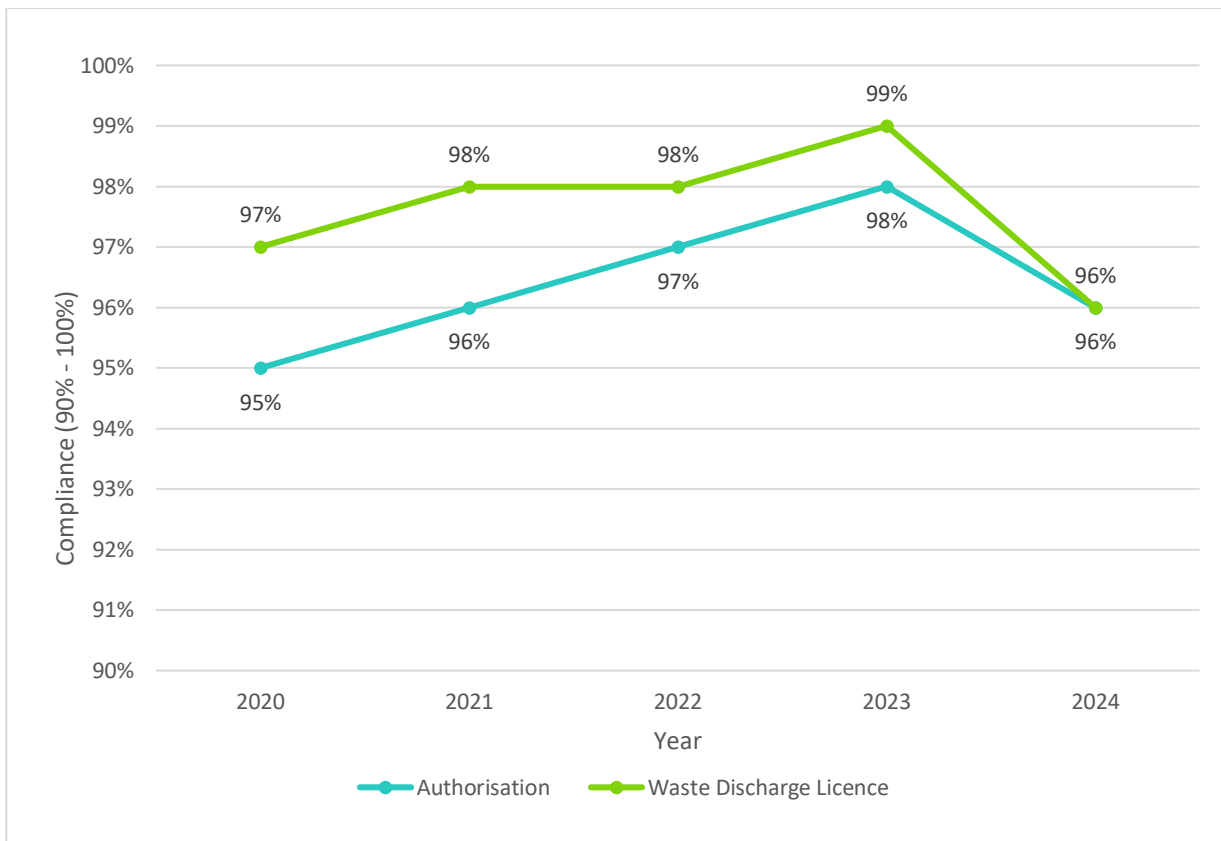


Figure 7-3: Authorisation and WDL – Operator compliance trends from 2020 - 2024

7.3.2 DITT

The overall compliance scores attained by DITT are the lowest they have been across the five years of data with a decrease of 6% to a score of 91% for the Authorisation, while the NT EPA recommendations remained consistent at 98%.

The total number of DITT OFIs (Authorisation and NT EPA recommendations) was 18 in 2021 AEPAR, 17 OFIs in 2022, 12 OFIs in 2023 and now 18 OFIs in the 2024 AEPAR.

Authorisation

The audit process identified one DITT Authorisation OFI remaining from 2022 and one OFI carried over from 2023 with one OFI similar to an OFI from 2021, two other OFIs similar to OFIs identified in 2022 and another one OFI similar to an OFI from 2023. This audit finding indicates that some OFIs are challenging and have not yet been addressed.

The comparison between the 2020 - 2024 DITT Authorisation audit condition numbers and compliance scores is shown in Figure 7-4.

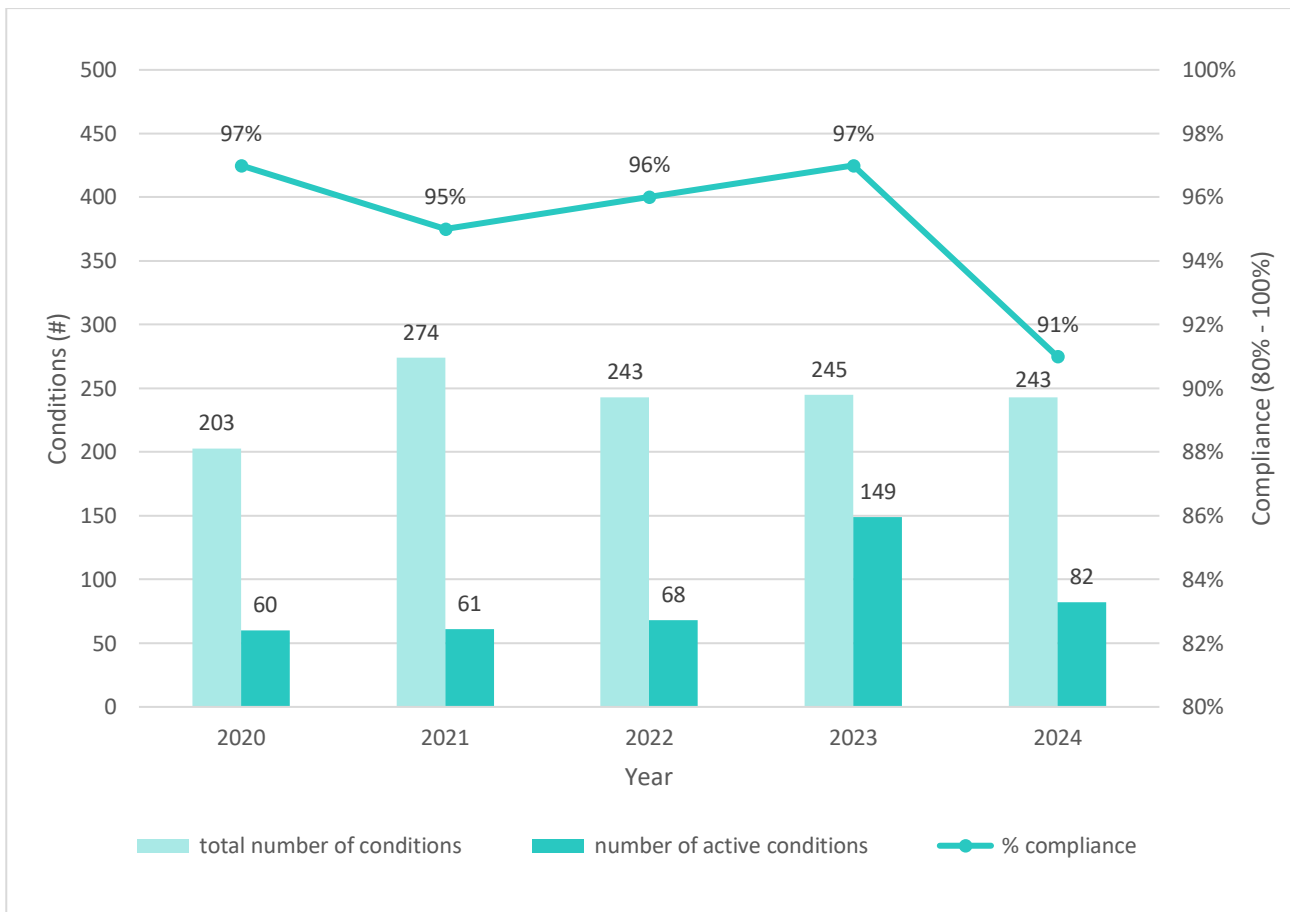


Figure 7-4: Authorisation - DITT findings 2020 - 2024 (by year, by conditions)

NT EPA recommendations

Overall, DITT has maintained a high level of compliance at 98% for adopting the intent of the NT EPA recommendations in the wording of the Authorisation conditions and implementation of the recommendations.

The total number of NT EPA recommendations (117) was consistent from 2020 to 2024 as shown in Figure 7-5. Audits since 2021 have considered the number of recommendations requiring incorporation into the Authorisation.

The NT EPA recommendations audit process identified seven OFIs in 2020, 14 OFIs in 2021, nine OFIs in 2022, one in 2023 and three OFIs in 2024. One of the part compliances and corresponding OFIs is similar to an OFI that has been recorded each year since 2020.

The comparison between the 2020 - 2024 DITT NT EPA recommendations audit condition numbers, active condition numbers and compliance scores is shown in Figure 7-5.

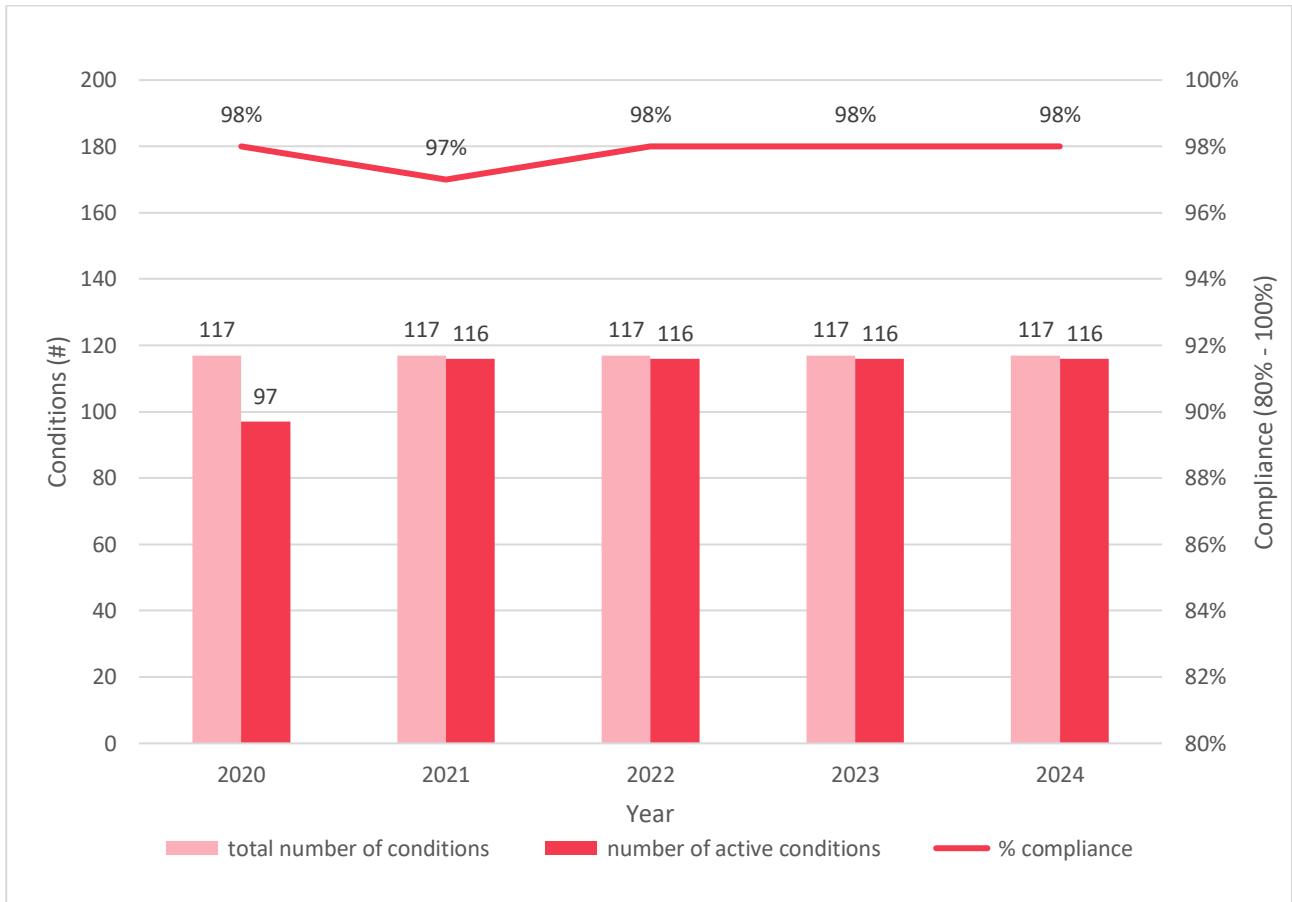


Figure 7-5: NT EPA recommendations – DITT findings 2020 - 2024 (by year, by conditions)

The trend of consistently high compliance scores attained by DITT in recent years for the NT EPA recommendations is illustrated in Figure 7-6 along with the significant decrease in the Authorisation compliance score in 2024.

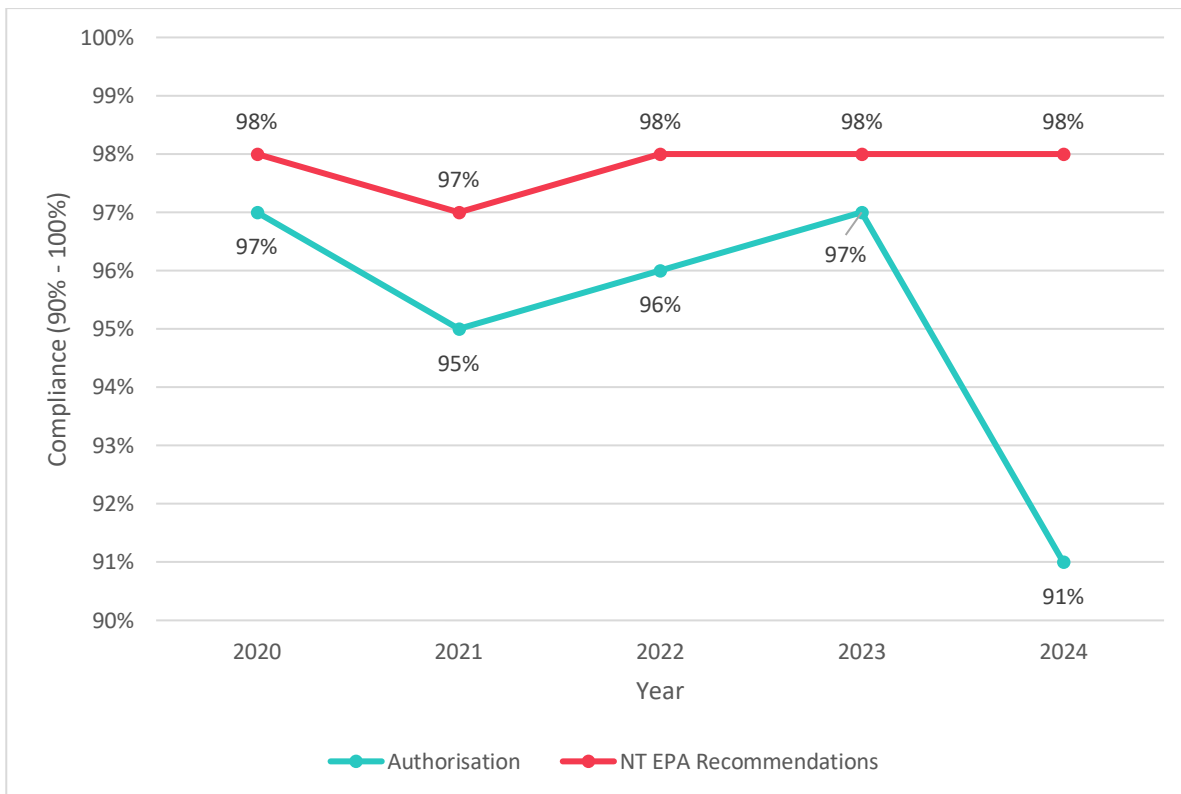


Figure 7-6: Authorisation and NT EPA recommendations - DITT compliance trends from 2020 - 2024

7.3.3 River system health

Consistent with the findings reported in the 2021, 2022 and 2023 AEPARs, the 2024 AEPAR river system health monitoring indicates:

- Aquatic ecosystems of the McArthur River and its tributaries are in good condition.
- An extremely low risk to human health from consuming the monitored fish species caught in the McArthur River catchment in the vicinity or immediately downstream of the mineral lease.

8. Status of opportunities for improvement

8.1 Operator OFI status

OFIs for the Operator were identified in the AEPAR for the audit period of 01 May 2022 to 30 April 2023 and were also identified in previous AEPAR audit periods. It is notable that the opportunities are not mandatory requirements. These opportunities were identified with respect to:

- Authorisation conditions
- Operator commitments
- environmental risk
- river system health.

There were no OFIs in relation to the Operator’s compliance with WDL conditions in the previous audit period.

The status of the OFIs has been reviewed as part of the 2024 audit. This was undertaken through review of summary information provided by the Operator.

8.1.1 Findings

The status of each of the Operator 2023 AEPAR OFIs is set out in Table 8-1, and a summary presented in Figure 8-1. The majority of OFIs have either been implemented, or the Operator intends to implement them.

In the context of this assessment ‘implemented’ means the Operator has provided evidence which demonstrates action taken in line with the OFI, noting that in some cases ‘implemented’ implies that ongoing action is required and will be undertaken to address the OFI (e.g. annual provision of reports). In one instance (OFI-23-OP-AUTH-01 - Prepare annual as-built factual reports for the NOEF as required by the MMP) the response to the OFI provided by the Operator indicated the MMP does not require provision of annual reports, notwithstanding that the Operator provided an annual report. The Independent Monitor’s interpretation of the MMP is that as-built factual reports are required to be prepared for the NOEF on completion of the works or annually. As evidence shows the Operator has provided an annual report for 2023 (although the 2022 report remained incomplete at the end of the current audit period), the Independent Monitor has assumed that future reports will be prepared by the Operator annually and has considered this OFI as implemented.



Figure 8-1: Operator 2023 OFI status

Further, in the context of this assessment:

- 'Ongoing' means the Operator has indicated action has, or will be taken, in line with the OFI; however, evidence has not been provided, as an occasion to address the OFI did not occur in the audit period or evidence addressing part of the OFI only, has been provided.
- 'Partially implemented' means the Operator has provided evidence to demonstrate that part of the OFI has been implemented; however, the Operator has not addressed and/or provided evidence addressing another part of the OFI.
- 'Under consideration' means the Operator has acknowledged the value of improvement identified through the OFI; however, is currently considering its approach for action to address the OFI.
- 'Not implemented' means the Operator's response is ambiguous or appears to suggest addressing the OFI is unnecessary.

The OFIs categorised as 'Not implemented' are briefly discussed below:

- OFI-23-OP-COM-01 and OFI-23-OP-COM-02 have carried over from the 2021 AEPAR without being actioned by the Operator. These OFIs refer to the existence of two registers of commitments within the MMP (Appendix M and L), which the Operator has previously clarified are both relevant. No evidence has been provided by the Operator to specifically address Appendix L; however, it is notable there is considerable overlap of commitments between the registers. The Independent Monitor considers improved tracking of commitments is important for the facilitation of commitment address and to demonstrate such address, and as such has retained these OFIs.
- The response to one OFI relevant to river system health (OFI-23-OP-RH-06) is ambiguous, and it is unclear to the Independent Monitor as to whether the Operator intends to take further action.

This review of OFI status shows that more than half of all the Operator 2023 AEPAR OFIs (18) were similar to, or carried over from, previous years. The situation where OFIs are repeated across multiple years is an indication that OFIs remain unresolved. It is notable that of these carried over OFIs, nine were implemented in the audit period.

Table 8-1: Status of Operator opportunities for improvement

OFI ref.	Operator OFI ¹	Document Section / Key Regulatory Activity	Status
OFI-23-OP-AUTH-01 ⁺	Prepare annual as-built factual reports for the NOEF as required by the MMP. (Condition 3)	General	Implemented
OFI-23-OP-AUTH-02 ⁺	Submit 'as built' construction reports for the TSF to DITT within 30 days* upon construction being finalised. (Condition 8)	Mining Management Plan and Reporting	Ongoing
OFI-23-OP-AUTH-03	Incorporate more detail on the timeframes for action/s if TARP triggers are exceeded. (Condition 46.c)	Mining Management Plan and Reporting	Under consideration
OFI-23-OP-AUTH-04	Incorporate more information to outline how transparency in monitoring, reporting and review is provided to show openness and accountability. (Condition 46.e)	Mining Management Plan and Reporting	Under consideration
OFI-23-OP-AUTH-05 [*]	Ensure the ICE progressively prepares monthly construction reports for the NOEF. (Condition 48.b)	Independent Oversight - Appointment of ICE	Implemented
OFI-23-OP-AUTH-06	Ensure the ICE sign off all hold points. (Condition 48.c)	Independent Oversight - Appointment of ICE	Ongoing
OFI-23-OP-AUTH-07	Operator to ensure the ICE agrees in writing that the appointment of an Operator's project manager/resident engineer as an onsite representative does not diminish the ICE's responsibility or liability for the project. (Condition 48.f)	Independent Oversight - Appointment of ICE	Ongoing
OFI-23-OP-AUTH-08 [*]	Provide evidence of ITRB review of Buttress Expansion Letter, Intermediate Buttress Design Report and Cell 2 Stage 7 Raise Construction report and the TSF OMS Manual (at least annually). (Condition 50.b.ii, 50.e & 50.e.ii)	Independent Tailings Review Board	Implemented
OFI-23-OP-AUTH-09 [*]	Ensure that the ITRB meets annually. (Condition 50.b.ii, 50.e & 50.e.ii)	Independent Tailings Review Board	Implemented
OFI-23-OP-AUTH-10	Document and update actions resulting from inspections, listed in the Dams and Sumps Register as it appears no actions have been recorded since December 2021. (Condition 64)	Water Management and Storage	Ongoing
OFI-23-OP-AUTH-11	Provide confirmation that the weekly inspections of the SPROD and EPROD are being undertaken in accordance with ANCOLD (2003), and provide current versions of the Dam Safety Emergency Plan and Operations, Maintenance and Surveillance (OMS) manual. (64.a and 64.d)	Water Management and Storage	Ongoing
OFI-23-OP-AUTH-12	Document inspections of North East Bravo Sump between June 2022 and April 2023. (Condition 64.p)	Water Management and Storage	Ongoing

OFI ref.	Operator OFI ¹	Document Section / Key Regulatory Activity	Status
OFI-23-OP-AUTH-13	Document inspections of Central East Bravo Sump between October 2022 and April 2023. (Condition 64.s)	Water Management and Storage	Implemented
OFI-23-OP-AUTH-14*	Construct the permanent gauging stations on Emu Creek and Glyde River now that approvals have been received. (Schedule D - 3.a and 3.b)	Environmental Management and Monitoring	Implemented
OFI-23-OP-COM-01+	Provide detail and address the outstanding commitments from the MMP (Appendix L), along with the six incomplete actions for the commitments reported in the EMR (Appendix B).	Operator Commitments OFI	Not implemented
OFI-23-OP-COM-02+	Incorporate the commitments from the MMP (Appendix L and Appendix M) to a single commitment register for reporting against in future EMRs, and rationalise the commitments to avoid duplication.	Operator Commitments OFI	Not implemented
OFI-23-OP-COM-03+	Provide additional information in the commitments register to identify where a commitment is closed out with no further action proposed. Provide details of close-out actions to confirm commitments are complete, e.g., date completed, brief description of action completed, reference to relevant supporting report/ data/ documentation.	Operator Commitments OFI	Under consideration
OFI-23-OP-COM-04+	Provide a unique reference number to each commitment to facilitate tracking and reporting.	Operator Commitments OFI	Under consideration
OFI-23-OP-RI-01+	Implement regular formal environmental risk assessment reviews to monitor the effectiveness of controls as part of continuous improvement.	Risk Management OFI	Under consideration
OFI-23-OP-RI-02+	Undertake regular formal environmental risk assessment reviews to update risk status and track environmental risk management progress as part of continuous improvement.	Risk Management OFI	Under consideration
OFI-23-OP-RH-01+	Adopt the conclusions of the Operator's external experts that it is preferable to increase the number of reference sites along the McArthur River rather than in adjacent catchments.	Freshwater Macroinvertebrate Monitoring	Implemented
OFI-23-OP-RH-02+	Increase the number of downstream reference sites with riffle microhabitat in future sampling as planned.	Freshwater Macroinvertebrate Monitoring	Implemented
OFI-23-OP-RH-03+	Maintain longer term data collection for comparison of annual aquatic fauna program to better understand longer-term trends and influences of inter-year variability in-flow on aquatic fauna community development and resilience in the McArthur River diversion channel.	Diversity and Abundance of Freshwater Aquatic Fauna	Implemented
OFI-23-OP-RH-04+	Increase the number of tagged fish to replace the fish for which batteries in the tag are reaching their expiry dates.	Freshwater Sawfish and Barramundi Acoustic Monitoring	Implemented

OFI ref.	Operator OFI ¹	Document Section / Key Regulatory Activity	Status
OFI-23-OP-RH-05 ⁺	Determine if inclusion of tissue metal concentration sampling at the remote Batten Point (McArthur River estuary) location would be beneficial to the monitoring program and/or enhance the relevance of the monitoring program to the local community.	Aquatic Fauna – Metals	Implemented
OFI-23-OP-RH-06 [*]	Undertake a reach-scale assessment to measure the extent of rehabilitation along the entire McArthur River diversion channel and provide an indication of the reach scale trajectory of rehabilitation for fish habitat. This may be undertaken at a coarse level and provide a measure of riparian revegetation success combined with introduced woody debris over time.	Diversity and Abundance of Freshwater Aquatic Fauna	Not implemented
OFI-23-OP-RH-07	Develop time series graphical representation of wet season magnitude and extent against key metrics influenced by flow and pertinent to the AMP objectives.	All freshwater aquatic ecology monitoring programs	Partially implemented

Note: 1 Reference to related Authorisation is provided where applicable.

* Similar OFI from 2022 AEPAR.

+ OFI carried over from 2021 AEPAR.

The timeframe for submission of as-constructed construction reports is amended from 30 to 60 days in the Authorisation dated 17 May 2023 (Condition 8.b).

8.2 DITT OFI status

OFIs for DITT were identified in the AEPAR for the audit period of 01 May 2022 to 30 April 2023 and were also identified in previous AEPAR audit periods. It is notable that the opportunities are not mandatory requirements. These opportunities were identified with respect to:

- Authorisation conditions
- NT EPA recommendations
- performance in regulatory procedures and regulatory approach.

The status of the OFIs has been reviewed as part of the 2024 audit. This was undertaken through review of summary information provided by DITT.

8.2.1 Findings

The status of the DITT 2023 AEPAR OFIs is set out in Table 8-2. Of the 16 OFIs for which DITT provided a response regarding action during the audit period, 13 are ongoing and three have not been implemented.

In the context of this assessment 'ongoing' means DITT has indicated action has, or will be taken, in line with the OFI; however, evidence has not been provided, as an occasion to address the OFI did not occur in the audit period or evidence addressing part of the OFI only, has been provided. Four of the ongoing OFIs relate to the establishment of independent expert panels for the NOEF and TSF, for which progress was made; however, the panels were not established. Eight of the OFIs relate to review and/or approval of Operator submissions.

In the context of this assessment 'not implemented' means DITT's response is ambiguous or appears not to address the OFI. These OFIs are briefly discussed below:

- OFI-23-DE-REC-01 is incorrectly identified in the DITT response, and as such it is unclear whether DITT has incorporated a mechanism for the revised monitoring program to be reviewed by the Independent Panel(s) and Independent Monitor and then be approved.
- DITT response to OFI-23-DE-REG-02 refers to review related to 'relevance and focus of the content of the EMR', whereas the OFI is intended to address processes, tasks and outputs associated with DITT's annual review of the EMR.
- It is unclear from DITT's response to OFI-23-DE-REG-03 whether DITT intends to prepare an internal procedure for regulation of Authorisation conditions and NT EPA recommendations.

Of the 16 OFIs for which DITT provided a response, 11 were initially identified through Independent Monitor auditing prior to the 2023 AEPAR, suggesting that close-out of some opportunities is taking considerable time.

Table 8-2: Status of DITT opportunities for improvement

OFI ref.	Operator OFI ¹	Document section / key regulatory activity	Status
OFI-23-DE-AUTH-01 [^]	DITT to follow up the requirement for the Operator to submit TSF as built construction reports for approved works for the TSF Cell 1 Stage 5 and Cell 2 Stage 6 raises. (Condition 8)	Mining Management Plan and Reporting	Not implemented
OFI-23-DE-AUTH-02	DITT to formally assess the annual EMR within an agreed timeframe. (Condition 9)	Mining Management Plan and Reporting	Ongoing
OFI-23-DE-AUTH-03	Provide more timely responses from DITT on review/approval of submitted documents. (Conditions 16.e, 17.b, 23.e, 27.e, 29.c 36.e & 37.d)	Overburden Management Project	Ongoing
OFI-23-DE-AUTH-04	DITT to establish the Independent Panels (NOEF and TSF) as soon as practical. (Condition 21)	Overburden Management Project	Ongoing
OFI-23-DE-AUTH-05 [*]	DITT to establish the Independent Panel (NOEF) or use an alternative expert review in the interim to assess requirement for the NOEF seepage interception trench and recovery system. (Condition 22)	Overburden Management Project	Ongoing
OFI-23-DE-AUTH-06 [*]	DITT to establish the independent panels (NOEF and TSF) so that consultation during the preparation of future management plans can occur. (Condition 27.d)	Overburden Management Project	Ongoing
OFI-23-DE-AUTH-07	DITT to request the Operator to update the WMP to include the requirements to: report results annually to DITT; require the Independent Monitor audit of the results every three years; and publish the results of the program on the Operator's website. Alternately, reword Conditions 27.g.i., ii. and iii. so that they refer to these activities as needed to be done but not necessarily for the plan to ensure they are done. (Condition 27.g.i, 27.g.ii, 27.g.iii)	Overburden Management Project	Ongoing
OFI-23-DE-AUTH-08	DITT to liaise with the Operator with a standing agenda item on ITRB in the TWG regarding ITRB matters for example: <ul style="list-style-type: none"> ITRB review of TSF construction documentation not occurring in timely manner OMS Manual not being updated and progressed from draft version for the Cell 1 stage 5 and Cell 2 Stage 7 raises or reviewed by ITRB Design changes to the Cell 2 Stage 7 raise buttressing not being reviewed or endorsed by the ITRB. (Condition 50.c) 	Independent Tailings Review Board, Tailings Storage Facility	Not implemented
OFI-23-DE-AUTH-09 ^{**}	DITT to formally review and assess TSF Quarterly Reports received after November 2022 and advise the Operator in writing when reports are accepted. (Condition 80)	Tailings Storage Facility	Not implemented
OFI-23-DE-AUTH-10 ^{**}	DITT to formally review and assess TSF Quarterly Reports in a more timely fashion. (Condition 80)	Tailings Storage Facility	Not implemented
OFI-23-DE-AUTH-11 ^{**}	DITT to request that the Operator submit TSF quarterly reports in a more timely fashion. (Condition 80)	Tailings Storage Facility	Not implemented

OFI ref.	Operator OFI ¹	Document section / key regulatory activity	Status
OFI-23-DE-REC-01 ^{^^^}	DITT to incorporate a mechanism for the revised monitoring program (assume Water Monitoring Program) to be reviewed by the Independent Panel(s) and Independent Monitor and then be approved by the relevant regulators, e.g. DITT. (NT EPA recommendation 27)	Adaptive Management	Not implemented
OFI-23-DE-REG-01 ^{^^}	Prioritise the establishment of the Independent Panel of Experts for TSF and NOEF to trigger and facilitate independent reviews of the Operator's monitoring program and reporting.	Regulatory Approach	Ongoing
OFI-23-DE-REG-02 ^{^^}	Facilitate an internal DITT review to examine the annual EMR process, tasks and outputs with a view to streamline the activity. As part of this review, examine what is sufficient for regulatory requirements and responding to community expectations, as well as how the annual process could be more efficient.	Regulatory Approach	Not implemented
OFI-23-DE-REG-03 ^{^^}	Prepare an internal procedure for the regulation of the Authorisation conditions and NT EPA recommendations to document the processes, timing, due dates, overdue submissions, approvals, decisions, public /community communication and records requirements to assist managing the complex regulatory requirements relating to DITT activities.	Regulatory Approach	Not implemented
OFI-23-DE-REG-04 ^{^^}	Reduce reliance on key individuals within DITT to ensure consistency and continuity of compliance and performance.	Regulatory Approach	Ongoing

Note: 1 Reference to related Authorisation or NT EPA recommendations is provided where applicable.

[^]OFI carried over from 2021 AEPAR.

^{^^}OFI carried over from 2020 AEPAR.

^{^^^}OFI very similar to an OFI from 2020 AEPAR.

*OFI carried over from 2022 AEPAR.

**OFI very similar to an OFI from 2022 AEPAR.

9. Stakeholder engagement

9.1 Overarching scope and approach

The Independent Monitor's stakeholder engagement approach aims to meet the following objectives:

- Communication reflects local community interests.
- Engagement is appropriate, relevant, and inclusive and builds stakeholder trust of the Independent Monitor team, process and outcomes.
- Stakeholders perceive the Independent Monitor process as transparent, which facilitates stakeholder trust of the outcomes.
- Community and key stakeholders are informed about the environmental review and audit report findings.

A comprehensive Stakeholder Engagement Plan was prepared to guide community and stakeholder engagement and communications for the Independent Monitor. The Independent Monitor stakeholder engagement team (CCC), an NT Aboriginal business, were engaged as subconsultants, to facilitate community engagement throughout the audit process.

An overview of the engagement approach, scope, limitations, key outcomes, and recommendations for future engagement is summarised in the following sections.

9.2 2023 AEPAR engagement

9.2.1 Scope and approach

Prior to the release of the 2023 AEPAR, the Independent Monitor stakeholder engagement team (hereafter referred to as the stakeholder engagement team) met with members of the local community on-country in October 2023 to communicate the findings of the 2023 AEPAR.

The engagement approach aimed to:

- Provide copies of the Independent Monitor Annual Report Card (ARC) 2023, a condensed, visual and reader friendly version of the full report, to community stakeholders in Borroloola and surrounding area.
- Meet with community stakeholders, both one-on-one and in small group settings, to talk them through the findings of the report and provide an opportunity for stakeholders to ask questions regarding the audit findings.
- Provide community stakeholders with the contact details of the Independent Monitor stakeholder engagement team, offering the opportunity to discuss the report and ask questions.

9.2.1.1 Annual Report Card

A condensed and reader friendly version of the full report (the ARC) has been shared with the communities since 2021 and was implemented based on stakeholder feedback in 2020. The 2023 ARC was used in the same manner as previous years - as a means to share the

Independent Monitor findings about the Operator's environmental performance, and the performance of DITT in regulating the environmental performance of the Operator.

Copies of the 2023 ARC were left behind for stakeholders who missed engagement to collect or view, both at the Operator's Borroloola office and the Mabunji office (Borroloola). Copies were also given to individuals who were identified for engagement but were unable to attend. The engagement team found it difficult to leave copies at the same venues as prior years, due to the spaces being used by other groups.

9.2.1.2 Face-to-face consultation

The stakeholder engagement team undertook engagement in Borroloola and surrounds between 23 and 26 October 2023, accompanied by a local Yanyuwa/Marra Traditional Owner who has supported the Independent Monitor stakeholder engagement team previously. Based on participant feedback in 2020, the Independent Monitor has held face-to-face engagement with community members since 2021, and this continues to be the adopted approach.

Consultation with the community followed the same process as previous years. First, the stakeholder engagement team introduced themselves, provided copies of the ARC 2023, and gave an overview of Independent Monitor's role and the monitoring process. Then the stakeholder engagement team discussed the AEPAR results and sought feedback from community stakeholders on the results and created opportunities for stakeholders to ask any questions. Where possible, the stakeholder engagement team answered stakeholder questions. If the questions were beyond the scope of the Independent Monitor, the stakeholder engagement team provided contact details for the Operator. Lastly, the stakeholder engagement team asked stakeholders to identify their primary Mine-related concerns and sought their feedback on how engagement could be changed or improved for future years. Stakeholders were given the contact details of the engagement team for any follow up queries.

In total, 27 stakeholders were engaged in person during the engagement team's visit to Borroloola and the surrounding region. The majority of these stakeholders were engaged in Borroloola and surrounding Town Camps. The 2023 engagement took place in:

- Borroloola (including town camps)
- Wandangula (Police Lagoon)
- Goolminyini (Devil Spring)
- Minyalini (Campbell Spring)

The Independent Monitor also returned to Borroloola in February 2024 and presented the 2023 audit findings to the CRG meeting.

9.2.1.3 Engagement limitations

In previous years, the Independent Monitor stakeholder engagement team travelled to Robinson River to engage with the community there. Poor road conditions between Borroloola and Robinson River prevented the engagement team from travelling to this community in October 2023, where six stakeholders participated in engagement in 2022. The stakeholder

engagement team left copies of the Annual Report Card in the Operator's Borroloola office to be shared with interested members of the Robinson River community once travel resumed.

Fewer stakeholders were engaged during the 2023 consultation period than in the 2022 consultation period. In 2022, 36 stakeholders engaged with the Independent Monitor stakeholder engagement team. In 2023, 27 stakeholders were engaged and many community members commented on the timing of engagement conflicting with their other commitments leading them to be unable to attend AEPAR engagement.

9.2.1.4 Engagement with Aboriginal corporations

Feedback from stakeholders during 2022 engagement included suggesting that the Independent Monitor engage directly with Aboriginal corporations, through participating and presenting at their Annual General Meetings (AGM). The stakeholder engagement team reached out to three major Aboriginal corporations in the area in the lead up to the engagement period; however, none of the Aboriginal corporations accepted the offer.

9.2.2 2023 AEPAR engagement outcomes summary

Engagement feedback from local community members during the 2023 consultation activities focused on environmental monitoring, rehabilitation, and the health of the McArthur River. Overall, the community responded positively to the AEPAR 2023 findings, and feel that the Operator does a good job of managing environmental risks associated with mining activities.

Traditional Owners from the BBLF area have stated that they wish to see more air and water monitoring conducted in the port area and Mule Creek. Stakeholders expect the monitoring processes to be open and transparent and suggest that local people are involved in the monitoring process.

This topic of involving local people in environmental monitoring was found across several engagement outcomes and was a recurring theme in discussions with community members. The li-Anthawirriyarra Sea Rangers have expressed a keen desire to be involved in the water monitoring and data collection for the Independent Monitor. This sentiment is shared broadly in the community and has been raised in previous rounds of engagement. As described in Section 3.6, the li-Anthawirriyarra Sea Rangers have been involved in water monitoring with the Operator.

After seeing before and after images that highlighted the rehabilitation of Country that has been undertaken by the Operator, stakeholders were pleased and shared the sentiment that the Operator is working hard to rehabilitate the environment.

Stakeholders from Bing Bong and Mule Creek expressed concern about the health of the ecosystem in these areas, citing a perceived decline in the availability of Barramundi and Bream. The stakeholder engagement team could not corroborate these claims.

9.2.2.1 Out of scope matters

A number of the conversations held between the stakeholder engagement team and community members were determined as falling outside of the scope of the Independent Monitor's assessment; however, some of the issues raised by community members are conceptually related to the Independent Monitor's focus.

While the following three matters that were raised by community members are considered out of scope, community stakeholders will have more flexible definitions of matters for which the Operator is responsible. The Independent Monitor suggests that the Operator consider engaging with community to discuss the following stakeholder requests to:

- Restock fish supplies in the creeks in the area, particularly Mule Creek near Bing Bong.
- Focus rehabilitation efforts on the Bing Bong area, particularly around clearing and burn management ahead of the Dry season.
- Gain support from the Operator to better manage Country in the area, to enable Traditional Owners and Rangers to manage the Country in ways that are culturally appropriate.

9.2.3 Identified opportunities for improvements to future engagement

Timing of the Independent Monitor engagement in Borroloola and surrounding regions was raised as a key area for improvement for future years. As noted in Section 9.1, conflicting schedules impacted stakeholder engagement in 2022, and has continued to impact engagement in 2023.

Access proved to be an issue during 2023 engagement. The stakeholder engagement team were unable to reach Robinson River due to impassable river crossings and the general condition of the road, impacted by recent weather.

Presenting at Aboriginal corporation AGMs was raised in the last engagement round and was attempted during 2023 engagement. However, this did not lead to any opportunities for the stakeholder engagement team to present the 2023 AEPAR findings to the Aboriginal corporation AGMs.

10. Overall conclusions

The Operator has a broad range of aquatic ecosystem monitoring programs and management actions that have been developed over the Mine's life to meet the environmental objectives. During the audit period, these were well-implemented and where impacts were noted, they were adequately described, and mitigation actions recommended. This AEPAR supports the continuation of the current aquatic ecology monitoring programs as these activities are appropriate and effective to achieve the river system health objectives.

Overall, the McArthur River and its tributaries are in good health. There are localised elevated levels of metals, in Barney Creek and Surprise Creek, immediately adjacent to the Mine's processing area, within the mineral lease. These elevated levels only occur in areas not accessible to the public and will require ongoing monitoring and management.

The management actions undertaken to remove potentially contaminated sediments from Barney Creek have contributed to protecting downstream beneficial uses and environmental values.

Data collected over the 2023-2024 monitoring program demonstrates that fish caught outside of the mineral lease boundary and throughout the McArthur River catchment, including Barramundi and Sooty Grunter, are safe to consume. The review of monitoring data to-date indicates that there is an extremely low risk to human health from consuming fish caught in the McArthur River catchment in the vicinity or immediately downstream of the mineral lease boundary.

The audit found the Operator maintained a high level of compliance with regulatory approval requirements during the audit period. The Operator's continued high level of compliance with the Authorisation and WDL conditions across key operational activities is a measure of the level of fulfillment of regulatory requirements. The Operator achieved an overall compliance score of 96% for both the Authorisation and the WDL. Most part-compliances identified for the Operator were of an administrative nature and did not present any immediate environmental risk.

DITT achieved an overall compliance score of 91% for the Authorisation and maintained a high compliance score, 98%, from 2022 to 2024, for the implementation of the NT EPA recommendations.

The environmental performance of both the Operator and DITT is fundamentally linked to the level of compliance achieved against Authorisation and WDL conditions, specifically designed to safeguard the environmental values of the McArthur River and protect the health of the McArthur River from potential impacts of the mining activities.

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EMR 2023-2024 Appendix O Acoustic Monitoring Program 2023

EMR 2023-2024 Appendix P Aquatic Fauna Monitoring Early Dry Season 2023

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Appendix A. Authorisation compliance workbook - Operator

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024													Evidence		Comments		
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nublir)	Monitoring & Reporting	Score	Compliance level				
SCHEDULE A																	
Definitions																	
1	1	In this document, unless the contrary intention appears:											-			Note that sub-conditions 1.a to 1.oo are not listed as they are all definitions and are unable to be audited for compliance.	
Interpretation																	
2	2	In this document, unless the contrary intention appears:											-			Note that sub-conditions 2.a to 2.i are not listed as they are all interpretations and are unable to be audited for compliance.	
General																	
3	3	Subject to any Conditions contained in the Act and this document, the Operator must comply with the commitments and activities contained in the MMP including the implementation of all systems referred to in the MMP.										4	Full Compliance	<p>EMR 2023-2024 Peer Review of NOEF Annual Construction Report 2023 MRM Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated 13Aug2024 Drone imagery regarding wet season capping of NOEF. Letter NOEF Temporary Floodproofing Delay - Independent Engineer Review. RFI 2023_NEa_001_NE_Alpha_Q100_Delay.</p> <p>EMR 2023-2024 states "During the reporting period, MRM operated the Mine in accordance with the January 2020 MMP. During the reporting period, the MMP was reviewed and an updated version was submitted to DITT on 15 March 2024. The 2024 MMP Update was subsequently approved on 23 July 2024. ", " All drilling during the reporting period was undertaken in accordance with the January 2020 MMP." and "The clearing and soil stripping activities undertaken in accordance with the January 2020 MMP during the reporting period are provided on Figure 4 (i.e. stripped material within the Stage L/M perimeter) and Figure 5."</p> <p>Section 5 of the January 2020 MMP Appendix G NOEF Design and Construction Guidelines required an as-built factual report for the works annually that the ICE reviews and endorses as being correct, which was completed in the audit period.</p> <p>The 2020 NOEF Design and Construction Guidelines indicate that the MRM operations team shall aim to complete all wet season capping works by 1 December each year." The Operator confirmed "as a minimum alluvial cover was present on key batter that interface with the CEB PAF-RE Cell by the 1 December 2023." Inspections and periodic maintenance were undertaken. Drone imagery was provided as evidence of the capping.</p>		<p>Assessment of the commitments is covered under condition 14a. Any management plans that are an appendix to the MMP are audited separately under Schedule D condition 6 related to monitoring requirements.</p> <p>MMP states "A temporary 20 year ARI flood protection levee is planned to extend from EPROD to SEPROD in the south (Figure 16). Construction will be in accordance with the NOEF Construction and Design guidelines. The temporary 20 year ARI flood protection levee will be in place for a maximum of two wet seasons."</p> <p>The Operator advised "MRM was granted approval from the ICE to extend the period of the temporary 20 year ARI flood protection, for a section between EPROD to SEPROD to be in place for greater than two wet seasons.", "Similarly, MRM was granted approval from the ICE to extend the period of temporary 20 year ARI flood protection for the NE Alpha Q20 Stage to be in place for greater than two wet seasons." and "Lastly, the Q20 floodproof for the NW Stage was in place for the 2022/2023 wet season, but then not required for the 2023/2024 wet season, as per the provided survey data (NW Stage Q20 evidence of no more than two wet seasons)."</p> <p>The Operator confirmed "there was mention of the temporary flood proofing in the latest MMP amendment, however specifics on keeping it in place for two wet seasons was approved by the ICE,".</p> <p>OBS: MMP amendments should include where the temporary 20 year ARI flood protection will be in place for more than 2 wet seasons or evidence of consultation and agreement on this with the regulator.</p>	
4	4	The Operator may only conduct mining activities identified in the MMP within the Mine subject to any Conditions contained in the Act, this document and the Conditions commitments and systems contained in the MMP.										4	Full Compliance	<p>EMR 2023-2024 Ground Disturbance Permit 48484 last signature 14Jun2023 Ground Disturbance Permit 46544 last signature 10March2023 Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated 13Aug2024</p> <p>EMR 2023-2024 states that the MMP was reviewed and an updated version was submitted on 15 March 2024 and that 2024 MMP Update was approved on 23 July 2024.</p> <p>Submission of proactive MMP amendments shows that there is a process in place for where any activities outside of the MMP are required and they do not occur until an amendment is approve.</p> <p>EMR 2023-2024 states "The clearing and soil stripping activities undertaken in accordance with the January 2020 MMP during the reporting period are provided on Figure 4 (i.e. stripped material within the Stage L/M perimeter) and Figure 5."</p> <p>Clearing permits include the prompt "Is the clearing work consistent with the current MMP" and specific prompts related to clearing. Ground Disturbance Permit 48482 includes reference to Jan 2020 MMP Section 4.5.4 and email from DITT in June 2022 regarding WMD upgrades.</p>			
5	5	The mine site is to be developed and operated in accordance with all relevant Commonwealth and Northern Territory legislation.										4	Full Compliance	<p>EPBC Act Approval 2003/954 - Annual Compliance Report Submission dated 29Sep2023 EPBC 2014/7210 - 2022-2023 EPBC Compliance Report dated 15Feb2024 Aboriginal Cultural Heritage Management Plan dated 29Feb2023 Whincoop Archaeology 2023 Annual Aboriginal Heritage Sites Inspection Report dated 18Oct2023 EMR 2023-2024</p> <p>Evidence was provided to demonstrate compliance with the Environment Protection and Biodiversity Conservation (EPBC) Act 1999, Aboriginal Sacred Sites Act 1989 and Heritage Act 2011. No instances of activities not complying with Commonwealth and Northern Territory legislation were identified as part of this audit.</p>		<p>The May 2022 Authorisation condition included the following examples of relevant legislation <i>Environment Protection and Biodiversity Conservation Act 1999, Northern Territory Aboriginal Sacred Sites Act 1984, Territory Parks and Wildlife Conservation Act 1976 and Heritage Act 2011</i> .</p>	
Mining management plan and reporting																	

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024														Evidence		Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhli)	Monitoring & Reporting	Score	Compliance level	Evidence		Comments
6	6	The Operator must on 31 August 2021 and on each anniversary of that date (or such other date as nominated by the Operator and approved by the Minister), review the approved MMP and if necessary, amend the MMP.										4	Full Compliance	Correspondence between Operator and DITT regarding 2023 MMP Amendment - Variation of Authorisation 0059 dated May2023 Letter from Operator to DITT subject: McArthur River Mining – 2022-2023 Environmental Monitoring Report dated 31Aug2023 The email to DITT accompanying the EMR on 31Aug2023 advised that an MMP review had been undertaken and no amendment to the MMP was required at that time.		EMR 2023-2024 states that the MMP was reviewed and an updated version was submitted on 15 March 2024 and that 2024 MMP Update was approved on 23 July 2024.
7	7	The Operator must submit annually all environmental monitoring data which has been collected since the previous data submission. The data submission must be provided in the approved form (being an MS Excel template that can be provided on request) and include laboratory and field data for the following:												Refer to sub conditions		
7.a	7.a	surface water;									1	2	Part Compliance (moderate)			No data was submitted in the audit period. The data for 2021-2022 was submitted April 2023 (before the audit period). The Operator advised that the Condition 7 monitoring data for years 2022-2023 and 2023-2024 is currently in draft. OFI: Submit all environmental monitoring data annually.
7.b	7.b	groundwater;									1	2	Part Compliance (moderate)			No data was submitted in the audit period. The data for 2021-2022 was submitted April 2023 (before the audit period). The Operator advised that the Condition 7 monitoring data for years 2022-2023 and 2023-2024 is currently in draft. OFI: Refer to OFI condition 7.a.
7.c	7.c	dust;									1	2	Part Compliance (moderate)			No data was submitted in the audit period. The data for 2021-2022 was submitted April 2023 (before the audit period). The Operator advised that the Condition 7 monitoring data for years 2022-2023 and 2023-2024 is currently in draft. OFI: Refer to OFI condition 7.a.
7.d	7.e	sediments;									1	2	Part Compliance (moderate)			No data was submitted in the audit period. The data for 2021-2022 was submitted April 2023 (before the audit period). The Operator advised that the Condition 7 monitoring data for years 2022-2023 and 2023-2024 is currently in draft. OFI: Refer to OFI condition 7.a.
7.e	7.f	gas; and									1	2	Part Compliance (moderate)			No data was submitted in the audit period. The data for 2021-2022 was submitted April 2023 (before the audit period). The Operator advised that the Condition 7 monitoring data for years 2022-2023 and 2023-2024 is currently in draft. OFI: Refer to OFI condition 7.a.
7.f	7.g	water transfers and discharges (including dates, times and volumes).									1	2	Part Compliance (moderate)			No data was submitted in the audit period. The data for 2021-2022 was submitted April 2023 (before the audit period). The Operator advised that the Condition 7 monitoring data for years 2022-2023 and 2023-2024 is currently in draft. OFI: Refer to OFI condition 7.a.
8	8	From 13 November 2020 (i.e. the date of authorisation of the Overburden Management Project) the Operator must:												Refer to sub conditions		In the May 2022 Authorisation, this condition related to 'as-built' construction reports that were due to be submitted within 30 days upon completion rather than being related to a list of structures as described in Condition 8.a and with a timeframe of 60 days.
8.a	N/A	annually submit to the Department, unless otherwise agreed to in writing by the Department, a list of structures scheduled to be constructed in the coming year that will have an "as-constructed" construction report developed subject to Condition 48(g) and in accordance with the approved MMP; and									1	4	Full Compliance	Email from Operator to DITT subject: MRM Condition 8(a) - List of "as-constructed" construction reports 2023-2024 dated Aug2023. The list of structures was submitted as required in the audit period. Of the five structures in the list due for completion in the audit period, only the Cell 2 Stage 8 Raise had reached practical completion at the end of the audit period. The Operator advised that construction work progressed on the South Sediment Dam in the audit period. This structure was not included in the list of structures submitted on 30Aug2023.		OBS: Maintain a register of annual structures expected to have construction completed and expected date for construction completion (structure specific date based upon e.g. commissioning, practical completion) and expected date for "as-constructed" report to be completed. Maintain the register to capture structures or "as-constructed" reports not completed in previous year/s until they are closed out. OBS: Changed circumstances that may emerge and impact the planned schedule of the list of structures to be constructed should be advised to the regulator and an updated list of structures and estimated completion dates provided. OBS: Incorporate the "as-constructed" construction reports for stages of the NOEF (Projects Team and Operations Team) in the annual list of structures required by Condition 8.a.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024																
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuyin)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments	
8.b	8 cont	submit the "as-constructed" construction reports subject to the above condition for each structure to the Department within 60 days or an alternate date agreed to by the Department in writing, upon construction being finalised.									1	N/A	Not Applicable	Letter GHD to MRM dated 12Aug2024 Subject: TSF Construction Works, May 2023 - April 2024, Engineer of Record Oversight. Letter GHD to MRM dated 12Aug2024 Subject: TSF Construction Works, May 2023 - April 2024, Engineer of Record Oversight states "At conclusion of the reporting period (30th of April 2024), construction of the Cell 2 Stage 8 Raise has reached practical completion,". For the audit period, this condition is considered not applicable as within 60 days of construction being finalised was not triggered for any of the structures.	For the audit period, this condition is considered not applicable as within 60 days of construction being finalised was not triggered for any of the structures. Regarding the TSF Cell 2 Stage 8 Raise that was completed by 30Apr2024, the ICE advised in September 2024 that the construction report is not complete. As this is due after the audit period, it will be audited in 2025. In the May 2022 Authorisation, this condition related to 'as-built' construction reports that were due to be submitted within 30 days upon completion rather than being related to a list of structures as described in Condition 8.a with a timeframe of 60 days.	
9	9	The Operator must submit on or before 31 August 2021 and on each anniversary of that date (or such other date as nominated by the Operator and approved by the Minister), an EMR for the previous year in the reporting period as agreed with the Department.									1	4	Full Compliance	EMR 2022-2023 dated 31Aug2023. Correspondence between Operator and DITT relating to 2022-2023 EMR Submission.		
Security and levy																
10	10	The Operator must provide to the Minister a security of \$479,200,853 in the form of cash or an unconditional bank guarantee prior to undertaking any mining activities authorised by this Variation of Authorisations 0059-01 and 0059-02.										4	Full Compliance	Independent Monitor sighted email evidence of payment of the increase in the security of \$2,723,885.00 and received by NT Government May 2023. Correspondence between DITT and Operator regarding Variation of Authorisation 0059 and Security Request and receipt.	The security has increased from \$476,476,968 in the May 2022 Authorisation to \$479,200,853 in the May 2023 Authorisation.	
11	11	The security provided for under Condition 10 will be reassessed, and may be revised, following the submission, assessment and approval of an:											Refer to sub conditions			
11.a	11.a	independent third party assessment of the security by a qualified person approved by the Minister (also refer to Condition 40);										N/A	Not Applicable	MRM Mine Rehabilitation Planning Security Audit 2023 dated Dec2022 Letter from Operator to DITT subject: McArthur River Mining – 2023 Unplanned Closure Plan and Independent Security Audit dated Jan2023	McArthur River Mining – 2023 Unplanned Closure Plan and Independent Security Audit was submitted to DITT Jan2023 (before the audit period) and approved in May2023 (in the audit period). There were no independent third party assessment of the security in the audit period. An updated Unplanned Closure Plan and security assessment that covers MMP amendment activities was submitted May2024 (after the audit period).	
11.b	11.b	amended MMP;										4	Full Compliance	2024 MMP Submission dated March 2024		
11.c	11.c	amendment to the Unplanned Closure Plan.										N/A	Not Applicable	MRM Mine Rehabilitation Planning Security Audit 2023 dated Dec2022 Letter from Operator to DITT subject: McArthur River Mining – 2023 Unplanned Closure Plan and Independent Security Audit dated Jan2023	McArthur River Mining – 2023 Unplanned Closure Plan and Independent Security Audit was submitted to DITT Jan2023 (before the audit period) and approved in May2023 (in the audit period). An updated Unplanned Closure Plan and security assessment that covers MMP amendment activities was submitted May2024 (outside the audit period). There was no amendment to the Unplanned Closure Plan in the audit period. Unplanned Closure Plan was due to be submitted in August 2023, but extension granted by DITT until submission of AMMP in 2024.	
12	12	The revised security amount to be provided under Condition 10 is to be provided prior to creating the new disturbance, covered under the revised security as per written notification from the Department. For the avoidance of doubt, the Operator must provide the revised security amount in the form of cash or an unconditional bank guarantee to the Minister.										4	Full Compliance	Ground Disturbance Permit 48484 last signature Jun2023 Ground Disturbance Permit 46544 last signature March2023 Evidence provided indicates that disturbance part of the amended MMP approved on 17May2023 only occurred after the additional security payment was made.	The Operator advised that the works in Ground Disturbance Permit 48484 were part of the amended MMP approved on 17May2023.	
13	13	Each financial year, upon receipt of a written notice by the Minister as to the levy payable for that financial year, the Operator must pay a levy to the Mining Remediation Fund of an amount calculated in accordance with the Act and as stated by the Minister in the notice.										4	Full Compliance	Receipt for Tax invoice 6812446187 (undated) Tax invoice 929052693 dated Aug2023 Screen shot provided by DITT demonstrated payment had been made as required.		

Overburden Management Project

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024													Evidence		Comments	
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhlin)	Monitoring & Reporting	Score	Compliance level			
Explanatory note:	Explanatory note:	The following conditions were introduced in the previous variation, dated 15 August 2019 to reflect the intent of the thirty recommendations made by the NT EPA in the making of their Assessment Report 86 published July 2018. The NT EPA articulated an overarching environmental objective to be achieved during operation of the Mine: to ensure the health of McArthur River is protected along its whole length at all times from mine related impacts. The Minister accepted the recommendations as overarching conditions for the life of the project and have been retained to achieve transparency.														
14	14	The Operator must ensure activities related to the McArthur River Overburden Management Project are implemented in accordance with:												Refer to sub conditions		
14.a	14.a	all environmental commitments and safeguards identified in the final Environmental Impact Statement for the McArthur River Mine Overburden Management Project (draft Environmental Impact Statement, Supplement to the draft Environmental Impact Statement and additional information);										3	Part Compliance (High)	2023-2024 Reconciliation of Commitments and Actions Register undated. The review identified that all the OMP EIS commitments provided in the MMP (Appendix M) were addressed in the EMR. Other commitments identified in the MMP (Appendix L) were not addressed in the EMR. Notwithstanding, from the 13 commitments identified in the MMP (Appendix L), all appear to be addressed to some extent within the OMP EIS commitments, apart from one commitment, i.e., 'Install additional groundwater monitoring at Bing Bong'. In total, 230 commitments were identified in the EMR. Of these, 155 commitments were identified to be ongoing (i.e., relating to ongoing committed activity at the Mine), 12 commitments were identified to be complete (i.e., no further action required), and 63 commitments were identified to be not currently relevant (e.g., commitments relating to specific actions during the Mine closure). Of the 155 ongoing commitments, the EMR 2024 provided by the Operator indicated that six commitments may be incompletely addressed.	OFIs are not included here as they are provided in the Commitments - Operator Review section in the AEPAR.	
14.b	14.b	recommendations in the NT EPA Assessment Report 86 where they are approved under an MMP;										N/A	Not Applicable	NT EPA recommendations workbook for DITT	Given the NT EPA recommendations audit of the Department identified that all NT EPA recommendations are included as conditions in the Authorisation, audit of this condition is covered under other relevant Authorisation conditions.	
14.c	14.c	if there is any inconsistency between the above documents, the most recent authorisation shall prevail to the extent of any inconsistency.										4	Full Compliance	The IM did not identify any examples of the Authorisation not being the document followed in the event of any inconsistencies.	The Operator advised that they focus on the Authorisation. They note there are inconsistencies regarding some timeframes (e.g., for panels). The Authorisation prevails if there is an inconsistency.	
15	15	The Operator must provide written notice to the Minister and NT EPA if it alters or proposes to alter the McArthur River Mine Overburden Management Project and/or commitments, safeguards or mitigation measures in the Environmental Impact Statement in such a manner that the environmental significance of the action may have changed. The referral should be made in accordance with the Environment Protection Act 2019.										4	Full Compliance	EMR 2023-2024 EMR 2023-2024 states "MRM updated the environmental risk assessment as part of the MMP submission on 15 March 2024. The MMP describes the continued development of the McArthur River Mine based on conceptual level designs. MRM's latest environmental risk assessment concluded that the risk profile remains consistent with the OMP EIS (i.e. all risks under the MMP were determined to be low or medium based on the assessment matrix)."	The Operator advised that "When an MMP amendment is submitted to DITT for a change relating to the EIS we do a self assessment under the EP Act 2019 to determine if a referral is or is not required. In the audit period, the minor amendment approved and also the amendment submitted in the audit period but not approved until after the audit period both had self assessments. The Southern water dam was the largest footprint outside of the EIS and the self assessment was undertaken.	
16	16	By 13 May 2022 (i.e. within 18 months of the date of authorisation of the Overburden Management Project), unless otherwise agreed in writing by the Department, the Operator must submit a plan to the Department for review, that:										N/A	Not Applicable	Email from Operator to DITT subject: MRM Water Management Plan Update dated May2022 (before the audit period)	Condition was due and WMP submitted before the audit period.	
16.a	16.a	Enables measurement of total loads of lead and zinc and is consistent with requirements of Condition 27;		1			1			1	1	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.	
16.b	16.b	Quantifies and ensures annual loads of lead and zinc discharged to the McArthur River in future years (July to June) do not exceed the loads discharged in 2017-2018 (as per Condition 68(e)) taking into account seasonal variations in rainfall, and subject to future annual load calculations;		1			1			1	1	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.	
16.c	16.c	addresses recommendations and outcomes arising from audits of loads by the Independent Monitor;		1			1			1	1	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.	
16.d	16.d	include sufficient detail to inform the development of monitoring and management measures (including but not limited to early warning alerts and intervention levels), as part of the site wide AMP (Condition 45);		1			1			1	1	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.	

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhlin)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
16.e	16.e	once approved by the Department, be implemented by the Operator.										N/A	Not Applicable	MRM TWG Meeting Minutes 2022-2023 audit period (before the audit period). Conditions 16+17 - Mining Officer Notes 2022-2023 audit period (before the audit period). The Mining Officer notes for Jan2023 indicated that DITT had advised MRM at TWG that condition 16 had been satisfied verbally, and letter from delegate to follow." No formal approval of the plan has occurred.	Future item. No formal approval of the plan has occurred.
17	17	By 13 May 2022, the Operator must:											Refer to sub conditions		
17.a	17.a	submit a plan to the Department for review, that shall include:		1			1					N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
17.a.i	17.a.i	site-specific trigger values determined in accordance with Australian and New Zealand Guidelines for Fresh and Marine Water Quality, 2018 framework, incorporating ANZECC (2000) guidelines, at appropriate monitoring locations, in accordance with Condition 27;		1			1			1	1	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
17.a.ii	17.a.ii	a commitment that creeks on the mine site show long-term improving trends in water quality within 20 years after cessation of mining;		1			1			1	1	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
17.a.iii	17.a.iii	methodology to calculate contaminant loads and contaminant concentrations entering creeks and the McArthur River using system modelling that must:		1			1				1		Refer to sub conditions		
17.a.iii.a	17.a.iii.a	use suitable site-specific data collected as part of Condition 26;		1			1				1	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
17.a.iii.b	17.a.iii.b	be subject to review by the relevant independent panel;		1			1				1	N/A	Not Applicable		Independent panel not established in the audit period.
17.a.iii.c	17.a.iii.c	detail specific assumptions to be tested including but are not limited to:		1			1				1		Refer to sub conditions		
17.a.iii.c.i	17.a.iii.c.i	groundwater flow paths;				1					1	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
17.a.iii.c.ii	17.a.iii.c.ii	attenuation of metals from mine-derived wastes;		1		1	1		1		1	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
17.b	17.b	once approved by the Department, implement the plan;		1			1				1	N/A	Not Applicable	MRM TWG Meeting Minutes 2022-2023 audit period (before the audit period). Conditions 16+17 - Mining Officer Notes 2022-2023 audit period (before the audit period). The Mining Officer notes for Jan2023 indicated that DITT had advised MRM at TWG that condition 16 had been satisfied verbally, and letter from delegate to follow." No formal approval of the plan has occurred.	Future item. No formal approval of the plan has occurred.
17.c	17.c	incorporate the relevant findings from the plan into the AMP.		1			1				1	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
18	18	The Operator must provide a written response to the Department, if an independent technical panel's, required under Condition 21, review of the models and modelling outputs, and the data collection programs that informed the model development at Condition 17(a)(iii) address recommendations for improvements. All relevant outputs must be used to inform and update the AMP.		1		1	1				1	N/A	Not Applicable	Email from Operator to DITT subject: FW: MRM Independent Panels Discussion dated Apr2023 Email from Operator to DITT subject: MRM CRG Sitting Fees & Expenses dated Nov2023 Email from Operator to DITT subject: RE: MRM CRG and independent panels of experts - meeting notes from July 2023 dated Aug2023	No Independent Panels had been established in the audit period.
19	19	Every three (3) years from the date of authorisation of the Overburden Management Project, an independent environmental audit of the Quality Assurance (QA) and Quality Control (QC) procedures and waste rock identification and handling performance must be undertaken and:							1		1		Refer to sub conditions		
19.a	19.a	the results of the audit be provided within six (6) weeks to the Department and to the relevant independent panel;							1		1		-		There is no Operator action required by this condition. Waste Rock Handling Procedures audit site visit debrief with DITT was conducted in Jun2022. No independent panel was in place. Next audit is due June 2025 (three years from previous site audit).

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuyin)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
19.b	19.b	the Operator must provide a written response to the satisfaction of the Department where findings from the audit and review by the relevant panel includes matters that need to be addressed or areas for improvement.							1		1	4	Full Compliance	No evidence of the Operator providing a written response to DITT on the waste rock handling procedures audit findings. Pending review of the audit findings by the NOEF Independent Panel, which is yet to be established.	OBS: Operator to prepare a written response to the satisfaction of DITT on the waste rock handling procedures audit findings following the establishment of the NOEF Independent Panel.
20	20	From 13 November 2020 (i.e. date of authorisation of the Overburden Management Project), new areas of the NOEF foundation development (i.e. areas at base level) that do not currently contain PAF wastes must include a low permeability liner of 0.5m thickness and maximum saturated hydraulic conductivity of 1 x 10 ⁻⁹ metres per second above which future PAF, NAF and benign materials are to be stored.							1			4	Full Compliance	NEB Permeability by Constant Head Test Report for samples June to October 2023 NB Permeability Data Table undated NE Bravo Foundation Underdrain & VWP Inspection and Test Plan 4B April to July 2023 NE Bravo Foundation Underdrain & VWP Inspection and Test Plan 1B April to June 2023 NE Bravo CCL Box Out Inspection and Test Plan 7A June to August 2023 NE Bravo CCL Box Out Inspection and Test Plan 5B June to September 2023 NE Bravo CCL Box Out Inspection and Test Plan 3C June to July 2023 NE Bravo CCL Box Out Inspection and Test Plan 2A April to July 2023 NE Bravo CCL Box Out Inspection and Test Plan 1C April to June 2023 The Northeast Bravo foundation results for permeability provided showed that the results were orders of magnitude smaller than the required 1 x 10 ⁻⁹ m/s. The ITPs provided included the acceptance criteria of maximum hydraulic conductivity 1 x 10 ⁻⁹ m/s and 500mm for minimum thickness, as required by this condition.	OBS: ITPs should be prepared prior to commencement of works to ensure requirements are aligned between Operator and ICE.
21	21	The Operator must provide funding and assist the Department to establish and operate an independent panel(s) of experts to advise on matters affecting the environmental performance of the NOEF, TSF and mine closure planning.							1			4	Full Compliance	Correspondence between the Operator and DITT regarding Independent Panels Discussion and CRG Sitting Fees & Expenses during the audit period. Correspondence between DITT and the Operator regarding Independent Panels. An email from the Operator indicating intention to pay for advertising for the Independent Chair for the Mine Closure Panel role was sighted along with the Operator's involvement in the process so this condition is considered complied with. DITT responded to the Operator's concerns regarding the perceived conflict of interest, or lack of independence associated with the mine operator engaging the Chair and members of the independent panels of experts directly.	
22	22	By 13 November 2021 (i.e. within 12 months of date of authorisation of the Overburden Management Project), the Operator must submit a report to the Department for review, detailing the results of relevant studies undertaken to inform the requirements for implementation (including timelines) of a NOEF groundwater seepage interception and recovery system that:				1						N/A	Not Applicable	NOEF Interception Scheme Report Authorisation Condition 22 dated Nov2021.	Completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
22.a	22.a	controls seepage to the Barney Creek diversion channel and the McArthur River;		1		1	1				1	N/A	Not Applicable	NOEF Interception Scheme Report Authorisation Condition 22 dated Nov2021.	Completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
22.b	22.b	achieves a recovering trend in the Barney Creek diversion channel and the old McArthur River channel (at SW06) water quality within 20 years of cessation of mining;		1		1	1				1	N/A	Not Applicable	NOEF Interception Scheme Report Authorisation Condition 22 dated Nov2021.	Completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
22.c	22.c	facilitates achieving requirements of Conditions 16 and 17.		1		1	1				1	N/A	Not Applicable	NOEF Interception Scheme Report Authorisation Condition 22 dated Nov2021.	Completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
23	23	By 13 November 2022 (i.e. within 24 months of date of authorisation of the Overburden Management Project), the Operator must submit a NOEF geosynthetic liner cover system plan to the Department for review. The plan must:							1			3	Part Compliance (High)	Correspondence between Operator and DCCEEW regarding EPBC 2014-7210 -Condition 10b - Submission of Geosynthetic Liner Testing Plan (in the audit period) Correspondence between Operator and DITT relating to Variation of Authorisation 0059 Condition 23 – Geosynthetic Liner Cover System Testing Plan (before the audit period). The Operator advised that the NOEF Geosynthetic Liner Cover System Plan dated Oct2022 submitted was "a working draft that is not suitable for review and approval at this stage". Almost two years later, the final report remains unsubmitted by the Operator. It is noted that a revised Geosynthetic Liner Testing Plan was submitted to the Commonwealth for review and approval in the audit period.	The Operator advised "A revised GSL Testing Plan was also submitted to the Commonwealth Department of Climate Change, Energy, Environment and Water for approval under EPBC 2014/7210 Condition 10b. [...] The revised GSL Testing Plan has not yet been approved." The second revision of the plan is yet to be submitted to the Commonwealth. The Operator advised that following review/ approval by the DCCEEW, the plan would be resubmitted to DITT for review / approval. The Operator advised "MRM must satisfy comments from two regulatory bodies before being able to finalise the plan. The intent is to have one plan for use onsite as opposed to referencing two separate plans that may contradict each other." OFI: Submit a final NOEF Geosynthetic Liner Cover System Plan for approval.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nublir)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
23.a	23.a	outline a process (including timelines) to test and evaluate (i.e. criteria) the constructability and effectiveness of geosynthetic liner cover options including a geosynthetic liner /compacted clay layer combination;							1		1	N/A	Not Applicable	Correspondence between Operator and DCCEEW regarding EPBC 2014-7210 -Condition 10b - Submission of Geosynthetic Liner Testing Plan (in the audit period) Correspondence between Operator and DITT relating to Variation of Authorisation 0059 Condition 23 – Geosynthetic Liner Cover System Testing Plan (before the audit period).	Considered N/A as the required plan was due and submitted before the audit period. The Operator advised "A revised GSL Testing Plan was also submitted to the Commonwealth Department of Climate Change, Energy, Environment and Water for approval under EPBC 2014/7210 Condition 10b. [...] The revised GSL Testing Plan has not yet been approved."
23.b	23.b	include implementation of trials on rehabilitated stages of the NOEF;							1		1	N/A	Not Applicable	Correspondence between Operator and DCCEEW regarding EPBC 2014-7210 -Condition 10b - Submission of Geosynthetic Liner Testing Plan (in the audit period) Correspondence between Operator and DITT relating to Variation of Authorisation 0059 Condition 23 – Geosynthetic Liner Cover System Testing Plan (before the audit period).	Considered N/A as the required plan was due and submitted before the audit period. The Operator advised "A revised GSL Testing Plan was also submitted to the Commonwealth Department of Climate Change, Energy, Environment and Water for approval under EPBC 2014/7210 Condition 10b. [...] The revised GSL Testing Plan has not yet been approved."
23.c	23.c	identify relevant performance parameters that must be monitored, including but not limited to:							1		1	N/A	Not Applicable	Correspondence between Operator and DCCEEW regarding EPBC 2014-7210 -Condition 10b - Submission of Geosynthetic Liner Testing Plan (in the audit period) Correspondence between Operator and DITT relating to Variation of Authorisation 0059 Condition 23 – Geosynthetic Liner Cover System Testing Plan (before the audit period).	Considered N/A as the required plan was due and submitted before the audit period. The Operator advised "A revised GSL Testing Plan was also submitted to the Commonwealth Department of Climate Change, Energy, Environment and Water for approval under EPBC 2014/7210 Condition 10b. [...] The revised GSL Testing Plan has not yet been approved."
23.c.i	23.c.i	slope stability during extreme events;							1		1	N/A	Not Applicable	Correspondence between Operator and DCCEEW regarding EPBC 2014-7210 -Condition 10b - Submission of Geosynthetic Liner Testing Plan (in the audit period) Correspondence between Operator and DITT relating to Variation of Authorisation 0059 Condition 23 – Geosynthetic Liner Cover System Testing Plan (before the audit period).	Considered N/A as the required plan was due and submitted before the audit period. The Operator advised "A revised GSL Testing Plan was also submitted to the Commonwealth Department of Climate Change, Energy, Environment and Water for approval under EPBC 2014/7210 Condition 10b. [...] The revised GSL Testing Plan has not yet been approved."
23.c.ii	23.c.ii	cover performance as a result of heat effects;							1		1	N/A	Not Applicable	Correspondence between Operator and DCCEEW regarding EPBC 2014-7210 -Condition 10b - Submission of Geosynthetic Liner Testing Plan (in the audit period) Correspondence between Operator and DITT relating to Variation of Authorisation 0059 Condition 23 – Geosynthetic Liner Cover System Testing Plan (before the audit period).	Considered N/A as the required plan was due and submitted before the audit period. The Operator advised "A revised GSL Testing Plan was also submitted to the Commonwealth Department of Climate Change, Energy, Environment and Water for approval under EPBC 2014/7210 Condition 10b. [...] The revised GSL Testing Plan has not yet been approved."
23.c.iii	23.c.iii	tolerance of the geosynthetic liner to expected differential settlement;							1		1	N/A	Not Applicable	Correspondence between Operator and DCCEEW regarding EPBC 2014-7210 -Condition 10b - Submission of Geosynthetic Liner Testing Plan (in the audit period) Correspondence between Operator and DITT relating to Variation of Authorisation 0059 Condition 23 – Geosynthetic Liner Cover System Testing Plan (before the audit period).	Considered N/A as the required plan was due and submitted before the audit period. The Operator advised "A revised GSL Testing Plan was also submitted to the Commonwealth Department of Climate Change, Energy, Environment and Water for approval under EPBC 2014/7210 Condition 10b. [...] The revised GSL Testing Plan has not yet been approved."
23.c.iv	23.c.iv	veracity of cover longevity predictions;							1		1	N/A	Not Applicable	Correspondence between Operator and DCCEEW regarding EPBC 2014-7210 -Condition 10b - Submission of Geosynthetic Liner Testing Plan (in the audit period) Correspondence between Operator and DITT relating to Variation of Authorisation 0059 Condition 23 – Geosynthetic Liner Cover System Testing Plan (before the audit period).	Considered N/A as the required plan was due and submitted before the audit period. The Operator advised "A revised GSL Testing Plan was also submitted to the Commonwealth Department of Climate Change, Energy, Environment and Water for approval under EPBC 2014/7210 Condition 10b. [...] The revised GSL Testing Plan has not yet been approved."
23.c.v	23.c.v	likely long-term maintenance requirements.							1		1	N/A	Not Applicable	Correspondence between Operator and DCCEEW regarding EPBC 2014-7210 -Condition 10b - Submission of Geosynthetic Liner Testing Plan (in the audit period) Correspondence between Operator and DITT relating to Variation of Authorisation 0059 Condition 23 – Geosynthetic Liner Cover System Testing Plan (before the audit period).	Considered N/A as the required plan was due and submitted before the audit period. The Operator advised "A revised GSL Testing Plan was also submitted to the Commonwealth Department of Climate Change, Energy, Environment and Water for approval under EPBC 2014/7210 Condition 10b. [...] The revised GSL Testing Plan has not yet been approved."
23.d	23.d	Include reporting of trial results and monitoring outcomes:							1		1		Refer to sub conditions		
23.d.i	23.d.i	within three years from the submission of the plan;							1		1	N/A	Not Applicable		Future item. Due prior to 12 November 2025.
23.d.ii	23.d.ii	every three years thereafter, to the relevant independent panel and the Community Reference Group for review, and shall be audited by the Independent Monitor. The Operator must provide a written response to the Department, if review from the relevant panels and Community Reference Group require matters to be addressed;							1		1	N/A	Not Applicable		Future item. Due three years after submission related to condition 23.d.i. Independent panel was not established in the audit period and the plan was not provided to the CRG. A review by the Independent Monitor is not due and has not been undertaken.
23.d.iii	23.d.iii	must be used to inform the AMP and closure planning for the mine.							1		1	N/A	Not Applicable	NOEF Geosynthetic Liner Cover System Plan dated Oct2022. Section 1.1 of the Liner Plan states: "It is intended that the results from testing, modelling and analysis in this plan will be used to finalise the detailed design for the NOEF cover system, and inform the Adaptive Management Plan (AMP) and closure planning for the Mine."	Future item as the plan has not been approved.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024														Evidence		Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhlir)	Monitoring & Reporting	Score	Compliance level			
23.e	23.e	The NOEF geosynthetic liner cover system plan, once approved by the Department, must be implemented by the Operator.							1		1	N/A	Not Applicable			Future item as the plan is not approved. The Operator advised "A revised GSL Testing Plan was also submitted to the Commonwealth Department of Climate Change, Energy, Environment and Water for approval under EPBC 2014/7210 Condition 10b. [...] The revised GSL Testing Plan has not yet been approved."
24	24	By 13 November 2025 (i.e. within five (5) years of the date of authorisation of the Overburden Management Project), the Operator must submit a strategy to the Department that details the long-term disposal management of tailings into the mine pit void, submerged under a suitable depth of pit water. The plan must:							1		1	N/A	Not Applicable			Future item. Five years from 13Nov2020. The Operator has commenced early work planning on this strategy and submitted a version to the Commonwealth.
24.a	24.a	include strategies on the tailings reprocessing and assessment of residual chemical contaminants that may likely impact on meeting the requirements of Condition 16;							1		1	N/A	Not Applicable			Future item. Five years from 13Nov2020.
24.b	24.b	be reviewed by the relevant independent panel.							1		1	N/A	Not Applicable			Future item. Five years from 13Nov2020.
25	25	Once approved by the Department, the strategy developed in accordance with Condition 24 must be used to develop a plan five (5) years prior to cessation of mining, for approval by the Department. Any requirement to vary the approved disposal strategy or plan must be:							1		1	N/A	Not Applicable			Future item. Condition triggered by condition 24, which is not until required until five years from 13Nov2020.
25.a	25.a	applied for in writing to the Minister;							1		1	N/A	Not Applicable			Future item. Condition triggered by condition 24, which is not until required until five years from 13Nov2020.
25.b	25.b	based on leading practice and site conditions;							1		1	N/A	Not Applicable			Future item. Condition triggered by condition 24, which is not until required until five years from 13Nov2020.
25.c	25.c	supported by the relevant independent panel;							1		1	N/A	Not Applicable			Future item. Condition triggered by condition 24, which is not until required until five years from 13Nov2020.
25.d	25.d	notified to the NT EPA in accordance with Condition 15.							1		1	N/A	Not Applicable			Future item. Condition triggered by condition 24, which is not until required until five years from 13Nov2020.
26	26	By 13 November 2021 (i.e. within 12 months of date of authorisation of the Overburden Management Project), the Operator must review and synthesise all available and relevant information to submit a revised water monitoring plan (surface water and groundwater) to the Department for review, ensuring the plan is capable of identifying and quantifying impacts of mining activities on the environmental values and beneficial uses of the McArthur River.		1			1				1	N/A	Not Applicable			N/A as completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
27	27	The plan required under Condition 26 must:											Refer to sub conditions			
27.a	27.a	allow for assessment of compliance with Condition 16 and include sufficient detail to inform/develop/update the AMP;		1			1				1	N/A	Not Applicable			N/A as due and completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
27.b	27.b	at a minimum:											Refer to sub conditions			N/A as due and completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
27.b.i	27.b.i	quantify loads of lead and zinc entering the McArthur River each year;		1			1				1	N/A	Not Applicable			N/A as due and completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
27.b.ii	27.b.ii	quantify impacts to water quality and trends in groundwater to determine that objectives and targets are being met, including the effectiveness of source control to reduce loads to as low as is reasonably practicable;				1					1	N/A	Not Applicable			N/A as due and completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
27.b.iii	27.b.iii	develop appropriate future trigger values for waterways on the mine site and the McArthur River in accordance with the ANZECC Guidelines. In the interim, the trigger values in the most current WDL shall be used;		1			1				1	N/A	Not Applicable			N/A as due and completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024															Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuyllin)	Monitoring & Reporting	Score	Compliance level			
27.c	27.c	be prepared in consultation with the NT EPA;		1		1					1	N/A	Not Applicable	Water Management Plan dated 13May2022. Correspondence between Operator and DITT relating to Water Management Plan (before the audit period). Conditions 16+17 - DITT Mining Officer Notes Jan2023 (before the audit period). Correspondence between DITT and Operator relating to TRM: McArthur River Mine - NT EPA review of Water Management Plan and Aquatic Ecology Management Plan (before the audit period). Correspondence between Operator and DITT stated "Additionally, MRM has sought an extension to the consultation timeframe of VOA 0059 Condition 27c) to 31 July 2022 to enable consultation to be expanded to include the NT EPA (in addition to that previously completed with the Department of Environment, Parks and Water Security [DITT])." The DITT Mining Officer notes had for Nov2022 that DITT had determined that NT EPA did need to be consulted. The notes indicated that in Dec2022 the Operator presented at an NT EPA meeting. No evidence has been provided showing that NT EPA had been consulted prior to the initial submission of the WMP or by the extension date requested of 31Jul2022.	This condition is marked as completed in the Authorisation dated 17May2023. Correspondence from DITT to Operator states "Additionally, I note there were some comments specific to the water monitoring plan made by NT EPA members during the meeting that you attended, which should be considered in any revision of your plan, including: · the addition of organic matter as a parameter for the monitoring program to explain some findings · the inclusion of certified reference material for laboratory analysis, which would be used to give confidence that the analysis is accurate." OBS: Comments from the NT EPA should be considered for incorporation into the WMP.	
27.d	27.d	be prepared in consultation with the relevant independent panel;		1		1					1	N/A	Not Applicable		No independent technical panels, required under Condition 21, have been set up.	
27.e	27.e	once approved by the Department, be implemented by the Operator;		1		1					1	N/A	Not Applicable	WRM 2023-2024 Annual Site Water Balance for the McArthur River Mine Forecast Report dated Jan2024 2023/24 Bing Bong Loading Facility Site Runoff Pond Wet Season TARPs Worksheet dated Jan2024 WRM 2023-2024 Annual Site Water Balance for the Bing Bong Loading Facility Report dated Jan2024	Evidence of implementation was provided by the Operator but as the plan has not been approved by DITT this condition is N/A	
27.f	27.f	be subject to consultation with the relevant independent panel in the event that the plan requires updating (e.g. to maintain the currency of the monitoring network);		1		1					1	N/A	Not Applicable		The Operator advised "The water management plan did not require updating during the reporting period." and "The NT EPA comments will be considered in the next revision of the Water Management Plan, to be developed in consultation with the relevant panel as required by Condition 27. In order to expedite development and minimise administrative burden, MRM plans to develop a single updated Adaptive Management Plan compilation (including Water Management Plan) for independent panel and NT Department review."	
27.g	27.g	ensure results of the program:												Refer to sub conditions		
27.g.i	27.g.i	are reported annually to the Department;		1		1					1	4	Full Compliance	EMR 2023-2024 Correspondence between Operator and DITT relating to 2023-2024 EMR Submission (after the audit period).	As the Water Management Plan that this condition refers to is not approved, it does not need to be implemented and this condition is considered a future requirement. However, the Operator reports the results annually via the EMR and through the data submission required by condition 7, although no data submission was made the in audit period. OBS: Refer to OFI in condition 7.a.	
27.g.ii	27.g.ii	are audited by the Independent Monitor every three years;		1		1					1	N/A	Not Applicable		DITT advised that this condition is not referring to content of the plan and is not the responsibility of the Operator.	
27.g.iii	27.g.iii	be published on the Operator's website.		1		1					1	N/A	Not Applicable		As the Water Management Plan that this condition refers to is not approved, it does not need to be implemented and this condition is considered a future requirement.	
28	28	By 13 May 2022 (i.e. within 18 months of date of authorisation of the Overburden Management Project), the Operator must submit a research and investigation program to the Department for review that establishes the concentration of mine-derived contaminants at which chronic and acute impacts to biota of relevance to the McArthur River system occur using recognised and accepted eco-toxicological testing, and:		1			1					N/A	Not Applicable		The Operator submitted the Ecotoxicology Research and Investigation Program before the audit period and this is considered compliant. This condition is marked as completed in the Authorisation dated 17May2023.	
28.a	28.a	the results of this program must be integrated with other relevant programs, monitoring programs and management plans;		1			1				1	N/A	Not Applicable		The Operator submitted the Ecotoxicology Research and Investigation Program before the audit period and this is considered compliant. This condition is marked as completed in the Authorisation dated 17May2023.	

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024													Evidence		Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuyin)	Monitoring & Reporting	Score	Compliance level		
28.b	28.b	the plan once approved by the Department must be implemented by the Operator.		1			1				1	4	Full Compliance	Email from DITT to Operator subject: Auth 0059 Condition 28 - MRM Ecotox research and investigation program dated Aug2022 Adaptive Management Plan Version E dated 27May2022. WDL174-13 McArthur River Mining dated 27May2021. EMR 2023-2024 Implementation of the Ecotoxicology Research and Investigation Program is demonstrated in the AMP and EMR 2023-2024.	The Operator advised "Ten of the water quality site-specific guideline values (SSGVs) recommended in the Condition 28 report were accepted and prescribed by the administering authority as site-specific trigger values (SSTVs) in MRM's amended Waste Discharge Licence 174-13. MRM continues to monitor, investigate and report against the site-specific trigger values as conditioned in the latest version of the WDL. The WDL 174 site-specific trigger values also form the basis of a number of Trigger Action Response Plans in the Mine's Adaptive Management Plan. See Table 8 of AMP. This further demonstrates how guideline values from the Condition 28 report have been implemented by MRM in day to day operations."
29	29	By 13 May 2022 the Operator must provide to the department a monitoring program that provides improved understanding of aquatic ecosystems in the McArthur River from changing water flows, levels and quality. The program must:		1			1				1	N/A	Not Applicable		Considered N/A as the Aquatic Ecology Monitoring Plan was due before the audit period and Rev 1 and 2 were submitted to DITT before the audit period and included the requirements of this condition.
29.a	29.a	be consistent with the aquatic ecology monitoring and management plan required under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) Approval 2014/7210;		1			1				1	N/A	Not Applicable		Considered N/A as the Aquatic Ecology Monitoring Plan was due before the audit period and Rev 1 and 2 were submitted to DITT before the audit period and included the requirements of this condition.
29.b	29.b	include monitoring of relevant parameters at appropriate frequencies to allow for implementation of applicable Trigger Action Response Plans (TARPs) included in the Adaptive Management Plan (AMP);		1			1				1	N/A	Not Applicable		Considered N/A as the Aquatic Ecology Monitoring Plan was due before the audit period and Rev 1 and 2 were submitted to DITT before the audit period and included the requirements of this condition.
29.c	29.c	be implemented by the Operator, once approved by the Department.		1			1				1	N/A	Not Applicable	Correspondence between Operator and DITT relating to Aquatic Ecology Management Plan (before the audit period). Aquatic Ecology Management Plan EPBC ACT APPROVAL 2014/7210 NOVEMBER 2022 (AEMP) Nov2022 (before the audit period). Correspondence between Operator and DITT relating to Draft Aquatic Ecology Management Plan (before the audit period). Correspondence between Operator and DITT relating to Aquatic Ecology Management Plan (before the audit period).	Considered N/A as the plan is yet to be formally approved by DITT. The Operator advised "The plan was not updated over the reporting period. MRM is still working through the independent expert review and DCCEEW acceptance of these comments (as required by EPBC Act approval). The plan will be updated based on any comments and DCCEEW comments and will then be resubmitted to DCCEEW and DITT."
30	30	At all times, the Operator must conduct works consistent with the Northern Territory Aboriginal Sacred Sites Act 1989 and valid AAPA certificate. All conditions of the AAPA certificate must be complied with (including but not limited to NOEF height restrictions), and evidence produced to demonstrate compliance, when requested by the Minister.								1	1	4	Full Compliance	Two examples of survey reports of NOEF. The examples were not dated however showed that the NOEF was below the topography plus 80m. The Operator advised that height checks are conducted and recorded monthly as part of the End of Month process and this is considered compliant.	
31	31	The Operator must not disturb or encroach within 5m of archaeological site MRM4, until a design of the NOEF is agreed in writing by the Department. Consultation between the Operator and Minister for Arts, Culture and Heritage must be undertaken prior to seeking endorsement of the design.								1	1	4	Full Compliance	Aboriginal Cultural Heritage Management Plan dated Feb2023 Whincop Archaeology 2023 Annual Aboriginal Heritage Sites Inspection Report dated Oct2023 EMR 2023-2024 The Annual Aboriginal Heritage Sites Inspection Report dated 18Oct2023 indicates that MRM4 has "no impacts" and the fencing is "good". EMR 2023-2024 states "No disturbance occurred in the area of the MRM4 Cultural Site during the reporting period. The MRM4 Cultural Site has an exclusion fence with appropriate 'no access' signage, at a minimum offset distance of 5 m from the actual site as shown in Plate 2." A drone photo of the area from 1 May 2024 appeared to show no disturbance in the area. No disturbance was observed of MRM4 during the IM site visit in August 2024.	
32	32	By 13 May 2021 (i.e. within six months of date of authorisation of the Overburden Management Project), the Operator must provide a report to the Minister, and AAPA or the Minister for Arts, Culture and Heritage (where relevant) that demonstrates the consultation process undertaken or provide a plan to the Minister that details consultation activities and timeliness to identify and engage with appropriate custodians and traditional owners with an interest in land that would be or may be affected by the Overburden Management Project.								1	1	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
33	33	By 13 November 2021 (i.e. within 12 months of date of authorisation of the Overburden Management Project), the Operator must develop or revise and submit to the Department for review an existing air quality monitoring plan that monitors sulfur dioxide emissions at an appropriate location between the NOEF and sensitive receptors determined in consultation with NT EPA.	1							1	1	N/A	Not Applicable		Considered N/A as the AQMP was due and submitted before the audit period and included the requirements of this condition. This condition is marked as completed in the Authorisation dated 17May2023.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024														Evidence		Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhlin)	Monitoring & Reporting	Score	Compliance level			
34	34	The air quality monitoring plan required under Condition 33 must include:												Refer to sub conditions		
34.a	34.a	objectives, locations, frequency of monitoring, trigger values and reporting commitments to manage and protect any potential air quality risk to human health outside of the mineral lease;	1							1	1	N/A	Not Applicable			Considered N/A as the AQMP was due and submitted before the audit period and included the requirements of this condition. This condition is marked as completed in the Authorisation dated 17May2023.
34.b	34.b	evidence of consultation with the NT EPA to be provided at the time of the plan submission;	1							1	1	N/A	Not Applicable			Considered N/A as the AQMP was due and submitted before the audit period and included the requirements of this condition. This condition is marked as completed in the Authorisation dated 17May2023.
34.c	34.c	once approved by the Department, be implemented by the Operator.	1							1	1	4	Full Compliance	Monthly SO ₂ reports (online). The IM viewed several dust deposition gauges (DDGs) on site in August 2024. It is noted that DDGs were impacted during flooding and were deployed once access was available to areas. The Operator advised that as part of the March pre-flood event preparations, the van dorn monitors were fuelled up.		Approval was obtained on Aug2022 (before the audit period). Implementation of the approved AQMP is assessed under Schedule D condition 6.a.ii. The Air Monitoring Report for the audit period states "SO ₂ monitoring was conducted at the 'SO2VAN01' monitoring site, which was relocated during the review period to the western edge of the Northern Overburden Emplacement Facility, and at the 'SO2VILL02' located at the workers village. "
35	35	The results of the air quality plan for each reporting frequency must be:												Refer to sub conditions		
35.a	35.a	made available on the Operator's website. Initial monitoring results to be reported within 6 months of the plan being accepted by the Department or an alternative timeframe as agreed in writing with the Department;	1							1	1	4	Full Compliance	Monthly SO ₂ reports (online). Sighted real time data for SO2VAN01 and monthly reports for SO2VAN01 and SO2VILL02 (with the exception of a January report) on Operator's website while preparing the previous AEPAR (in the audit period) and after the audit period (Aug2024).		
35.b	35.b	incorporated where relevant in the AMP.	1							1	1	4	Full Compliance	Adaptive Management Plan Version E dated 27May2022. The AQMP has been incorporated into the AMP before the audit period. No changes were identified in the audit period indicating a requirement to update the AMP.		The Operator advised "There were no revisions to the Adaptive Management Plan over the reporting period. The AMP is a management plan that includes a TARP for air quality, which is designed to ensure negligible air quality impacts to community health. This TARP was based on the air quality management plan required by Condition 33 & 34." The Operator advised that the SO ₂ monitors have trigger levels relevant to an offlease position but are located on lease and so they are considering potential to change those.
36	36	By 13 November 2022 (i.e. within 24 months of date of authorisation of the Overburden Management Project), the Operator must submit a monitoring and management plan to the Department for review that manages risks of metal toxicity from human consumption of aquatic fauna obtained from the McArthur River. The plan must:		1			1			1	1	N/A	Not Applicable			Considered N/A as the Aquatic Ecology Monitoring Plan was due before the audit period and Rev 1 and 2 were submitted to DITT before the audit period and included the requirements of this condition.
36.a	36.a	determine if aquatic fauna obtained from any reach of the McArthur River, that may be impacted by the mine's operations, is safe to eat;		1			1			1	1	N/A	Not Applicable			Considered N/A as the Aquatic Ecology Monitoring Plan was due before the audit period and Rev 1 and 2 were submitted to DITT before the audit period and included the requirements of this condition. This condition is marked as completed in the Authorisation dated 17May2023.
36.b	36.b	include demonstrated evidence of consultation with NT EPA;		1			1			1	1	N/A	Not Applicable			Considered N/A as the Aquatic Ecology Monitoring Plan was due before the audit period and Rev 1 and 2 were submitted to DITT before the audit period and included the requirements of this condition. This condition is marked as completed in the Authorisation dated 17May2023.
36.c	36.c	detail public reporting of the monitoring results, including at appropriate locations in the Borroloola region;		1			1			1	1	N/A	Not Applicable			Considered N/A as the Aquatic Ecology Monitoring Plan was due before the audit period and Rev 1 and 2 were submitted to DITT before the audit period and included the requirements of this condition. This condition is marked as completed in the Authorisation dated 17May2023.
36.d	36.d	include provisions for implementation and maintenance of signage at waterways at the MRM site in accordance with the requirements of Condition 62 until the risk of contamination from consumption of this aquatic fauna is demonstrated to be acceptable by the Department;		1			1			1	1	N/A	Not Applicable			Considered N/A as the Aquatic Ecology Monitoring Plan was due before the audit period and Rev 1 and 2 were submitted to DITT before the audit period and included the requirements of this condition. This condition is marked as completed in the Authorisation dated 17May2023.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024														Evidence		Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhlin)	Monitoring & Reporting	Score	Compliance level			
36.e	36.e	once approved by the Department, be implemented by the Operator.		1			1			1	1	N/A	Not Applicable	DITT approved verbally at the Technical Working Group Jan2023 but it is not formally approved.	Considered N/A as the plan is yet to be formally approved by DITT.	
37	37	By 13 November 2022 (i.e. within 24 months of date of authorisation of the Overburden Management Project), the Operator must submit a plan to the Department for review that outlines a monitoring program for management of Largetooth Sawfish. The plan must:										N/A	Not Applicable		Considered N/A as a monitoring and management plan for the largetooth sawfish that included the requirements of this condition was included in the Aquatic Ecology Management Plan due and submitted before the audit period.	
37.a	37.a	include a sampling strategy for Largetooth Sawfish that is non-lethal;					1				1	N/A	Not Applicable		Considered N/A as a monitoring and management plan for the largetooth sawfish that included the requirements of this condition was included in the Aquatic Ecology Management Plan due and submitted before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.	
37.b	37.b	include details of parameters and criteria, from which the results could be used to define specific (measurable and time-bound) performance indicators to abate a significant decline in Largetooth Sawfish movement;					1				1	N/A	Not Applicable		Considered N/A as a monitoring and management plan for the largetooth sawfish that included the requirements of this condition was included in the Aquatic Ecology Management Plan due and submitted before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.	
37.c	37.c	include trigger levels for investigation and implementation of management measures;					1				1	N/A	Not Applicable		Considered N/A as a monitoring and management plan for the largetooth sawfish that included the requirements of this condition was included in the Aquatic Ecology Management Plan due and submitted before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.	
37.d	37.d	once approved by the Department, be implemented by the Operator.					1				1	N/A	Not Applicable	DITT approved verbally at the Technical Working Group Jan2023 but it is not formally approved.	Future item. No formal approval of the plan has occurred.	
38	38	Within six months following the establishment of the required panels and groups in accordance with Condition 21, the Operator must:											Refer to sub conditions			
38.a	38.a	develop environmental objectives for a Care and Maintenance Plan in consultation with the relevant Independent Panels, CRG, custodians and traditional owners;								1	1	N/A	Not Applicable		Future item as while the CRG was established in the audit period, no independent panels had been established in the audit period so this condition is not triggered.	
38.b	38.b	submit this to the Department for review.									1	N/A	Not Applicable		Future item as while the CRG was established in the audit period, no independent panels had been established in the audit period so this condition is not triggered.	
39	39	By 13 November 2025 (i.e. within five years of date of authorisation of the Overburden Management Project), the environmental objectives arising from Condition 38 must be used to develop a Care and Maintenance Plan in consultation with the Department.						1			1	N/A	Not Applicable		Future item. Within five years from 13 Nov2020. Note May 2022 Authorisation refers to condition 37, however, June 2021 Authorisation and May 2023 Authorisation refer to condition 38.	
40	40	The Operator must facilitate an independent third-party assessment of the security for rehabilitation of disturbances resulting from authorised activities in the approved MMP that is consistent with requirements under Conditions 10, 11 and 12, to the satisfaction of the Department, and every 3 years thereafter if the security has been re-calculated or adjusted.									1	N/A	Not Applicable	MRM Mine Rehabilitation Planning Security Audit 2023 dated Dec2022 Letter from Operator to DITT subject: McArthur River Mining – 2023 Unplanned Closure Plan and Independent Security Audit dated Jan2023	McArthur River Mining – 2023 Unplanned Closure Plan and Independent Security Audit was submitted to DITT Jan2023 (before the audit period) and approved on 17May2023 (in the audit period). There were no independent third party assessments of the security in the audit period.	
41	41	The Operator, consistent with Condition 40, must:											Refer to sub conditions			
41.a	41.a	commission a qualified person to review the security amount whose appointment is accepted by the Minister;									1	N/A	Not Applicable		Triggered 3 years after the 13Nov2020, which was 13Nov2023 that was in the audit period. Considered N/A as it was undertaken before the audit period. Independent third-party assessments of the security have been done as per the evidence included for conditions 10 to 13.	

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024															Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nublir)	Monitoring & Reporting	Score	Compliance level			
41.b	41.b	ensure that the security is reviewed and delivered to the Department within six months of acceptance of the qualified person.									1	N/A	Not Applicable			Triggered 3 years after the 13Nov2020, which was 13Nov2023 that was in the audit period. Considered N/A as it was undertaken before the audit period. The Operator considers that they have complied with this condition as their submissions in previous audit periods were by qualified persons accepted previously by DITT. OBS: DITT should consider changing the wording of this condition if reapproval of the qualified person to undertake the independent third-party assessment of the security is not required.
42	42	For every approved MMP and MMP amendment, the Operator must provide a revised copy of the approved document that removes commercially sensitive information, includes an overview and environmental section, and is suitable for publication on the Department's website, or provide written approval to make the complete documents publicly accessible.								1	1	3	Part Compliance (High)	With the approval of the authorisation on 17May2023 DITT requested a revised copy of the approved MMP amendment (dated Jan 2023) that removes commercially sensitive information suitable for publication on the Department's website. While the 17May2023 authorisation is uploaded on DITT's website, a suitable version of the MMP amendment (dated Jan 2023) for upload on the website has not been provided by the Operator in the audit period.		The Operator advised "MRM is in the process of writing to the Department, requesting that this version not be uploaded to the Departments website as it is only a small amendment that has been superseded by the 2024 MMP that was recently approved." OFI: For every approved MMP and MMP amendment, provide the approved document that removes commercially sensitive information, includes an overview and environmental section, and is suitable for publication on the NT Government's website, or provide written approval to make the complete documents publicly accessible.
43	43	The Operator must assist, as required, the Department to establish and operate a Community Reference Group (CRG).								1		4	Full Compliance	Correspondence between Operator and DITT regarding CRG and independent panels of experts and notes from the meeting 14 and 26 July 2023 and forms required (during the audit period). MRM Community Reference Group Public Communique dated Feb2024. Evidence was provided that the Operator has participated in the CRG and assisted DITT where appropriate.		The CRG held their inaugural meeting on-site 27Jul2023 which was a familiarisation visit. The Operator advised that they have discussed the March flooding event with the community at the CRG meeting in May 2024 (outside the audit period).
44	44	By 13 May 2022, (i.e. within 18 months of date of authorisation of the Overburden Management Project), the Operator must undertake a synthesis of all environmental monitoring programs (Condition 26) that assess impacts of mining activities on the environmental values and beneficial uses of the McArthur River, in accordance with NT EPA's overarching environmental outcome. The revised monitoring programs must:		1			1				1	N/A	Not Applicable			Considered N/A as this condition was due and completed before the audit period. The Operator believes that discussion in the EMR fulfills this requirement and verbal agreement was obtained from DITT. This condition is marked as completed in the Authorisation dated 17May2023.
44.a	44.a	use outputs generated for review and synthesis of water monitoring programs, as part of addressing Condition 26;		1			1				1	N/A	Not Applicable			Considered N/A as this condition was due and completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
44.b	44.b	demonstrate how all monitoring data collected under various monitoring programs and management plans were considered and synthesised (e.g. conceptual site models, trend analysis);		1			1				1	N/A	Not Applicable			Considered N/A as this condition was due and completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
44.c	44.c	be incorporated in the AMP.		1			1				1	N/A	Not Applicable			Considered N/A as this condition was due and completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
45	45	By 13 May 2022, (i.e. within 18 months of date of authorisation of the Overburden Management Project), the Operator must submit an AMP to the Department:									1	N/A	Not Applicable			This was due and the AMP submitted before the audit period.
45.a	45.a	The AMP must include the following key elements:											Refer to sub conditions			This condition is marked as completed in the Authorisation dated 17May2023.
45.a.i	45.a.i	clear, measurable environmental objectives for all significant environmental risks and potential impacts;									1	N/A	Not Applicable			This condition is marked as completed in the Authorisation dated 17May2023.
45.a.ii	45.a.ii	measurable performance indicators to show that objectives are on target to be met;									1	N/A	Not Applicable			This condition is marked as completed in the Authorisation dated 17May2023.
45.a.iii	45.a.iii	pre-determined triggers to warn of potential for performance indicators to be exceeded, as informed by monitoring;									1	N/A	Not Applicable			This condition is marked as completed in the Authorisation dated 17May2023.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhlin)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
45.a.iv	45.a.iv	realistic and achievable contingency interventions to maintain performance indicators if triggers are consistently exceeded;									1	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
45.a.v	45.a.v	clearly defined management measures/actions that are capable of being implemented in a timely way to meet performance indicators and environmental objectives;									1	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. OBS: Further detail on potential contingency measures timelines for the implementation of management actions in Table 9 (Adaptive Management Plan (AMP) Revision E) should be provided.
45.a.vi	45.a.vi	monitoring in accordance with relevant Recommendations in NT EPA Assessment Report 86 to determine whether management measures are effective and to inform the need for adjustments to management measures or need for alternatives;									1	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. OBS: Incorporate in the AMP further information on the processes to assess the effectiveness of the Monitoring Programs and enable adaptive adjustment, including further information on the interactions between the annual EMR and the AMP.
45.a.vii	45.a.vii	a continual feedback system to inform appropriate actions to be initiated when triggered and environmental objectives are always being met;									1	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
45.a.viii	45.a.viii	continual development of new management actions as required based on knowledge gained from experience at the site and elsewhere across industry.									1	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
45.b	45.b	The AMP must be reviewed by the Independent Monitor or an appropriately qualified, independent third party, and updated with inputs from the CRG (once established under Condition 43);									1	4	Full Compliance	AMP version E dated May2022. Independent Monitor's Review of the Adaptive Management Plan dated July 2023. "Review of the Adaptive Management Plan" final dated July 2023 is the Independent Monitor's review of the AMP (Revision E) undertaken within the three year period since the Independent Monitor's review of the initial AMP (Revision 0), completed in June 2020.	The CRG was established in the audit period. The Operator advised "MRM intends to socialise the Adaptive Management Plan with the Community Reference Group (CRG) when an appropriate time allows for consultation. Note that technical information such as the Adaptive Management Plan will need to be strategically delivered to the CRG and potentially over a few meetings to ensure content can be digested by the group and feedback incorporated. Over the past few meetings, the agenda has been focussed on getting the CRG up to speed on general environmental performance, closure pans and the recent weather event associated with Cyclone Megan. The Adaptive Management Plan will be a topic of future meetings." As per condition 46.g. the next Independent Monitor's review of the AMP is due June 2026.
45.c	45.c	all review findings and CRG input requirements are to be provided to the Department for approval.									1	N/A	Not Applicable	Independent Monitor's Review of the Adaptive Management Plan dated July 2023.	No CRG comments to date. Pending submission of the combined IM and CRG comments. Delayed establishment of the CRG has resulted in this task being delayed. The Operator advised "The IM's review comments will be addressed in the next revision of the Adaptive Management Plan, to be developed and submitted following consultation with the relevant panel on the Water Management Plan as required under Condition 27. Note that any changes to the Water Management Plan would likely trigger changes to the Adaptive Management Plan."
46	46	Unless agreed otherwise in writing by the Department, the AMP must:											Refer to sub conditions		
46.a	46.a	clearly set out the required management objectives and performance indicators;									1	N/A	Not Applicable		Submitted to DEPWS as part of WDL requirement and was submitted to DITT (before the audit period).
46.b	46.b	provide clarity on the triggers for changes to management actions, and responsibility and evidentiary basis for decision-making;									1	N/A	Not Applicable		Submitted to DEPWS as part of WDL requirement and was submitted to DITT (before the audit period).
46.c	46.c	establish the timeframe for initiation of certain actions if triggers are exceeded, including decisions to discontinue an activity and clarify responsibility and evidentiary basis for decision-making;									1	N/A	Not Applicable		Submitted to DEPWS as part of WDL requirement and was submitted to DITT (before the audit period). OBS: Incorporate more detail on the timeframes for action/s if Trigger Action Response Plan (TARP) triggers are exceeded in the AMP.
46.d	46.d	establish a process for adjusting triggers that includes the regulator;									1	N/A	Not Applicable		Submitted to DEPWS as part of WDL requirement and was submitted to DITT (before the audit period).

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024														Evidence		Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nublir)	Monitoring & Reporting	Score	Compliance level			
46.e	46.e	establish transparent monitoring, reporting and review requirements;									1	N/A	Not Applicable		Submitted to DEPWS as part of WDL requirement and was submitted to DITT (before the audit period). OBS: Incorporate more information to outline how transparency in monitoring, reporting and review is provided to show openness and accountability in the AMP.	
46.f	46.f	establish processes to achieve transparency and stakeholder engagement in AMP design and implementation that includes NT EPA, DAWE and CRG;									1	N/A	Not Applicable		Submitted to DEPWS as part of WDL requirement and was submitted to DITT (before the audit period).	
46.g	46.g	set out the mechanism for periodic review by Independent Monitor, which must not exceed a frequency of every three years;									1	N/A	Not Applicable		Submitted to DEPWS as part of WDL requirement and was submitted to DITT (before the audit period).	
46.h	46.h	be provided to the Department for re-approval in the event that any material changes are made to the AMP.									1	N/A	Not Applicable		The Operator advised "No changes were made to the AMP during the reporting period." The Operator advised "The IM's review comments will be addressed in the next revision of the Adaptive Management Plan, to be developed and submitted following consultation with the relevant panel on the Water Management Plan as required under Condition 27. Note that any changes to the Water Management Plan would likely trigger changes to the Adaptive Management Plan."	
47	47	The Operator must provide written notice to the Minister and to the NT EPA where trends indicate performance indicators and environmental objectives will not, or are unlikely to be, met by implementing the AMP.									1	4	Full Compliance	EMR 2023-2024 EMR 2023-2024 states "A set of mitigation measures were developed specifically to manage the risks and ensure the environmental objectives continue to be maintained, including protecting the McArthur River beneficial uses and community values. These controls have been implemented throughout the reporting period where appropriate." EMR 2023-2024 states "It can be concluded that the Mine's key environmental objective "Protect the beneficial uses and community values adjacent to the BBLF and transshipment corridor from impacts associated with MRM's operations" continues to be met." Related to Metal and Metalloid Concentrations in Near Shore Sediment, the EMR 2023-2024 states "Overall, the survey concluded that the current environmental risk is low, though the increasing trends in lead and zinc concentrations indicate a need for improved management practices to prevent future environmental risks." Although some improved management practices should be initiated, there has been no indication that trends are showing performance indicators and environmental objectives won't be met.	May 2023 Authorisation includes "under clause 14A of the <i>Environmental Assessment Administrative Procedures 1984</i> "	
Independent Certifying Engineer (ICE)																
48	48	The Operator must appoint an Independent Certifying Engineer (ICE) to:											Refer to sub conditions			

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhlin)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
48.a	48.a	warrant and accept both the design and construction works;							1		1	3	Part Compliance (High)	<p>NOEF ICE Role Proposal for Services Report dated Jun2021. EOR Contract #11007275 dated 14Sep2023 and VAO2 dated May2024. Consultancy Services Contract #11007275 dated Mar2023. Peer Review of NOEF Annual Construction Report 2023 MRM Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024. TSF Cell 2 Stage 8 – Raise to RL 10064 Detailed Design Report MRM Pty Ltd Aug2023 (neither J Castle or B Hanslow signed). TSF Cell 1 Stage 6 – Raise to RL 10061 Detailed Design Report MRM Pty Ltd Oct2023 (J Castle is an author but not signed off by B Hanslow). SITE INSTRUCTIONS AND NOTES_SI 2023_002 – Cell 2 Stage 8 Raise Construction Cell 2 Eastern Wall Revised Buttress Design dated Sep2023 Letter GHD to Operator subject TSF Construction Works, May 2023 - April 2024, Engineer of Record Oversight dated Aug2024.</p> <p>Letter GHD to Operator subject TSF Construction Works, May 2023 - April 2024, Engineer of Record Oversight dated Aug2024 states "This letter confirms the MRM Engineer of Record (EoR) oversight for the works undertaken between the 1st of May 2023 and the 30th of April 2024 at the Tailings Storage Facility (TSF) at McArthur River Mine (MRM), in accordance with Clause 48 of MRM's Variation of Authorisation (VOA). A GHD EoR Delegate (under the direction of the EoR) was on-site throughout the reporting period for construction to complete hold point releases and witness the works, in accordance with the EOR Contract (Contract Number #11007275)."</p> <p>This condition is compliant for the TSF Domain but part compliant (high) for the NOEF Domain.</p>	<p>This condition previously included 'without limitation on responsibility'.</p> <p>The ICE role is going out to tender. Peer Review of NOEF Annual Construction Report 2023 states "The regulator (Department of Industry, Tourism and Trade, or DITT) requires MRM to have an appropriately qualified independent engineer to be involved in the design and construction process. GHD Pty Ltd (GHD) have therefore been engaged by MRM to provide engineering services and certification for the various projects associated with the NOEF." NOEF Projects (construction team): Peer Review of NOEF Annual Construction Report 2023 states "The Projects team were able to successfully close out all relevant QA/QC documentation for the work areas completed within 2023, providing the required information and inspections to close out each hold and witness point for construction to date. Based on routine site inspections, observations and review of QA/QC documentation, the construction works by the Projects team for 2023 in the Central East Bravo, North East Alpha, South East Alpha and North East Bravo stages was completed in general accordance with the specifications and are consistent with the design intent." A list of recommendations was then stated. NOEF Operations: Peer Review of NOEF Annual Construction Report 2023 states "Not all work areas constructed in 2023 can be commented on at the time of writing this report given the number of outstanding ITP's still to be submitted to the ICE for review." A list of recommendations was then stated.</p> <p>OFI: The Operator to complete NOEF Operations ITPs in a timely manner to allow the ICE to warrant and accept the construction works.</p>
48.b	48.b	be present during all phases of construction where required in the approved MMP (including at hold points) and oversee and certify the works that they meet design specifications;							1		1	4	Full Compliance	<p>Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024 TSF Cell 2 Construction Daily Report dated Aug2023 South Buttress Foundation Excavation Construction Daily Report dated Jul2023 TSF Cell 2 Raise Construction Daily Report dated Sep2023 TSF Cell 2 Raise Construction Daily Report dated Nov2023 TSF 2023 Cell Raises Hold Point Report dated Feb2024 TSF Construction Progress Report 08Nov2023 - 29Nov2023 dated Nov2023 TSF Construction Quality Report 3Jan2024 - 23Jan2024 dated Jan2024 TSF 2023 Cell Raises Hold Point Report dated Sep2023 TSF Site Observation Form dated Feb2024 Peer Review of NOEF Monthly Construction Report Reports January to April 2024 Letter GHD to Operator subject TSF Construction Works, May 2023 - April 2024, Engineer of Record Oversight dated Aug2024. The ICE advised that work areas are inspected and compared to specification prior to approval, documented using ITPs, monthly construction reports, hold point release forms, layer construction checklists (TSF only) these are also hold points.</p>	<p>Letter GHD to Operator subject TSF Construction Works, May 2023 - April 2024, Engineer of Record Oversight dated Aug2024 states "This letter confirms the MRM Engineer of Record (EoR) oversight for the works undertaken between the 1st of May 2023 and the 30th of April 2024 at the Tailings Storage Facility (TSF) at McArthur River Mine (MRM), in accordance with Clause 48 of MRM's Variation of Authorisation (VOA). A GHD EoR Delegate (under the direction of the EoR) was on-site throughout the reporting period for construction to complete hold point releases and witness the works, in accordance with the EOR Contract (Contract Number #11007275)."</p> <p>There is a hold point release form for the ICE for TSF for all of them with one ITP per raise. There is one ITP per lot for NOEF and some have a hold release form while others are straight into the ITP.</p>
48.c	48.c	approve re-commencement of construction at defined hold points;							1		1	4	Full Compliance	<p>Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024 Peer Review of NOEF Monthly Construction Report Reports January to April 2024 TSF Cell 2 Construction Daily Report dated Aug2023 TSF Cell 2 Raise Construction Daily Report dated Sep2023 TSF Cell 2 Raise Construction Daily Report dated Nov2023 TSF 2023 Cell Raises Hold Point Report dated Feb2024 TSF Construction Progress Report 08Nov2023 - 29Nov2023 dated Nov2023 TSF Construction Quality Report 3Jan2024 - 23Jan2024 dated Jan2024 TSF 2023 Cell Raises Hold Point Report dated Sep2023</p> <p>The ICE stated that quality documents including ITPs are all submitted to ICE for review and approval before finalisation (ICE checked against guideline). Also can add any new hold or witness points as required to benefit construction. Defined hold points are summarised in monthly reports and comment provided regarding them being released to re-commence construction.</p>	

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhlin)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
48.d	48.d	approve any material changes to the design during construction;							1		1	4	Full Compliance	Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024. SITE INSTRUCTIONS AND NOTES_SI 2023_002 – Cell 2 Stage 8 Raise Construction Cell 2 Eastern Wall Revised Buttress Design dated Sep2023. Cell 2 Stage 8 design GHG/MRM responses to ITRB dated Aug2023. Peer Review of NOEF Monthly Construction Report Reports January to April 2024 Evidence was shown of the ICE approving material changes to the design during construction and no instances of this not occurring were identified for the audit period.	The ICE provides input and recommendation but role is to approve or otherwise any proposed changes. The change management process is documented through technical queries and the request for information (RFI) process (depending on complexity of material change). The ICE refers to it as the formal communications process. Technical queries for smaller updates or RFI for bigger changes. These are submitted, reviewed against design, guidelines and an assessment made and either accepted (sometimes with conditions) or declined. In some situations there are multiple revisions. These are summarised in the monthly and annual construction reports. Examples might be the location of VWPs for something minor or major might be a change to foundation level or extent of foundation.
48.e	48.e	verify any monitoring equipment/structure installed or to be installed as part of the construction as specified in the relevant detailed designs remains functional at the conclusion of the construction works;							1		1	4	Full Compliance	Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024 NE Bravo CCL Underdrain VWP ITP - 1B - Approved NE Bravo CCL Underdrain VWP ITP - 4B - Approved Letters of the ICE review of TSF piezometer data. Peer Review of NOEF Monthly Construction Report Reports January to April 2024 ITPs, letters of review of TSF piezometer data and discussion with the ICE demonstrated that this condition was met.	Installation of all instruments via ITPs and included in monthly reports. MRM collect data for VWPs manually weekly until attached to datalogger (cables laid progressively as NOEF is constructed progressively) and ICE reviews that quarterly of VWPs at NOEF and TSF. More than 100 VWPs already in place. TSF weekly reviews of the data logger during construction. TSF survey deformation was manual surveys then April tags drone photogrammetry as a reference point. TSF has had inSAR monthly satellite monitoring (since approximately 2022 although timing unsure). This is reviewed monthly by the ICE. NOEF has commenced more recently inSAR monthly satellite monitoring.
48.e.i	48.e.i	in the event such equipment becomes non-functional, then replacement or an ICE approved alternative must be implemented by the Operator;							1		1	4	Full Compliance	Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024 NE Bravo CCL Underdrain VWP ITP - 1B - Approved NE Bravo CCL Underdrain VWP ITP - 4B - Approved Letters of the ICE review of TSF piezometer data. Peer Review of NOEF Monthly Construction Report Reports January to April 2024 Peer Review of NOEF Annual Construction Report 2023 states "It was also noted that the VWP cable for SEa_02 was damaged adjacent to the southern corner of the extraction tower sump area and was repaired to ensure its proper operation."	Cable issues with VWP and MRM repaired those and they are retested and they are recalibrated (on the NOEF and TSF).
48.f	48.f	agree in writing, if the Operator wish to appoint an Operator's project manager/resident engineer as an onsite representative, and agree in writing that this does not diminish the ICE's responsibility or liability for the project;							1		1	N/A	Not Applicable	Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024	The Operator advised that there were no situations where anyone other than the ICE was the on-site representative and no evidence contrary to that has been observed.
48.g	48.g	on completion of construction, provide a certified "as-constructed" construction report detailing:							1		1	4	Full Compliance	Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024. Letter GHD to MRM dated 12Aug2024 Subject: TSF Construction Works, May 2023 - April 2024, Engineer of Record Oversight. TSF Cell 1 Stage 5 - Raise to RL 10059 m Construction Report dated March 2022. TSF Cell 2 Stage 6 - Raise to RL 10061 m Construction Report May 2022. Letter GHD to MRM dated Aug2024 Subject: TSF Construction Works, May 2023 - April 2024, Engineer of Record Oversight states "At conclusion of the reporting period (30th of April 2024), construction of the Cell 2 Stage 8 Raise has reached practical completion,". Evidence was provided that the TSF Cell 1 Stage 5 and TSF Cell 2 Stage 6 "as-constructed" construction reports were prepared before the audit period (although not submitted to DITT, which is relevant to condition 8). Only one of the structures in the annual list (August 2023) of six structures scheduled to be constructed in the coming year under Condition 8 was completed in the timeframe advised. No as-constructed reports were completed in the audit period.	
48.g.i	48.g.i	all the works undertaken;							1		1	N/A	Not Applicable	Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024	
48.g.ii	48.g.ii	evidence of:											Refer to sub conditions		
48.g.ii.a	48.g.ii.a	hold-point sign-offs;							1		1	N/A	Not Applicable	Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024	

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuyin)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
48.g.ii.b	48.g.ii.b	testing carried out (including but not limited to field tests, laboratory tests and statistical tests);							1		1	N/A	Not Applicable	Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024	
48.g.ii.c	48.g.ii.c	acceptance criteria applied and compliance of the test results with the acceptance criteria;							1		1	N/A	Not Applicable	Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024	
48.g.ii.d	48.g.ii.d	where deviations to the plan have occurred, justification that demonstrates the design intent and performance of the structure has not been compromised.							1		1	N/A	Not Applicable	Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024	
49	49	The Operator must ensure that the ICE holds appropriate public and professional indemnity insurance to cover the scope of works associated with the scope of work certified.										4	Full Compliance	Certificate of Placement – Public and Products Liability Policy provided is for 31May2023 to 31May2024. (Relevant for the audit period). Certificate of Placement – Professional Indemnity 1 December 2022 at 4.00pm to 1 December 2023 at 4.00pm (Relevant for audit period). Certificate of Placement – Public and Products Liability from 31May2022 to 31May 2023 (Relevant for beginning of audit period). Sighted Professional Indemnity for GHD covering 2024.	
Independent Tailings Review Board (ITRB)															
50	50	The Operator must:											Refer to sub conditions		
50.a	50.a	convene an advisory board (Independent Tailings Review Board or ITRB);							1			4	Full Compliance	TSF Cell 2 Stage 8 Raise to RL 10,063 Independent Technical Review Board Report dated Aug2023 ITRB Site Visit Report February 2024 dated May2024	Bruce Brown, David Williams, Tamie Weaver continue to be the ITRB members and prepared the Cell 2 Stage 8 Raise Report Aug2023 and were on site Feb2024.
50.b	50.b	ensure the ITRB:											Refer to sub conditions		
50.b.i	50.b.i	membership includes independent geotechnical, tailings, and groundwater specialists;							1			4	Full Compliance	TSF Cell 2 Stage 8 Raise to RL 10,063 Independent Technical Review Board Report dated Aug2023 ITRB Site Visit Report February 2024 dated May2024 Curriculum vitae for ITRB members Dr. Tamie Weaver and Prof. David Williams Letter Operator to Department subject RE: MRM ITRB - Appointment of New Tailings Independent review board (ITRB) member (before audit period). Curriculum vitae for ITRB members Dr. Tamie Weaver and Prof. David Williams show their experience to meet this condition. Dr. Bruce Brown's relevant experience that meets this condition is included in the letter Operator to Department subject RE: MRM ITRB - Appointment of New Tailings Independent review board (ITRB) member (before audit period).	Bruce Brown, David Williams, Tamie Weaver continue to be the ITRB members and prepared the Cell 2 Stage 8 Raise Report Aug2023 and were on site Feb2024.
50.b.ii	50.b.ii	meets regularly to advise on operation of the TSF and any future modifications to its design;							1			4	Full Compliance	ITRB Meeting Presentation - May 2024 dated 20Jun2024 (outside audit period) TSF Cell 2 Stage 8 Raise to RL 10,063 Independent Technical Review Board Report dated Aug2023 ITRB Site Visit Report February 2024 dated May2024 (after audit period) ITRB Meeting Presentation - Feb 2024 dated Feb2024 Independent Tailing Review Board Document Comment Tracking Register - TSF Cell 1 Raise dated Dec2023 Email from ITRB to Operator subject: RE: MRM ITRB - Update Meeting dated May2024 (after audit period) Email from ITRB to Operator subject: Review of OMS manual dated Nov2023 Email from ITRB to Operator subject: RE: Cell 1 Raise 6 dated Oct2023 Email from ITRB to Operator subject: MRM ITRB Site Visit February 2024 dated Jun2024 (after audit period) Email from ITRB to Operator subject: MRM ITRB Review of Cell 2 Eastern Embankment Revised Buttress Design dated Jun2024 (after audit period) TSF Cell 2 Stage 8 Raise to RL 10,063 Independent Technical Review Board Report dated Aug2023 states "Provided that the minor matters raised above are adequately addressed by GHD, the Stage 8 Raise Design is endorsed by the ITRB as being more than adequate." All three members attended site on 15 February 2024. A variety of evidence has been sighted that demonstrated the ITRB met in the audit period and advised on operation of the TSF and future modifications.	

Authorisation compliance workbook - Operator

Audit period 01 May 2023 to 30 April 2024

17 May 2023 Authorisation Condition No.
 5 May 2022 Authorisation Condition No.
 Condition/requirement

Air Quality (dust & sulphur dioxide, transport)
 Surface Water (River, Creek, Artificial dams)
 Marine Waters (Bing Bong, marine sediments)
 Groundwater
 Aquatic fauna (fish river)
 Vegetation & Rehabilitation (terrestrial, diversion & NOEF)
 Waste (general, mine rock, tailings)
 Community (local indigenous & nuhlin)
 Monitoring & Reporting

Score Compliance level

Evidence

Comments

17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhlin)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments
50.b.iii	50.b.iii	is required to meet within 90 days from commencement of construction to allow sufficient time for review of subsequent modification to the TSF;							1			4	Full Compliance	<p>TSF Cell 2 Stage 8 Raise to RL 10,063 Independent Technical Review Board Report dated Aug2023 Independent Tailing Review Board Document Comment Tracking Register - TSF Cell 1 Raise dated Dec2023</p> <p>Email from ITRB to Operator subject: MRM ITRB Review of Cell 2 Eastern Embankment Revised Buttress Design dated Jun2024 (after audit period).</p> <p>Correspondence between ITRB internally cced and Operator subject: Re: ITRB Review Requirements.</p> <p>MRM TSF Quarterly Report - Q3 2023 JULY TO SEPTEMBER 2023 - draft.</p> <p>MRM TSF Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft.</p> <p>Based on draft quarterly report, Cell 1 Stage 6 construction commenced September 2023 and Cell 2 Stage 8 commenced August 2023 meeting the within 90 day ITRB review requirement.</p> <p>There was evidence of the Cell 2 Eastern Embankment Revised Buttress Design endorsement.</p> <p>There is evidence that the Operator provided the Buttress expansion letter and intermediate buttress design report to the ITRB in January 2023 and followed up with the ITRB to ensure they had them in April 2023. However, there is no evidence to show that they were reviewed/endorsed by the ITRB. As this is a historic issue from before the audit period, it has not been considered a part compliance for this condition but is covered in Condition 50.e.</p>	The Operator advised "The ITRB provides endorsement of raises prior to them commencing, which MRM would consider to meet this requirement."
50.c	50.c	provide details of the members of the ITRB panel and meeting frequency to the Department for endorsement by the Department;							1	1		4	Full Compliance	<p>TSF Cell 2 Stage 8 Raise to RL 10,063 Independent Technical Review Board Report dated Aug2023 ITRB Site Visit Report February 2024 dated May2024.</p> <p>Curriculum vitae for ITRB members Dr. Tamie Weaver and Prof. David Williams Letter Operator to Department subject RE: MRM ITRB - Appointment of New Tailings Independent review board (ITRB) member (before audit period).</p> <p>Curriculum vitae for ITRB members Dr. Tamie Weaver and Prof. David Williams show their experience to meet this condition. Dr. Bruce Brown's relevant experience that meets this condition is included in the letter Operator to Department subject RE: MRM ITRB - Appointment of New Tailings Independent review board (ITRB) member (before audit period).</p> <p>The Department advised the Independent Monitor in the 2020 audit that they had endorsed the members of the ITRB. There have been no changes in the audit period.</p>	Bruce Brown, David Williams, Tamie Weaver continue to be the ITRB members and prepared the Cell 2 Stage 8 Raise Report Aug2023 and were on site Feb2024.
50.d	50.d	together with the ICE, provide a written response to the satisfaction of the Department, in the event that future review of the designs by independent experts require additional matters to be addressed;							1	1		N/A	Not Applicable		No review of the designs by independent experts has occurred.
50.e	50.e	ensure ITRB endorses any future modifications to the TSF in writing, with all ITRB review comments appropriately addressed for both construction and future use of the structure. This includes, but is not limited to:							1	1		4	Full Compliance	<p>SITE INSTRUCTIONS AND NOTES_SI 2023_002 – Cell 2 Stage 8 Raise Independent Tailing Review Board Document Comment Tracking Register - TSF Cell 1 Raise 6 dated Dec2023</p> <p>Email from ITRB to Operator subject: RE: MRM ITRB - Update Meeting dated May2024 (after audit period)</p> <p>Email from ITRB to Operator subject: Review of OMS manual dated Nov2023</p> <p>Email from ITRB to Operator subject: RE: Cell 1 Raise 6 dated Oct2023</p> <p>Email from ITRB to Operator subject: MRM ITRB Site Visit February 2024 dated Jun2024 (after audit period)</p> <p>Email from ITRB to Operator subject: MRM ITRB Review of Cell 2 Eastern Embankment Revised Buttress Design dated Jun2024 (after audit period) Construction Cell 2 Eastern Wall Revised Buttress Design dated Sep2023</p> <p>Correspondence between ITRB internally cced and Operator subject: Re: ITRB Review Requirements.</p> <p>Memo ITRB to Operator June2024 subject: Review of Cell 2 Stage 7 Construction Phase - Buttress Expansion Revision</p> <p>An example of modifications is the Cell 2 eastern wall revised buttress design, which the ITRB reviewed and following those review comments being adequately addressed, ITRB accepted.</p> <p>Following review by the ITRB of the GHD Letter dated November 2021 titled "Review of Cell 2 Stage 7 Construction Phase - Buttress Expansion Revision" the ITRB stated "the revised buttress expansion was included in the Cell 2 Stage 8 Raise Detailed Design that was reviewed by the ITRB. The review was presented by the ITRB in a report dated 7 August 2023."</p>	

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024																Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhlin)	Monitoring & Reporting	Score	Compliance level				
50.e.i	50.e.i	Studies and/or trials to inform future construction and/or operation of the structure;							1		1	N/A	Not Applicable			The Operator advised "Until MRM have completed CPTu drilling and a larger data set of shear strength / density testing, the beach improvement trial is still ongoing. Note there have not been any changes to design as a result of the beach improvement work at this stage, this will come in later stages of design."	
50.e.ii	50.e.ii	The TSF Operations, Maintenance and Surveillance (OMS) manual, including the Trigger, Action and Response Plan (TARP) is updated regularly to accommodate any relevant changes to the structure that may impact on its stability and performance.							1		1	4	Full Compliance	TSF - Operations, Maintenance and Surveillance Manual revision 8 dated May2024 Email from ITRB to Operator subject: Review of OMS manual dated Nov2023 TSF - Operations, Maintenance and Surveillance Manual including ITRB review comments Email from ITRB to Operator subject: Review of OMS manual dated Nov2023 states "I have carried out a detailed review of the OMS manual and find it to be a comprehensive document that includes all elements required for a OMS manual." The TSF OMS was subsequently updated by the Operator after the audit period. The ITRB are yet to endorse revision 8 of the TSF OMS.		OBS: It is recommended that the revised TSF OMS (revision 8 or later) is endorsed by the ITRB prior to the next audit.	
Waste Rock Management																	
51	51	From the date of authorisation Non-benign Waste is to be permanently placed consistent with the approved MMP:											Refer to sub conditions				
51.a	51.a	above the 100 year ARI flood level, unless flood mitigation measures are provided consistent with the approved MMP and relevant Detailed Designs submitted to the Department in accordance with the conditions of this variation of Authorisation, with the exception of PAF(RE);		1		1			1			4	Full Compliance	NOEF North East Alpha Stage Complete Design Report version 3 dated Feb2022 (before audit period). NOEF North East Bravo Stage FOUNDATION DESIGN REPORT version 2 dated Aug2024 (after the audit period). NOEF North West Stage Foundation and Base Design Report version 4 dated Jul2022 (before audit period). January 2020 MMP EMR 2023-2024 dated Aug2024. Correspondence between ICE and Operator relating to Northern Overburden Emplacement Facility (NOEF), Independent Design Review of North-West Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024 NOEF North East Alpha Stage Complete Design Report states: "As shown in Figure 9, the vertical location is above the 100 year flood level, as the cells are located above the Wedge. It is also below the current 80m height limit." It also includes a design criteria of above Q100 flood level in Table 2. Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd states, related to North East Bravo "Construction works on Q100 flood levee was commenced in September to December of 2023. Due to the NE Bravo Stage located outside the existing barrier network around the NOEF, the non-benign materials stored within the stage will require flood protection from the northern extent of the stage." and "Following the installation of BGM, the crest and toe anchor trenches were backfilled to existing surface levels and this concludes the Q100 levee construction prior to December".		Peer Review of NOEF Annual Construction Report 2023 states "The design parameters of the PAF(RE) Cells are as below: [...] The PAF(RE) cells shall be at a minimum elevation of the Q100 flood level".	
51.b	51.b	on a compacted clay liner (CCL) or low permeability material that satisfies the design objective in Condition 20 that slopes towards a Perimeter Runoff Dam (PROD) or an appropriately lined storage structure, as defined in Condition 58(a);		1		1			1			4	Full Compliance	NOEF North East Bravo Stage FOUNDATION DESIGN REPORT version 2 dated Aug2024 (after the audit period). NEB Permeability by Constant Head Test Report for samples June to October 2023. NB Permeability Data Table undated. NE Bravo Foundation Underdrain & VWP ITP 4B April to July 2023, 1B April to June 2023. NE Bravo CCL Box Out ITP 7A June to August 2023, 5B June to September 2023, NE Bravo CCL Box Out Inspection and Test Plan 3C June to July 2023, NE Bravo CCL Box Out Inspection and Test Plan 2A April to July 2023, and NE Bravo CCL Box Out Inspection and Test Plan 1C April to June 2023. The Northeast Bravo foundation results for permeability provided showed that the results were orders of magnitude smaller than the required 1 x 10-9 m/s. The ITPs provided included the CCL acceptance criteria of maximum hydraulic conductivity 1 x 10-9 m/s demonstrating low permeability. NOEF North East Bravo Stage FOUNDATION DESIGN REPORT states "Construction of the Wedge Zone above the Base Zone, which will be sloped generally south-east towards the dewatering sumps and nearest PROD (EPROD)," and "As shown in Figure 45,the top of the finished Wedge will slope south-east at approximately 1% to promote runoff toward the NEB and NEa dewatering sumps in the short term, and EPROD once the sumps have been filled in to Wedge level. [...] This will ensure surface flows directing west to east are redirected southeast towards the collection sumps or EPROD."		May 2022 Authorisation refers to condition 19. 18June2021 Authorisation and May 2023 Authorisation refer to condition 20 rather than condition 19. The Independent Monitor believes that condition 20 is the correct reference.	

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024															
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuyllin)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments
51.c	51.c	PAF is emplaced in lift heights that minimises particle size segregation and creation of chimney structures, and must not exceed 7.5m taking into construction tolerances;		1		1			1			4	Full Compliance	NOEF North East Bravo Stage FOUNDATION DESIGN REPORT version 2 dated Aug2024 (after the audit period). ITPs Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024 Peer Review of NOEF Monthly Construction Report Reports January to April 2024 ITPs describe Hauling and Dumping of a 7.5m thick PAF(HC)/MS-NAF layer and particle size of 0.2m under Acceptance Checklists and Criteria.	
51.d	51.d	PAF(RE) is emplaced in dedicated cells in lift heights that minimises particle size segregation and creation of chimney structures, but must not exceed 2m taking into construction tolerances;		1		1			1			4	Full Compliance	NOEF North West Stage Foundation and Base Design Report version 4 dated Jul2022 (before audit period). NOEF North East Bravo Stage FOUNDATION DESIGN REPORT version 2 dated Aug2024 (after the audit period). ITPs Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024 Peer Review of NOEF Monthly Construction Report Reports January to April 2024 ITPs describe Hauling and Dumping of a maximum 2m thick PAF(RE) layer and particle size of 0.2m under Acceptance Checklists and Criteria. Peer Review of NOEF Annual Construction Report 2023 states "The design parameters of the PAF(RE) Cells are as below: ... Maximum lift height 2 m by paddock dumping"	
51.e	51.e	advection barriers of appropriate thickness and moisture condition are emplaced at suitable intervals that disrupt the formation of oxygen convection cycles;	1						1			4	Full Compliance	NOEF North West Stage Foundation and Base Design Report version 4 dated Jul2022 (before audit period). NOEF North East Bravo Stage FOUNDATION DESIGN REPORT version 2 dated Aug2024 (after the audit period). Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024 Peer Review of NOEF Monthly Construction Report Reports January to April 2024 ITPs Peer Review of NOEF Annual Construction Report 2023 states "The design parameters of the PAF(RE) Cells are as below: Advection barriers shall be placed on each lift with 0.1 m thick on top and 0.5 m thick on batters" and "The controls implemented to protect the PAF(RE) cell include additional compaction by limiting lift heights and employing flatter batter angles. This aims to restrict oxygen ingress and disrupt flow paths through the material." ITPs describe the placement of and thickness of the advection barriers, and also describes moisture condition by stating: "No moisture conditioning required".	
51.f	51.f	the ICE verifies the suitability of the PAF placement methodology with respect to particle size segregation and advection barriers;				1			1			4	Full Compliance	NOEF North East Bravo Stage FOUNDATION DESIGN REPORT version 2 dated Aug2024 (after the audit period). Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024 Peer Review of NOEF Monthly Construction Report Reports January to April 2024 ITPs All ITPs are signed by the ICE, which includes PAF placement methodology.	
51.g	51.g	construction of the NOEF stages, as defined in Conditions 52 and 53 is undertaken in accordance with a valid AAPA certificate;								1		4	Full Compliance	AAPA Authority Certificate C2004/014 dated Jan2004. AAPA Authority Certificate C2004/084 dated Jun2004. Two examples of height checks of the NOEF - undated. NOEF North East Bravo Stage FOUNDATION DESIGN REPORT version 2 dated Aug2024 (after the audit period). Evidence of the AAPA certificates and compliance with height requirements were sighted. NOEF North East Bravo Stage FOUNDATION DESIGN REPORT "NB: upper-slope sections would only be developed upon receiving the relevant approvals and Aboriginal Area Protection Authority (AAPA) certificates"	Condition previously referenced Conditions 53 and 54 rather than 52 and 53.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuyin)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
51.h	51.h	design of the NOEF is flexible to accommodate changes, if required, to comply with archaeological site MRM4 matters under Condition 31;								1		4	Full Compliance	NOEF North East Bravo Stage FOUNDATION DESIGN REPORT version 2 dated Aug2024 (after the audit period). NOEF North East Bravo Stage FOUNDATION DESIGN REPORT "NB: upper-slope sections would only be developed upon receiving the relevant approvals and Aboriginal Area Protection Authority (AAPA) certificates"	Planning of stages avoided MRM4 in the audit period.
51.i	51.i	in the event that future review of the designs or as-built structure by independent experts require additional matters to be addressed, the Operator together with the ICE must provide a written response to the satisfaction of the Department;									1	N/A	Not Applicable		The Independent Panels are yet to be formed, and as such there was no independent expert review of NOEF designs or as-built structures over the audit period.
51.j	51.j	at mine closure, non-benign waste rock is encapsulated and fully contained within an engineered cover system consistent with the Overburden Management Project, or an alternative cover system endorsed by the relevant independent technical panels to the satisfaction of the Department.						1	1			N/A	Not Applicable		Future item. Mine closure is not relevant to the audit period.
Construction of CWNOEF															
52	52	From the date of authorisation of the Overburden Management Project, the Operator is approved to construct, operate and maintain the following stages for permanent placement of Waste Rock in the NOEF:										4	Full Compliance	EMR 2023-2024 dated 31Aug2024 Table 5 of the EMR 2023-2024 shows the waste dumping locations, which include the below areas of NOEF in addition to stockpiles that are not permanent.	The Operator advised that the GPS management system for the trucks reduces potential errors associated with waste placement.
52.a	52.a	West A, B, C and D;											-		Compliance scored under condition 52.
52.b	52.b	CW (alpha, bravo and charlie);											-		Compliance scored under condition 52.
52.c	52.c	CE (alpha and bravo);											-		Compliance scored under condition 52.
52.d	52.d	SE;											-		Compliance scored under condition 52.
52.e	52.e	NW;											-		Compliance scored under condition 52.
52.f	52.f	NE.											-		Compliance scored under condition 52.
53	53	The Operator must develop the NOEF Stages defined in Condition 52 in accordance with Concept designs presented in the approved MMP.										4	Full Compliance	EMR 2023-2024 31Aug2024 EMR 2023-2024 31Aug2024 states "MRM cleared approximately 66.2 ha around the NOEF area during the reporting period and constructed approximately 20.0 ha of Basal Compacted Clay Liners (CCL). These works were carried out in accordance with the January 2020 MMP. Figure 5 shows the cleared area at the NOEF and the constructed CCL in the NOEF area. The various stages of the NOEF and the NE Bravo Stage foundation were constructed as per the OMP EIS methodology and consistent with the approved January 2020 MMP." EMR 2023-2024 states "During the reporting period, MRM operated the Mine in accordance with the January 2020 MMP. " No examples of the NOEF stages being developed contrary to the concept designs presented in the approved MMP were identified.	
54	54	During construction of the NOEF, the Operator must ensure:											Refer to sub conditions		
54.a	54.a	engagement of the ICE consistent with Condition 48;										4	Full Compliance		Refer to condition 48 for further detail of compliance.
54.b	54.b	waste rock management requirements comply with Condition 51.										4	Full Compliance		Refer to condition 51 for further details of compliance.
Remaining Waste Rock Management Facilities															
55	55	From the date of authorisation of the Overburden Management Project, temporary placement of non-benign waste is authorised for the following:											Refer to sub conditions		
55.a	55.a	EOEF (except for PAF(RE));										N/A	Not Applicable		There was no placement of waste on EOEF in the audit period.
55.b	55.b	stockpiles on NOEF, SOEF and WOEF;										4	Full Compliance	EMR 2023-2024 dated 31Aug2024 Table 5 of the EMR 2023-2024 shows the waste dumping locations, which include the NOEF in addition to stockpiles that are not permanent.	Waste only on NOEF.
55.c	55.c	ROM Pad;										4	Full Compliance	EMR 2023-2024 dated 31Aug2024 Table 5 of the EMR 2023-2024 shows the waste dumping locations, which include the NOEF in addition to stockpiles that are not permanent.	Ore is stored on the ROM pad, part of which becomes non-benign waste.
55.d	55.d	any other location approved by Department in writing.										N/A	Not Applicable		No other areas were approved or used.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024																
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhlin)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments	
56	56	The Operator must ensure that non-benign waste temporarily placed outside of the NOEF:											Refer to sub conditions		There are minor grammatical changes between May 2022 and May 2023 Authorisations, however the requirements of the condition are identical. The Operator advised "All in a controlled area and would transport to dams and sumps".	
56.a	56.a	has suitable water management structures (e.g. drains and sumps) in place to contain and manage poor quality drainage in accordance with the approved MMP;		1					1			4	Full Compliance	Ore is stored on the ROM pad, part of which becomes non-benign waste.	ROM pad is the only relevant area. The Operator advised "All in a controlled area and would transport to dams and sumps".	
56.b	56.b	has installed water diversion structures that allow segregation of mine-affected drainage from non-mine affected drainage;		1					1			4	Full Compliance	Ore is stored on the ROM pad, part of which becomes non-benign waste.	ROM pad is the only relevant area. The Operator advised "All in a controlled area and would transport to dams and sumps".	
56.c	56.c	has monitoring and management measures, in accordance with the AMP, implemented to ensure environmental objectives defined in the approved MMP are satisfied;		1					1		1	4	Full Compliance	Ore is stored on the ROM pad, part of which becomes non-benign waste.	ROM pad is the only relevant area. The Operator advised "All in a controlled area and would transport to dams and sumps".	
56.d	56.d	is removed and managed at cessation of mining in accordance with the approved MMP;							1			N/A	Not Applicable		Future item as cessation of mining has not occurred.	
56.e	56.e	is removed and managed in accordance with the approved MMP in the event of unplanned closure;						1	1			N/A	Not Applicable		Future item as there have been no unplanned closures.	
56.f	56.f	has oversight provided by ICE as per Condition 48.							1			N/A	Not Applicable		Only the NOEF used as relevant to the ICE in the audit period. The ROM pad has no ICE involvement.	
Ore Processing and Milling																
57	57	Surface water management infrastructure associated with the lead filtration facility at the Mine must be suitably designed and constructed to contain a 100 year ARI rainfall event.		1								4	Full Compliance	Flood extents for 1% Annual Exceedance Probability rainfall event. Sighted area during the site visit in August 2024.	The Operator advised "The lead filtration facility is currently under construction, however is not anticipated to be completed until Q3 or Q4 in 2025. The filtration facility is currently being constructed in the Mill, within the Mine Levee Wall. Attached is a map showing the flood extents in a 1 in 100 year ARI rainfall event, demonstrating that this area is above this level."	
58	58	From the date of authorisation of the Overburden Management Project, the Operator is authorised to expand the ore processing and associated milling and storage facilities in accordance with concepts and management systems detailed in the approved MMP including:											Refer to sub conditions			
58.a	58.a	ensuring the structures to be developed are suitably designed and constructed to allow management of poor quality drainage in accordance with the Water Management Plan that is generated from the construction and future operation of the structures;		1								4	Full Compliance	Extract from the WMP: McArthur River Mine 2021-22 Site Configuration and Water Management Infrastructure dated May2022. Extract from the WMP: Schematic of the 2021_22 - 2024_25 McArthur River Mine Water Management System dated May2022. The Operator has provided evidence of the location of the Reagent Mining Facility, Copper Mud Facility, Gypsum Plant, Lead Storage Facility and the expansion of the concentrate storage shed, which is within the defined catchment suitable to manage poor quality water in accordance with the Water Management Plan.		
58.a.i	58.a.i	construction and development of Gypsum Plant;		1								4	Full Compliance	2023/24 ANNUAL SITE WATER BALANCE FOR THE MCARTHUR RIVER MINE Water balance forecast report dated Jan2024. Independent Monitor sighted the foundations installed June 2023 in a bunded area near the reverse osmosis plant. There is no reference to the Gypsum Plant in the EMR 2023-2024. No evidence has been provided relating to the design and construction in accordance with the WMP.	"The Gypsum Plant is still under construction and is currently expected to be commissioned in April 2025." 2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report state "The purpose of the Gypsum Plant is to: • treat PbOx excess water to a suitable water quality before it re-enters the Mine water management system; and • provide opportunities for potential end uses after treatment" The Operator advised "These facilities are located within the mine levee wall and as such drainage during construction reports to the open pit or the nearest sump in accordance with the WMP."	
58.a.ii	58.a.ii	construction and development of Caustic Facility;		1								N/A	Not Applicable		Construction for the Caustic Facility was completed before the audit period. Located in the mill area and runoff from that area is contained and managed. The Operator advised "These facilities are located within the mine levee wall and as such drainage during construction reports to the open pit or the nearest sump in accordance with the WMP."	

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024														Evidence		Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhlin)	Monitoring & Reporting	Score	Compliance level			
58.a.iii	58.a.iii	construction and development of Reagent Mixing Facility;		1								N/A	Not Applicable		The Operator has advised that construction for the Reagent Mixing Facility was completed before the audit period. The Operator advised "These facilities are located within the mine levee wall and as such drainage during construction reports to the open pit or the nearest sump in accordance with the WMP."	
58.a.iv	58.a.iv	construction and development of Copper Mud Facility;		1								N/A	Not Applicable		The Operator has advised that construction for the Copper Mud Facility was completed before the audit period. The Operator advised "These facilities are located within the mine levee wall and as such drainage during construction reports to the open pit or the nearest sump in accordance with the WMP."	
58.a.v	58.a.v	construction and development of Lead Concentrate Storage Facility;		1								N/A	Not Applicable		The lead concentrate facility is currently still in concept phase and construction has not commenced.	
58.a.vi	58.a.vi	expansion of the concentrate storage shed and use of external hardstand area;		1								N/A	Not Applicable		The expansion of the existing concentrate storage facility also has not commenced.	
58.b	58.b	Wastes generated from the operation of the Gypsum Plant must be managed in accordance with Condition 63.							1			N/A	Not Applicable		Future item. Gypsum Plant is under construction expected to be commissioned in April 2025.	
Water Management and Storage																
59	59	Until the AMP (including Environmental Management Plans and sub-plans) is approved by the Department in writing, the Operator must prepare, review and include the following for each MMP and where appropriate each MMP amendment, a Water Management Plan which includes:										N/A	Not Applicable		Condition is completed. AMP was submitted with the January 2020 MMP and approved 13Nov2020. This condition is marked as completed in the Authorisation dated 17May2023.	
59.a	59.a	modelling of surface water at and around the Mine;		1							1	N/A	Not Applicable		Condition is completed. AMP was submitted with the January 2020 MMP and approved 13Nov2020. This condition is marked as completed in the Authorisation dated 17May2023.	
59.b	59.b	a whole of Mine water balance which takes account of the modelling of surface water;		1		1					1	N/A	Not Applicable		Condition is completed. AMP was submitted with the January 2020 MMP and approved 13Nov2020. This condition is marked as completed in the Authorisation dated 17May2023.	
59.c	59.c	calibration of the modelling of surface water to confirm its accuracy;		1							1	N/A	Not Applicable		Condition is completed. AMP was submitted with the January 2020 MMP and approved 13Nov2020. This condition is marked as completed in the Authorisation dated 17May2023.	
59.d	59.d	a written plan detailing how water at the Mine will be managed for the forthcoming wet season;		1		1					1	N/A	Not Applicable		Condition is completed. AMP was submitted with the January 2020 MMP and approved 13Nov2020. This condition is marked as completed in the Authorisation dated 17May2023.	
59.e	59.e	a plan of actions which will be undertaken to reduce the risk of any releases from AMD storage structures;		1							1	N/A	Not Applicable		Condition is completed. AMP was submitted with the January 2020 MMP and approved 13Nov2020. This condition is marked as completed in the Authorisation dated 17May2023.	
59.f	59.f	a plan of actions, including engineers' reporting schedules, which will be undertaken to ensure the structural integrity of all AMD storage structures;		1							1	N/A	Not Applicable		Condition is completed. AMP was submitted with the January 2020 MMP and approved 13Nov2020. This condition is marked as completed in the Authorisation dated 17May2023.	
59.g	59.g	a plan of actions which will be undertaken to ensure seepage from AMD storage structures is minimised including, where required, timelines for repairing damaged or installing new seepage management infrastructure.		1		1					1	N/A	Not Applicable		Condition is completed. AMP was submitted with the January 2020 MMP and approved 13Nov2020. This condition is marked as completed in the Authorisation dated 17May2023.	

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024															Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuyin)	Monitoring & Reporting	Score	Compliance level			
60	60	From 13 November 2020 (i.e. the date of authorisation of the Overburden Management Project), water-related activities involving interfering with waterway and water extraction must be undertaken in accordance with the Water Act 1992, and where required, appropriate licenses/approvals are obtained from the responsible agency prior to commencement of the works. The Operator must ensure:		1								4	Full Compliance	2024 Annual Report for the Northern Cleanwater Drain authorised under Permit to Interfere with a Waterway - IWW:MRM-001. dated Jul2024 (after the audit period). Email Operator to DEPWS MRM Notification of Completion - Northern Cleanwater Drain Works dated Dec2023. Email Operator to DEPWS RE: BCPNA07137 - MRM Application for a Bore Work Permit - Tailings Storage Facility Monitoring and Investigation dated Feb2024 Sighted notification of completion for the NOEF Cleanwater Drain that was submitted to the Water Licencing team within DEPWS and the annual report. The annual report dated Jul2024 referred to a previous annual report dated Jul2023. Sighted Bore Work permit. The Northern Cleanwater Drain was visited during the site visit August 2024.		
60.a	60.a	activities involving disturbance must not commence until required studies and/or trials to inform future design, construction and/or operation, as detailed in the approved MMP, are completed;		1							1	N/A	Not Applicable		There were no specific requirements specified in the MMP.	
60.b	60.b	works are conducted in accordance with a valid AAPA certificate;		1						1		4	Full Compliance	AAPA certificate 2004/84 The relevant AAPA certificate for construction of the NOEF (inclusive of the Northern Cleanwater Drain) is 2004/84.		
60.c	60.c	detailed designs, where nominated in the approved MMP, are developed and implemented in consultation with required experts, including but not limited to ecology, engineering and any other experts as appropriate;		1							1	N/A	Not Applicable		The MMP does not include requirements for bores or drains.	
60.d	60.d	regular inspections and maintenance are undertaken to ensure design objectives continue to be satisfied.		1							1	4	Full Compliance	2024 Annual Report for the Northern Cleanwater Drain authorised under Permit to Interfere with a Waterway - IWW:MRM-001. dated Jul2024. Sighted NOEF Cleanwater Drain annual report. This report refers to an assessment of revegetation and erosion processes (IPE, 2024). 2023 LiDAR imagery will be used as a baseline dataset from which to compare future erosion.		
61	61	The Operator must complete translocation of the Purple-crown Fairy Wren in accordance with the approved MMP, prior to commencement of works on the Old McArthur River Channel plug.						1				N/A	Not Applicable		Historical item. Completed before the audit period. The Operator advised that annual monitoring of the translocation area occurs. This condition is marked as completed in the Authorisation dated 17May2023.	
62	62	The Operator must erect and maintain warning signage that:											Refer to sub conditions			
62.a	62.a	is permanent and weatherproof;								1		4	Full Compliance	Memo subject 'Warning Signage Inspection - January 2023 dated Mar2023 (before audit period) Warning Signage Inspection – August 2024 (after audit period) Signage appears permanent and waterproof.		
62.b	62.b	contains specific wording agreed to by the Chief Health Officer (CHO) of the Northern Territory;								1		4	Full Compliance	Memo subject 'Warning Signage Inspection - January 2023 dated Mar2023 (before audit period) Warning Signage Inspection – August 2024 (after audit period)		
62.c	62.c	is located:											Refer to sub conditions			
62.c.i	62.c.i	at appropriate distances and frequency along the waterway;								1		4	Full Compliance	Memo subject 'Warning Signage Inspection - January 2023 dated Mar2023 (before audit period) Warning Signage Inspection – August 2024 (after audit period)		
62.c.ii	62.c.ii	as a minimum at all access points, including but not limited to crossings, vehicle tracks and walking tracks.								1		4	Full Compliance	Memo subject 'Warning Signage Inspection - January 2023 dated Mar2023 (before audit period) Warning Signage Inspection – August 2024 (after audit period) Signage appears to be located at all access points, including but not limited to crossings, vehicle tracks and walking tracks based on aerial photography and the Warning Signage Inspection - August 2024.	Signage at location 41 was removed in the previous audit period. The Operator advised that location 41 is well within the fenced area and the access would be from location 6 where a sign remains.	
62.c.iii	62.c.iii	along the length of:											Refer to sub conditions			

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhli)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
62.c.iii.a	62.c.iii.a	Barney Creek downstream to its junction with the McArthur River;								1		4	Full Compliance	Memo subject 'Warning Signage Inspection - January 2023 dated Mar2023 (before audit period) Warning Signage Inspection – August 2024 (after audit period)	
62.c.iii.b	62.c.iii.b	Barney Creek upstream to a point a short distance upstream of where the Carpentaria Highway crosses Barney Creek;								1		4	Full Compliance	Memo subject 'Warning Signage Inspection - January 2023 dated Mar2023 (before audit period) Warning Signage Inspection – August 2024 (after audit period) Warning Signage Inspection - August 2024 viewed confirming no access signage is in place in all locations (refer locations 7 and 8).	
62.c.iii.c	62.c.iii.c	Surprise Creek to approximately the location of SW29;								1		4	Full Compliance	Memo subject 'Warning Signage Inspection - January 2023 dated Mar2023 (before audit period) Warning Signage Inspection – August 2024 (after audit period) Warning Signage Inspection – August 2024 confirming no access signage is in place in all locations. Location 44 is the approximate location of SW29 (with 43 and 42 also relevant).	
62.c.iii.d	62.c.iii.d	the Bing Bong shipping channel and in the immediate area surrounding the shipping channel and the swing basin, unless otherwise agreed in writing by the CHO and the Department.								1		4	Full Compliance	Memo subject 'Warning Signage Inspection - January 2023 dated Mar2023 (before audit period) Warning Signage Inspection – August 2024 (after audit period) Email from DITT to Operator subject: MRM Technical Working Group - fortnightly meeting dated Jun2023 Email from DITT to Operator subject: RE: MRM Condition 62.c.iii.d - to discuss at TWG dated May2023 Warning Signage Inspection – August 2024 showed signage is located at each land entry point to the BBLF, which surround the water access. However, there was no evidence of signage along the length of the shipping channel and in the immediate area surrounding the shipping channel and swing basin. The Operator advised "MRM have provided correspondence to the Department on the intent of this condition." and "MRM are waiting on formal confirmation to be provided by the Department."	This condition now includes 'unless otherwise agreed in writing by the CHO and the Department.'
63	63	Wastes generated from operation of the Water Treatment Plant and Gypsum Plant must be disposed of in accordance with concepts and management systems detailed in the approved MMP, ensuring:											Refer to sub conditions		
63.i	63.a.i	trials for the permanent disposal of Gypsum Plant and Water Treatment Plant wastes must be undertaken to inform final material placement;								1		N/A	Not Applicable		Water Treatment Plant and Gypsum Plant are not operational.
63.ii	63.a.ii	the ITRB or an approved qualified and experienced independent third party endorse the waste disposal strategy, if the wastes are to be placed in the TSF; or								1		N/A	Not Applicable		Water Treatment Plant and Gypsum Plant are not operational.
63.iii	63.a.iii	the ICE or an approved qualified and experienced independent third party endorse the waste disposal strategy, if the wastes are to be placed in the NOEF.								1	1	N/A	Not Applicable		Water Treatment Plant and Gypsum Plant are not operational.
64	64	Water storage structures into which the Operator places or directs AMD must be designed, constructed and managed by the Operator to minimise to as low as reasonably practicable contaminants entering the Receiving Environment. In this regard the water storage structures into which the Operator is authorised to place or direct AMD whilst they continue to meet the requirements of this Condition are as follows:		1								3	Part Compliance (High)	2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report McArthur River Mine Jun2024 Screen shot of monthly inspections No evidence was provided for addressing the outstanding actions in the Full Recommendations Register - Mines Dams, which is Appendix D of the 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report McArthur River Mine June 2024. Evidence of monthly inspection actions being recorded was provided (screen shot of online system). However, there was no evidence provided to demonstrate progress to close the majority of the inspection actions in the audit period. Evidence provided was for after the audit period.	The Operator advised that the safety culture system lists actions required (after the audit period). OFI: Action and record evidence regarding addressing the outstanding actions in the Full Recommendations Register - Mines Dams, which is Appendix D of the 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report McArthur River Mine 7 June 2024. OFI: For monthly inspection actions, provide further information to record progress status and close out of the inspection actions.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhli)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
64.a	64.a	NOEF Southern Perimeter Runoff Dam (SPROD)		1								3	Part Compliance (High)	2023/24 Annual Site Water Balance for the McArthur River Mine Water. balance forecast report Jan2024, TARP included. Dams and Prods Register 2024. Photos and inspections in audit period. 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report McArthur River Mine Jun2024. NOEF Perimeter Runoff Dams Dam Safety Emergency Plan October 2022 (Draft document). NOEF Perimeter Runoff Dams Operations, Maintenance and Surveillance Manuals October 2022 (Draft document). 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report states that inspection frequency is okay. However, the NOEF Perimeter Runoff Dams Operations, Maintenance and Surveillance Manuals has not been updated to reflect the frequency of inspections that occurs and continues to include the requirement for daily to tri-weekly routine visual inspections aligned with ANCOLD (2003), which are not occurring.	OFl: Update and finalise the NOEF Perimeter Runoff Dams Operations, Maintenance and Surveillance Manuals (including but not limited to the recommended frequency of routine visual inspection for EPROD and SPROD, refer 2023 Mine Dam Inspection Report) and the NOEF Perimeter Runoff Dams Dam Safety Emergency Plan.
64.b	64.b	NOEF South East Perimeter Runoff Dam (SEPROD);		1								4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water. balance forecast report Jan2024, TARP included. Dams and Prods Register 2024. Photos and inspections in audit period. 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report McArthur River Mine Jun2024. 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report states that inspection frequency is okay.	
64.c	64.c	NOEF Western Perimeter Runoff Dam (WPROD);		1								4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water. balance forecast report Jan2024, TARP included. Dams and Prods Register 2024. Photos and inspections in audit period. 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report McArthur River Mine Jun2024. 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report states that inspection frequency is okay.	
64.d	64.d	NOEF Eastern Perimeter Runoff Dam (EPROD);		1								3	Part Compliance (High)	2023/24 Annual Site Water Balance for the McArthur River Mine Water. balance forecast report Jan2024, TARP included. Dams and Prods Register 2024. Photos and inspections in audit period. 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report McArthur River Mine Jun2024. NOEF Perimeter Runoff Dams Dam Safety Emergency Plan October 2022 (Draft document with no revision status). NOEF Perimeter Runoff Dams Operations, Maintenance and Surveillance Manuals October 2022 (Draft document with no revision status). EPROD Construction Report dated Nov2022. 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report states that inspection frequency is okay. However, the NOEF Perimeter Runoff Dams Operations, Maintenance and Surveillance Manuals has not been updated to reflect the frequency of inspections that occurs and continues to include the requirement for daily to tri-weekly routine visual inspections aligned with ANCOLD (2003), which are not occurring. Second stage of commissioning of EPROD (the reservoir to reach its Maximum Operating Level) not undertaken to date. Will be undertaken as part of the Operations, Maintenance and Surveillance Manual and a formal report provided.	EPROD Construction Report states "ANCOLD (2003) suggest that a Dam Safety Emergency Plan (DSEP) be prepared for all dams where there is a potential for the loss of life in the event of a dam failure. The EPROD DSEP is currently in draft form and is recommended it be completed and implemented in a timely manner. ANCOLD (2003) also recommends that all dams Consequence Category greater than "Very Low" should have an Operations, Maintenance and Surveillance (OMS) manual. The EPROD OMS manual is also in draft format at the time of writing and is recommended it be completed and implemented in a timely manner." OBS: Undertake and document the second stage of commissioning of EPROD (the reservoir to reach its Maximum Operating Level) under the Operations, Maintenance and Surveillance Manual and provide a formal report. OFl: Refer to Condition 64.a.
64.e	64.e	Mill Anti-Pollution Pond (Mill APP);		1								4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water. balance forecast report Jan2024, TARP included. Dams and Prods Register 2024. Photos and inspections in audit period. 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report McArthur River Mine Jun2024. 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report states that inspection frequency is okay.	Was flooded in March 2024.
64.f	64.f	Mill Concentrator Runoff Pond (Mill CRP);		1								4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024, TARP included, CCL, 27ML Dams and Prods Register 2024. Photos and inspections in audit period.	

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuihira)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
64.g	64.g	Open Pit Van Duncan's Dam (OP VDD);		1								4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024, TARP included, no liner, 26ML Dams and Prods Register 2024. Photos and inspections in audit period.	Duncan's Dam in Dams and Prods Register 2024.
64.h	64.h	Open Pit Pete's Pond (OP PP);		1								4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024, TARP included, HDPE, 115ML Dams and Prods Register 2024. Photos and inspections in audit period.	
64.i	64.i	Open Pit Lake Archer (OP LA);		1								4	Full Compliance	2023/24 annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024, TARP included, HDPE, 25ML Dams and Prods Register 2024. Photos and inspections in audit period.	
64.j	64.j	Mill Old Stores Dam (Mill OSD);		1								4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024, 0.6 ML. No inspections monthly during the audit period. Mill OSD is not documented in the Dams and Sumps Registers. However, due to size, location and overflow this is considered acceptable.	The Operator advised two years ago "The Mill Old Stores Dam, is actually a small 5m x 5m sump. A pump was removed from the sump over the Dry Season. This is the only recent history of maintenance for this water storage, as it has been dry for some time now. MRM will seek to have it removed from the VoA in the next amendment." This sump has not been removed from the Authorisation dated 17May2023. The Operator advised in the previous audit period "Collects runoff from the mill and raw water overflow. Pumped back to mill or overflows to a drain that reports to Lake Archer. No documented inspections. Located in an operational area that has a high level of interaction, i.e. any issues would be picked up. Clay lined, not HDPE."
64.k	64.k	Open Pit Pond 2 (OP P2);		1								4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024, TARP included, HDPE, 65 ML Dams and Prods Register 2024. Photos and inspections in audit period. 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report McArthur River Mine Jun2024. No design or construction drawings.	
N/A	64.l	NOEF East Drain Sump (EDS);		1								N/A	Not Applicable		Decommissioned. No longer included in the 17May2023 Authorisation.
64.l	64.m	NOEF West D Sump (WDS);		1								4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024 no liner, 38.1 ML Dams and Prods Register 2024. Photos and inspections in audit period. Field sheet regarding water quality monitoring (Feb2024) Field sheet regarding water quality monitoring (Mar2023) (before the audit period).	
64.m	64.n	NOEF Mine Infrastructure Area Sump (MIAS);		1								4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024 HDPE, 15 ML Dams and Prods Register 2024. Photos and inspections in audit period.	
64.n	64.o	NOEF West A Sump (WAS);		1								4	Full Compliance	Field sheet regarding water quality monitoring (Feb2024). Field sheet regarding water quality monitoring (Mar2023) (before the audit period). WAS has water quality monitoring undertaken there and the Operator advised that any operational observations regarding risks would be raised.	OBS: Consider documenting inspections of all structures listed to store AMD.
64.o	64.p	NOEF North East Alpha Sump (NEAS);		1								4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024 no liner, 10 ML Central East Area Sump Basis of Design Report dated Apr2021 (before audit period). Field sheet regarding water quality monitoring (Mar2023) (before audit period) Field sheet regarding water quality monitoring (Apr2024) Field sheet regarding water quality monitoring (Mar2024) NEAS/NEAET has water quality monitoring undertaken there and the Operator advised that any operational observations regarding risks would be raised.	Sump is now rock-filled with an extraction tower. Although NEA sump and NEA extraction tower are shown as both being sampled on the same Upon Discharge Surface Water Sampling sheet on Apr2024. OBS: As sumps are converted to extraction towers, they should be renamed in the AMD storage structure list and be included in the monthly inspection program.

Authorisation compliance workbook - Operator

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17 May 2023 Authorisation Condition No.
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 Condition/requirement

Air Quality (dust & sulphur dioxide, transport)
 Surface Water (River, Creek, Artificial dams)
 Marine Waters (Bing Bong, marine sediments)
 Groundwater
 Aquatic fauna (fish river)
 Vegetation & Rehabilitation (terrestrial, diversion & NOEF)
 Waste (general, mine rock, tailings)
 Community (local indigenous & nuhlin)
 Monitoring & Reporting

Score	Compliance level	Evidence	Comments
4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024 no liner, 1.4 M. Field sheet regarding water quality monitoring (Mar2023) (before audit period) Field sheet regarding water quality monitoring (Mar2024) (no safe access) NWS/NWET has water quality monitoring undertaken there and the Operator advised that any operational observations regarding risks would be raised.	Sump is now rock-filled with an extraction tower. OBS: Refer to OBS in Condition 64.o.
N/A	Not Applicable		Future item. Not yet constructed
4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024 no liner, 264 ML. CENTRAL EAST SUMP DESIGN drawings dated Aug2022 (before audit period). Central East Area Sump Basis of Design Report dated Apr2021 (before audit period). Field sheet regarding water quality monitoring (Apr2024) Field sheet regarding water quality monitoring (Mar2023) (before the audit period). CEBS/CEBET has water quality monitoring undertaken there and the Operator advised that any operational observations regarding risks would be raised.	Sump is now rock-filled with an extraction tower. OBS: Refer to OBS in Condition 64.o.
N/A	Not Applicable	2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024 states "NOEF SSD will be constructed." and HDPE, 0.2 ML. ICE Review of Design and Design Changes (Southern Sediment Dam) dated Aug2024. NOEF Southern Sediment Dam Detailed Design Report dated Nov2023 ICE Review of Design and Design Changes (Southern Sediment Dam) "GHD considers that the designs (and subsequent design changes) presented are acceptable and the construction specifications are appropriate. It is recommended that MRM record all post IFC design changes in the as-constructed drawing set as per their Sediment Dam Construction Guideline which shall be developed on completion of the project."	Southern Sediment Dam (NOEF SSD) is SSB. Not constructed.
4	Full Compliance	SE Alpha Sump and Extraction Tower Basis of Design Report QC1019_003-REP-001-1 dated JAN2024. SOUTH EAST ALPHA DEWATERING SUMP drawings dated Nov2022 (before audit period). Field sheet regarding water quality monitoring (Mar2023) (before the audit period). Field sheet regarding water quality monitoring (Feb2024) Field sheet regarding water quality monitoring (Mar2024) SEAS/SEAET has water quality monitoring undertaken there and the Operator advised that any operational observations regarding risks would be raised.	Rock-filled with an extraction tower. OBS: Refer to OBS in Condition 64.o.
3	Part Compliance (High)	NE Bravo Sump and Extraction Tower Basis of Design Report QC1019_001-REP-001-0 JUN2024. Field sheet regarding water quality monitoring (Apr2024) unsafe access NEBET is listed to have water quality monitoring undertaken and the Operator advised that any operational observations regarding risks would be raised. However, the only monitoring record that was provided for NEBET showed that it was not monitored due to unsafe access.	Rock-filled with an extraction tower. OFI: Document operational activities for the North East Bravo Sump and NOEF South West Stilling Basin that demonstrate the potential for contaminants to enter the Receiving Environment is minimised (e.g., inspections). OBS: Refer to OBS in Condition 64.o.
N/A	Not Applicable		Not constructed.
3	Part Compliance (High)	Inspection test record #4 - Geomembrane installation dated Oct2022 (before audit period) Inspection test record #2 - Liner surface preparation dated Oct2022 (before audit period) No evidence related to management has been provided. While this structure is not commissioned it may still contain AMD so is triggered and part compliant.	Construction incomplete and not commissioned. OFI: Refer to OFI in Condition 64.u.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhlin)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments	
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement														
64.x	N/A	NOEF Diamond Sump;		1								3	Part Compliance (High)	<p>NOEF Southern Sediment Dam Detailed Design Report dated Nov2023 Field sheet regarding water quality monitoring (Feb2024) (listed as SRSB) Field sheet regarding water quality monitoring (Mar2023) (listed as SRSB) (before the audit period). Water Management Plan 2022.</p> <p>NOEF Southern Sediment Dam Detailed Design Report dated Nov2023 states "As part of the drainage works associated with SSD, Engeny have been requested to update the design for the existing "diamond sump", which is an existing stilling basin located at the base of the NOEF ramp. The stilling basing requires update to the 0.1% AEP design event as per requirements outlined in Table 2.2."</p> <p>Dimond sump has water quality monitoring undertaken there and the Operator advised that any operational observations regarding risks would be raised.</p> <p>Water Management Plan 2022 lists South Stilling Basin as not developed with no mention of Diamond Sump. The Operator advised that Diamond Sump is incorporated into the Southern Sediment Dam also referred to as South Stilling Basin. However, there has been insufficient evidence to demonstrate that Diamond Sump was listed for storage of AMD before it was added to the Authorisation dated 17May 2023 and inadequate consistency regarding naming and demonstrating adequacy of the sump.</p>	<p>The Operator advised "The original Diamond Sump is a historical facility that was constructed circa 2018, however no construction records are available. [...] the Diamond Sump was redesigned and incorporated in with the South Sediment Dam design." and "Some temporary rectification works were completed during the audit period, however the permanent works as per the updated design are now planned to occur in 2025."</p> <p>OFl: Review all structures on site that store AMD and ensure a complete list is included in the Authorisation and structures are inspected regularly.</p> <p>OFl: To ensure consistency so a single name is used for each structure, review the list of AMD structures listed in the Authorisation against reporting records (e.g., inspection registers and monitoring sheets).</p>	
64.y	64.v	Southern Overburden Emplacement Facility Sump (SOEF Sump);		1								4	Full Compliance	Dams and Prods Register 2024. Photos and inspections in audit period.		
64.z	64.w	EOEF Low Grade Sump (LGS);		1								N/A	Not Applicable		Not constructed.	
64.aa	64.x	Bing Bong Surface Runoff Pond 1 (BBSRP1);		1	1							4	Full Compliance	2023/24 SITE WATER BALANCE FOR THE BING BONG LOADING FACILITY January 2024 27ML, TARP included Bing Bong Surface Runoff Ponds Routine Inspection Forms Jun2023, Oct2023, Feb2024 and May2024 (after audit period)		
64.bb	64.y	Bing Bong Surface Runoff Pond 2 (BBSRP2);		1	1							4	Full Compliance	2023/24 SITE WATER BALANCE FOR THE BING BONG LOADING FACILITY January 2024 30ML, TARP included Bing Bong Surface Runoff Ponds Routine Inspection Forms Jun2023, Oct2023, Feb2024 and May2024 (after audit period) "BB SRP2 and BB SRP3 are lined with a high-density polyethylene (HDPE) material to limit seepage"		
64.cc	64.z	Bing Bong Surface Runoff Pond (BBSRP3).		1	1							4	Full Compliance	2023/24 SITE WATER BALANCE FOR THE BING BONG LOADING FACILITY January 2024 17ML, TARP included Bing Bong Surface Runoff Ponds Routine Inspection Forms Jun2023, Oct2023, Feb2024 and May2024 (after audit period) "BB SRP2 and BB SRP3 are lined with a high-density polyethylene (HDPE) material to limit seepage"		
Water Transfer and Discharge																
65	65	The Operator must not transfer water to or discharge water from any water storage structure until:												Refer to sub conditions	<p>Memo MRM subject: Weekly Water Quality Review – 18th, 20th and 22nd of February 2024 dated Mar2024 Water Management Plan dated May2022 Water Discharge Procedure PRO-OP-0008-2200035 dated Nov2021 2023-24 Loads Estimate 2023-24 Waste Discharge Records - External Reporting Weekly Mine Water Report Spreadsheet dated Feb2024</p>	<p>Samples are taken and wait for prelim results before discharge. Site water team are provided email results and base their decision on that. During flooding there were daily reports from the geochemist with the latest results (Daily Report for key storage being balanced at the time - viewed 16 April2024). Twice daily meeting General Manager, Mining Manager, Site Water Superintendent, Enviro Superintendent and couple of Dewatering staff.</p>
65.a	65.a	water quality analysis has been received and interpreted by the Operator;		1							1	4	Full Compliance	<p>Memo MRM subject: Weekly Water Quality Review – 18th, 20th and 22nd of February 2024 dated Mar2024 Water Management Plan dated May2022</p> <p>Water Management Plan section 3.4.4 states: "Water is not transferred from any water storage structure until water quality analysis has been received and interpreted and the results confirm that the water is suitable for the destination."</p> <p>Memo MRM subject: Weekly Water Quality Review – 18th, 20th and 22nd of February 2024 dated Mar2024 states "Managed release from the Water Management Dam Release Point into Little Barney Creek occurred during the time of sampling." and shows that the water was acceptable for managed release.</p>		

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhlin)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
65.b	65.b	results confirm the water is suitable for the destination, having regard to the requirements of this document, the approved MMP and any other relevant restrictions on transfer or discharge of water within or from the Mine.		1								4	Full Compliance	Memo MRM subject: Weekly Water Quality Review – 18th, 20th and 22nd of February 2024 dated Mar2024 Water Management Plan dated May2022 Water Management Plan section 3.4.4 states: "Water is not transferred from any water storage structure until water quality analysis has been received and interpreted and the results confirm that the water is suitable for the destination."	
66	66	The Operator is authorised to undertake works to release water from WMD to Little Barney Creek in accordance with previous approvals as defined in Schedule B.		1								N/A	Not Applicable		Construction was complete before the audit period. Schedule B included an MMP amendment to construct the additional discharge point.
67	67	From the date of authorisation of the Overburden Management Project, water releases are authorised from the following points: < Authorised Release Points, Receiving Water Body, Latitude, Longitude > *WMD, Little Barney Creek, -16.42635, 136.0693 *Mine Levee Release Point (MLRP), Barney Creek Diversion, -16.42743, 136.1114 *South-East Levee 1 Release Point (SEL1 RP), Barney Creek Diversion, -16.42394, 136.1082 *McArthur River Diversion Channel Release Point, McArthur River Diversion, -16.435385, 136.120196		1								4	Full Compliance	2023-24 Waste Discharge Records - External Reporting The 2023-24 Waste Discharge Records showed that water was released from WMD (WMD RP, MRDC DP and MLDP), NC1A (MLDP), SEPROD (CERP) and Pond 2 (MLDP). Identified release points during site visit August 2024.	Location coordinates for the McArthur River Diversion Channel Release Point were Latitude 16.43468 and Longitude 136.1207 in the May 2022 Authorisation.
68	68	The Operator must:											Refer to sub conditions		
68.a	68.a	ensure all offsite water discharges are undertaken in accordance with a valid WDL;		1								4	Full Compliance	2023-24 Waste Discharge Records 2023-24 Loads Estimate WDL 174 Annual Monitoring Report 2023-2024.	The WDL audit for the period 1May2023 to 30Apr2024 found that offsite water discharges were undertaken in accordance with the WDL. A total of approximately 3,887.5 ML of water was released from authorised discharge and release points to the McArthur River during the reporting period.
68.b	68.b	only release water for offsite discharge from the WDL approved points;		1								4	Full Compliance	2023-24 Waste Discharge Records - External Reporting The 2023-24 Waste Discharge Records showed that water was released from WMD (WMD RP, MRDC DP and MLDP), NC1A (MLDP), SEPROD (CERP) and Pond 2 (MLDP) and these are all approved in the WDL, noting some are only approved as temporary.	There is an additional on lease release point in the Authorisation.
68.c	68.c	interpret and report all data and results acquired as part of the activity in the Operator's Annual Environmental Mining Report;		1							1	4	Full Compliance	Surface Water Monitoring Report for the 2023/24 Reporting Period EMR 2023-2024 dated 31Aug2024 The Surface Water Monitoring Report has the detail regarding the data and results with the EMR 2023-2024 providing discussion around the "holistic review of the environmental performance".	
68.d	68.d	evaluate the performance of this activity in terms of its effectiveness as a management tool;		1							1	4	Full Compliance	Surface Water Monitoring Report for the 2023/24 Reporting Period EMR 2023-2024 dated 31Aug2024 EMR 2023-2024 states "A Level 3 TARP investigation is being undertaken for elevated bioavailable lead concentrations in fluvial sediment. The investigation is being undertaken to better understand the contributing sources of the fluvial sediment analyte exceedances and assess the effectiveness of the Mine's existing controls." The Surface Water Monitoring Report has the detail regarding the performance of monitoring but the EMR 2023-2024 has discussion around the "holistic review of the environmental performance" and "A weight-of-evidence assessment has been undertaken by considering results of key monitoring programs to determine whether there are any areas of environmental risk that require further actions for the protection of the McArthur River beneficial uses and community values from mining impacts."	EMR 2023-2024 states "In response to the Level 3 TARP for total lead, MRM has engaged specialist consultants to review the limits for managed release loads in the AMP to account for seasonal variations in rainfall as recommended by the NT EPA in Assessment Report 86. Potential impact associated with the Level 3 TARP is expected to be negligible in the context of the total background lead load transported by the McArthur River over the reporting period. To verify this, additional fluvial sediment sampling will be undertaken downstream of the Mine during the 2024 dry season."
68.e	68.e	by 30 June 2020, characterise total loads of mine-derived contaminants from all source inputs for the 2017-2018 period consistent with Condition 16.b), unless otherwise agreed in writing by the Department.		1							1	N/A	Not Applicable	Email Operator to Department subject MRM Variation of Authorisation Condition (38c); 2017-2018 Mine -Derived Loads dated May2020. 220508 MRM-DPIR_Condition 38 mine-derived loads. Attachment A - 2017-18 Mine Derived Analyte Loads Assessment.	Considered N/A as due and completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.

Authorisation compliance workbook - Operator

Audit period 01 May 2023 to 30 April 2024

17 May 2023 Authorisation Condition No.
 5 May 2022 Authorisation Condition No.
 Condition/requirement

Air Quality (dust & sulphur dioxide, transport)
 Surface Water (River, Creek, Artificial dams)
 Marine Waters (Bing Bong, marine sediments)
 Groundwater
 Aquatic fauna (fish river)
 Vegetation & Rehabilitation (terrestrial, diversion & NOEF)
 Waste (general, mine rock, tailings)
 Community (local indigenous & nublir)
 Monitoring & Reporting

Score
 Compliance level
 Evidence
 Comments

69	69	The Operator must in relation to the WMD release point to Little Barney Creek undertake:																
69.a	69.a	release activity that minimises localised erosion, and utilises suitable energy dissipation and flow spreader structures (e.g. rock basin) and be monitored daily during release events;		1									4	Full Compliance	2023-24 Loads Estimate 2023-24 Waste Discharge Records - External Reporting 2023-24 WMD Release Point Checklist dated May2024 Photo: Rock basin dated Mar2024 The 2023-24 WMD Release Point Checklist spreadsheet states that the following is required "daily inspection of the rock basin at the release point to ensure erosion is being suitable controlled" and includes a prompt to advise if "rock basin erosion is controlled" . It also requires a cell to tick for photo evidence of rock basin. The release days in the 2023-24 WMD Release Point Checklist spreadsheet are identical to those in the 2023-24 Waste Discharge Records for WMD RP. Daily monitoring was not undertaken on 6 of the 54 discharge days due to access restrictions (from cyclone/ flooding and a safety incident) and on the final day of discharge.			
69.b	69.b	remediation in the event of unacceptable erosion occurring at the Carpentaria Highway culvert system to the satisfaction of the Department of Infrastructure, Planning and Logistics and the Department;		1									N/A	Not Applicable	Surface Water Monitoring Report for the 2023/24 Reporting Period WRM's "Review of Little Barney Creek geomorphic characteristics" is an attachment to the 23/24 Surface Water Quality Report. Review of Little Barney Creek geomorphic characteristics states "Based on the available aerial photography and LiDAR ground survey information there has been no significant change to the Little Barney Creek channel bed and banks downstream of the WMDRP."	The Operator advised "No remediation occurred during the reporting period."		
69.c	69.c	a cross-section profile survey immediately up-stream and down-stream of the Carpentaria Highway crossing, prior to and following each wet season;		1									4	Full Compliance	Surface Water Monitoring Report for the 2023/24 Reporting Period WRM's "Review of Little Barney Creek geomorphic characteristics" is an attachment to the 23/24 Surface Water Quality Report. Surface Water Monitoring Report for the 2023/24 Reporting Period states "Appendix B presents a review of Little Barney Creek geomorphic characteristics downstream of WMD RP. This assessment was undertaken in accordance with conditions of the VoA. The findings of this assessment included: • The 2023 LiDAR shows little to no changes to the banks of Little Barney Creek compared to 2018 LiDAR; • Minor gully erosion was observed on the northern bank, upstream of the Little Barney Creek culvert crossing; however, this is likely attributed to local catchment runoff inflows and not WMD RP releases as the discharge point does not release directly into the channel; and • There have been no significant changes to the Little Barney Creek channel, with no significant bed erosion along the length of the channel since 2018." LiDAR of Little Barney Creek upstream and downstream of the Carpentaria Highway culverts were included.			
69.d	69.d	each wet season quantification of any significant changes to creek morphology as function of time by documenting at a minimum morphology prior to first water release, and following the last water release. This could be achieved, for example, using a drone survey of the drainage system between the flow outlet and Barney Creek Diversion using a consistent flight path, with the resulting image overlaid on appropriately sized grid (e.g. 2.5 x 2.5 m);		1									4	Full Compliance	Surface Water Monitoring Report for the 2023/24 Reporting Period WRM's "Geomorphic characteristics of Little Barney Creek" is an attachment to the 23/24 Surface Water Quality Report. Surface Water Monitoring Report for the 2023/24 Reporting Period states "Appendix B presents a review of Little Barney Creek geomorphic characteristics downstream of WMD RP. This assessment was undertaken in accordance with conditions of the VoA. The findings of this assessment included: • The 2023 LiDAR shows little to no changes to the banks of Little Barney Creek compared to 2018 LiDAR; • Minor gully erosion was observed on the northern bank, upstream of the Little Barney Creek culvert crossing; however, this is likely attributed to local catchment runoff inflows and not WMD RP releases as the discharge point does not release directly into the channel; and • There have been no significant changes to the Little Barney Creek channel, with no significant bed erosion along the length of the channel since 2018."			

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhlin)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
69.e	69.e	measure and record flow duration, flow rate and volume of all water released from WMD into Little Barney Creek;		1								3	Part Compliance (High)	2023-24 Waste Discharge Records - External Reporting 2023-24 WMD Release Point Checklist dated May2024 The 2023-24 Waste Discharge Records & Loads Tracking includes the flow duration, average flow rate and a volume based on the flow duration and average flow. No evidence of a process of measuring flow duration and volume of all water released from WMD into Little Barney Creek or recording flow rate of all water released from WMD into Little Barney Creek was provided. It appeared that the volume is calculated not measured. It appeared that there are flow meters but there is incomplete evidence of record keeping and measuring.	OFI: The current process relies on manual entries to create records of flow start, stop, rate and volume. The flow volume is determined based on calculations rather than measurements. Explore opportunities to automate the measurement and recording of data capture for discharge events.
69.f	69.f	ensure all evidence of continuous flow in Little Barney Creek along the length of the drainage system between WMD release outlet and Little Barney Creek Diversion Channel is available for inspection;		1								4	Full Compliance	Approval for temporary exemption to Condition 69f dated Mar2024 2023-24 WMD Release Point Checklist Rock Basin and Little Barney Creek Photos The 2023-24 WMD Release Point Checklist has a prompt to enter yes or no regarding "flow along drainage line" that has the answer Y for all releases (except for those where access was restricted due to cyclone/flooding and a safety incident). It also request a tick for a photo evidence of flow. Photos of Little Barney Creek showed flow.	Approval of an exemption to the requirement for flow in Little Barney Creek was provided in April, 2024 however, the Operator advised that discharge had ceased by this point and no discharges occurring under the exemption.
69.g	69.g	ensure the surface water monitoring schedule for the activity includes SW06, which must be assessed for identical parameters as defined for SW03. At monitoring points SW03 and SW06:		1								4	Full Compliance	2023-24 WMD Release Point Checklist 2021-22 MRM Environmental Monitoring Schedule I1001 Rev3 dated Oct2022. Correspondence between Operator and DITT with response February 2024 regarding Inclement Weather and Surface Water Monitoring. Upon Discharge Surface Water Sampling WDL 174-14 dated 11, 12 and 25Mar Upon Discharge Surface Water Field Sheet template has SW06/SW20. Surface Water Monitoring Report for the 2023/24 Reporting Period Surface Water Data extracted 240530 spreadsheet The 2021-22 MRM Environmental Monitoring Schedule I1001 Rev3 that was relevant for the audit period, has identical monitoring requirements for SW03 and SW06. The parameters at SW19 and SW20 are identical to SW03/SW06 but the frequency is only weekly and doesn't include the twice weekly requirement during discharge from the WMD RP. Upon Discharge Surface Water Sampling WDL 174-14 field sheets dated 11, 12 and 25Mar show SW20 substituted for SW06 using the same parameters as SW03. Surface Water Data extracted 240530 spreadsheet shows the same analysis were undertaken for SW20 as SW03. The example upon discharge field sheets viewed, Surface Water Monitoring Report for the 2023/24 Reporting Period and COC also indicate the same parameters were used.	2023-24 WMD Release Point Checklist does not include SW06 but states "SW20 (or SW19 if access is restricted)". The Operator advised "Due to AAPA restrictions, MRM was not able to collect water quality samples from SW06. Instead, sampling was conducted at SW03 and SW20. SW20 is located directly upstream of SW06 and is considered a suitable substitute." OBS: Update the monitoring schedule and Water Management Plan to reflect that SW06 is an alternative to SW20 (and even SW19 if SW20 not available) ensuring the same sampling requirements as SW03.
69.g.i	69.g.i	Field parameters must also be measured daily during water release from WMD into Little Barney;		1								4	Full Compliance	2023-24 WMD Release Point Checklist 2021-22 MRM Environmental Monitoring Schedule I1001 Rev3 dated Oct2022. Correspondence between Operator and DITT with response February 2024 regarding Inclement Weather and Surface Water Monitoring. Surface Water Monitoring Report for the 2023/24 Reporting Period Surface Water Monitoring Report for the 2023/24 Reporting Period Figure 4.9 WMD RP inspection summary, at downstream locations (SW03, SW19/SW20) shows that daily sampling was not undertaken after 19Mar2024 due to access and safety constraints.	"Sampling of rivers and creeks was suspended on Monday 15 April due to a near-miss incident with an Estuarine Crocodile." "As notified to the Administering Authority on 17 April 2024, the frequency of sampling at the natural surface water locations has been reduced as the field monitoring teams have recently reported increasing activity of estuarine crocodiles at the McArthur River monitoring points. This includes an observation at the McArthur River upstream control point SW21 the morning of Monday 15 April 2024. MRM notes that until such time as we can ensure the sampling can be undertaken in a safe manner by monitoring personnel, MRM intends to collect the samples during the managed releases approximately once per week." OBS: Refer to OBSs for condition 29.1 of the WDL.
69.g.ii	69.g.ii	The surface water monitoring analytical suite must include thallium, boron and cobalt;		1								4	Full Compliance	2021-22 MRM Environmental Monitoring Schedule I1001 Rev3 dated Oct2022. Surface Water Monitoring Report for the 2023/24 Reporting Period Surface Water Data extracted 240530 spreadsheet (laboratory results only) The Environmental Monitoring Schedule does include thallium, boron and cobalt, and the Surface Water Data extracted 240530 spreadsheet showed that SW03 and SW20 samples were all analysed for thallium, boron and cobalt.	

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024																
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhlin)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments	
69.g.iii	69.g.iii	The surface water monitoring must be continued for a further two weeks following completion of the release activities for the season or until field parameters have returned to baseline levels;		1							1	4	Full Compliance	2023-24 Waste Discharge Records - External Reporting 2023-24 WMD Release Point Checklist dated May2024 Surface Water Monitoring Report for the 2023/24 Reporting Period Surface Water Monitoring Report for the 2023/24 Reporting Period Figure 4.9 WMD RP inspection summary, at downstream locations (SW03, SW19/SW20) shows that daily sampling was not undertaken after 19Mar2024 due to access and safety constraints.	OBS: Refer to OBSs for condition 29.1 of the WDL.	
69.h	69.h	measure total loads of analytes (including lead and zinc) from all controlled discharge activities entering McArthur River at location SW06 or an alternate location as agreed by the Department; and		1							1	3	Part Compliance (High)	2023-24 WMD Release Point Checklist 2021-22 MRM Environmental Monitoring Schedule I1001 Rev3 dated Oct2022. Correspondence between Operator and DITT with response February 2024 regarding Inclement Weather and Surface Water Monitoring. Surface Water Data extracted 240530 spreadsheet (laboratory results only) The 2021-22 MRM Environmental Monitoring Schedule I1001 Rev3 that was relevant for the audit period, has analytes including lead and zinc and Surface Water Data extracted 240530 spreadsheet shows results for total loads of analytes including lead and zinc at SW20 in lieu of SW06. No sampling was undertaken at SW06. The Operator informed DITT on 16Feb2024 that they proposed to sample at SW20 in lieu of SW06 and commenced discharge on 17Feb2024. However, DITT advised that no alternate locations have been approved.	OFI: Seek formal agreement from DITT that SW19 or SW20 monitoring location is an acceptable alternative to SW06 related to monitoring during discharges from WMD into Little Barney Creek.	
69.i	69.i	interpret the data acquired as part of the activity and its effectiveness and report in the Operator's Annual EMR in accordance with Condition 9.		1							1	4	Full Compliance	EMR 2023-2024 Correspondence between Operator and DITT relating to 2023-2024 EMR Submission (after the audit period). Related to this condition, correspondence between Operator and DITT relating to 2023-2024 EMR Submission states "Water management detailed in Section 3.1. Managed releases during the reporting period are detailed in Section 3.1.3." These are correct references and provide a high level interpretation with further detail in the Surface Water Monitoring Report for the 2023/24 Reporting Period.		
70	70	The Operator is authorised to undertake water management trial/s in accordance with:												Refer to sub conditions		
70.a	70.a	concepts detailed in the approved MMP, ensuring the trial/s is designed to manage and control all impacted surface water runoff in accordance with the Water Management Plan:		1								N/A	Not Applicable		Future item. No trials have occurred.	
70.a.i	70.a.i	Irrigation of Treated Water – Open Woodland Irrigation;		1								N/A	Not Applicable		Future item. No trials have occurred.	
70.a.ii	70.a.ii	Irrigation of Treated Water – Phytoremediation;		1								N/A	Not Applicable		Future item. No trials have occurred.	
70.a.iii	70.a.iii	Lowering of surface water elevations – Evapotranspiration;		1								N/A	Not Applicable		Future item. No trials have occurred.	
70.a.iv	70.a.iv	Sulfate Treatment System – Passive engineered wetland;		1								N/A	Not Applicable		Future item. No trials have occurred. Trials have not been completed because the Water Management Dam is already functioning as a passive water treatment wetland	
70.a.v	70.a.v	Sulfate Treatment System – Active Bioreactor;		1								N/A	Not Applicable		Future item. No trials have occurred. There has been no progress on the Active Bioreactors, this project is unlikely to be feasible / practical.	
70.b	70.b	detailed designs, where nominated in the approved MMP, are developed in accordance with the concepts outlined in the approved MMP, and endorsed by a relevant independent third party, prior to construction.		1								N/A	Not Applicable		Future item. There were no relevant designs in the audit period.	
71	71	At the conclusion of the trials in Condition 70, the Operator must apply in writing to the Department for approval of full-scale implementation.		1							1	N/A	Not Applicable		Future item. No trials have occurred.	
72	72	Water management using the Centre Pivot Irrigator is authorised:												Refer to sub conditions		
72.a	72.a	within the Mine Levee in accordance with the concept previously approved, as defined in Schedule B;		1								N/A	Not Applicable		Centre Pivot Irrigator not used in the audit period.	
72.b	72.b	adjacent to the TSF in accordance with the concept presented in the approved MMP;		1								N/A	Not Applicable		Centre Pivot Irrigator not used in the audit period.	
72.c	72.c	to be configured to maximise evaporation and minimise surface spray drift, surface runoff and infiltration into underlying natural soils.		1								N/A	Not Applicable		Centre Pivot Irrigator not used in the audit period.	

Perimeter Run-Off Dams - SPROD, SEPROD, WPROD and EPROD

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024														Evidence		Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhlin)	Monitoring & Reporting	Score	Compliance level			
73	73	The Operator is approved to develop SPROD and SEPROD in accordance with relevant documents defined in Schedule B;		1								N/A	Not Applicable		Operator advised that SPROD and SEPROD were constructed prior to the audit period. Liner and spillway construction were undertaken on SPROD 2019 and 2020 with a construction report prepared in the previous audit period.	
74	74	The Operator is authorised to complete works to construct EPROD and WPROD in accordance with following:											Refer to sub conditions			
74.a	74.a	EPROD:											Refer to sub conditions			
74.a.i	74.a.i	as previously approved and defined in Schedule B, ensuring that only benign material be used in the construction of the western embankment wall;		1								N/A	Not Applicable		No EPROD construction occurred in the audit period.	
74.b	74.b	WPROD:											Refer to sub conditions			
74.a.i	74.a.i	CWNOEF and NOEF West D Amendment, as defined in Schedule B; and		1								N/A	Not Applicable		Completed before the audit period. WPROD was completed in July 2017 (before the audit period commenced) and Independent Monitor sighted a completion report dated 14Jul2017.	
74.a.ii	74.a.ii	WPROD and Western Surface Water Management Design Update (GHD Memo), as defined in Schedule B.		1								N/A	Not Applicable		Completed before the audit period. WPROD was completed in July 2017 (before the audit period commenced) and Independent Monitor sighted a completion report dated 14Jul2017.	
75	75	The Operator must: (1) Construct EPROD and WPROD informed by the following monitoring regime in the event groundwater dewatering is											Refer to sub conditions		Note that the May 2022 Authorisation had slightly different wording and format but an equivalent intent for subcondition 75 (1).	
75.a	75.a	six hourly monitoring of field parameters for the first 24 hours of dewatering. Should parameters not stabilise during the first 24 hours then six hourly monitoring must continue until stabilisation has occurred;		1		1						N/A	Not Applicable		The Operator advised "There were no further construction or commissioning works over the audit period. There are no plans to change the geometry of these structures at this stage"	
75.b	75.b	field parameters must be taken daily following the first 24 hour period. Should parameters change more than 20% then the frequency must increase to every 12 hours until parameters have stabilised;		1		1						N/A	Not Applicable		The Operator advised "There were no further construction or commissioning works over the audit period. There are no plans to change the geometry of these structures at this stage"	
75.c	75.c	field parameters must include pH, specific electrical conductivity (SEC), temperature, REDOX and dissolved oxygen;		1		1						N/A	Not Applicable		The Operator advised "There were no further construction or commissioning works over the audit period. There are no plans to change the geometry of these structures at this stage"	
75.d	75.d	water samples must be taken and analysed at the commencement of dewatering at the end of the first 24 hours, and then weekly sampling and analysis of dewatering water for the remainder of the construction;		1		1						N/A	Not Applicable		The Operator advised "There were no further construction or commissioning works over the audit period. There are no plans to change the geometry of these structures at this stage"	
75.e	75.e	additional sampling and analysis must be undertaken if there is a substantial change in field parameters (approximately 30%);		1		1						N/A	Not Applicable		The Operator advised "There were no further construction or commissioning works over the audit period. There are no plans to change the geometry of these structures at this stage"	
75.f	75.f	analysis must include: specific electrical conductivity (SEC), major ions (Ca, K, Mg, Na, Cl, CO ₃ , HCO ₃ and SO ₄), Al, As, Cd, Co, Cu, Fe, Mn, Ni, Pb, Se and Zn;		1		1						N/A	Not Applicable		The Operator advised "There were no further construction or commissioning works over the audit period. There are no plans to change the geometry of these structures at this stage"	
75.g	75.g	field parameters and samples for analysis must be taken from the dewatering source, not the receiving storage;		1		1						N/A	Not Applicable		The Operator advised "There were no further construction or commissioning works over the audit period. There are no plans to change the geometry of these structures at this stage"	
75.h	75.h	if flow meters fail, then dewatering must cease until they are repaired or replaced;		1		1						N/A	Not Applicable		The Operator advised "There were no further construction or commissioning works over the audit period. There are no plans to change the geometry of these structures at this stage"	
75.i	75.i	field water quality parameters, flow meter volumes and laboratory analysis must be submitted to Department on a monthly basis;		1		1						N/A	Not Applicable		The Operator advised "There were no further construction or commissioning works over the audit period. There are no plans to change the geometry of these structures at this stage"	
75.j	75.j	any indication of fracturing and/or caverns (Karstification/dissolution features) must be recorded during logging along with water strikes and estimated yields during drilling;		1		1						N/A	Not Applicable		The Operator advised "There were no further construction or commissioning works over the audit period. There are no plans to change the geometry of these structures at this stage"	

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
75 (2)	75.k	Prior to use of the structure, submit to the Department construction reports including QA and QC data endorsed by the ICE within 60 days of construction being completed.									1	N/A	Not Applicable		The Operator advised "There were no further construction or commissioning works over the audit period. There are no plans to change the geometry of these structures at this stage"
Tailings storage facility															
76	76	From the date of authorisation of the Overburden Management Project, tailings must be managed in accordance with the following:												Refer to sub conditions	
76.a	76.a	be deposited only in Cell 1, Cell 2 or combined Cell 1 and Cell 2;							1			4	Full Compliance	MRR TSM Quarterly Report - Q1 2023 January 2023 to March 2023. MRR TSM Quarterly Report - Q2 2023 April 2023 to June 2023. Review of the quarterly reports provided (relevant to a quarter of the audit period) do not indicate tailings being deposited outside of Cell 1 and Cell 2, in compliance with this condition.	
76.b	76.b	any construction of tailings lift, as approved in Condition 79, be reviewed and endorsed by independent oversight requirements in Condition 48 and 50 or an alternative independent qualified and experienced third party approved by the Department in writing;							1				-		Refer to compliance scored in conditions 48 and 50.
76.c	76.c	construction of the TSF lifts is undertaken in accordance with a valid AAPA certificate;							1			4	Full Compliance	Aboriginal Cultural Heritage Management Plan version 1.1 dated Jun2022. Aboriginal Cultural Heritage Management Plan advises that C2004/083 Variation to C2004/013 D89/199; 90/1015.1 is in place for the TSF.	
76.d	76.d	the TSF Seepage Interception Trench is fully operational by end of December 2020;							1			N/A	Not Applicable		The Independent Monitor was advised by the Operator that "The construction of the Surprise Creek Interception Trench was complete on 5 November 2020." Condition is obsolete. Evidence of operation was observed during the waste rock handling procedures audit conducted on 15June2022 OBS: DITT should consider marking this condition as complete given the TSF Seepage Interception Trench is fully operational.
76.e	76.e	in the event that future review of the designs or as-built structure by independent experts require additional matters to be addressed, the Operator together with the ICE must provide a written response that justifies the existing design or proposes an alternate design to the satisfaction of the Department.							1	1		N/A	Not Applicable		The Operator advised "there have been no changes to the general philosophy of the TSF over the reporting period".
TSF Cell 1 and 2 Construction															
77	77	From the date of authorisation of the Overburden Management Project, the Operator is approved to develop TSF Cell 1, Cell 2 and Combined Cell 1 and 2 lifts in accordance with:							1			4	Full Compliance	TSF Cell 2 Stage 8 – Raise to RL 10064 Detailed Design Report McArthur River Mining Pty Ltd Aug2023 (neither J Castle or B Hanslow signed). TSF Cell 1 Stage 6 – Raise to RL 10061 Detailed Design Report McArthur River Mining Pty Ltd Oct2023 (J Castle is an author but not signed off by B Hanslow). MRR TSM Quarterly Report - Q1 2023 January 2023 to March 2023. MRR TSM Quarterly Report - Q2 2023 April 2023 to June 2023. MRR TSM Quarterly Report - Q3 2023 JULY TO SEPTEMBER 2023 - draft. MRR TSM Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft.	
77.a	77.a	McArthur River Mining Pty Ltd, Tailings Storage Facility, Design Development – Life of Mine Plan, May 2017, as defined in Schedule B;							1			4	Full Compliance	TSF Cell 2 Stage 8 – Raise to RL 10064 Detailed Design Report McArthur River Mining Pty Ltd Aug2023 (neither J Castle or B Hanslow signed). TSF Cell 1 Stage 6 – Raise to RL 10061 Detailed Design Report McArthur River Mining Pty Ltd Oct2023 (J Castle is an author but not signed off by B Hanslow). TSF Cell 1 Stage 6 – Raise to RL 10061 Detailed Design Report states "The TSF Life of Mine Plan (LOM) presents the design basis for operation and closure of the TSF (GHD 2017a). It is a critical reference document that describes the design criteria and should be referred to directly. Since completion of the 2017 TSF LOM plan, geotechnical design parameters are reviewed as new information becomes available and updated if necessary (GHD, 2022b). Geotechnical parameters used as part of the Cell 1 Stage 6 design are included in this report. " The TSF Cell 2 Stage 8 – Raise to RL 10064 Detailed Design Report has an equivalent section.	With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required.
77.b	77.b	the approved MMP for the following stages:											Refer to sub conditions		

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
77.b.ii	77.b.ii	Cell 1 Raise 4 – 10,056.0 mRL;							1			N/A	Not Applicable		Historic item. Works completed before the audit period.
77.b.ii	77.b.ii	Cell 1 Raise 5 – 10,059.0 mRL;							1			N/A	Not Applicable		Historic item. Works completed before the audit period.
77.b.iii	77.b.iii	Cell 2 Raise 6 – 10,061.0 mRL;							1			N/A	Not Applicable		Historic item. Works completed before the audit period.
77.b.iv	77.b.iv	Cell 2 Raise 7 – 10,061.5 mRL;							1			N/A	Not Applicable		Historic item. Works completed before the audit period.
77.b.v	77.b.v	Combined Cell 1 and 2 Raise 1 – 10,062.6 mRL;							1			N/A	Not Applicable		N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
77.b.vi	77.b.vi	Combined Cell 1 and 2 Raise 2 – 10,063.8 mRL;							1			N/A	Not Applicable		N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
77.b.vii	77.b.vii	Combined Cell 1 and 2 Raise 3 – 10,065.0 mRL;							1			N/A	Not Applicable		N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which was above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
77.b.viii	77.b.viii	Combined Cell 1 and 2 Raise 4 – 10,066.2 mRL;							1			N/A	Not Applicable		N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
77.b.ix	77.b.ix	Combined Cell 1 and 2 Raise 5 – 10,067.4 mRL;							1			N/A	Not Applicable		N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
77.b.x	77.b.x	Combined Cell 1 and 2 Raise 6 – 10,068.6 mRL;							1			N/A	Not Applicable		N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
77.b.xi	77.b.xi	Combined Cell 1 and 2 Raise 7 – 10,069.8 mRL;							1			N/A	Not Applicable		N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
77.b.xii	77.b.xii	Combined Cell 1 and 2 Raise 8 – 10,071.0 mRL;							1			N/A	Not Applicable		N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
77.b.xiii	77.b.xiii	Combined Cell 1 and 2 Raise 9 – 10,072.2 mRL;							1			N/A	Not Applicable		N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
77.b.xiv	77.b.xiv	Combined Cell 1 and 2 Raise 10 – 10,073.4 mRL;							1			N/A	Not Applicable		N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
77.b.xv	77.b.xv	Combined Cell 1 and 2 Raise 11 – 10,074.6 mRL;							1			N/A	Not Applicable		N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
77.b.xvi	77.b.xvi	Combined Cell 1 and 2 Raise 12 – 10,075.8 mRL;							1			N/A	Not Applicable		N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
77.b.xvii	77.b.xvii	Combined Cell 1 and 2 Raise 13 – 10,077.0 mRL;							1			N/A	Not Applicable		N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
77.b.xviii	77.b.xviii	Combined Cell 1 and 2 Raise 14 – 10,078.0 mRL.							1			N/A	Not Applicable		N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
78	78	For each lift, the Operator must ensure detailed designs follow the approved McArthur River Mining Pty Ltd Tailings Storage Facility Raising General Specification for Design and Construction; with oversight provided by the ICE consistent with Condition 48.							1			4	Full Compliance	TSF Cell 2 Stage 8 – Raise to RL 10064 Detailed Design Report McArthur River Mining Pty Ltd Aug2023 (neither J Castle or B Hanslow signed). TSF Cell 1 Stage 6 – Raise to RL 10061 Detailed Design Report McArthur River Mining Pty Ltd Oct2023 (J Castle is an author but not signed off by B Hanslow). Letter GHD to Operator subject TSF Construction Works, May 2023 - April 2024, Engineer of Record Oversight dated Aug2024. TSF Cell 2 Stage 8 – Raise to RL 10064 Detailed Design Report states "Geometric parameters for the proposed Cell 2 Stage 8 raise are given in Table 2.4 and presented on the typical sections in Figure 3.1 and Figure 3.2, which are consistent with the currently approved TSF LOM Plan and the General Specification for Design and Construction (GHD, 2019f), included as Appendix I of the approved 2020 Mining Management Plan."	The ICE advised that the process followed is the design team prepare the design, the EOR/ICE review the design, then the ITRB review the design, the design team make updates with ICE oversight. There is then a construction endorsement letter by ICE after construction.
TSF Management															
79	79	The Operator must operate and maintain the TSF in accordance with the most up-to-date TSF Operations Maintenance and Surveillance manual, ensuring:							1			4	Full Compliance	MRM TSF Quarterly Report - Q1 2023 January 2023 to March 2023. MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023. MRM TSF Quarterly Report - Q3 2023 JULY TO SEPTEMBER 2023 - draft. MRM TSF Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft. Tailings Storage Facility – Operations, Maintenance and Surveillance Manual (version 7 dated Sep2023). No instances of not conforming with the TSF Operations Maintenance and Surveillance manual were identified for the audit period. Although identified in previous audits, the required tailings density remains inconsistent in the TSF OMS. MRM TSF Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft showed there were pockets of time where the tailings density was below the 50-55% target including 13 days in December 2023 and stated "A density lower than 50% is not considered to be a material concern on a short-term basis".	In the audit period, the routine daily inspection form format has changed to an online version. The new version appears to not include all checks daily. OBS: The routine inspection forms should be updated to incorporate the relevant requirements of the Authorisation. OBS: Table 7-2 (TSF Critical Operating Parameters) of the OMS Manual should be updated to be consistent with TARP Table 7-10 (Tailings density TARP) which specifies density >50% as the target normal range (repeat from 2022/2023). OBS: Obtain ITRB and ICE review of the following statement related to tailings density that is included in TSF Quarterly Reports "A density lower than 50% is not considered to be a material concern on a short-term basis" and if accurate include this concept in the TSF OMS. OBS: Examine schedule for the preparation for TSF "as-constructed" construction reports so they are submitted within 60 days of completion of construction.
79.a	79.a	no discharge of water into the TSF unless											Refer to sub conditions		
79.a.i	79.a.i	it is water contained within the Tailings stream which is at normal operational slurry densities; or							1			4	Full Compliance	MRM TSF Quarterly Report - Q1 2023 January 2023 to March 2023. MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023. MRM TSF Quarterly Report - Q3 2023 JULY TO SEPTEMBER 2023 - draft. MRM TSF Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft. TSF Domain - Routine Inspection Form 16Jun2023, 12Aug2023, 8Oct2023 and 15Mar2024. MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023 indicated that tailings was above 50%, as required and stated "Daily density readings for the tailings slurry pumped to the TSF over the reporting period are provided in Figure 1 below. The average density for tailings slurry during the reporting period was 53.5%, primarily within the nominal target density range. The few instances where densities fell below the target range were the result of minor mill processing issues which caused a higher water content in the slurry than desired; as discussed above, these short-term variations are not of significant concern. " There were pockets of time where the tailings density was below the 50% target including 13 days in December 2023. However, it was still a slurry and considered compliant.	

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
79.a.ii	79.a.ii	It is endorsed by the ITRB;							1			N/A	Not Applicable		The Operator advised "No additional water sources were released to the TSF during the reporting period."
79.b	79.b	all Tailings are deposited sub-aerially to allow proper beaching and drying between deposition cycles;							1			4	Full Compliance	MRM TSF Quarterly Report - Q1 2023 January 2023 to March 2023. MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023. MRM TSF Quarterly Report - Q3 2023 JULY TO SEPTEMBER 2023 - draft. MRM TSF Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft. MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023, states "The tailings are deposited sub-aerially through spigots at approximately 50 metre (m) intervals around the perimeter of the TSF embankment via three high density polyethylene (HDPE) perimeter pipelines." EMR 2023-2023 " Placement of tailings around the Cell 1 and Cell 2 perimeters using the subaerial spigot discharge system, as stipulated within the designs and TSF operational guidelines. A total of 2,852,207 tonnes (t) of tailings were deposited into the TSF during the reporting period." Sub-aerial deposition observed during site visit August 2024 (after the audit period).	
79.c	79.c	surface water levels are maintained in the TSF such that they do not come into contact with the embankment internal walls;		1					1			4	Full Compliance	MRM TSF Quarterly Report - Q1 2023 January 2023 to March 2023. MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023. MRM TSF Quarterly Report - Q3 2023 JULY TO SEPTEMBER 2023 - draft. MRM TSF Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft. MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023 states "The general design philosophy for water management at the TSF is the reduction of seepage through minimising the size of decant ponds and maximising evaporation. Minimising the size of decant ponds also acts to maximise the beach length, which controls the water table in embankments and thereby increases the stability of the structure." DITT site investigation notes from 27Mar2024 "TSF Cell 1 showing absence of pooled water against the embankment" including a photo.	
79.d	79.d	phreatic surface is managed to avoid compromising the integrity of the embankment.										4	Full Compliance	MRM TSF Quarterly Report - Q1 2023 January 2023 to March 2023. MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023. MRM TSF Quarterly Report - Q3 2023 JULY TO SEPTEMBER 2023 - draft. MRM TSF Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft. The TSF OMS states "Maintain as small a decant pond as possible" with the reasoning "Reduce pore pressures / phreatic surface level in the embankment and reduce the risk of embankment instability". MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023, states "The general design philosophy for water management at the TSF is the reduction of seepage through minimising the size of decant ponds and maximising evaporation. Minimising the size of decant ponds also acts to maximise the beach length, which controls the water table in embankments and thereby increases the stability of the structure." DITT site investigation notes from Mar2024 "TSF Cell 1 showing absence of pooled water against the embankment" including a photo.	
80	80	The Operator must provide quarterly to the Minister a written status report on the seepage and management of seepage from the TSF, including the following:		1		1			1		1	2	Part Compliance (moderate)	MRM TSF Quarterly Report - Q1 2023 January 2023 to March 2023. MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023. MRM TSF Quarterly Report - Q3 2023 JULY TO SEPTEMBER 2023 - draft (after audit period). MRM TSF Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft (after audit period). The most recent TSF quarterly report submitted in the audit period was for Q2 2023 April 2023 to June 2023 on 20Sep2023. Draft TSF Quarterly Reports for Q3 2023 JULY TO SEPTEMBER 2023 and Q4 2023 OCTOBER TO DECEMBER 2023 were provided (after the audit period) but no evidence has been provided for their submission. TSF Cell 1 Stage 5 and TSF Cell 2 Stage 6 raise "as-constructed" construction reports were identified as not submitted in the AEPAR 2022 and 2023 although a DITT review of Quarterly Reports had requested "as constructed" construction reports be submitted. Evidence was provided that the TSF Cell 1 Stage 5 and TSF Cell 2 Stage 6 "as-constructed" construction reports were prepared before the audit but not submitted to DITT.	OFI: Submit TSF quarterly reports to DITT quarterly. OFI: Submit TSF Cell 1 Stage 5 and Cell 2 Stage 6 raises "as-constructed" construction reports to DITT (dated March 2022 and May 2022 respectively).

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
80.a	80.a	water levels in the TSF;		1					1			4	Full Compliance	MRM TSF Quarterly Report - Q1 2023 January 2023 to March 2023. MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023. MRM TSF Quarterly Report - Q3 2023 JULY TO SEPTEMBER 2023 - draft. MRM TSF Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft. For example, in MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023 and Q3 2023 JULY TO SEPTEMBER 2023 (draft), water levels in the TSF were included in section 3.2.	
80.b	80.b	all monitoring data associated with the seepage (including geotechnical and environmental monitoring);		1		1			1			4	Full Compliance	MRM TSF Quarterly Report - Q1 2023 January 2023 to March 2023. MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023. MRM TSF Quarterly Report - Q3 2023 JULY TO SEPTEMBER 2023 - draft. MRM TSF Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft. For example, in MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023 and Q3 2023 JULY TO SEPTEMBER 2023 (draft), seepage quality is discussed in section 3.4 with TSF stability and associated monitoring discussed in section 3.5.	
80.c	80.c	flow rate of each seep;		1		1			1			4	Full Compliance	MRM TSF Quarterly Report - Q1 2023 January 2023 to March 2023. MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023. MRM TSF Quarterly Report - Q3 2023 JULY TO SEPTEMBER 2023 - draft. MRM TSF Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft. For example, section 3.3. of MRM TSF Quarterly Reports - Q2 2023 April 2023 to June 2023 and Q3 2023 JULY TO SEPTEMBER 2023 (draft) includes seepage flow rates.	
80.d	80.d	all actions undertaken during the quarter associated with the seepage and management of Tailings;		1		1			1			4	Full Compliance	MRM TSF Quarterly Report - Q1 2023 January 2023 to March 2023. MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023. MRM TSF Quarterly Report - Q3 2023 JULY TO SEPTEMBER 2023 - draft. MRM TSF Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft. Attachment B - TSF Recommendation Instruction and Action Register of the MRM TSF Quarterly Report - April 2023 to June 2023 includes the actions undertaken in the quarter.	Attachment B - TSF Recommendation Instruction and Action Register of the MRM TSF Quarterly Report - April 2023 to June 2023 includes actions that were due but were incomplete. OBS: Recommendations in the TSF Recommendation Instruction and Action Register should be closed out by the due date. Where actions are not completed by the due date, stating "overdue" rather than "incomplete" and using a different colour of shading in the TSF Recommendation Instruction and Action Register, may prove helpful.
80.e	80.e	all actions planned for the next quarter associated with seepage and management of Tailings.		1		1			1			4	Full Compliance	MRM TSF Quarterly Report - Q1 2023 January 2023 to March 2023. MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023. MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023 - Table 6 describes the ongoing operational actions by recommended frequency and the Attachment B - TSF Recommendation Instruction and Action Register also includes actions.	
Geochemical, Geotechnical and Hydrogeological Assessments and Investigation Drilling															
81	81	The Operator is authorised to undertake Drilling Investigations as outlined in relevant approved plans defined in Schedule B and approved MMP, ensuring adherence to industry best practice:				1						4	Full Compliance	EMR 2023 - 2024 dated 31Aug2024 EMR 2023-2024 Appendix A 2023-2024 Drilling Register dated August 2024 The Operator advised that there was no hydrogeological drilling in the audit period. This is supported by no Hydrogeological Drilling and Field Campaign report appendix with the EMR 2023-2024. The 2023-2024 Drilling Register includes one dewatering bore. EMR 2023 - 2024 states "Exploration and regional drilling works were undertaken within MA366, and mineral leases MLN1121 and MLN1222 during the reporting period. All drilling during the reporting period was undertaken in accordance with the January 2020 MMP. A drilling register for the reporting period is provided in Appendix A."	
81.i	81.i	in order to collect samples for waste rock characterisation and geochemical and geotechnical analyses;				1			1			4	Full Compliance	EMR 2023 - 2024 dated 31Aug2024 EMR 2023-2024 Appendix A 2023-2024 Drilling Register dated August 2024 2023-2024 Drilling Register has 41 boreholes for purposes of resource, dewatering or geotechnical.	
81.ii	81.ii	to characterise available construction and rehabilitation materials available within the Mine Levee Wall (including the pit) and areas surrounding the TSF and NOEF;						1				4	Full Compliance	EMR 2023 - 2024 dated 31Aug2024 EMR 2023-2024 Appendix A 2023-2024 Drilling Register dated August 2024 2023-2024 Drilling Register has 41 boreholes for purposes of resource, dewatering or geotechnical.	

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhli)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
81.iii	81.iii	to enable geochemical assessment of the overburden emplacement facility and underlying sediments;				1			1		1	4	Full Compliance	EMR 2023 - 2024 dated 31Aug2024 EMR 2023-2024 Appendix A 2023-2024 Drilling Register dated August 2024 2023-2024 Drilling Register has 41 boreholes for purposes of resource, dewatering or geotechnical.	
81.iv	81.iv	to obtain hydrogeological information associated with pit inflows, groundwater inputs into the underground void and installation of additional monitoring bores to inform site management.				1					1	N/A	Not Applicable	EMR 2023 - 2024 dated 31Aug2024 The Operator advised that there was no hydrogeological drilling in the audit period. This is supported by no Hydrogeological Drilling and Field Campaign report appendix with the EMR 2023-2024.	
82	82	The Operator must ensure the disturbances from the drilling and site investigation activities are rehabilitated consistent with industry best practice.						1				N/A	Not Applicable		The Operator advised "No geotechnical or hydrological investigative drilling that required revegetation occurred during the reporting period. The drilling registers will be included in Appendix A and Appendix J of the EMR." Noting that there is no Appendix J (related to hydrogeological drilling in previous years) in the 2023-2024 EMR as none was undertaken.
83	83	Characterisation data from the drilling must be kept and made available to the Minister on request; and reported in the Operator's EMR or an alternative format as agreed with the Department.									1	3	Part Compliance (High)	EMR 2023 - 2024 dated 31Aug2024 EMR 2023-2024 Appendix A 2023-2024 Drilling Register dated August 2024 Correspondence between Operator and DITT relating to MRM - 2023-2024 EMR Submission (after audit period). In the previous audit, the Operator advised "Characterisation data for Geochemical and Geotechnical exploration drilling is commercially sensitive information not suitable for inclusion in the EMR." Associated with this condition, the 2023-2024 EMR Submission Letter states "Drilling data included in Section 2.1, and Appendix A of the EMR." The drilling data is included but characterisation data is not reported in the EMR 2023 - 2024 and no alternative submission format was agreed by DITT.	Authorisation dated 5May2022 did not allow characterisation data to be submitted in an alternative format as agreed with the Department. No request was made in the audit period from the Minister for characterisation data from the drilling. OPI: Include characterisation data for geochemical and geotechnical exploration drilling in the EMR or an alternative format as agreed with DITT.
84	84	All documentation relating to the investigations undertaken is to be made available to the Department on request.				1			1		1	N/A	Not Applicable		There were no requests from DITT related to the investigations in the audit period
85	85	On completion of the investigation the disturbances are to be rehabilitated in accordance with the approved MMP and the basis for the proposed adjustment of total security adjustments required under Condition 11, are provided in the annual Unplanned Closure Plan report to the satisfaction of the Department.						1				N/A	Not Applicable		Investigations are not complete or in areas of ongoing disturbance. The Operator does not intend to seek to relinquish security from these areas until rehabilitated. The full security remains in place.
Exploration															
86	86	The Operator must ensure that:											Refer to sub conditions		
86.a	86.a	works are undertaken in accordance with management systems detailed in the approved MMP;										4	Full Compliance	Exploration Management Plan SPC-3100001 version 2 dated May2021. Exploration Management Plan SPC-3100001 version 3 effective April 2024 (end of audit period). Photo of Teena_230629 Teena Rehabilitation Work 2023 slides Photos of the Teena site post rehabilitation The proposed rehabilitation and photos post rehabilitation appear to show works in accordance with the requirements of this condition.	January 2020 MMP states "Following the completion of the drilling program and prior to the wet season, drill hole collars will be surveyed, plugged and backfilled with clean fill. Compacted ground will be ripped, with stockpiled topsoil and vegetation spread over the cleared area." The Operator advised "Exploration works were limited to the "Teena" prospect during the reporting period. During this time, the Teena site was closed for the short term. The site is expected to open for future exploration in 2024 and beyond. Rehabilitation work included minor ripping of compacted surfaces, sealing and grouting of bore casings and the spread of topsoil over cleared areas. A summary of planned temporary rehabilitation has been provided as well as photos showing the post rehabilitation condition in 2024. An inspection of the site will be completed during the next reporting period." OBS: Undertake the proposed inspection of Teena rehabilitation site in 2024/2025.
86.b	86.b	an environmental management plan is in place that addresses:											Refer to sub conditions		

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nublir)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
86.b.i	86.b.i	chemical use and storage (e.g. hydrocarbons, drilling fluids);							1			4	Full Compliance	<p>Exploration Management Plan SPC-3100001 May 2021, Version 2. Exploration Management Plan SPC-3100001 version 3 effective April 2024 (end of audit period). Photo of Teena_230629 Teena Rehabilitation Work 2023 slides Photos of the Teena site post rehabilitation</p> <p>The proposed rehabilitation by end of 2023 and photos post rehabilitation appear to show works in accordance with the requirements of this condition.</p>	<p>Section 3.1.2 of the Exploration Management Plan states "Hydrocarbon spills will be minimised using liners and drip trays under machinery, and appropriately sized spill-kits available in the event of a spill; • Hazardous substances (including hydrocarbons) will be stored and handled in accordance with relevant Australian standards; • Hydrocarbons will be stored in lined and banded areas;" and "Spill kits are located on drill sites for the duration of drilling activities and maintained in accordance with MRM's General Spill Response Procedure (PRO-2600047)."</p>
86.b.ii	86.b.ii	erosion and sediment control;		1								4	Full Compliance	<p>Exploration Management Plan SPC-3100001 May 2021, Version 2. Exploration Management Plan SPC-3100001 version 3 effective April 2024 (end of audit period). Photo of Teena_230629 Teena Rehabilitation Work 2023 slides Photos of the Teena site post rehabilitation</p> <p>The proposed rehabilitation by end of 2023 and photos post rehabilitation appear to show works in accordance with the requirements of this condition.</p>	<p>Section 3.1.1 of the Exploration Management Plan says "During the planning and construction of the drill area and when necessary, access tracks, the following will be considered: [...] *Vegetation clearing during, and immediately after rainfall events, will be avoided; * Vegetation clearing will be kept to a minimum required to safely traverse vehicles and drill rigs along tracks and drill pads; [...] *Methods to control erosion and sediment flow;" and "Appropriately size sumps and tanks to contain sufficient volumes of water, sediment and drilling fluids encountered during drilling;"</p> <p>The rehabilitation requirements are included "Access tracks will be rehabilitated, including pushing in all windrows, unless otherwise agreed in writing by the land holder or appropriate third party; * Appropriate erosion and sediment controls will be installed where erosion is evident or likely to occur; * Access through watercourses will be removed and banks restored; * All previously disturbed areas will be stable, with no evidence of active soil erosion".</p>
86.b.iii	86.b.iii	dust;	1									4	Full Compliance	<p>Exploration Management Plan SPC-3100001 May 2021, Version 2. Exploration Management Plan SPC-3100001 version 3 effective April 2024 (end of audit period). Photo of Teena_230629 Teena Rehabilitation Work 2023 slides Photos of the Teena site post rehabilitation</p> <p>The proposed rehabilitation by end of 2023 and photos post rehabilitation appear to show works in accordance with the requirements of this condition.</p>	Section 3.1.2 of the Exploration Management Plan says "Controls to minimise airborne dust".
86.b.iv	86.b.iv	associated risks common for exploration works;										4	Full Compliance	<p>Exploration Management Plan SPC-3100001 May 2021, Version 2. Exploration Management Plan SPC-3100001 version 3 effective April 2024 (end of audit period). Photo of Teena_230629 Teena Rehabilitation Work 2023 slides Photos of the Teena site post rehabilitation</p> <p>The proposed rehabilitation by end of 2023 and photos post rehabilitation appear to show works in accordance with the requirements of this condition.</p>	There are controls for various other common risks included in the Exploration Management Plan.
86.c	86.c	rehabilitation is undertaken for locations not needed for further use;										4	Full Compliance	<p>Photo of Teena_230629 Teena Rehabilitation Work 2023 slides Photos of the Teena site post rehabilitation</p> <p>The proposed rehabilitation and photos post rehabilitation appear to show works in accordance with the requirements of this condition.</p>	<p>Investigations are not complete or in areas of ongoing disturbance. The Operator does not intend to seek to relinquish security from these areas until rehabilitated. The full security remains in place. However, temporary rehabilitation has been undertaken</p> <p>The Operator advised" Exploration works were limited to the "Teena" prospect during the reporting period. During this time, the Teena site was closed for the short term. The site is expected to open for future exploration in 2024 and beyond. Rehabilitation work included minor ripping of compacted surfaces, sealing and grouting of bore casings and the spread of topsoil over cleared areas. A summary of planned temporary rehabilitation has been provided as well as photos showing the post rehabilitation condition in 2024. An inspection of the site will be completed during the next reporting period."</p>
86.d	86.d	an exploration rehabilitation report including details regarding the status of disturbance, rehabilitated drill holes and the basis for the proposed adjustment of total security subject to Conditions 10, 11 and 12, be prepared, submitted and implemented to the satisfaction of the Department.							1			N/A	Not Applicable	<p>Correspondence between Operator and DITT relating to MRM - 2023-2024 EMR Submission (after audit period).</p> <p>The 2023-2024 EMR Submission Letter states that: "Rehabilitation of disturbance related to investigation drilling has been undertaken progressively, and no adjustment to security is currently being sought"</p>	May 2022 Authorisation did not specify "exploration" rehabilitation report and did not include "be prepared, submitted and implemented".

Non-mineral Waste Management

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024													Evidence		Comments	
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhlin)	Monitoring & Reporting	Score	Compliance level			
87	87	The Operator is authorised to complete works to prepare and construct a Centralised Waste Facility (CWF) for management of general, contaminated and putrescible wastes, in accordance with:											Refer to sub conditions		CWF has not been constructed.	
87.a	87.a	concept designs presented in the document entitled McArthur River Mine Mining Management Plan Amendment, January 2019, as defined in Schedule B, ensuring:							1			N/A	Not Applicable		CWF has not been constructed.	
87.a.i	87.a.i	detailed designs follow the approved concepts for the facility (including 100 year ARI flood immunity, CCL and protective armour, drainage works and biosecurity control);							1			N/A	Not Applicable		CWF has not been constructed.	
87.a.ii	87.a.ii	the structure design and construction is undertaken in accordance with independent oversight consistent with Conditions 48 and 50;							1			N/A	Not Applicable		CWF has not been constructed.	
87.a.iii	87.a.iii	detailed designs include allowances for the installation of an adequate number of monitoring bores at suitable locations to monitor the environmental performance of the structure with respect to contaminant seepage. These monitoring locations must be integrated and reported within the site-wide water monitoring requirements.				1			1			N/A	Not Applicable		CWF has not been constructed.	
88	88	The Operator must ensure the non-mineral waste facility, landfill or equivalent previously in use is rehabilitated following approval by the Department of a rehabilitation plan.							1			N/A	Not Applicable		Remains in use.	
Rehabilitation Trials																
89	89	The Operator is authorised to undertake the following rehabilitation trials, in accordance with concepts defined in relevant documents in Schedule B and the approved MMP:											Refer to sub conditions			
89.a	89.a	Construction Test Pads (CTP) on NOEF West stage;							1	1		4	Full Compliance	EMR 2023-2024 dated 31Aug2024 EMR 2023-2024 states "NOEF Large-Scale West AB Rehabilitation Trial Large scale rehabilitation trials continued on the West AB batter to test aspects such as underliner, BGM installation, overliner, growth medium trials and performance monitoring. The results to date from the large-scale trials are currently being collated and analysed and will be presented in the Large Scale Cover System Trial Report." No instances were identified that trial were not in accordance with concepts defined in relevant documents in Schedule B and the approved MMP.	The Operator advised "The original CTPs are completed, however there are multiple ongoing constructability trials associated with the Cover System. These are currently being written into a report and will be available next year."	
89.b	89.b	PAF(RE) Cell and Cover System Performance on NOEF Southeast stage;							1	1		4	Full Compliance	NOEF PAF(RE) Cell Field Trial Phase 1 Performance Monitoring Report 2022/2023 dated Mar2024 EMR 2023-2024 dated 31Aug2024 The EMR 2023-2024 only included findings from the 2022-2023 reporting period and that the 2023-2024 reporting period would be in the 2024-2025 EMR. No instances were identified that trial were not in accordance with concepts defined in relevant documents in Schedule B and the approved MMP.		
89.c	89.c	Mine Levee revegetation.							1	1		N/A	Not Applicable		The Operator advised that this trial will not be proceeding. A trial has been identified as not required and the Operator intends to monitor the revegetation on the NOEF itself (i.e. rather than doing a trial on the levee to inform the NOEF).	
90	90	The Operator must ensure all contaminated runoff is contained and managed within the water management circuit and as detailed in the Water Management Plan.		1								4	Full Compliance	During the August 2024 site visit it was observed that trials were in the mine site water management area.	The Operator advised that the NOEF rehab trial area runoff all drains to within the on site water management system.	
Bing Bong Loading Facility																
91	91	Dredging activities at the Bing Bong Port Facility are authorised, subject to:											Refer to sub conditions			

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhlin)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
91.a	91.a	submission to the department of a Dredging and Dredge Spoil Management Plan;			1							4	Full Compliance	Correspondence between Operator and DITT relating to VOA 0059 - Dredging and Dredge Spoil Management Plan. Correspondence between Operator and DITT regarding 2023 MMP Amendment - Variation of Authorisation 0059 dated May2023 In February 2023 the Operator submitted a Dredging and Dredge Spoil Management Plan to DITT.	The Operator advised "There has been no revision of the February 2023 Dredging and Dredge Spoil Management Plan. No dredging activities have occurred during the audit period."
91.b	91.b	approval of the Plan by the Department;			1							4	Full Compliance	Correspondence between Operator and DITT regarding 2023 MMP Amendment - Variation of Authorisation 0059 dated May2023 DITT approved the Dredging and Dredge Spoil Management plan (DSMP) on 17May2023.	The Operator advised "There has been no revision of the February 2023 Dredging and Dredge Spoil Management Plan. No dredging activities have occurred during the audit period."
91.c	N/A	subsequent provision of any required additional information (including but not limited to detailed designs) and written acceptance by the Department, prior to commencement of dredging.			1							N/A	Not Applicable		The Operator advised "There has been no revision of the February 2023 Dredging and Dredge Spoil Management Plan. No dredging activities have occurred during the audit period."
Environmental Monitoring and Management															
92	92	Environmental monitoring for the McArthur River Mine site (including BBLF) must be undertaken in accordance with requirements in Schedule D and reported as part of Condition 9.									1	4	Full Compliance	EMR 2023-2024 dated 31Aug2024. Environmental monitoring is discussed in the EMR 2023-2024 and includes BBLF.	Additional evidence is provided under the individual conditions from Schedule D.
Adaptive Management															
93	93	By 13 November 2021 (i.e. within 12 months of the date of authorisation of the Overburden Management Project), the Operator must submit a revised AMP as required under Conditions 45.									1	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
94	94	The revised AMP must:											Refer to sub conditions		
94.a	94.a	address the comments from the Independent Monitor or independent third party review of the draft AMP and ensuring compliance with Condition 45;										N/A	Not Applicable		With respect to the next revision of the AMP "The IM's review comments will be addressed in the next revision of the Adaptive Management Plan, to be developed and submitted following consultation with the relevant panel on the Water Management Plan as required under Condition 27. Note that any changes to the Water Management Plan would likely trigger changes to the Adaptive Management Plan."
94.b	94.b	be consistent with the AMP required under the <i>Water Act 1992</i> and <i>Environment Protection and Biodiversity Conservation Act 1999</i> ;										4	Full Compliance	The AMP is the same document that is submitted to DEPWS under the WDL although some appendices (e.g., Rehabilitation Plan) are not relevant to the WDL and therefore not submitted to DEPWS. The AMP is therefore consistent (although appendices submitted are not identical) and compliant with the requirements of this condition. Revisions of the AMPs have been submitted to DEPWS (NT) and DCCEEW (Commonwealth) in Correspondence between DITT and Operator relating to Amended Adaptive Management Plan (November 2021) confirmed approval.	
94.c	94.c	be reviewed by a Department approved independent third-party at the discretion of the Minister;										4	Full Compliance	No DITT requests for independent third-party AMP review. However, an independent review of AMP-Revision C was conducted in response to a requirement under the Waste Discharge Licence (WDL) and finalised in March 2021. A copy of the independent review by the University of Queensland, Sustainable Minerals Institute was provided to DITT.	
94.d	94.d	be approved by the Minister;										4	Full Compliance	Correspondence between DITT and Operator relating to Amended Adaptive Management Plan (November 2021) confirmed approval. DITT approval letter August 2022 stated that the plan was assessed as meeting the requirements of conditions 45, 46, 93, 94 and 95 regarding the AMP.	
94.e	94.e	once approved, be implemented in full.										4	Full Compliance	EMR 2023-2024 dated 31Aug2024 EMR 2023-2024 states "The analysis of results in this EMR are used to determine environmental performance, compliance with the relevant approval conditions and assess whether the current controls are adequate in managing potential environmental risks. Additional controls, monitoring and/or investigations may be required where existing management controls are determined to be inadequate, performance does not meet relevant approvals, or if new risks have been identified. A description of actions is provided for each environmental management aspect (Sections 3 and 4) and is summarised in Section 6." Section 6 of the EMR demonstrates that the AMP is implemented. No situations where the AMP wasn't implemented were identified in this audit.	

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhlin)	Monitoring & Reporting	Evidence		Comments	
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement										Score	Compliance level		
95	95	Any material changes to the AMP required by Condition 94 must be re-approved by the Minister.										N/A	Not Applicable		The Operator advised "There were no revisions to the Adaptive Management Plan over the reporting period."
Mine Closure															
96	96	From the date of authorisation of the Overburden Management Project, the Operator must submit an updated Mine Closure Plan with each Amended MMP that builds upon the closure concepts defined in the Overburden Management Project.						1				4	Full Compliance	No Mine Closure Plan was submitted with the Amended MMP in the audit period. DITT did not request a mine closure plan from the Operator. The Regulator advised "The Unplanned Closure Plan will be implemented in the event of permanent closure."	In May 2023 the Operator submitted an MMP amendment. The Operator advised "The Mine Closure Plan remains unchanged from the plan that was submitted with the Overburden Management Project (OMP) Environment Impact Statement (EIS) as additional studies have not yet been undertaken to build on closure concepts. Note Condition 23 and Condition 24 of the VoA require strategies to be developed to inform long term closure of the Open Pit, TSF and NOEF domains, which are required to be reviewed by the relevant Independent Panel. These strategies include forward works programs (studies) to build on the concepts provided in the OMP EIS. The plan required by Condition 23 is yet to be approved and the tailings strategy required by Condition 24 is not due to the Department until 13 November 2025, after which point, further studies would then commence once the plan is approved by the Independent Panels. These studies would be used to inform an updated Mine Closure Plan. MRM considers the Unplanned Closure Plan fulfils the requirements of Condition 96 until such time that the plans required by Condition 23 and 24 are reviewed and approved. The Unplanned Closure Plan provides a updated immediate closure plan based on updated disturbance footprints."
97	97	The Mine Closure Plan required under Condition 96 must:											Refer to sub conditions		
97.a	97.a	detail how key mine domains will be rehabilitated to achieve the Overburden Management Project closure objectives;						1				N/A	Not Applicable	No Mine Closure Plan was submitted with the Amended MMP in the audit period. DITT did not request a mine closure plan from the Operator. The Regulator advised "The Unplanned Closure Plan will be implemented in the event of permanent closure."	
97.b	97.b	address outcomes of the reviews by independent technical and closure panels in accordance with Condition 21 with respect to mine closure;						1				N/A	Not Applicable	No Mine Closure Plan was submitted with the Amended MMP in the audit period. DITT did not request a mine closure plan from the Operator. The Regulator advised "The Unplanned Closure Plan will be implemented in the event of permanent closure."	
97.c	97.c	incorporate relevant outcomes from rehabilitation trials defined in Condition 89.						1				N/A	Not Applicable	No Mine Closure Plan was submitted with the Amended MMP in the audit period. DITT did not request a mine closure plan from the Operator. The Regulator advised "The Unplanned Closure Plan will be implemented in the event of permanent closure."	
98	98	Five years prior to the planned closure of the mine, the Operator must:											Refer to sub conditions		Future item. Mine closure more than 5 years away.
98.a	98.a	finalise the Mine Closure Plan required under Condition 96;						1				N/A	Not Applicable		Future item. Mine closure more than 5 years away.
98.b	98.b	submit to the Department the plan for approval by the Minister;						1				N/A	Not Applicable		Future item. Mine closure more than 5 years away.
98.c	98.c	implement the Mine Closure Plan in full, following its approval.						1				N/A	Not Applicable		Future item. Mine closure more than 5 years away.
Unplanned Mine Closure															
99	99	From 13 November 2020 (i.e. the date of authorisation of the Overburden Management Project), the Operator must annually submit to the Department, unless otherwise agreed in writing by the Department, an Unplanned Mine Closure Plan on or before 31 August, starting 2021, that is accompanied by a related security estimate.						1				N/A	Not Applicable	Correspondence between Operator and DITT regarding this condition (in the audit period). The Operator stated "To streamline the approvals process and ensure continuity between documents, MRM wishes to align the submission of the next Unplanned Closure Plan and Security Assessment with the submission of the MMP amendment. The MMP amendment is planned to be submitted in Q2 2024." DITT agreed in writing with the Operator's approach.	Considered N/A as DITT agreed in writing for the UCP submission to be delayed to align with the next MMP submission outside the audit period.
Independent Monitoring Assessment Conditions															
100	100	The Operator must comply with the clauses pertaining to it in SCHEDULE C - INDEPENDENT MONITORING ASSESSMENT CONDITIONS.									1	N/A	Not Applicable		Assessed through individual conditions in Schedule C.
SCHEDULE C - Independent Monitoring Assessment Conditions															
Schedule C - 1	Schedule C - 1	The purpose of the McArthur River Mine – Independent Monitoring Assessment Conditions" is to establish and set out the operational requirements for an independent monitoring assessment of the environmental performance of the Mine.											-		Commentary only.
Schedule C -2	Schedule C -2	These Conditions may be cited as the "McArthur River Mine – Independent Monitoring Assessment Conditions".											-		Commentary only.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024														Evidence		Comments	
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhlin)	Monitoring & Reporting	Score	Compliance level	Evidence		Comments	
Schedule C -3	Schedule C -3	The purpose of these Conditions is to establish and set out the operational requirements for an independent monitoring assessment of the environmental performance of the Mine.											-				These Independent Monitor conditions are not relevant to the Operator.
Schedule C -4	Schedule C -4	The Department will engage an Independent Monitor to undertake the independent monitoring assessment.											-				These Independent Monitor conditions are not relevant to the Operator.
Schedule C -5	Schedule C -5	The Operator and the Department acknowledge that this independent monitoring assessment is in addition to their respective obligations and statutory responsibilities in relation to the Mine.									1	4	Full Compliance				The Operator has participated in the Independent Monitor assessment in addition to their respective obligations and statutory responsibilities.
Schedule C -6	Schedule C -6	The Independent Monitor will:											-				These Independent Monitor conditions are not relevant to the Operator.
Schedule C -6.a	Schedule C -6.a	monitor the environmental performance of the Mine by reviewing:											-				These Independent Monitor conditions are not relevant to the Operator.
Schedule C -6.a.i	Schedule C -6.a.i	environmental assessments and monitoring activities undertaken by the Operator; and											-				These Independent Monitor conditions are not relevant to the Operator.
Schedule C -6.a.ii	Schedule C -6.a.ii	environmental assessments and audits undertaken by the Department; and											-				These Independent Monitor conditions are not relevant to the Operator.
Schedule C -6.b	Schedule C -6.b	report to the Operator and the Department any urgent issues requiring investigation and reporting.											-				These Independent Monitor conditions are not relevant to the Operator.
Schedule C -7	Schedule C -7	The Independent Monitor will not review:											-				These Independent Monitor conditions are not relevant to the Operator.
Schedule C -7.a	Schedule C -7.a	Mine safety; or											-				These Independent Monitor conditions are not relevant to the Operator.
Schedule C -7.b	Schedule C -7.b	social issues arising from the operation of the Mine in the McArthur River Region.											-				These Independent Monitor conditions are not relevant to the Operator.
Schedule C -8	Schedule C -8	The Department will engage an Independent Monitor in accordance with its procurement processes.											-				These Independent Monitor conditions are not relevant to the Operator.
Schedule C -9	Schedule C -9	The Independent Monitor may be (in order of preference): a. an environmental or mining agency in another jurisdiction in Australia; or b. university having the necessary expertise; or c. an environmental consultant that has the necessary expertise, relevant experience and the necessary resources.											-				These Independent Monitor conditions are not relevant to the Operator.
Schedule C -10	Schedule C -10	Prior to advertising a tender seeking to engage an Independent Monitor, the Department must provide the Operator with a copy of the proposed tender documentation, including:											-				These Independent Monitor conditions are not relevant to the Operator.
Schedule C -10.a	Schedule C -10.a	the Conditions of tendering; and											-				These Independent Monitor conditions are not relevant to the Operator.
Schedule C -10.b	Schedule C -10.b	the scope of services; and											-				These Independent Monitor conditions are not relevant to the Operator.
Schedule C -10.c	Schedule C -10.c	the assessment criteria; and											-				These Independent Monitor conditions are not relevant to the Operator.
Schedule C -10.d	Schedule C -10.d	the Conditions of contract.											-				These Independent Monitor conditions are not relevant to the Operator.
Schedule C -11	Schedule C -11	The Operator may, within 14 days of receiving the proposed tender documentation, provide comment on the proposed documentation to the Department and the Department must consider any comments provided by the Operator on the proposed documentation prior to advertising the tender.									1	N/A	Not Applicable				The extension of the Independent Monitor contract was provided by DITT to the Operator before the audit period. The Operator did not raise any comments.
Schedule C -12	Schedule C -12	The Department must provide the Community with an opportunity to provide submissions on the engagement of the Independent Monitor and the Department must consider any submissions provided by the Community on the engagement of the Independent Monitor prior to advertising the tender.											-				These Independent Monitor conditions are not relevant to the Operator.
Schedule C -13	Schedule C -13	The terms of engagement of the Independent Monitor may include the following:											-				These Independent Monitor conditions are not relevant to the Operator.

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhli)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments
Schedule C -13.a	Schedule C -13.a	a period of engagement between three and five years;											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -13.b	Schedule C -13.b	a statement acknowledging that the Operator is responsible for the costs of the Independent Monitor;											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -13.c	Schedule C -13.c	a warranty by the Independent Monitor that it will:											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -13.c.i	Schedule C -13.c.i	act independently of the Department, the Operator, the Minister and any other person; and											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -13.c.ii	Schedule C -13.c.ii	act honestly, reasonably and with the degree of professional care, knowledge, experience, skill and diligence which may reasonably be expected; and											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -13.c.iii	Schedule C -13.c.iii	act within the time prescribed under these Conditions, the terms of engagement, or where no time is prescribed, within a reasonable time; and											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -13.c.iv	Schedule C -13.c.iv	immediately notify the Department in writing upon becoming aware of the existence or possibility of a conflict of interest;											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -13.d	Schedule C -13.d	an obligation on the Independent Monitor to keep all information provided to the Independent Monitor confidential.											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -14	Schedule C -14	If the Independent Monitor requires an indemnity, the Operator must enter into a binding agreement providing a reciprocal indemnity to the Department.									1	N/A	Not Applicable		The Independent Monitor did not require an indemnity.
Schedule C -15	Schedule C -15	The Department must notify the Operator of the appointment of the Independent Monitor and must provide the Operator with a copy of the terms of engagement.											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -16	Schedule C -16	The Operator and the Department must not interfere or attempt to influence the Independent Monitor in its assessment of environmental performance under these Conditions.									1	4	Full Compliance		The Operator has not interfered or attempted to influence the Independent Monitor.
Schedule C -17	Schedule C -17	The Operator and the Department must each:												Refer to sub conditions	Provided for context of the subconditions.
Schedule C -17.a	Schedule C -17.a	cooperate with the Independent Monitor; and									1	4	Full Compliance		The Independent Monitor confirms that the Operator cooperated with the Independent Monitor.
Schedule C -17.b	Schedule C -17.b	provide all necessary information and documents within their possession, custody or control to the Independent Monitor; and									1	4	Full Compliance		The Independent Monitor confirms that the Operator provided all necessary information and documents within their possession, custody or control.
Schedule C -17.c	Schedule C -17.c	procure for the Independent Monitor access to such premises owned, leased, or licensed by it as may be reasonably necessary,									1	4	Full Compliance		An Independent Monitor site visit was undertaken in August 2024.
Schedule C -17.d	Schedule C -17.d	to enable the Independent Monitor to undertake its assessment of environmental performance under these Conditions.									1	4	Full Compliance		The Independent Monitor confirms that the Operator enabled the Independent Monitor to undertake their assessment.
Schedule C -18	Schedule C -18	The Independent Monitor must engage with the Operator, the Department and the Community in undertaking the independent monitoring assessment.											-		Not included as there is no requirement for the Operator. This is an Independent Monitor requirement only.
Schedule C -19	Schedule C -19	If the Independent Monitor identifies an issue it considers requires urgent investigation and reporting:									1		Refer to sub conditions		The Independent Monitor did not identify any issue it considered required urgent investigation and reporting during the audit period.
Schedule C -19.a	Schedule C -19.a	the Independent Monitor must advise the Operator and the Department of the issue as soon as practicable and may include recommendations as to action to be taken; and											-		Not included as there is no requirement for the Operator.
Schedule C -19.b	Schedule C -19.b	the Operator must consider the advice, and any recommendations, from the Independent Monitor and notify the Department and the Independent Monitor of the action the Operator proposes to take; and									1	N/A	Not Applicable		The Independent Monitor did not identify any issue it considered required urgent investigation and reporting during the audit period.
Schedule C -19.c	Schedule C -19.c	the Department may, where appropriate, advise the Operator and the Independent Monitor of action the Department proposes to take; and											-		Not included as there is no requirement for the Operator.

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nulin)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments
Schedule C -19.d	Schedule C -19.d	the Independent Monitor may provide further advice to the Operator, and where appropriate the Department, regarding the proposed action and the Operator and the Department must consider the further advice; and									1	N/A	Not Applicable		The Independent Monitor did not identify any issue it considered required urgent investigation and reporting during the audit period.
Schedule C -19.e	Schedule C -19.e	if, after providing further advice, the Independent Monitor is not satisfied with the proposed action, the Independent Monitor may notify the Operator and the Department of the Independent Monitor's intention to undertake its own investigation and report; and											-		Not included as there is no requirement for the Operator.
Schedule C -19.f	Schedule C -19.f	the Operator and the Department must facilitate the Independent Monitor's investigation and report.									1	N/A	Not Applicable		The Independent Monitor did not identify any issue it considered required urgent investigation and reporting during the audit period.
Schedule C -20	Schedule C -20	The independent monitoring assessment is to be conducted, where practical, in a manner that complements the existing annual environmental assessment and audit processes undertaken by the Operator and the Department.											-		Not included as there is no requirement for the Operator. This is an Independent Monitor requirement only.
Schedule C -21	Schedule C -21	The Independent Monitor must prepare and provide a report:											-		Not included as there is no requirement for the Operator. This is an Independent Monitor requirement only.
Schedule C -21.a	Schedule C -21.a	annually to the Minister to assist with the review of the Mining Management Plan; and											-		Not included as there is no requirement for the Operator.
Schedule C -21.b	Schedule C -21.b	on request by the Minister.											-		Not included as there is no requirement for the Operator.
Schedule C -22	Schedule C -22	The Minister must provide a report received from the Independent Monitor to the Operator and the Department within 14 days of receiving the report.											-		Not included as there is no requirement for the Operator.
Schedule C -23	Schedule C -23	The Independent Monitor must prepare an additional report in a form suitable for distribution to the Community.											-		Not included as there is no requirement for the Operator.
Schedule C -24	Schedule C -24	The Operator and the Department acknowledge that the report from the Independent Monitor will be made publicly available (including publication on an appropriate internet site) and may include data used in the preparation of the report.								1	1	4	Full Compliance	Letter DITT to Operator Re: Independent Monitor Annual Environmental Performance Audit Report 2023 - request for comment dated Dec2023. The AEPAR 2023 was sent to the Operator from DITT on behalf of the Minister for Mining on Dec2023 and it included reference to the report being made publicly available. Independent Monitor Report (AEPAR) made publicly available by posting on NT.GOV.AU website (viewed by Independent Monitor on 9Aug2024). https://nt.gov.au/industry/mining/decisions/independent-monitor-for-the-mcarthur-river-mine/reports-and-documents	
Schedule C -25	Schedule C -25	Prior to being made publicly available, the Minister must request from the Operator and the Department any comments on the Independent Monitor's report. Such comments must be provided within 28 days of the Minister's request and must be made publicly available with the Independent Monitor's report.									1	4	Full Compliance	Letter DITT to Operator Re: Independent Monitor Annual Environmental Performance Audit Report 2023 - request for comment dated Dec2023. Letter Operator to DITT subject: Independent Monitor Annual Environmental Performance Audit Report 2023 - McArthur River Mine dated Jan2024 The AEPAR 2023 was sent to the Operator from DITT on behalf of the Minister for Mining on Dec2023 and requested the Operator's comment. The Operator responded on 11 Jan2024, within the required 28 days of receipt.	Request from the Minister and response from Operator and DITT were within 28 days from the request.
Schedule C -26	Schedule C -26	The Operator acknowledges that it is responsible for all costs of the independent monitoring assessment other than those costs directly attributable to those elements of the independent monitoring assessment associated with Condition 21(b)) which are the responsibility of the Department.									1	4	Full Compliance		The Operator has paid the DITT invoices.
Schedule C -27	Schedule C -27	The Department may provide to the Operator, from time to time, a notice setting out amounts due and payable under the terms of the engagement of the Independent Monitor.											-		Not included as there is no requirement for the Operator.
Schedule C -28	Schedule C -28	The Operator must pay an amount notified in accordance with Condition 27 within seven (7) days of receiving such notice.									1	4	Full Compliance	Invoice payment issues did occur in the audit period due to PO changes between 2022 and 2023. However, all invoices were paid.	DITT invoices require payment in a month rather than within seven days of receipt as stated in this condition. This longer timeframe appears acceptable and DITT amend the condition.
Schedule C -29	Schedule C -29	If the Operator disputes a notice provided by the Department under Condition 27:											Refer to sub conditions		Provided for context of the subconditions.

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhlur)	Monitoring & Reporting	Score	Compliance level			
Schedule C -29.a	Schedule C -29.a	the Operator must pay the amount specified in the notice in accordance with Condition 28; and									1	N/A	Not Applicable		The Independent Monitor is not aware of any disputes in the audit period.	
Schedule C -29.b	Schedule C -29.b	the Operator must notify the Department in writing within 14 days of receiving the notice, setting out the reasons why the Operator disputes the notice; and									1	N/A	Not Applicable		The Independent Monitor is not aware of any disputes in the audit period.	
Schedule C -29.c	Schedule C -29.c	the Chief Executive of the Operator and the Chief Executive of the Department must meet within five (5) working days to resolve the dispute.									1	N/A	Not Applicable		The Independent Monitor is not aware of any disputes in the audit period.	
Schedule C -30	Schedule C -30	If there is a dispute (other than a dispute mentioned in Condition 29) between the Operator and the Department as to any matter or thing arising out of these Conditions (the "Dispute"), the party claiming that a Dispute has arisen must notify the other party to the Dispute and the Chief Executive of the Operator, the Chief Executive of the Department and the Independent Monitor must meet within five (5) working days to resolve the Dispute.									1	N/A	Not Applicable		The Independent Monitor is not aware of any disputes in the audit period.	
Schedule C -31	Schedule C -31	If the Chief Executive of the Operator, the Chief Executive of the Department and the Independent Monitor are unable to resolve a Dispute within ten (10) working days of meeting in accordance with Condition 30, the Operator and the Department may agree to the appointment of an independent party to assist in the resolution of the Dispute.									1	N/A	Not Applicable		The Independent Monitor is not aware of any disputes in the audit period.	
Schedule C -32	Schedule C -32	If, within five (5) working days of either the Operator or the Department nominating a person to be the independent party, no agreement is reached as to who is to be appointed as the independent party, either the Operator, the Department or both may refer the matter to the President of the Law Society of the Northern Territory.									1	N/A	Not Applicable		The Independent Monitor is not aware of any disputes in the audit period.	
Schedule C -33	Schedule C -33	The President of the Law Society Northern Territory may nominate a person to be the independent party and the parties to the Dispute are bound to accept the appointment of that person.									1	N/A	Not Applicable		The Independent Monitor is not aware of any disputes in the audit period.	
Schedule C -34	Schedule C -34	The role of the independent party is to assist in negotiating a resolution of the Dispute and the independent party cannot make a decision that is binding on either the Operator or the Department.									1	N/A	Not Applicable		The Independent Monitor is not aware of any disputes in the audit period.	
Schedule C -35	Schedule C -35	The Operator and the Department must make available to the independent party all materials requested by it and must provide the independent party with all other materials relevant to the Dispute.									1	N/A	Not Applicable		The Independent Monitor is not aware of any disputes in the audit period.	
Schedule C -36	Schedule C -36	The Operator and the Department must:											Refer to sub conditions		Provided for context of the subconditions.	
Schedule C - 36.a	Schedule C - 36.a	Bear their own costs of resolving the Dispute under this Condition; and									1	N/A	Not Applicable		The Independent Monitor is not aware of any disputes in the audit period.	
Schedule C - 36.b	Schedule C - 36.b	Bear equally the costs of any independent party engaged.									1	N/A	Not Applicable		The Independent Monitor is not aware of any disputes in the audit period.	
SCHEDULE D - ENVIRONMENTAL MONITORING AND MANAGEMENT																
Schedule D - 1	Schedule D - 1	If the Operator establishes a new surface water monitoring location, a written notice of the location (in GDA 94 format) and nature of the monitoring must be given to the Department within 30 days of its establishment.		1							1	N/A	Not Applicable		No new surface water monitoring locations were established in the audit period.	
Schedule D - 2	Schedule D - 2	The Operator must maintain continuous monitoring having regard to:		1								4	Full Compliance	SW Loggers Master Continuous Data Records 2023-2024 Continuous monitoring was evident at all sites.		
Schedule D - 2.a	Schedule D - 2.a	devices installed at the following locations:											Refer to sub conditions			
Schedule D - 2.a.i	Schedule D - 2.a.i	SW29 (upstream Surprise Creek outside the zone of influence of TSF);		1							1	4	Full Compliance	SW Loggers Master A logger was deployed at this location.		

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuyllin)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
Schedule D - 2.a.ii	Schedule D - 2.a.ii	SCGS (Surprise Creek gauge station between the TSF and the Mine);		1							1	4	Full Compliance	SW Loggers Master A logger was deployed at this location.	SW02 (SCGS)
Schedule D - 2.a.iii	Schedule D - 2.a.iii	SW30 (upstream Emu Creek);		1							1	4	Full Compliance	SW Loggers Master Two loggers were deployed at this location. One was lost in flooding but the other provided data.	
Schedule D - 2.a.iv	Schedule D - 2.a.iv	USGS (upstream at the McArthur River gauge station);		1							1	4	Full Compliance	SW Loggers Master A logger was deployed at this location although it was inaccessible at 15Aug2024 however continuous data exists from the gauging station.	SW10 was inaccessible 15/8/2024
Schedule D - 2.a.v	Schedule D - 2.a.v	BCGS (upstream at the Barney Creek gauge station);		1							1	4	Full Compliance	SW Loggers Master A logger was deployed at this location.	SW04 (BCGS)
Schedule D - 2.a.vi	Schedule D - 2.a.vi	SW12 (immediately downstream of the Mine capturing outflow from Emu Creek, Barney Creek, drainage lines from SEPROD, Old McArthur River Channel and the McArthur River diversion channel but before the Glyde River joins the McArthur River channel);		1							1	4	Full Compliance	SW Loggers Master A logger was deployed at this location.	
Schedule D - 2.b	Schedule D - 2.b	devices must at a minimum measure electrical conductivity, and may measure additional parameters such as pH;		1							1	4	Full Compliance	SW Loggers Master All devices at least measured EC.	
Schedule D - 2.c	Schedule D - 2.c	the Operator must from 30 August 2017 include data from these devices in data submission under Condition 7 of Schedule A.		1							1	3	Part Compliance (High)	There was no data submitted under condition 7 in the audit period.	OFI: Refer to OFI condition 7.a.
Schedule D - 3	Schedule D - 3	From the date of authorisation of the Overburden Management Project the Operator is approved to install and manage the following gauging stations at:											Refer to sub conditions	Enviromon Memo: Derivation of Discharge rating for monitoring site at Emu Creek for Xylem dated Nov2023	This condition changed from "must" install to "is approved to" install in the May 2023 authorisation.
Schedule D - 3.a	Schedule D - 3.a	Emu Creek;		1							1	4	Full Compliance	Enviromon Memo: Derivation of Discharge rating for monitoring site at Emu Creek for Xylem dated Nov2023 The Emu Creek gauging station was installed over the reporting period.	
Schedule D - 3.b	Schedule D - 3.b	Glyde River.		1							1	4	Full Compliance	There is no gauging station installed on the Glyde River. However, this condition no longer states "must" install so this is compliant.	AAPA certificate not in place for construction access. There is existing access to approximately 100m from site. Proposing to proceed with helicopter bringing in larger materials. OBS: Construct the permanent gauging station on the Glyde River.
Schedule D - 4	Schedule D - 4	The Operator must ensure groundwater monitoring bores and extraction bores are constructed, maintained and decommissioned in compliance with the document entitled Minimum construction requirements for water bores in Australia published by the National Uniform Drillers Licensing Committee (third edition, February 2012 or a current version of the document). In this regard:				1					1	N/A	Not Applicable	McArthur River Mining Pty Ltd Annual Groundwater Report 2023/2024 Final August 2024 (EMR 2023-2024 Appendix I). The Operator advised that there was no hydrogeological drilling in the audit period. This is consistent with there being no Hydrogeological Drilling and Field Campaign report appendix with the EMR 2023-2024. However, the 2023-2024 Drilling Register includes one dewatering bore MUDS_TEST hole, which the Operator advised "was a test hole to assess the target galleries. This hole was not completed to meet the intended purpose for dewatering bore." No construction, maintenance or decommissioning of groundwater monitoring bores and extraction bores occurred in the audit period.	
Schedule D - 4.a	Schedule D - 4.a	construction logs and bore location coordinates in GDA 94 format must be available to the Minister on request and provided to the Minister annually in the EMR;				1					1	N/A	Not Applicable	McArthur River Mining Pty Ltd Annual Groundwater Report 2023/2024 Final August 2024 (EMR 2023-2024 Appendix I) South MUDS 2 Bore Completion Diagram The 2023-2024 Drilling Register includes one dewatering bore MUDS_TEST hole, which the Operator advised "was a test hole to assess the target galleries. This hole was not completed to meet the intended purpose for dewatering bore." No construction of groundwater monitoring bores and extraction bores occurred in the audit period.	DITT advised that there were no requests by the Minister in the audit period.

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Schedule D - 4.b	Schedule D - 4.b	logs of maintenance activities must be kept available to the Minister on request;				1					1	N/A	Not Applicable	Slides regarding GW18013, GW18016S, GW19051 and SS2-1 McArthur River Mining Pty Ltd Annual Groundwater Report 2023/2024 Final August 2024 (EMR 2023-2024 Appendix I) Annual Groundwater Report 2022/2023 dated Jun2023. While previous audit periods have indicated via sampling results that bores SS2-1, GW18013, GW18016S and GW19051 had damage or blockages a review by the Operator indicated GW18013, GW18016S and GW19051 are "functioning well according to the monthly sampling and dip measurement biannually" and "SS2-1 is no longer in operation, having been removed during mine expansion works prior to this reporting period." Annual Groundwater Report 2024 stated "Bore blocked at 5.50 m" for GW132 and "Unable to sample, permanent pump detached from the tubing*" in the 2023 Report but there is no evidence of maintenance. Annual Groundwater Report 2023 stated "Bore collapsed at the screen" for GWNOEF1S and while there is no longer a comment in the 2024 report that bore was not sampled but there is no evidence of maintenance. Annual Groundwater Report 2023 stated "Pump stuck in bore. No air valve" for GW043B but no comment in 2024 and there is no evidence of maintenance. Annual Groundwater Report 2023 stated "Permanent pump stuck, bore casing bent at ground level" for GWBB006C and in 2024 "Blocked access". The Operator advised "No maintenance activity occurred during the reporting period 01/05/23 to 30/4/24."	DITT advised that there were no requests by the Minister in the audit period. The Operator advised there were no maintenance activities during audit period. OBS: There appear to be bores that are damaged and unserviceable that should be maintained to keep the monitoring bores available for monitoring. In the event they can't be used, perhaps they should be maintained, rehabilitated (to repair a bore that has failed) or decommissioned.	
Schedule D - 4.c	Schedule D - 4.c	logs of bore decommissioning activities must be kept and made available to the Minister on request and reported in the Operator's Annual EMR or an alternative format as agreed with the Department.				1					1	N/A	Not Applicable	McArthur River Mining Pty Ltd Annual Groundwater Report 2023/2024 Final August 2024 (EMR 2023-2024 Appendix I) Annual Groundwater Report 2022/2023 dated Jun2023. Annual Groundwater Report 2023/2024 stated "Sampling numbers were lower than planned, with many bores decommissioned due to operational activities / changes." No decommissioning of groundwater monitoring bores and extraction bores occurred in the audit period.	DITT advised that there were no requests by the Minister in the audit period.	
Schedule D - 5	Schedule D - 5	The Operator must take appropriate action to reduce the risk to mining operations associated with livestock on the adjoining pastoral property by maintaining an Exclusion Area and managing livestock as appropriate in consultation with the Chief Veterinary Officer.								1		4	Full Compliance	2018-2019 cattle management plan was submitted in the January 2020 MMP, which was not approved until 13Nov2020. 2023/24 MRM Cattle Muster / Aerial Inspection Register. MRM Cattle management fence line inspections register. 240325 - Flood Damage - Fence Inspection Example EMR 2023-2024 dated 31Aug2024. The Cattle Management Fence Line Inspections Register provided evidence that approximately weekly inspections were performed in the dry season during the audit period. Seven aerial musters were documented in the 2023/24 MRM Cattle Muster / Aerial Inspection Register between 13Jun2023 and 29Apr2024, and also confirmed in the EMR 2023-2024.	OBS: Document weekly inspections of the cattle exclusion zone fence undertaken, or amend the inspection schedule in the Cattle Management Plan to reflect what is practical.	
Schedule D - 6	Schedule D - 6	From the date of authorisation of the Overburden Management Project the Operator must undertake monitoring in accordance with the following Environmental Management Plans approved in the MMP:											Refer to sub conditions			
Schedule D - 6.a	Schedule D - 6.a	Adaptive Management Plan, which includes:											Refer to sub conditions			Adaptive Management Plan The AMP is a framework document and does not require monitoring specifically, but rather makes reference to monitoring contained within specific management plans such as the WMP, AQMP and RMP.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024															Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nuhlin)	Monitoring & Reporting	Score	Compliance level			
Schedule D - 6.a.i	Schedule D - 6.a.i	Water Management Plan		1		1	1				1	3	Part Compliance (High)	<p>Water Management Plan dated 13May2022.</p> <p>IndoPacific McArthur River Freshwater Macroinvertebrate Assessment 2023 dated May2024</p> <p>IndoPacific Monitoring Of Select Analytes and Lead Isotope Ratios in fluvial Sediments, Fish and Molluscs of the McArthur River 2023 dated Feb2024</p> <p>IndoPacific Aquatic Fauna Abundance and Diversity of the McArthur River, NT, Early Dry Season 2023 dated Jan2024</p> <p>IndoPacific Report on the Aquatic Fauna of the McArthur River, NT, Late Dry Season 2023 dated May2024</p> <p>2021-22 MRM Environmental Monitoring Schedule dated Oct2022</p> <p>WRM 2023/24 Annual Site Water Balance for the McArthur River Mine Water Balance Forecast Report dated Jan2024 (includes TARPS)</p> <p>Annual Groundwater Report 2023/2024 Final Aug 2024 (EMR 2023-2024 Appendix I)</p> <p>SURFACE WATER MONITORING REPORT FOR THE 2023/24 REPORTING PERIOD dated Aug2024 (EMR 2023-2024 Appendix C)</p> <p>Correspondence between Operator and DITT February 2024 regarding Inclement Weather and Surface Water Monitoring.</p> <p>Surface Water Data extracted 240530 spreadsheet (laboratory results only).</p> <p>The 2021-22 MRM Environmental Monitoring Schedule I1001 Rev3 (relevant to the audit period), has monitoring required at SW06. No sampling was undertaken at SW06 in the audit period. The Operator informed DITT on 16Feb2024 that they proposed to sample at SW20 in lieu of SW06. However, DITT advised that no alternate monitoring locations have been approved.</p> <p>This condition is compliant for the Groundwater and Aquatic Fauna Environmental Aspects but part compliant (high) for the Surface Water, and Monitoring and Reporting Environmental Aspects.</p>	<p>Water Management Plan May 2022 states "A water balance for the Mine site is undertaken annually to assess the historical performance of the water management system as well as outline the strategy and forecast performance over a forward period. The water balance model is an essential risk management tool for the Mine site." and "The water storage TARPs are developed annually prior to wet season to reflect current water management conditions."</p> <p>Annual Groundwater Report 2023/2024 states "Update the monitoring program to remove monitoring locations that have been decommissioned/destroyed. Where monitoring bores have become dry, consider if a replacement bore, screened in a deeper unit, is required (e.g. GW074)."</p> <p>SURFACE WATER MONITORING REPORT FOR THE 2023/24 "Surface water quality monitoring will continue to be undertaken in accordance with the currently approved Water Management Plan and monitoring results in the following reporting period will continue to be assessed under the Mine's Adaptive Management Plan."</p> <p>OBS: Revise TARPs annually prior to each wet season to ensure they are up to date and the WMP should be updated accordingly.</p> <p>OBS: Consider addressing the McArthur River Mining Pty Ltd Annual Groundwater Report 2023/2024 (Klohn Crippen Berger, August 2024) recommendations that remain unactioned from previous years.</p> <p>OFl: Update the Water Management Plan and monitoring schedule regarding the use of SW20 and SW19 in lieu of SW06.</p>	
Schedule D - 6.a.ii	Schedule D - 6.a.ii	Air Quality	1								1	4	Full Compliance	<p>Todorski Ambient Air Monitoring Report - McArthur River Mine and Bing Bong Facility May 2023 - April 2024 dated 9 Jul2024</p> <p>Todorski Ambient Air Monitoring Report states "The air quality monitoring network at the Mine currently consists of one High Volume Air Sampler (HVAS), two sulfur dioxide (SO2) monitors, 23 deposited dust gauges and three DustTrak monitors. The BBLF monitoring network currently consists of six deposited dust gauges. The deposited dust gauge bottle samples and HVAS filter papers are analysed at a laboratory for metal concentrations."</p> <p>There was insufficient data in the 2023-2024 EMR period related to HVAS and deposition dust gauges (e.g., low dust levels, inability to access locations). The Todorski Ambient Air Monitoring Report provides recommendations on opportunities to improve the mass of dust collected and the quality of the data collected (e.g., method/sampling technique).</p>	<p>Todorski Ambient Air Monitoring Report stated "SO2 monitoring was conducted at the 'SO2VAN01' monitoring site, which was relocated during the review period to the western edge of the Northern Overburden Emplacement Facility, and at the 'SO2VILL02' located at the workers village. The data indicate that 1-hour and 24-hour SO2 concentrations at the SO2VAN01 monitoring site exceeded the adopted air quality goals on occasion. However, investigations found that the maximum SO2 concentrations at the off-site locations of Borroloola and Goolminyini (44km and 28km away respectively) were significantly lower than the adopted air quality goals."</p> <p>"HVAS monitoring is conducted approximately every 6 days for a 24-hour monitoring period".</p> <p>OBS: Consider the opportunities raised in the Ambient Air Monitoring Report McArthur River Mine and Bing Bong Loading Facility May 2023 – April 2024 (Todorski, 9 July 2024) to improve the monitoring.</p>	
Schedule D - 6.a.iii	Schedule D - 6.a.iii	Rehabilitation Management Plan						1			1	4	Full Compliance	<p>Indopacific McArthur River Acoustic Monitoring Program 2023 Assessment of Largemouth Sawfish and Barramundi dated May2024</p> <p>Indopacific McArthur River and Barney Creek Revegetation Monitoring Report 2023 Jul2024</p> <p>McArthur River Riparian Bird Monitoring Early Dry Season Report May 2023 dated Jun2024</p> <p>McArthur River Riparian Bird Monitoring Late Dry Season Report November 2023 dated Jun2024</p> <p>Rehabilitation Management Plan dated Mar2021.</p> <p>Noting for the reports above, fieldwork was undertaken in the audit period and reporting after the audit period.</p> <p>The RMP requires annual monitoring of revegetation in April/May and the Revegetation and Monitoring Report dated May2023 states "Revegetation monitoring in 2023 was undertaken between the 20th and 24th of April within the Barney Creek domain and the 15th and 19th of June within the McArthur River domain. Monitoring within the McArthur River domain was undertaken later as a result of the elevated water levels present in April when many monitoring plots were still partially submerged." and "To meet statutory requirements, annual revegetation monitoring along the McArthur River and Barney Creek diversion channels has been undertaken since 2012. The data collection and assessment in 2023 were conducted as per McArthur River Mines (MRM) 2021-2023 Rehabilitation Management Plan (RMP) and Adaptive Management Plan (AMP) Trigger Action Response Plan (TARP)".</p>	<p>Section 9.1 of the RMP states "In order to determine the short-term success of revegetation works prior to their first wet season rainfall; fortnightly visual inspections of the rehabilitation area will be completed by a member of the Rehabilitation Team. Aspects such as vegetation health and mortality rate will be assessed in accordance with the Channel Revegetation Assessment Procedure." Evidence of this fortnightly monitoring has not been provided.</p> <p>OBS: Ensure that records of fortnightly visual inspections by a member of the Rehabilitation Team of the rehabilitation area are kept prior to their first wet season rainfall.</p> <p>Section 9.2.3 of the RMP states: "Monitoring of rehabilitation will be conducted annually and will consist of an intensive data collection period (fieldwork), data analysis and reporting." Indopacific McArthur River and Barney Creek Revegetation Monitoring Report 2023 Jul2024 is evidence of this.</p>	

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
Schedule D - 6.b.	Schedule D - 6.b.	Waste Management Plan							1		1	4	Full Compliance	Waste Management Plan 2018-2020 dated 2020. Environmental Monitoring Schedule Rev 3 dated Oct2022. EMR 2023-2024 dated 31Aug2024. Spreadsheet of monthly waste records. Screenshot regarding quarterly commentary on recycling data. Email trail demonstrating quarterly corporate reporting. Quantities of landfill and recyclable waste streams are provided in Table 8 of the EMR 2023-2024. Evidence was provided demonstrating that waste records are reported and that temporal variations in data are investigated quarterly rather than monthly.	Section 8 of the Waste Management Plan details monitoring, which states: "Waste records are submitted to the Environment Department on a monthly basis and analysed against previous quarter's volumes. Any significant changes in volumes are investigated further with the respective department." OBS: The Waste Management Plan should be updated to reflect the process occurring on site (quarterly rather than monthly) for submission of waste records and analysis against the previous quarter's data.
Schedule D - 6.c	Schedule D - 6.c	NOEF Management Plan							1		1	4	Full Compliance	NOEF Management Plan dated 31Jan2020. ICE Endorsement of the NOEF Management Plan dated Jan2020. EMR 2023-2024 dated 31Aug2024 EMR 2023-2024 states "The NOEF temperature monitoring program results over the reporting period are presented in Appendix E. Results obtained over the reporting period show that the temperatures within the NOEF are stable and that overall, the PAF cells are maintaining an average background temperature between 50 and 70°C."	Evidence of implementation is reflected in the ICE Design Reviews, Construction Reports and ITPs that are included in this audit workbook. The requirement for material tracking through use of a Global Positioning System (GPS) tracking system as required by the NOEF Management Plan was observed by the Independent Monitor during a site visit in 2023 (e.g., Fleet Management System) and the Operator confirmed this remained in place over the audit period.
Schedule D - 6.d	Schedule D - 6.d	BBLF Environment Management Plan									1	4	Full Compliance	Indopacific Annual Seagrass Survey of the Bing Bong Loading Facility 2023 dated Jun2024 (EMR 2023-2024 Appendix W) BBLF EMP dated Mar2021. EMR 2023-2024 dated 31Aug2024. Metal and Metalloid Concentrations of Near Shore Sediment of Bing Bong Loading Facility, 2023 dated 2024 (EMR 2023-2024 Appendix U) Metals and Lead in Marine Water (DGT) Monitoring 2023-2024 dated Aug2024 ANNUAL MARINE MONITORING PROGRAM OF THE BING BONG LOADING FACILITY, 2023 dated Aug2024 ((EMR 2023-2024 Appendix S) Todorski Ambient Air Monitoring Report - McArthur River Mine and Bing Bong Facility May 2023 - April 2024 dated 9 Jul2024 (EMR 2023-2024 Appendix H) Annual Groundwater Report 2023/2024 Final August 2024 (EMR 2023-2024 Appendix I) 2023/24 Bing Bong Loading Facility Site Runoff Pond Wet Season TARPs Worksheet dated Jan2024 WRM 2023/24 Site Water Balance for the Bing Bong Loading Facility dated 31Jan2024 SURFACE WATER MONITORING REPORT FOR THE 2023/24 REPORTING PERIOD dated Aug2024 (EMR 2023-2024 Appendix C) Monitoring reports as appendices to the EMR 2023-2024 demonstrated the monitoring is occurring.	Section 6 of the BBLF EMP outlines monitoring programs consisting of Surface Water, Groundwater, Depositional Dust, and Marine. Section 6.3 of the BBLF EMP states: "Depositional dust is monitored at five potential impact sites near or within operational areas, and one control site located 2 km southwest of the BBLF (Figure 5 and Appendix E). The sampling period is approximately one month (30 ±2 days)." Todorski Ambient Air Monitoring Report states "The BBLF monitoring network currently consists of six deposited dust gauges. The deposited dust gauge bottle samples and HVAS filter papers are analysed at a laboratory for metal concentrations." that meets this requirement. Section 6.1 of the BBLF EMP states: "These monitoring programs are Surface water quality samples are collected in accordance with MRM Artificial Surface Water Monitoring Procedure (PRO-2200025)." Section 6.2 of the BBLF EMP states: "Groundwater quality samples are collected in accordance with MRM Groundwater Monitoring Procedure (PRO-2200024)." Section 6.4.2 of the BBLF EMP states: "The monitoring program consists of seven sampling zones which are presented in Figure 7, and listed in Appendix G. Data from the near shore sediment monitoring sites is collected annually, and samples are analysed for:"
Schedule D - 6.e	Schedule D - 6.e	Unplanned Closure Plan									1	4	Full Compliance	Unplanned Closure Plan dated Jan2023. EMR 2023-2024 dated 31Aug2024. The Unplanned Closure Plan references various monitoring as included in the WMP, AQMP and RMP, which are assessed under Schedule D Condition 6 - a. Unique to the UCP in terms of monitoring is that related to the rehabilitation trials. For example the Geosynthetic Liner Cover System Plan would be relevant but it is not approved. The EMR 2023-2024 discusses monitoring that is related to rehabilitation trials.	Any monitoring required post unplanned closure is not applicable as the site is operational.
Schedule D - 7	Schedule D - 7	Any required material changes to the Environmental Management Plans mentioned in Condition 6 of this Schedule must be approved by the Department in writing.									1	N/A	Not Applicable		The Operator advised "There has been no change to the approved EMPs over the audit period."
Schedule D - 8	Schedule D - 8	For the purposes of managing chemicals and flammable or combustible liquids, the Operator must:											Refer to sub conditions		
Schedule D - 8.a	Schedule D - 8.a	store and handle all hazardous chemicals, toxic substances, gases and dangerous goods associated with the Mine in accordance with the current Australian Standard where such is applicable, and the laws of the Northern Territory;									1	4	Full Compliance	Environmental Inspection (Concentrator, Concentrator Shed and Fuel Farm) Dec2023. Environmental Inspection (P2, PP, Duncan Dam and New Fuel Farm) Dec2023. Chemical storage inspection INS-0154458 dated Feb2024 Chemical storage inspection INS-0154459 dated Feb2024 PO for chemical inspection by Risk Management Technologies May2024 (after audit period) Evidence of inspections indicated compliance with appropriate storage of hazardous chemicals, toxic substances, gases and dangerous goods.	The Operator advised that they schedule a Chemalet inspection every three to four years. A PO was provided as evidence to demonstrate that MRM is organising an inspection, which is planned for Q4 2024.

Authorisation compliance workbook - Operator
 Audit period 01 May 2023 to 30 April 2024

17 May 2023 5 May 2022
 Authorisation Authorisation
 Condition No. Condition No. Condition/requirement

Air Quality (dust & sulphur dioxide, transport)
 Surface Water (River, Creek, Artificial dams)
 Marine Waters (Bing Bong, marine sediments)
 Groundwater
 Aquatic fauna (fish river)
 Vegetation & Rehabilitation (terrestrial, diversion & NOEF)
 Waste (general, mine rock, tailings)
 Community (local indigenous & nublir)
 Monitoring & Reporting

Score Compliance level

Evidence

Comments

17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Air Quality (dust & sulphur dioxide, transport)	Surface Water (River, Creek, Artificial dams)	Marine Waters (Bing Bong, marine sediments)	Groundwater	Aquatic fauna (fish river)	Vegetation & Rehabilitation (terrestrial, diversion & NOEF)	Waste (general, mine rock, tailings)	Community (local indigenous & nublir)	Monitoring & Reporting	Score	Compliance level	Evidence	Comments
Schedule D - 8.b	Schedule D - 8.b	include bulk storage tanks and associated infrastructure on a maintenance schedule which conforms with the current Australian Standard where such is applicable, and the laws of the Northern Territory;									1	4	Full Compliance	Leach Tank 36-TK-08 10 year Condition Assessment Report Apr2024 Spreadsheet of PM work orders - TK030 and TK031 Maintenance work order - Thickness test sulphuric acid tank dated June2024 (after audit period) Monthly level control alarm checks on diesel storage tank #1 work orders January to April 2024. Monthly level control alarm checks on diesel storage tank #1 work order dated May and June2024 (after audit period) Monthly visual tank inspection tank #2 July and August 2024 (after audit period) Monthly visual tank inspection tank #1 August 2024 (after audit period). Forecast acid tank 2 (sfleming2 v1) Schedule. Forecast acid tank 2 Schedule. Forecast fuel farm tank 1 (sfleming2 v1) Schedule. Forecast fuel farm tank 1 Schedule. The spreadsheet of work orders provided for TK030 and TK031 appeared to list a number of inspections (pro-active items) as outstanding while reactive maintenance items were closed. No evidence of the TK030 or TK031 inspections for pro-active items was provided. The Operator advised the inspections are ongoing in accordance with maintenance schedules.	OBS: Close out work orders related to bulk storage tank inspections including for pro-active items with evidence of them occurring.
Schedule D - 8.c	Schedule D - 8.c	include regular integrity testing to ensure loss of containment or failure of bulk storage tanks does not occur.		1		1					1	4	Full Compliance	230204 26PI01 THICKNESS ACID SYSTEM dated 22Jan2023 (before audit period). Leach Tank 36-TK-08 10 year Condition Assessment Report Apr2024 Spreadsheet of PM work orders - TK030 and TK031 Maintenance work order - Thickness test sulphuric acid tank dated June2024 (after audit period) Monthly level control alarm checks on diesel storage tank #1 work orders January to April 2024. Monthly level control alarm checks on diesel storage tank #1 work order dated May and June2024 (after audit period) Monthly visual tank inspection tank #2 July and August 2024 (after audit period) Monthly visual tank inspection tank #1 August 2024 (after audit period). Forecast acid tank 2 (sfleming2 v1) Schedule. Forecast acid tank 2 Schedule. Forecast fuel farm tank 1 (sfleming2 v1) Schedule. Forecast fuel farm tank 1 Schedule.	

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments	
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement														
SCHEDULE A																
Definitions																
1	1	In this document, unless the contrary intention appears:											-		Note that sub-conditions 1.a to 1.o are not listed as they are all definitions and are unable to be audited for compliance.	
Interpretation																
2	2	In this document, unless the contrary intention appears:											-		Note that sub-conditions 2.a to 2.i are not listed as they are all interpretations and are unable to be audited for compliance.	
General																
3	3	Subject to any Conditions contained in the Act and this document, the Operator must comply with the commitments and activities contained in the MMP including the implementation of all systems referred to in the MMP.	1										4	Full Compliance	<p>EMR 2023-2024 Peer Review of NOEF Annual Construction Report 2023 MRM Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated 13Aug2024 Drone imagery regarding wet season capping of NOEF. Letter NOEF Temporary Floodproofing Delay - Independent Engineer Review. RFI 2023_NEa_001_NE_Alpha_Q100_Delay.</p> <p>EMR 2023-2024 states "During the reporting period, MRM operated the Mine in accordance with the January 2020 MMP. During the reporting period, the MMP was reviewed and an updated version was submitted to DITT on 15 March 2024. The 2024 MMP Update was subsequently approved on 23 July 2024. ", " All drilling during the reporting period was undertaken in accordance with the January 2020 MMP." and "The clearing and soil stripping activities undertaken in accordance with the January 2020 MMP during the reporting period are provided on Figure 4 (i.e. stripped material within the Stage L/M perimeter) and Figure 5."</p> <p>Section 5 of the January 2020 MMP Appendix G NOEF Design and Construction Guidelines required an as-built factual report for the works annually that the ICE reviews and endorses as being correct, which was completed in the audit period.</p> <p>The 2020 NOEF Design and Construction Guidelines indicate that the MRM operations team shall aim to complete all wet season capping works by 1 December each year." The Operator confirmed "as a minimum alluvial cover was present on key batter that interface with the CEB PAF-RE Cell by the 1 December 2023." Inspections and periodic maintenance were undertaken. Drone imagery was provided as evidence of the capping.</p>	<p>Assessment of the commitments is covered under condition 14a. Any management plans that are an appendix to the MMP are audited separately under Schedule D condition 6 related to monitoring requirements.</p> <p>MMP states "A temporary 20 year ARI flood protection levee is planned to extend from EPROD to SEPROD in the south (Figure 16). Construction will be in accordance with the NOEF Construction and Design guidelines. The temporary 20 year ARI flood protection levee will be in place for a maximum of two wet seasons."</p> <p>The Operator advised "MRM was granted approval from the ICE to extend the period of the temporary 20 year ARI flood protection, for a section between EPROD to SEPROD to be in place for greater than two wet seasons.", "Similarly, MRM was granted approval from the ICE to extend the period of temporary 20 year ARI flood protection for the NE Alpha Q20 Stage to be in place for greater than two wet seasons." and "Lastly, the Q20 floodproof for the NW Stage was in place for the 2022/2023 wet season, but then not required for the 2023/2024 wet season, as per the provided survey data (NW Stage Q20 evidence of no more than two wet seasons)."</p> <p>The Operator confirmed "there was mention of the temporary flood proofing in the latest MMP amendment, however specifics on keeping it in place for two wet seasons was approved by the ICE,".</p> <p>OBS: MMP amendments should include where the temporary 20 year ARI flood protection will be in place for more than 2 wet seasons or evidence of consultation and agreement on this with the regulator.</p>
4	4	The Operator may only conduct mining activities identified in the MMP within the Mine subject to any Conditions contained in the Act, this document and the Conditions commitments and systems contained in the MMP.	1										4	Full Compliance	<p>EMR 2023-2024 Ground Disturbance Permit 48484 last signature 14Jun2023 Ground Disturbance Permit 46544 last signature 10March2023 Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated 13Aug2024</p> <p>EMR 2023-2024 states that the MMP was reviewed and an updated version was submitted on 15 March 2024 and that 2024 MMP Update was approved on 23 July 2024.</p> <p>Submission of proactive MMP amendments shows that there is a process in place for where any activities outside of the MMP are required and they do not occur until an amendment is approve.</p> <p>EMR 2023-2024 states "The clearing and soil stripping activities undertaken in accordance with the January 2020 MMP during the reporting period are provided on Figure 4 (i.e. stripped material within the Stage L/M perimeter) and Figure 5."</p> <p>Clearing permits include the prompt "Is the clearing work consistent with the current MMP" and specific prompts related to clearing. Ground Disturbance Permit 48482 includes reference to Jan 2020 MMP Section 4.5.4 and email from DITT in June 2022 regarding WMD upgrades.</p>	
5	5	The mine site is to be developed and operated in accordance with all relevant Commonwealth and Northern Territory legislation.	1										4	Full Compliance	<p>EPBC Act Approval 2003/954 - Annual Compliance Report Submission dated 29Sep2023 EPBC 2014/7210 - 2022-2023 EPBC Compliance Report dated 15Feb2024 Aboriginal Cultural Heritage Management Plan dated 29Feb2023 Whincop Archaeology 2023 Annual Aboriginal Heritage Sites Inspection Report dated 18Oct2023 EMR 2023-2024</p> <p>Evidence was provided to demonstrate compliance with the Environment Protection and Biodiversity Conservation (EPBC) Act 1999, Aboriginal Sacred Sites Act 1989 and Heritage Act 2011. No instances of activities not complying with Commonwealth and Northern Territory legislation were identified as part of this audit.</p>	The May 2022 Authorisation condition included the following examples of relevant legislation <i>Environment Protection and Biodiversity Conservation Act 1999, Northern Territory Aboriginal Sacred Sites Act 1984, Territory Parks and Wildlife Conservation Act 1976 and Heritage Act 2011</i> .
Mining management plan and reporting																

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments	
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement														
6	6	The Operator must on 31 August 2021 and on each anniversary of that date (or such other date as nominated by the Operator and approved by the Minister), review the approved MMP and if necessary, amend the MMP.	1									4	Full Compliance	Correspondence between Operator and DITT regarding 2023 MMP Amendment - Variation of Authorisation 0059 dated May2023 Letter from Operator to DITT subject: McArthur River Mining – 2022-2023 Environmental Monitoring Report dated 31Aug2023 The email to DITT accompanying the EMR on 31Aug2023 advised that an MMP review had been undertaken and no amendment to the MMP was required at that time.	EMR 2023-2024 states that the MMP was reviewed and an updated version was submitted on 15 March 2024 and that 2024 MMP Update was approved on 23 July 2024.	
7	7	The Operator must submit annually all environmental monitoring data which has been collected since the previous data submission. The data submission must be provided in the approved form (being an MS Excel template that can be provided on request) and include laboratory and field data for the following:												Refer to sub conditions		
7.a	7.a	surface water;	1									2	Part Compliance (moderate)		No data was submitted in the audit period. The data for 2021-2022 was submitted April 2023 (before the audit period). The Operator advised that the Condition 7 monitoring data for years 2022-2023 and 2023-2024 is currently in draft. OFI: Submit all environmental monitoring data annually.	
7.b	7.b	groundwater;	1									2	Part Compliance (moderate)		No data was submitted in the audit period. The data for 2021-2022 was submitted April 2023 (before the audit period). The Operator advised that the Condition 7 monitoring data for years 2022-2023 and 2023-2024 is currently in draft. OFI: Refer to OFI condition 7.a.	
7.c	7.c	dust;	1									2	Part Compliance (moderate)		No data was submitted in the audit period. The data for 2021-2022 was submitted April 2023 (before the audit period). The Operator advised that the Condition 7 monitoring data for years 2022-2023 and 2023-2024 is currently in draft. OFI: Refer to OFI condition 7.a.	
7.d	7.e	sediments;	1									2	Part Compliance (moderate)		No data was submitted in the audit period. The data for 2021-2022 was submitted April 2023 (before the audit period). The Operator advised that the Condition 7 monitoring data for years 2022-2023 and 2023-2024 is currently in draft. OFI: Refer to OFI condition 7.a.	
7.e	7.f	gas; and	1									2	Part Compliance (moderate)		No data was submitted in the audit period. The data for 2021-2022 was submitted April 2023 (before the audit period). The Operator advised that the Condition 7 monitoring data for years 2022-2023 and 2023-2024 is currently in draft. OFI: Refer to OFI condition 7.a.	
7.f	7.g	water transfers and discharges (including dates, times and volumes).	1									2	Part Compliance (moderate)		No data was submitted in the audit period. The data for 2021-2022 was submitted April 2023 (before the audit period). The Operator advised that the Condition 7 monitoring data for years 2022-2023 and 2023-2024 is currently in draft. OFI: Refer to OFI condition 7.a.	
8	8	From 13 November 2020 (i.e. the date of authorisation of the Overburden Management Project) the Operator must:												Refer to sub conditions	In the May 2022 Authorisation, this condition related to 'as-built' construction reports that were due to be submitted within 30 days upon completion rather than being related to a list of structures as described in Condition 8.a and with a timeframe of 60 days.	
8.a	N/A	annually submit to the Department, unless otherwise agreed to in writing by the Department, a list of structures scheduled to be constructed in the coming year that will have an "as-constructed" construction report developed subject to Condition 48(g) and in accordance with the approved MMP; and	1									4	Full Compliance	Email from Operator to DITT subject: MRM Condition 8(a) - List of "as-constructed" construction reports 2023-2024 dated Aug2023. The list of structures was submitted as required in the audit period. Of the five structures in the list due for completion in the audit period, only the Cell 2 Stage 8 Raise had reached practical completion at the end of the audit period. The Operator advised that construction work progressed on the South Sediment Dam in the audit period. This structure was not included in the list of structures submitted on 30Aug2023.	OBS: Maintain a register of annual structures expected to have construction completed and expected date for construction completion (structure specific date based upon e.g. commissioning, practical completion) and expected date for "as-constructed" report to be completed. Maintain the register to capture structures or "as-constructed" reports not completed in previous year/s until they are closed out. OBS: Changed circumstances that may emerge and impact the planned schedule of the list of structures to be constructed should be advised to the regulator and an updated list of structures and estimated completion dates provided. OBS: Incorporate the "as-constructed" construction reports for stages of the NOEF (Projects Team and Operations Team) in the annual list of structures required by Condition 8.a.	

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
8.b	8 cont	submit the "as -constructed" construction reports subject to the above condition for each structure to the Department within 60 days or an alternate date agreed to by the Department in writing, upon construction being finalised.	1									N/A	Not Applicable	Letter GHD to MRM dated 12Aug2024 Subject: TSF Construction Works, May 2023 - April 2024, Engineer of Record Oversight. Letter GHD to MRM dated 12Aug2024 Subject: TSF Construction Works, May 2023 - April 2024, Engineer of Record Oversight states "At conclusion of the reporting period (30th of April 2024), construction of the Cell 2 Stage 8 Raise has reached practical completion,". For the audit period, this condition is considered not applicable as within 60 days of construction being finalised was not triggered for any of the structures.	For the audit period, this condition is considered not applicable as within 60 days of construction being finalised was not triggered for any of the structures. Regarding the TSF Cell 2 Stage 8 Raise that was completed by 30Apr2024, the ICE advised in September 2024 that the construction report is not complete. As this is due after the audit period, it will be audited in 2025. In the May 2022 Authorisation, this condition related to 'as-built' construction reports that were due to be submitted within 30 days upon completion rather than being related to a list of structures as described in Condition 8.a with a timeframe of 60 days.
9	9	The Operator must submit on or before 31 August 2021 and on each anniversary of that date (or such other date as nominated by the Operator and approved by the Minister), an EMR for the previous year in the reporting period as agreed with the Department.	1									4	Full Compliance	EMR 2022-2023 dated 31Aug2023. Correspondence between Operator and DITT relating to 2022-2023 EMR Submission.	
Security and levy															
10	10	The Operator must provide to the Minister a security of \$479,200,853 in the form of cash or an unconditional bank guarantee prior to undertaking any mining activities authorised by this Variation of Authorisations 0059-01 and 0059-02.	1									4	Full Compliance	Independent Monitor sighted email evidence of payment of the increase in the security of \$2,723,885.00 and receipted by NT Government May 2023. Correspondence between DITT and Operator regarding Variation of Authorisation 0059 and Security Request and receipt.	The security has increased from \$476,476,968 in the May 2022 Authorisation to \$479,200,853 in the May 2023 Authorisation.
11	11	The security provided for under Condition 10 will be reassessed, and may be revised, following the submission, assessment and approval of an:												Refer to sub conditions	
11.a	11.a	independent third party assessment of the security by a qualified person approved by the Minister (also refer to Condition 40);	1									N/A	Not Applicable	MRR Mine Rehabilitation Planning Security Audit 2023 dated Dec2022 Letter from Operator to DITT subject: McArthur River Mining – 2023 Unplanned Closure Plan and Independent Security Audit dated Jan2023	McArthur River Mining – 2023 Unplanned Closure Plan and Independent Security Audit was submitted to DITT Jan2023 (before the audit period) and approved in May2023 (in the audit period). There were no independent third party assessment of the security in the audit period. An updated Unplanned Closure Plan and security assessment that covers MMP amendment activities was submitted May2024 (after the audit period).
11.b	11.b	amended MMP;	1									4	Full Compliance	2024 MMP Submission dated March 2024	
11.c	11.c	amendment to the Unplanned Closure Plan.	1									N/A	Not Applicable	MRR Mine Rehabilitation Planning Security Audit 2023 dated Dec2022 Letter from Operator to DITT subject: McArthur River Mining – 2023 Unplanned Closure Plan and Independent Security Audit dated Jan2023	McArthur River Mining – 2023 Unplanned Closure Plan and Independent Security Audit was submitted to DITT Jan2023 (before the audit period) and approved in May2023 (in the audit period). An updated Unplanned Closure Plan and security assessment that covers MMP amendment activities was submitted May2024 (outside the audit period). There was no amendment to the Unplanned Closure Plan in the audit period. Unplanned Closure Plan was due to be submitted in August 2023, but extension granted by DITT until submission of AMMP in 2024.
12	12	The revised security amount to be provided under Condition 10 is to be provided prior to creating the new disturbance, covered under the revised security as per written notification from the Department. For the avoidance of doubt, the Operator must provide the revised security amount in the form of cash or an unconditional bank guarantee to the Minister.	1									4	Full Compliance	Ground Disturbance Permit 48484 last signature Jun2023 Ground Disturbance Permit 46544 last signature March2023 Evidence provided indicates that disturbance part of the amended MMP approved on 17May2023 only occurred after the additional security payment was made.	The Operator advised that the works in Ground Disturbance Permit 48484 were part of the amended MMP approved on 17May2023.
13	13	Each financial year, upon receipt of a written notice by the Minister as to the levy payable for that financial year, the Operator must pay a levy to the Mining Remediation Fund of an amount calculated in accordance with the Act and as stated by the Minister in the notice.	1									4	Full Compliance	Receipt for Tax invoice 6812446187 (undated) Tax invoice 929052693 dated Aug2023 Screen shot provided by DITT demonstrated payment had been made as required.	

Overburden Management Project

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments	
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement														
		The following conditions were introduced in the previous variation, dated 15 August 2019 to reflect the intent of the thirty recommendations made by the NT EPA in the making of their Assessment Report 86 published July 2018. The NT EPA articulated an overarching environmental objective to be achieved during operation of the Mine: to ensure the health of McArthur River is protected along its whole length at all times from mine related impacts. The Minister accepted the recommendations as overarching conditions for the life of the project and have been retained to achieve transparency.														
14	14	The Operator must ensure activities related to the McArthur River Overburden Management Project are implemented in accordance with:											Refer to sub conditions			
14.a	14.a	all environmental commitments and safeguards identified in the final Environmental Impact Statement for the McArthur River Mine Overburden Management Project (draft Environmental Impact Statement, Supplement to the draft Environmental Impact Statement and additional information);	1					1				3	Part Compliance (High)	2023-2024 Reconciliation of Commitments and Actions Register undated. The review identified that all the OMP EIS commitments provided in the MMP (Appendix M) were addressed in the EMR. Other commitments identified in the MMP (Appendix L) were not addressed in the EMR. Notwithstanding, from the 13 commitments identified in the MMP (Appendix L), all appear to be addressed to some extent within the OMP EIS commitments, apart from one commitment, i.e., 'Install additional groundwater monitoring at Bing Bong'. In total, 230 commitments were identified in the EMR. Of these, 155 commitments were identified to be ongoing (i.e., relating to ongoing committed activity at the Mine), 12 commitments were identified to be complete (i.e., no further action required), and 63 commitments were identified to be not currently relevant (e.g., commitments relating to specific actions during the Mine closure). Of the 155 ongoing commitments, the EMR 2024 provided by the Operator indicated that six commitments may be incompletely addressed.	OFIs are not included here as they are provided in the Commitments - Operator Review section in the AEPAR.	
14.b	14.b	recommendations in the NT EPA Assessment Report 86 where they are approved under an MMP;	1					1				N/A	Not Applicable	NT EPA recommendations workbook for DITT	Given the NT EPA recommendations audit of the Department identified that all NT EPA recommendations are included as conditions in the Authorisation, audit of this condition is covered under other relevant Authorisation conditions.	
14.c	14.c	if there is any inconsistency between the above documents, the most recent authorisation shall prevail to the extent of any inconsistency.	1					1				4	Full Compliance	The IM did not identify any examples of the Authorisation not being the document followed in the event of any inconsistencies.	The Operator advised that they focus on the Authorisation. They note there are inconsistencies regarding some timeframes (e.g., for panels). The Authorisation prevails if there is an inconsistency.	
15	15	The Operator must provide written notice to the Minister and NT EPA if it alters or proposes to alter the McArthur River Mine Overburden Management Project and/or commitments, safeguards or mitigation measures in the Environmental Impact Statement in such a manner that the environmental significance of the action may have changed. The referral should be made in accordance with the Environment Protection Act 2019.	1					1				4	Full Compliance	EMR 2023-2024 EMR 2023-2024 states "MRM updated the environmental risk assessment as part of the MMP submission on 15 March 2024. The MMP describes the continued development of the McArthur River Mine based on conceptual level designs. MRM's latest environmental risk assessment concluded that the risk profile remains consistent with the OMP EIS (i.e. all risks under the MMP were determined to be low or medium based on the assessment matrix)."	The Operator advised that "When an MMP amendment is submitted to DITT for a change relating to the EIS we do a self assessment under the EP Act 2019 to determine if a referral is or is not required. In the audit period, the minor amendment approved and also the amendment submitted in the audit period but not approved until after the audit period both had self assessments. The Southern water dam was the largest footprint outside of the EIS and the self assessment was undertaken.	
16	16	By 13 May 2022 (i.e. within 18 months of the date of authorisation of the Overburden Management Project), unless otherwise agreed in writing by the Department, the Operator must submit a plan to the Department for review, that:								1		N/A	Not Applicable	Email from Operator to DITT subject: MRM Water Management Plan Update dated May2022 (before the audit period)	Condition was due and WMP submitted before the audit period.	
16.a	16.a	Enables measurement of total loads of lead and zinc and is consistent with requirements of Condition 27;								1		N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.	
16.b	16.b	Quantifies and ensures annual loads of lead and zinc discharged to the McArthur River in future years (July to June) do not exceed the loads discharged in 2017-2018 (as per Condition 68(e)) taking into account seasonal variations in rainfall, and subject to future annual load calculations;								1		N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.	
16.c	16.c	addresses recommendations and outcomes arising from audits of loads by the Independent Monitor;								1		N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.	
16.d	16.d	include sufficient detail to inform the development of monitoring and management measures (including but not limited to early warning alerts and intervention levels), as part of the site wide AMP (Condition 45);								1		N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.	

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
16.e	16.e	once approved by the Department, be implemented by the Operator.								1		N/A	Not Applicable	MRM TWG Meeting Minutes 2022-2023 audit period (before the audit period). Conditions 16+17 - Mining Officer Notes 2022-2023 audit period (before the audit period). The Mining Officer notes for Jan2023 indicated that DITT had advised MRM at TWG that condition 16 had been satisfied verbally, and letter from delegate to follow." No formal approval of the plan has occurred.	Future item. No formal approval of the plan has occurred.
17	17	By 13 May 2022, the Operator must:											Refer to sub conditions		
17.a	17.a	submit a plan to the Department for review, that shall include:								1		N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
17.a.i	17.a.i	site-specific trigger values determined in accordance with Australian and New Zealand Guidelines for Fresh and Marine Water Quality, 2018 framework, incorporating ANZECC (2000) guidelines, at appropriate monitoring locations, in accordance with Condition 27;								1		N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
17.a.ii	17.a.ii	a commitment that creeks on the mine site show long-term improving trends in water quality within 20 years after cessation of mining;								1		N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
17.a.iii	17.a.iii	methodology to calculate contaminant loads and contaminant concentrations entering creeks and the McArthur River using system modelling that must:								1			Refer to sub conditions		
17.a.iii.a	17.a.iii.a	use suitable site-specific data collected as part of Condition 26;								1		N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
17.a.iii.b	17.a.iii.b	be subject to review by the relevant independent panel;								1		N/A	Not Applicable		Independent panel not established in the audit period.
17.a.iii.c	17.a.iii.c	detail specific assumptions to be tested including but are not limited to:								1			Refer to sub conditions		
17.a.iii.c.i	17.a.iii.c.i	groundwater flow paths;								1		N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
17.a.iii.c.ii	17.a.iii.c.ii	attenuation of metals from mine-derived wastes;				1		1		1		N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
17.b	17.b	once approved by the Department, implement the plan;	1							1		N/A	Not Applicable	MRM TWG Meeting Minutes 2022-2023 audit period (before the audit period). Conditions 16+17 - Mining Officer Notes 2022-2023 audit period (before the audit period). The Mining Officer notes for Jan2023 indicated that DITT had advised MRM at TWG that condition 16 had been satisfied verbally, and letter from delegate to follow." No formal approval of the plan has occurred.	Future item. No formal approval of the plan has occurred.
17.c	17.c	incorporate the relevant findings from the plan into the AMP.	1									N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
18	18	The Operator must provide a written response to the Department, if an independent technical panel's, required under Condition 21, review of the models and modelling outputs, and the data collection programs that informed the model development at Condition 17(a)(iii) address recommendations for improvements. All relevant outputs must be used to inform and update the AMP.		1		1		1				N/A	Not Applicable	Email from Operator to DITT subject: FW: MRM Independent Panels Discussion dated Apr2023 Email from Operator to DITT subject: MRM CRG Sitting Fees & Expenses dated Nov2023 Email from Operator to DITT subject: RE: MRM CRG and independent panels of experts - meeting notes from July 2023 dated Aug2023	No Independent Panels had been established in the audit period.
19	19	Every three (3) years from the date of authorisation of the Overburden Management Project, an independent environmental audit of the Quality Assurance (QA) and Quality Control (QC) procedures and waste rock identification and handling performance must be undertaken and:	1					1					Refer to sub conditions		
19.a	19.a	the results of the audit be provided within six (6) weeks to the Department and to the relevant independent panel;	1					1					-		There is no Operator action required by this condition. Waste Rock Handling Procedures audit site visit debrief with DITT was conducted in Jun2022. No independent panel was in place. Next audit is due June 2025 (three years from previous site audit).

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
19.b	19.b	the Operator must provide a written response to the satisfaction of the Department where findings from the audit and review by the relevant panel includes matters that need to be addressed or areas for improvement.	1					1				4	Full Compliance	No evidence of the Operator providing a written response to DITT on the waste rock handling procedures audit findings. Pending review of the audit findings by the NOEF Independent Panel, which is yet to be established.	OBS: Operator to prepare a written response to the satisfaction of DITT on the waste rock handling procedures audit findings following the establishment of the NOEF Independent Panel.
20	20	From 13 November 2020 (i.e. date of authorisation of the Overburden Management Project), new areas of the NOEF foundation development (i.e. areas at base level) that do not currently contain PAF wastes must include a low permeability liner of 0.5m thickness and maximum saturated hydraulic conductivity of 1 x 10 ⁻⁹ metres per second above which future PAF, NAF and benign materials are to be stored.						1				4	Full Compliance	NEB Permeability by Constant Head Test Report for samples June to October 2023 NB Permeability Data Table undated NE Bravo Foundation Underdrain & VWP Inspection and Test Plan 4B April to July 2023 NE Bravo Foundation Underdrain & VWP Inspection and Test Plan 1B April to June 2023 NE Bravo CCL Box Out Inspection and Test Plan 7A June to August 2023 NE Bravo CCL Box Out Inspection and Test Plan 5B June to September 2023 NE Bravo CCL Box Out Inspection and Test Plan 3C June to July 2023 NE Bravo CCL Box Out Inspection and Test Plan 2A April to July 2023 NE Bravo CCL Box Out Inspection and Test Plan 1C April to June 2023 The Northeast Bravo foundation results for permeability provided showed that the results were orders of magnitude smaller than the required 1 x 10 ⁻⁹ m/s. The ITPs provided included the acceptance criteria of maximum hydraulic conductivity 1 x 10 ⁻⁹ m/s and 500mm for minimum thickness, as required by this condition.	OBS: ITPs should be prepared prior to commencement of works to ensure requirements are aligned between Operator and ICE.
21	21	The Operator must provide funding and assist the Department to establish and operate an independent panel(s) of experts to advise on matters affecting the environmental performance of the NOEF, TSF and mine closure planning.	1			1		1				4	Full Compliance	Correspondence between the Operator and DITT regarding Independent Panels Discussion and CRG Sitting Fees & Expenses during the audit period. Correspondence between DITT and the Operator regarding Independent Panels. An email from the Operator indicating intention to pay for advertising for the Independent Chair for the Mine Closure Panel role was sighted along with the Operator's involvement in the process so this condition is considered complied with. DITT responded to the Operator's concerns regarding the perceived conflict of interest, or lack of independence associated with the mine operator engaging the Chair and members of the independent panels of experts directly.	
22	22	By 13 November 2021 (i.e. within 12 months of date of authorisation of the Overburden Management Project), the Operator must submit a report to the Department for review, detailing the results of relevant studies undertaken to inform the requirements for implementation (including timelines) of a NOEF groundwater seepage interception and recovery system that:						1				N/A	Not Applicable	NOEF Interception Scheme Report Authorisation Condition 22 dated Nov2021.	Completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
22.a	22.a	controls seepage to the Barney Creek diversion channel and the McArthur River;								1		N/A	Not Applicable	NOEF Interception Scheme Report Authorisation Condition 22 dated Nov2021.	Completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
22.b	22.b	achieves a recovering trend in the Barney Creek diversion channel and the old McArthur River channel (at SW06) water quality within 20 years of cessation of mining;								1		N/A	Not Applicable	NOEF Interception Scheme Report Authorisation Condition 22 dated Nov2021.	Completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
22.c	22.c	facilitates achieving requirements of Conditions 16 and 17.								1		N/A	Not Applicable	NOEF Interception Scheme Report Authorisation Condition 22 dated Nov2021.	Completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
23	23	By 13 November 2022 (i.e. within 24 months of date of authorisation of the Overburden Management Project), the Operator must submit a NOEF geosynthetic liner cover system plan to the Department for review. The plan must:						1				3	Part Compliance (High)	Correspondence between Operator and DCCEEW regarding EPBC 2014-7210 -Condition 10b - Submission of Geosynthetic Liner Testing Plan (in the audit period) Correspondence between Operator and DITT relating to Variation of Authorisation 0059 Condition 23 – Geosynthetic Liner Cover System Testing Plan (before the audit period). The Operator advised that the NOEF Geosynthetic Liner Cover System Plan dated Oct2022 submitted was "a working draft that is not suitable for review and approval at this stage". Almost two years later, the final report remains unsubmitted by the Operator. It is noted that a revised Geosynthetic Liner Testing Plan was submitted to the Commonwealth for review and approval in the audit period.	The Operator advised "A revised GSL Testing Plan was also submitted to the Commonwealth Department of Climate Change, Energy, Environment and Water for approval under EPBC 2014/7210 Condition 10b. [...] The revised GSL Testing Plan has not yet been approved." The second revision of the plan is yet to be submitted to the Commonwealth. The Operator advised that following review/ approval by the DCCEEW, the plan would be resubmitted to DITT for review / approval. The Operator advised "MRM must satisfy comments from two regulatory bodies before being able to finalise the plan. The intent is to have one plan for use onsite as opposed to referencing two separate plans that may contradict each other." OFI: Submit a final NOEF Geosynthetic Liner Cover System Plan for approval.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
23.a	23.a	outline a process (including timelines) to test and evaluate (i.e. criteria) the constructability and effectiveness of geosynthetic liner cover options including a geosynthetic liner /compacted clay layer combination;						1				N/A	Not Applicable	Correspondence between Operator and DCCEEW regarding EPBC 2014-7210 -Condition 10b - Submission of Geosynthetic Liner Testing Plan (in the audit period) Correspondence between Operator and DITT relating to Variation of Authorisation 0059 Condition 23 – Geosynthetic Liner Cover System Testing Plan (before the audit period).	Considered N/A as the required plan was due and submitted before the audit period. The Operator advised "A revised GSL Testing Plan was also submitted to the Commonwealth Department of Climate Change, Energy, Environment and Water for approval under EPBC 2014/7210 Condition 10b. [...] The revised GSL Testing Plan has not yet been approved."
23.b	23.b	include implementation of trials on rehabilitated stages of the NOEF;						1				N/A	Not Applicable	Correspondence between Operator and DCCEEW regarding EPBC 2014-7210 -Condition 10b - Submission of Geosynthetic Liner Testing Plan (in the audit period) Correspondence between Operator and DITT relating to Variation of Authorisation 0059 Condition 23 – Geosynthetic Liner Cover System Testing Plan (before the audit period).	Considered N/A as the required plan was due and submitted before the audit period. The Operator advised "A revised GSL Testing Plan was also submitted to the Commonwealth Department of Climate Change, Energy, Environment and Water for approval under EPBC 2014/7210 Condition 10b. [...] The revised GSL Testing Plan has not yet been approved."
23.c	23.c	identify relevant performance parameters that must be monitored, including but not limited to:						1				N/A	Not Applicable	Correspondence between Operator and DCCEEW regarding EPBC 2014-7210 -Condition 10b - Submission of Geosynthetic Liner Testing Plan (in the audit period) Correspondence between Operator and DITT relating to Variation of Authorisation 0059 Condition 23 – Geosynthetic Liner Cover System Testing Plan (before the audit period).	Considered N/A as the required plan was due and submitted before the audit period. The Operator advised "A revised GSL Testing Plan was also submitted to the Commonwealth Department of Climate Change, Energy, Environment and Water for approval under EPBC 2014/7210 Condition 10b. [...] The revised GSL Testing Plan has not yet been approved."
23.c.i	23.c.i	slope stability during extreme events;						1				N/A	Not Applicable	Correspondence between Operator and DCCEEW regarding EPBC 2014-7210 -Condition 10b - Submission of Geosynthetic Liner Testing Plan (in the audit period) Correspondence between Operator and DITT relating to Variation of Authorisation 0059 Condition 23 – Geosynthetic Liner Cover System Testing Plan (before the audit period).	Considered N/A as the required plan was due and submitted before the audit period. The Operator advised "A revised GSL Testing Plan was also submitted to the Commonwealth Department of Climate Change, Energy, Environment and Water for approval under EPBC 2014/7210 Condition 10b. [...] The revised GSL Testing Plan has not yet been approved."
23.c.ii	23.c.ii	cover performance as a result of heat effects;						1				N/A	Not Applicable	Correspondence between Operator and DCCEEW regarding EPBC 2014-7210 -Condition 10b - Submission of Geosynthetic Liner Testing Plan (in the audit period) Correspondence between Operator and DITT relating to Variation of Authorisation 0059 Condition 23 – Geosynthetic Liner Cover System Testing Plan (before the audit period).	Considered N/A as the required plan was due and submitted before the audit period. The Operator advised "A revised GSL Testing Plan was also submitted to the Commonwealth Department of Climate Change, Energy, Environment and Water for approval under EPBC 2014/7210 Condition 10b. [...] The revised GSL Testing Plan has not yet been approved."
23.c.iii	23.c.iii	tolerance of the geosynthetic liner to expected differential settlement;						1				N/A	Not Applicable	Correspondence between Operator and DCCEEW regarding EPBC 2014-7210 -Condition 10b - Submission of Geosynthetic Liner Testing Plan (in the audit period) Correspondence between Operator and DITT relating to Variation of Authorisation 0059 Condition 23 – Geosynthetic Liner Cover System Testing Plan (before the audit period).	Considered N/A as the required plan was due and submitted before the audit period. The Operator advised "A revised GSL Testing Plan was also submitted to the Commonwealth Department of Climate Change, Energy, Environment and Water for approval under EPBC 2014/7210 Condition 10b. [...] The revised GSL Testing Plan has not yet been approved."
23.c.iv	23.c.iv	veracity of cover longevity predictions;						1				N/A	Not Applicable	Correspondence between Operator and DCCEEW regarding EPBC 2014-7210 -Condition 10b - Submission of Geosynthetic Liner Testing Plan (in the audit period) Correspondence between Operator and DITT relating to Variation of Authorisation 0059 Condition 23 – Geosynthetic Liner Cover System Testing Plan (before the audit period).	Considered N/A as the required plan was due and submitted before the audit period. The Operator advised "A revised GSL Testing Plan was also submitted to the Commonwealth Department of Climate Change, Energy, Environment and Water for approval under EPBC 2014/7210 Condition 10b. [...] The revised GSL Testing Plan has not yet been approved."
23.c.v	23.c.v	likely long-term maintenance requirements.						1				N/A	Not Applicable	Correspondence between Operator and DCCEEW regarding EPBC 2014-7210 -Condition 10b - Submission of Geosynthetic Liner Testing Plan (in the audit period) Correspondence between Operator and DITT relating to Variation of Authorisation 0059 Condition 23 – Geosynthetic Liner Cover System Testing Plan (before the audit period).	Considered N/A as the required plan was due and submitted before the audit period. The Operator advised "A revised GSL Testing Plan was also submitted to the Commonwealth Department of Climate Change, Energy, Environment and Water for approval under EPBC 2014/7210 Condition 10b. [...] The revised GSL Testing Plan has not yet been approved."
23.d	23.d	Include reporting of trial results and monitoring outcomes:						1					Refer to sub conditions		
23.d.i	23.d.i	within three years from the submission of the plan;						1				N/A	Not Applicable		Future item. Due prior to 12 November 2025.
23.d.ii	23.d.ii	every three years thereafter, to the relevant independent panel and the Community Reference Group for review, and shall be audited by the Independent Monitor. The Operator must provide a written response to the Department, if review from the relevant panels and Community Reference Group require matters to be addressed;						1				N/A	Not Applicable		Future item. Due three years after submission related to condition 23.d.i. Independent panel was not established in the audit period and the plan was not provided to the CRG. A review by the Independent Monitor is not due and has not been undertaken.
23.d.iii	23.d.iii	must be used to inform the AMP and closure planning for the mine.	1					1				N/A	Not Applicable	NOEF Geosynthetic Liner Cover System Plan dated Oct2022. Section 1.1 of the Liner Plan states: "It is intended that the results from testing, modelling and analysis in this plan will be used to finalise the detailed design for the NOEF cover system, and inform the Adaptive Management Plan (AMP) and closure planning for the Mine."	Future item as the plan has not been approved.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Evidence		Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement										Score	Compliance level	
23.e	23.e	The NOEF geosynthetic liner cover system plan, once approved by the Department, must be implemented by the Operator.	1					1				N/A	Not Applicable	Future item as the plan is not approved. The Operator advised "A revised GSL Testing Plan was also submitted to the Commonwealth Department of Climate Change, Energy, Environment and Water for approval under EPBC 2014/7210 Condition 10b. [...] The revised GSL Testing Plan has not yet been approved."
24	24	By 13 November 2025 (i.e. within five (5) years of the date of authorisation of the Overburden Management Project), the Operator must submit a strategy to the Department that details the long-term disposal management of tailings into the mine pit void, submerged under a suitable depth of pit water. The plan must:	1		1	1						N/A	Not Applicable	Future item. Five years from 13Nov2020. The Operator has commenced early work planning on this strategy and submitted a version to the Commonwealth.
24.a	24.a	include strategies on the tailings reprocessing and assessment of residual chemical contaminants that may likely impact on meeting the requirements of Condition 16;	1			1						N/A	Not Applicable	Future item. Five years from 13Nov2020.
24.b	24.b	be reviewed by the relevant independent panel.	1			1						N/A	Not Applicable	Future item. Five years from 13Nov2020.
25	25	Once approved by the Department, the strategy developed in accordance with Condition 24 must be used to develop a plan five (5) years prior to cessation of mining, for approval by the Department. Any requirement to vary the approved disposal strategy or plan must be:	1									N/A	Not Applicable	Future item. Condition triggered by condition 24, which is not until required until five years from 13Nov2020.
25.a	25.a	applied for in writing to the Minister;	1									N/A	Not Applicable	Future item. Condition triggered by condition 24, which is not until required until five years from 13Nov2020.
25.b	25.b	based on leading practice and site conditions;	1									N/A	Not Applicable	Future item. Condition triggered by condition 24, which is not until required until five years from 13Nov2020.
25.c	25.c	supported by the relevant independent panel;	1									N/A	Not Applicable	Future item. Condition triggered by condition 24, which is not until required until five years from 13Nov2020.
25.d	25.d	notified to the NT EPA in accordance with Condition 15.	1									N/A	Not Applicable	Future item. Condition triggered by condition 24, which is not until required until five years from 13Nov2020.
26	26	By 13 November 2021 (i.e. within 12 months of date of authorisation of the Overburden Management Project), the Operator must review and synthesise all available and relevant information to submit a revised water monitoring plan (surface water and groundwater) to the Department for review, ensuring the plan is capable of identifying and quantifying impacts of mining activities on the environmental values and beneficial uses of the McArthur River.	1							1		N/A	Not Applicable	N/A as completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
27	27	The plan required under Condition 26 must:											Refer to sub conditions	
27.a	27.a	allow for assessment of compliance with Condition 16 and include sufficient detail to inform/develop/update the AMP;	1							1		N/A	Not Applicable	N/A as due and completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
27.b	27.b	at a minimum:											Refer to sub conditions	N/A as due and completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
27.b.i	27.b.i	quantify loads of lead and zinc entering the McArthur River each year;								1		N/A	Not Applicable	N/A as due and completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
27.b.ii	27.b.ii	quantify impacts to water quality and trends in groundwater to determine that objectives and targets are being met, including the effectiveness of source control to reduce loads to as low as is reasonably practicable;								1		N/A	Not Applicable	N/A as due and completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
27.b.iii	27.b.iii	develop appropriate future trigger values for waterways on the mine site and the McArthur River in accordance with the ANZECC Guidelines. In the interim, the trigger values in the most current WDL shall be used;								1		N/A	Not Applicable	N/A as due and completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
27.c	27.c	be prepared in consultation with the NT EPA;	1							1		N/A	Not Applicable	Water Management Plan dated 13May2022. Correspondence between Operator and DITT relating to Water Management Plan (before the audit period). Conditions 16+17 - DITT Mining Officer Notes Jan2023 (before the audit period). Correspondence between DITT and Operator relating to TRM: McArthur River Mine - NT EPA review of Water Management Plan and Aquatic Ecology Management Plan (before the audit period). Correspondence between Operator and DITT stated "Additionally, MRM has sought an extension to the consultation timeframe of VOA 0059 Condition 27c) to 31 July 2022 to enable consultation to be expanded to include the NT EPA (in addition to that previously completed with the Department of Environment, Parks and Water Security [DITT])." The DITT Mining Officer notes had for Nov2022 that DITT had determined that NT EPA did need to be consulted. The notes indicated that in Dec2022 the Operator presented at an NT EPA meeting. No evidence has been provided showing that NT EPA had been consulted prior to the initial submission of the WMP or by the extension date requested of 31Jul2022.	This condition is marked as completed in the Authorisation dated 17May2023. Correspondence from DITT to Operator states "Additionally, I note there were some comments specific to the water monitoring plan made by NT EPA members during the meeting that you attended, which should be considered in any revision of your plan, including: · the addition of organic matter as a parameter for the monitoring program to explain some findings · the inclusion of certified reference material for laboratory analysis, which would be used to give confidence that the analysis is accurate." OBS: Comments from the NT EPA should be considered for incorporation into the WMP.
27.d	27.d	be prepared in consultation with the relevant independent panel;	1							1		N/A	Not Applicable		No independent technical panels, required under Condition 21, have been set up.
27.e	27.e	once approved by the Department, be implemented by the Operator;	1							1		N/A	Not Applicable	WRM 2023-2024 Annual Site Water Balance for the McArthur River Mine Forecast Report dated Jan2024 2023/24 Bing Bong Loading Facility Site Runoff Pond Wet Season TARPs Worksheet dated Jan2024 WRM 2023-2024 Annual Site Water Balance for the Bing Bong Loading Facility Report dated Jan2024	Evidence of implementation was provided by the Operator but as the plan has not been approved by DITT this condition is N/A
27.f	27.f	be subject to consultation with the relevant independent panel in the event that the plan requires updating (e.g.to maintain the currency of the monitoring network);	1							1		N/A	Not Applicable		The Operator advised "The water management plan did not require updating during the reporting period." and "The NT EPA comments will be considered in the next revision of the Water Management Plan, to be developed in consultation with the relevant panel as required by Condition 27. In order to expedite development and minimise administrative burden, MRM plans to develop a single updated Adaptive Management Plan compilation (including Water Management Plan) for independent panel and NT Department review."
27.g	27.g	ensure results of the program:											Refer to sub conditions		
27.g.i	27.g.i	are reported annually to the Department;	1							1		4	Full Compliance	EMR 2023-2024 Correspondence between Operator and DITT relating to 2023-2024 EMR Submission (after the audit period).	As the Water Management Plan that this condition refers to is not approved, it does not need to be implemented and this condition is considered a future requirement. However, the Operator reports the results annually via the EMR and through the data submission required by condition 7, although no data submission was made the in audit period. OBS: Refer to OFI in condition 7.a.
27.g.ii	27.g.ii	are audited by the Independent Monitor every three years;	1							1		N/A	Not Applicable		DITT advised that this condition is not referring to content of the plan and is not the responsibility of the Operator.
27.g.iii	27.g.iii	be published on the Operator's website.	1							1		N/A	Not Applicable		As the Water Management Plan that this condition refers to is not approved, it does not need to be implemented and this condition is considered a future requirement.
28	28	By 13 May 2022 (i.e. within 18 months of date of authorisation of the Overburden Management Project), the Operator must submit a research and investigation program to the Department for review that establishes the concentration of mine-derived contaminants at which chronic and acute impacts to biota of relevance to the McArthur River system occur using recognised and accepted eco-toxicological testing, and:	1							1		N/A	Not Applicable		The Operator submitted the Ecotoxicology Research and Investigation Program before the audit period and this is considered compliant. This condition is marked as completed in the Authorisation dated 17May2023.
28.a	28.a	the results of this program must be integrated with other relevant programs, monitoring programs and management plans;	1							1		N/A	Not Applicable		The Operator submitted the Ecotoxicology Research and Investigation Program before the audit period and this is considered compliant. This condition is marked as completed in the Authorisation dated 17May2023.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
28.b	28.b	the plan once approved by the Department must be implemented by the Operator.	1							1		4	Full Compliance	Email from DITT to Operator subject: Auth 0059 Condition 28 - MRM Ecotox research and investigation program dated Aug2022 Adaptive Management Plan Version E dated 27May2022. WDL174-13 McArthur River Mining dated 27May2021. EMR 2023-2024 Implementation of the Ecotoxicology Research and Investigation Program is demonstrated in the AMP and EMR 2023-2024.	The Operator advised "Ten of the water quality site-specific guideline values (SSGVs) recommended in the Condition 28 report were accepted and prescribed by the administering authority as site-specific trigger values (SSTVs) in MRM's amended Waste Discharge Licence 174-13. MRM continues to monitor, investigate and report against the site-specific trigger values as conditioned in the latest version of the WDL. The WDL 174 site-specific trigger values also form the basis of a number of Trigger Action Response Plans in the Mine's Adaptive Management Plan. See Table 8 of AMP. This further demonstrates how guideline values from the Condition 28 report have been implemented by MRM in day to day operations."
29	29	By 13 May 2022 the Operator must provide to the department a monitoring program that provides improved understanding of aquatic ecosystems in the McArthur River from changing water flows, levels and quality. The program must:	1							1		N/A	Not Applicable		Considered N/A as the Aquatic Ecology Monitoring Plan was due before the audit period and Rev 1 and 2 were submitted to DITT before the audit period and included the requirements of this condition.
29.a	29.a	be consistent with the aquatic ecology monitoring and management plan required under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) Approval 2014/7210;								1		N/A	Not Applicable		Considered N/A as the Aquatic Ecology Monitoring Plan was due before the audit period and Rev 1 and 2 were submitted to DITT before the audit period and included the requirements of this condition.
29.b	29.b	include monitoring of relevant parameters at appropriate frequencies to allow for implementation of applicable Trigger Action Response Plans (TARPs) included in the Adaptive Management Plan (AMP);								1		N/A	Not Applicable		Considered N/A as the Aquatic Ecology Monitoring Plan was due before the audit period and Rev 1 and 2 were submitted to DITT before the audit period and included the requirements of this condition.
29.c	29.c	be implemented by the Operator, once approved by the Department.								1		N/A	Not Applicable	Correspondence between Operator and DITT relating to Aquatic Ecology Management Plan (before the audit period). Aquatic Ecology Management Plan EPBC ACT APPROVAL 2014/7210 NOVEMBER 2022 (AEMP) Nov2022 (before the audit period). Correspondence between Operator and DITT relating to Draft Aquatic Ecology Management Plan (before the audit period). Correspondence between Operator and DITT relating to Aquatic Ecology Management Plan (before the audit period).	Considered N/A as the plan is yet to be formally approved by DITT. The Operator advised "The plan was not updated over the reporting period. MRM is still working through the independent expert review and DCCEEW acceptance of these comments (as required by EPBC Act approval). The plan will be updated based on any comments and DCCEEW comments and will then be resubmitted to DCCEEW and DITT."
30	30	At all times, the Operator must conduct works consistent with the Northern Territory Aboriginal Sacred Sites Act 1989 and valid AAPA certificate. All conditions of the AAPA certificate must be complied with (including but not limited to NOEF height restrictions), and evidence produced to demonstrate compliance, when requested by the Minister.	1					1				4	Full Compliance	Two examples of survey reports of NOEF. The examples were not dated however showed that the NOEF was below the topography plus 80m. The Operator advised that height checks are conducted and recorded monthly as part of the End of Month process and this is considered compliant.	
31	31	The Operator must not disturb or encroach within 5m of archaeological site MRM4, until a design of the NOEF is agreed in writing by the Department. Consultation between the Operator and Minister for Arts, Culture and Heritage must be undertaken prior to seeking endorsement of the design.	1					1				4	Full Compliance	Aboriginal Cultural Heritage Management Plan dated Feb2023 Whincop Archaeology 2023 Annual Aboriginal Heritage Sites Inspection Report dated Oct2023 EMR 2023-2024 The Annual Aboriginal Heritage Sites Inspection Report dated 18Oct2023 indicates that MRM4 has "no impacts" and the fencing is "good". EMR 2023-2024 states "No disturbance occurred in the area of the MRM4 Cultural Site during the reporting period. The MRM4 Cultural Site has an exclusion fence with appropriate 'no access' signage, at a minimum offset distance of 5 m from the actual site as shown in Plate 2." A drone photo of the area from 1 May 2024 appeared to show no disturbance in the area. No disturbance was observed of MRM4 during the IM site visit in August 2024.	
32	32	By 13 May 2021 (i.e. within six months of date of authorisation of the Overburden Management Project), the Operator must provide a report to the Minister, and AAPA or the Minister for Arts, Culture and Heritage (where relevant) that demonstrates the consultation process undertaken or provide a plan to the Minister that details consultation activities and timeliness to identify and engage with appropriate custodians and traditional owners with an interest in land that would be or may be affected by the Overburden Management Project.	1					1				N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
33	33	By 13 November 2021 (i.e. within 12 months of date of authorisation of the Overburden Management Project), the Operator must develop or revise and submit to the Department for review an existing air quality monitoring plan that monitors sulfur dioxide emissions at an appropriate location between the NOEF and sensitive receptors determined in consultation with NT EPA.	1					1				N/A	Not Applicable		Considered N/A as the AQMP was due and submitted before the audit period and included the requirements of this condition. This condition is marked as completed in the Authorisation dated 17May2023.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments	
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement														
34	34	The air quality monitoring plan required under Condition 33 must include:												Refer to sub conditions		
34.a	34.a	objectives, locations, frequency of monitoring, trigger values and reporting commitments to manage and protect any potential air quality risk to human health outside of the mineral lease;	1					1					N/A	Not Applicable		Considered N/A as the AQMP was due and submitted before the audit period and included the requirements of this condition. This condition is marked as completed in the Authorisation dated 17May2023.
34.b	34.b	evidence of consultation with the NT EPA to be provided at the time of the plan submission;	1					1					N/A	Not Applicable		Considered N/A as the AQMP was due and submitted before the audit period and included the requirements of this condition. This condition is marked as completed in the Authorisation dated 17May2023.
34.c	34.c	once approved by the Department, be implemented by the Operator.	1					1					4	Full Compliance	Monthly SO ₂ reports (online). The IM viewed several dust deposition gauges (DDGs) on site in August 2024. It is noted that DDGs were impacted during flooding and were deployed once access was available to areas. The Operator advised that as part of the March pre-flood event preparations, the van dorn monitors were fuelled up.	Approval was obtained on Aug2022 (before the audit period). Implementation of the approved AQMP is assessed under Schedule D condition 6.a.ii. The Air Monitoring Report for the audit period states "SO ₂ monitoring was conducted at the 'SO2VAN01' monitoring site, which was relocated during the review period to the western edge of the Northern Overburden Emplacement Facility, and at the 'SO2VILL02' located at the workers village."
35	35	The results of the air quality plan for each reporting frequency must be:												Refer to sub conditions		
35.a	35.a	made available on the Operator's website. Initial monitoring results to be reported within 6 months of the plan being accepted by the Department or an alternative timeframe as agreed in writing with the Department;	1					1					4	Full Compliance	Monthly SO ₂ reports (online). Sighted real time data for SO2VAN01 and monthly reports for SO2VAN01 and SO2VILL02 (with the exception of a January report) on Operator's website while preparing the previous AEPAR (in the audit period) and after the audit period (Aug2024).	
35.b	35.b	incorporated where relevant in the AMP.	1					1					4	Full Compliance	Adaptive Management Plan Version E dated 27May2022. The AQMP has been incorporated into the AMP before the audit period. No changes were identified in the audit period indicating a requirement to update the AMP.	The Operator advised "There were no revisions to the Adaptive Management Plan over the reporting period. The AMP is a management plan that includes a TARP for air quality, which is designed to ensure negligible air quality impacts to community health. This TARP was based on the air quality management plan required by Condition 33 & 34." The Operator advised that the SO ₂ monitors have trigger levels relevant to an offlease position but are located on lease and so they are considering potential to change those.
36	36	By 13 November 2022 (i.e. within 24 months of date of authorisation of the Overburden Management Project), the Operator must submit a monitoring and management plan to the Department for review that manages risks of metal toxicity from human consumption of aquatic fauna obtained from the McArthur River. The plan must:								1				N/A	Not Applicable	Considered N/A as the Aquatic Ecology Monitoring Plan was due before the audit period and Rev 1 and 2 were submitted to DITT before the audit period and included the requirements of this condition.
36.a	36.a	determine if aquatic fauna obtained from any reach of the McArthur River, that may be impacted by the mine's operations, is safe to eat;								1				N/A	Not Applicable	Considered N/A as the Aquatic Ecology Monitoring Plan was due before the audit period and Rev 1 and 2 were submitted to DITT before the audit period and included the requirements of this condition. This condition is marked as completed in the Authorisation dated 17May2023.
36.b	36.b	include demonstrated evidence of consultation with NT EPA;								1				N/A	Not Applicable	Considered N/A as the Aquatic Ecology Monitoring Plan was due before the audit period and Rev 1 and 2 were submitted to DITT before the audit period and included the requirements of this condition. This condition is marked as completed in the Authorisation dated 17May2023.
36.c	36.c	detail public reporting of the monitoring results, including at appropriate locations in the Borroloola region;								1				N/A	Not Applicable	Considered N/A as the Aquatic Ecology Monitoring Plan was due before the audit period and Rev 1 and 2 were submitted to DITT before the audit period and included the requirements of this condition. This condition is marked as completed in the Authorisation dated 17May2023.
36.d	36.d	include provisions for implementation and maintenance of signage at waterways at the MRM site in accordance with the requirements of Condition 62 until the risk of contamination from consumption of this aquatic fauna is demonstrated to be acceptable by the Department;								1				N/A	Not Applicable	Considered N/A as the Aquatic Ecology Monitoring Plan was due before the audit period and Rev 1 and 2 were submitted to DITT before the audit period and included the requirements of this condition. This condition is marked as completed in the Authorisation dated 17May2023.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
36.e	36.e	once approved by the Department, be implemented by the Operator.	1							1		N/A	Not Applicable	DITT approved verbally at the Technical Working Group Jan2023 but it is not formally approved.	Considered N/A as the plan is yet to be formally approved by DITT.
37	37	By 13 November 2022 (i.e. within 24 months of date of authorisation of the Overburden Management Project), the Operator must submit a plan to the Department for review that outlines a monitoring program for management of Largetooth Sawfish. The plan must:								1		N/A	Not Applicable		Considered N/A as a monitoring and management plan for the largetooth sawfish that included the requirements of this condition was included in the Aquatic Ecology Management Plan due and submitted before the audit period.
37.a	37.a	include a sampling strategy for Largetooth Sawfish that is non-lethal;								1		N/A	Not Applicable		Considered N/A as a monitoring and management plan for the largetooth sawfish that included the requirements of this condition was included in the Aquatic Ecology Management Plan due and submitted before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
37.b	37.b	include details of parameters and criteria, from which the results could be used to define specific (measurable and time-bound) performance indicators to abate a significant decline in Largetooth Sawfish movement;								1		N/A	Not Applicable		Considered N/A as a monitoring and management plan for the largetooth sawfish that included the requirements of this condition was included in the Aquatic Ecology Management Plan due and submitted before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
37.c	37.c	include trigger levels for investigation and implementation of management measures;								1		N/A	Not Applicable		Considered N/A as a monitoring and management plan for the largetooth sawfish that included the requirements of this condition was included in the Aquatic Ecology Management Plan due and submitted before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
37.d	37.d	once approved by the Department, be implemented by the Operator.								1		N/A	Not Applicable	DITT approved verbally at the Technical Working Group Jan2023 but it is not formally approved.	Future item. No formal approval of the plan has occurred.
38	38	Within six months following the establishment of the required panels and groups in accordance with Condition 21, the Operator must:											Refer to sub conditions		
38.a	38.a	develop environmental objectives for a Care and Maintenance Plan in consultation with the relevant Independent Panels, CRG, custodians and traditional owners;	1									N/A	Not Applicable		Future item as while the CRG was established in the audit period, no independent panels had been established in the audit period so this condition is not triggered.
38.b	38.b	submit this to the Department for review.	1									N/A	Not Applicable		Future item as while the CRG was established in the audit period, no independent panels had been established in the audit period so this condition is not triggered.
39	39	By 13 November 2025 (i.e. within five years of date of authorisation of the Overburden Management Project), the environmental objectives arising from Condition 38 must be used to develop a Care and Maintenance Plan in consultation with the Department.	1									N/A	Not Applicable		Future item. Within five years from 13 Nov2020. Note May 2022 Authorisation refers to condition 37, however, June 2021 Authorisation and May 2023 Authorisation refer to condition 38.
40	40	The Operator must facilitate an independent third-party assessment of the security for rehabilitation of disturbances resulting from authorised activities in the approved MMP that is consistent with requirements under Conditions 10, 11 and 12, to the satisfaction of the Department, and every 3 years thereafter if the security has been re-calculated or adjusted.	1									N/A	Not Applicable	MRR Mine Rehabilitation Planning Security Audit 2023 dated Dec2022 Letter from Operator to DITT subject: McArthur River Mining – 2023 Unplanned Closure Plan and Independent Security Audit dated Jan2023	McArthur River Mining – 2023 Unplanned Closure Plan and Independent Security Audit was submitted to DITT Jan2023 (before the audit period) and approved on 17May2023 (in the audit period). There were no independent third party assessments of the security in the audit period.
41	41	The Operator, consistent with Condition 40, must:											Refer to sub conditions		
41.a	41.a	commission a qualified person to review the security amount whose appointment is accepted by the Minister;	1									N/A	Not Applicable		Triggered 3 years after the 13Nov2020, which was 13Nov2023 that was in the audit period. Considered N/A as it was undertaken before the audit period. Independent third-party assessments of the security have been done as per the evidence included for conditions 10 to 13.

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
41.b	41.b	ensure that the security is reviewed and delivered to the Department within six months of acceptance of the qualified person.	1									N/A	Not Applicable		Triggered 3 years after the 13Nov2020, which was 13Nov2023 that was in the audit period. Considered N/A as it was undertaken before the audit period. The Operator considers that they have complied with this condition as their submissions in previous audit periods were by qualified persons accepted previously by DITT. OBS: DITT should consider changing the wording of this condition if reapproval of the qualified person to undertake the independent third-party assessment of the security is not required.
42	42	For every approved MMP and MMP amendment, the Operator must provide a revised copy of the approved document that removes commercially sensitive information, includes an overview and environmental section, and is suitable for publication on the Department's website, or provide written approval to make the complete documents publicly accessible.	1									3	Part Compliance (High)	With the approval of the authorisation on 17May2023 DITT requested a revised copy of the approved MMP amendment (dated Jan 2023) that removes commercially sensitive information suitable for publication on the Department's website. While the 17May2023 authorisation is uploaded on DITT's website, a suitable version of the MMP amendment (dated Jan 2023) for upload on the website has not been provided by the Operator in the audit period.	The Operator advised "MRM is in the process of writing to the Department, requesting that this version not be uploaded to the Departments website as it is only a small amendment that has been superseded by the 2024 MMP that was recently approved." OFI: For every approved MMP and MMP amendment, provide the approved document that removes commercially sensitive information, includes an overview and environmental section, and is suitable for publication on the NT Government's website, or provide written approval to make the complete documents publicly accessible.
43	43	The Operator must assist, as required, the Department to establish and operate a Community Reference Group (CRG).	1									4	Full Compliance	Correspondence between Operator and DITT regarding CRG and independent panels of experts and notes from the meeting 14 and 26 July 2023 and forms required (during the audit period). MRM Community Reference Group Public Communique dated Feb2024. Evidence was provided that the Operator has participated in the CRG and assisted DITT where appropriate.	The CRG held their inaugural meeting on-site 27Jul2023 which was a familiarisation visit. The Operator advised that they have discussed the March flooding event with the community at the CRG meeting in May 2024 (outside the audit period).
44	44	By 13 May 2022, (i.e. within 18 months of date of authorisation of the Overburden Management Project), the Operator must undertake a synthesis of all environmental monitoring programs (Condition 26) that assess impacts of mining activities on the environmental values and beneficial uses of the McArthur River, in accordance with NT EPA's overarching environmental outcome. The revised monitoring programs must:	1							1		N/A	Not Applicable		Considered N/A as this condition was due and completed before the audit period. The Operator believes that discussion in the EMR fulfills this requirement and verbal agreement was obtained from DITT. This condition is marked as completed in the Authorisation dated 17May2023.
44.a	44.a	use outputs generated for review and synthesis of water monitoring programs, as part of addressing Condition 26;	1							1		N/A	Not Applicable		Considered N/A as this condition was due and completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
44.b	44.b	demonstrate how all monitoring data collected under various monitoring programs and management plans were considered and synthesised (e.g. conceptual site models, trend analysis);	1							1		N/A	Not Applicable		Considered N/A as this condition was due and completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
44.c	44.c	be incorporated in the AMP.	1							1		N/A	Not Applicable		Considered N/A as this condition was due and completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
45	45	By 13 May 2022, (i.e. within 18 months of date of authorisation of the Overburden Management Project), the Operator must submit an AMP to the Department:	1									N/A	Not Applicable		This was due and the AMP submitted before the audit period.
45.a	45.a	The AMP must include the following key elements:											Refer to sub conditions		This condition is marked as completed in the Authorisation dated 17May2023.
45.a.i	45.a.i	clear, measurable environmental objectives for all significant environmental risks and potential impacts;	1									N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
45.a.ii	45.a.ii	measurable performance indicators to show that objectives are on target to be met;	1									N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
45.a.iii	45.a.iii	pre-determined triggers to warn of potential for performance indicators to be exceeded, as informed by monitoring;	1									N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement										Score	Compliance level			
45.a.iv	45.a.iv	realistic and achievable contingency interventions to maintain performance indicators if triggers are consistently exceeded;	1										N/A	Not Applicable	This condition is marked as completed in the Authorisation dated 17May2023.	
45.a.v	45.a.v	clearly defined management measures/actions that are capable of being implemented in a timely way to meet performance indicators and environmental objectives;	1										N/A	Not Applicable	This condition is marked as completed in the Authorisation dated 17May2023. OBS: Further detail on potential contingency measures timelines for the implementation of management actions in Table 9 (Adaptive Management Plan (AMP) Revision E) should be provided.	
45.a.vi	45.a.vi	monitoring in accordance with relevant Recommendations in NT EPA Assessment Report 86 to determine whether management measures are effective and to inform the need for adjustments to management measures or need for alternatives;	1										N/A	Not Applicable	This condition is marked as completed in the Authorisation dated 17May2023. OBS: Incorporate in the AMP further information on the processes to assess the effectiveness of the Monitoring Programs and enable adaptive adjustment, including further information on the interactions between the annual EMR and the AMP.	
45.a.vii	45.a.vii	a continual feedback system to inform appropriate actions to be initiated when triggered and environmental objectives are always being met;	1										N/A	Not Applicable	This condition is marked as completed in the Authorisation dated 17May2023.	
45.a.viii	45.a.viii	continual development of new management actions as required based on knowledge gained from experience at the site and elsewhere across industry.	1										N/A	Not Applicable	This condition is marked as completed in the Authorisation dated 17May2023.	
45.b	45.b	The AMP must be reviewed by the Independent Monitor or an appropriately qualified, independent third party, and updated with inputs from the CRG (once established under Condition 43);	1										4	Full Compliance	AMP version E dated May2022. Independent Monitor's Review of the Adaptive Management Plan dated July 2023. "Review of the Adaptive Management Plan" final dated July 2023 is the Independent Monitor's review of the AMP (Revision E) undertaken within the three year period since the Independent Monitor's review of the initial AMP (Revision 0), completed in June 2020.	The CRG was established in the audit period. The Operator advised "MRM intends to socialise the Adaptive Management Plan with the Community Reference Group (CRG) when an appropriate time allows for consultation. Note that technical information such as the Adaptive Management Plan will need to be strategically delivered to the CRG and potentially over a few meetings to ensure content can be digested by the group and feedback incorporated. Over the past few meetings, the agenda has been focussed on getting the CRG up to speed on general environmental performance, closure pans and the recent weather event associated with Cyclone Megan. The Adaptive Management Plan will be a topic of future meetings." As per condition 46.g, the next Independent Monitor's review of the AMP is due June 2026.
45.c	45.c	all review findings and CRG input requirements are to be provided to the Department for approval.	1										N/A	Not Applicable	Independent Monitor's Review of the Adaptive Management Plan dated July 2023. No CRG comments to date. Pending submission of the combined IM and CRG comments. Delayed establishment of the CRG has resulted in this task being delayed. The Operator advised "The IM's review comments will be addressed in the next revision of the Adaptive Management Plan, to be developed and submitted following consultation with the relevant panel on the Water Management Plan as required under Condition 27. Note that any changes to the Water Management Plan would likely trigger changes to the Adaptive Management Plan."	
46	46	Unless agreed otherwise in writing by the Department, the AMP must:												Refer to sub conditions		
46.a	46.a	clearly set out the required management objectives and performance indicators;	1										N/A	Not Applicable	Submitted to DEPWS as part of WDL requirement and was submitted to DITT (before the audit period).	
46.b	46.b	provide clarity on the triggers for changes to management actions, and responsibility and evidentiary basis for decision-making;	1										N/A	Not Applicable	Submitted to DEPWS as part of WDL requirement and was submitted to DITT (before the audit period).	
46.c	46.c	establish the timeframe for initiation of certain actions if triggers are exceeded, including decisions to discontinue an activity and clarify responsibility and evidentiary basis for decision-making;	1										N/A	Not Applicable	Submitted to DEPWS as part of WDL requirement and was submitted to DITT (before the audit period). OBS: Incorporate more detail on the timeframes for action/s if Trigger Action Response Plan (TARP) triggers are exceeded in the AMP.	
46.d	46.d	establish a process for adjusting triggers that includes the regulator;	1										N/A	Not Applicable	Submitted to DEPWS as part of WDL requirement and was submitted to DITT (before the audit period).	

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Evidence		Comments	
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement										Score	Compliance level		
46.e	46.e	establish transparent monitoring, reporting and review requirements;	1									N/A	Not Applicable	Submitted to DEPWS as part of WDL requirement and was submitted to DITT (before the audit period). OBS: Incorporate more information to outline how transparency in monitoring, reporting and review is provided to show openness and accountability in the AMP.	
46.f	46.f	establish processes to achieve transparency and stakeholder engagement in AMP design and implementation that includes NT EPA, DAWE and CRG;	1									N/A	Not Applicable	Submitted to DEPWS as part of WDL requirement and was submitted to DITT (before the audit period).	
46.g	46.g	set out the mechanism for periodic review by Independent Monitor, which must not exceed a frequency of every three years;	1									N/A	Not Applicable	Submitted to DEPWS as part of WDL requirement and was submitted to DITT (before the audit period).	
46.h	46.h	be provided to the Department for re-approval in the event that any material changes are made to the AMP.	1									N/A	Not Applicable	The Operator advised "No changes were made to the AMP during the reporting period." The Operator advised "The IM's review comments will be addressed in the next revision of the Adaptive Management Plan, to be developed and submitted following consultation with the relevant panel on the Water Management Plan as required under Condition 27. Note that any changes to the Water Management Plan would likely trigger changes to the Adaptive Management Plan."	
47	47	The Operator must provide written notice to the Minister and to the NT EPA where trends indicate performance indicators and environmental objectives will not, or are unlikely to be, met by implementing the AMP.	1									4	Full Compliance	EMR 2023-2024 EMR 2023-2024 states "A set of mitigation measures were developed specifically to manage the risks and ensure the environmental objectives continue to be maintained, including protecting the McArthur River beneficial uses and community values. These controls have been implemented throughout the reporting period where appropriate." EMR 2023-2024 states "It can be concluded that the Mine's key environmental objective "Protect the beneficial uses and community values adjacent to the BBLF and transshipment corridor from impacts associated with MRM's operations" continues to be met." Related to Metal and Metalloid Concentrations in Near Shore Sediment, the EMR 2023-2024 states "Overall, the survey concluded that the current environmental risk is low, though the increasing trends in lead and zinc concentrations indicate a need for improved management practices to prevent future environmental risks." Although some improved management practices should be initiated, there has been no indication that trends are showing performance indicators and environmental objectives won't be met.	May 2023 Authorisation includes "under clause 14A of the <i>Environmental Assessment Administrative Procedures 1984</i> "
Independent Certifying Engineer (ICE)															
48	48	The Operator must appoint an Independent Certifying Engineer (ICE) to:											Refer to sub conditions		

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
48.a	48.a	warrant and accept both the design and construction works;	1			1		1				3	Part Compliance (High)	<p>NOEF ICE Role Proposal for Services Report dated Jun2021. EOR Contract #11007275 dated 14Sep2023 and VA02 dated May2024. Consultancy Services Contract #11007275 dated Mar2023. Peer Review of NOEF Annual Construction Report 2023 MRM Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024. TSF Cell 2 Stage 8 – Raise to RL 10064 Detailed Design Report MRM Pty Ltd Aug2023 (neither J Castle or B Hanslow signed). TSF Cell 1 Stage 6 – Raise to RL 10061 Detailed Design Report MRM Pty Ltd Oct2023 (J Castle is an author but not signed off by B Hanslow). SITE INSTRUCTIONS AND NOTES_SI 2023_002 – Cell 2 Stage 8 Raise Construction Cell 2 Eastern Wall Revised Buttress Design dated Sep2023 Letter GHD to Operator subject TSF Construction Works, May 2023 - April 2024, Engineer of Record Oversight dated Aug2024.</p> <p>Letter GHD to Operator subject TSF Construction Works, May 2023 - April 2024, Engineer of Record Oversight dated Aug2024 states "This letter confirms the MRM Engineer of Record (EoR) oversight for the works undertaken between the 1st of May 2023 and the 30th of April 2024 at the Tailings Storage Facility (TSF) at McArthur River Mine (MRM), in accordance with Clause 48 of MRM's Variation of Authorisation (VOA). A GHD EoR Delegate (under the direction of the EoR) was on-site throughout the reporting period for construction to complete hold point releases and witness the works, in accordance with the EOR Contract (Contract Number #11007275)."</p> <p>This condition is compliant for the TSF Domain but part compliant (high) for the NOEF Domain.</p>	<p>This condition previously included 'without limitation on responsibility'.</p> <p>The ICE role is going out to tender. Peer Review of NOEF Annual Construction Report 2023 states "The regulator (Department of Industry, Tourism and Trade, or DITT) requires MRM to have an appropriately qualified independent engineer to be involved in the design and construction process. GHD Pty Ltd (GHD) have therefore been engaged by MRM to provide engineering services and certification for the various projects associated with the NOEF." NOEF Projects (construction team): Peer Review of NOEF Annual Construction Report 2023 states "The Projects team were able to successfully close out all relevant QA/QC documentation for the work areas completed within 2023, providing the required information and inspections to close out each hold and witness point for construction to date. Based on routine site inspections, observations and review of QA/QC documentation, the construction works by the Projects team for 2023 in the Central East Bravo, North East Alpha, South East Alpha and North East Bravo stages was completed in general accordance with the specifications and are consistent with the design intent." A list of recommendations was then stated. NOEF Operations: Peer Review of NOEF Annual Construction Report 2023 states "Not all work areas constructed in 2023 can be commented on at the time of writing this report given the number of outstanding ITP's still to be submitted to the ICE for review." A list of recommendations was then stated.</p> <p>OFI: The Operator to complete NOEF Operations ITPs in a timely manner to allow the ICE to warrant and accept the construction works.</p>
48.b	48.b	be present during all phases of construction where required in the approved MMP (including at hold points) and oversee and certify the works that they meet design specifications;	1			1		1				4	Full Compliance	<p>Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024 TSF Cell 2 Construction Daily Report dated Aug2023 South Buttress Foundation Excavation Construction Daily Report dated Jul2023 TSF Cell 2 Raise Construction Daily Report dated Sep2023 TSF Cell 2 Raise Construction Daily Report dated Nov2023 TSF 2023 Cell Raises Hold Point Report dated Feb2024 TSF Construction Progress Report 08Nov2023 - 29Nov2023 dated Nov2023 TSF Construction Quality Report 3Jan2024 - 23Jan2024 dated Jan2024 TSF 2023 Cell Raises Hold Point Report dated Sep2023 TSF Site Observation Form dated Feb2024 Peer Review of NOEF Monthly Construction Report Reports January to April 2024 Letter GHD to Operator subject TSF Construction Works, May 2023 - April 2024, Engineer of Record Oversight dated Aug2024. The ICE advised that work areas are inspected and compared to specification prior to approval, documented using ITPs, monthly construction reports, hold point release forms, layer construction checklists (TSF only) these are also hold points.</p>	<p>Letter GHD to Operator subject TSF Construction Works, May 2023 - April 2024, Engineer of Record Oversight dated Aug2024 states "This letter confirms the MRM Engineer of Record (EoR) oversight for the works undertaken between the 1st of May 2023 and the 30th of April 2024 at the Tailings Storage Facility (TSF) at McArthur River Mine (MRM), in accordance with Clause 48 of MRM's Variation of Authorisation (VOA). A GHD EoR Delegate (under the direction of the EoR) was on-site throughout the reporting period for construction to complete hold point releases and witness the works, in accordance with the EOR Contract (Contract Number #11007275)."</p> <p>There is a hold point release form for the ICE for TSF for all of them with one ITP per raise. There is one ITP per lot for NOEF and some have a hold release form while others are straight into the ITP.</p>
48.c	48.c	approve re-commencement of construction at defined hold points;	1					1				4	Full Compliance	<p>Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024 Peer Review of NOEF Monthly Construction Report Reports January to April 2024 TSF Cell 2 Construction Daily Report dated Aug2023 TSF Cell 2 Raise Construction Daily Report dated Sep2023 TSF Cell 2 Raise Construction Daily Report dated Nov2023 TSF 2023 Cell Raises Hold Point Report dated Feb2024 TSF Construction Progress Report 08Nov2023 - 29Nov2023 dated Nov2023 TSF Construction Quality Report 3Jan2024 - 23Jan2024 dated Jan2024 TSF 2023 Cell Raises Hold Point Report dated Sep2023</p> <p>The ICE stated that quality documents including ITPs are all submitted to ICE for review and approval before finalisation (ICE checked against guideline). Also can add any new hold or witness points as required to benefit construction. Defined hold points are summarised in monthly reports and comment provided regarding them being released to re-commence construction.</p>	

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
48.d	48.d	approve any material changes to the design during construction;	1			1		1				4	Full Compliance	Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024. SITE INSTRUCTIONS AND NOTES_SI 2023_002 – Cell 2 Stage 8 Raise Construction Cell 2 Eastern Wall Revised Buttress Design dated Sep2023. Cell 2 Stage 8 design GHG/MRM responses to ITRB dated Aug2023. Peer Review of NOEF Monthly Construction Report Reports January to April 2024 Evidence was shown of the ICE approving material changes to the design during construction and no instances of this not occurring were identified for the audit period.	The ICE provides input and recommendation but role is to approve or otherwise any proposed changes. The change management process is documented through technical queries and the request for information (RFI) process (depending on complexity of material change). The ICE refers to it as the formal communications process. Technical queries for smaller updates or RFI for bigger changes. These are submitted, reviewed against design, guidelines and an assessment made and either accepted (sometimes with conditions) or declined. In some situations there are multiple revisions. These are summarised in the monthly and annual construction reports. Examples might be the location of VWPs for something minor or major might be a change to foundation level or extent of foundation.
48.e	48.e	verify any monitoring equipment/structure installed or to be installed as part of the construction as specified in the relevant detailed designs remains functional at the conclusion of the construction works;	1			1		1				4	Full Compliance	Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024 NE Bravo CCL Underdrain VWP ITP - 1B - Approved NE Bravo CCL Underdrain VWP ITP - 4B - Approved Letters of the ICE review of TSF piezometer data. Peer Review of NOEF Monthly Construction Report Reports January to April 2024 ITPs, letters of review of TSF piezometer data and discussion with the ICE demonstrated that this condition was met.	Installation of all instruments via ITPs and included in monthly reports. MRM collect data for VWPs manually weekly until attached to datalogger (cables laid progressively as NOEF is constructed progressively) and ICE reviews that quarterly of VWPs at NOEF and TSF. More than 100 VWPs already in place. TSF weekly reviews of the data logger during construction. TSF survey deformation was manual surveys then April tags drone photogrammetry as a reference point. TSF has had inSAR monthly satellite monitoring (since approximately 2022 although timing unsure). This is reviewed monthly by the ICE. NOEF has commenced more recently inSAR monthly satellite monitoring.
48.e.i	48.e.i	in the event such equipment becomes non-functional, then replacement or an ICE approved alternative must be implemented by the Operator;	1			1		1				4	Full Compliance	Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024 NE Bravo CCL Underdrain VWP ITP - 1B - Approved NE Bravo CCL Underdrain VWP ITP - 4B - Approved Letters of the ICE review of TSF piezometer data. Peer Review of NOEF Monthly Construction Report Reports January to April 2024 Peer Review of NOEF Annual Construction Report 2023 states "It was also noted that the VWP cable for SEa_02 was damaged adjacent to the southern corner of the extraction tower sump area and was repaired to ensure its proper operation."	Cable issues with VWP and MRM repaired those and they are retested and they are recalibrated (on the NOEF and TSF).
48.f	48.f	agree in writing, if the Operator wish to appoint an Operator's project manager/resident engineer as an onsite representative, and agree in writing that this does not diminish the ICE's responsibility or liability for the project;	1			1		1				N/A	Not Applicable	Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024	The Operator advised that there were no situations where anyone other than the ICE was the on-site representative and no evidence contrary to that has been observed.
48.g	48.g	on completion of construction, provide a certified "as-constructed" construction report detailing:	1			1						4	Full Compliance	Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024. Letter GHD to MRM dated 12Aug2024 Subject: TSF Construction Works, May 2023 - April 2024, Engineer of Record Oversight. TSF Cell 1 Stage 5 - Raise to RL 10059 m Construction Report dated March 2022. TSF Cell 2 Stage 6 - Raise to RL 10061 m Construction Report May 2022. Letter GHD to MRM dated Aug2024 Subject: TSF Construction Works, May 2023 - April 2024, Engineer of Record Oversight states "At conclusion of the reporting period (30th of April 2024), construction of the Cell 2 Stage 8 Raise has reached practical completion,". Evidence was provided that the TSF Cell 1 Stage 5 and TSF Cell 2 Stage 6 "as-constructed" construction reports were prepared before the audit period (although not submitted to DITT, which is relevant to condition 8). Only one of the structures in the annual list (August 2023) of six structures scheduled to be constructed in the coming year under Condition 8 was completed in the timeframe advised. No as-constructed reports were completed in the audit period.	
48.g.i	48.g.i	all the works undertaken;	1			1		1				N/A	Not Applicable	Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024	
48.g.ii	48.g.ii	evidence of:											Refer to sub conditions		
48.g.ii.a	48.g.ii.a	hold-point sign-offs;	1			1		1				N/A	Not Applicable	Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024	

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
48.g.ii.b	48.g.ii.b	testing carried out (including but not limited to field tests, laboratory tests and statistical tests);	1			1		1				N/A	Not Applicable	Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024	
48.g.ii.c	48.g.ii.c	acceptance criteria applied and compliance of the test results with the acceptance criteria;	1			1		1				N/A	Not Applicable	Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024	
48.g.ii.d	48.g.ii.d	where deviations to the plan have occurred, justification that demonstrates the design intent and performance of the structure has not been compromised.	1			1		1				N/A	Not Applicable	Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024	
49	49	The Operator must ensure that the ICE holds appropriate public and professional indemnity insurance to cover the scope of works associated with the scope of work certified.	1									4	Full Compliance	Certificate of Placement – Public and Products Liability Policy provided is for 31May2023 to 31May2024. (Relevant for the audit period). Certificate of Placement – Professional Indemnity 1 December 2022 at 4.00pm to 1 December 2023 at 4.00pm (Relevant for audit period). Certificate of Placement – Public and Products Liability from 31May2022 to 31May 2023 (Relevant for beginning of audit period). Sighted Professional Indemnity for GHD covering 2024.	
Independent Tailings Review Board (ITRB)															
50	50	The Operator must:											Refer to sub conditions		
50.a	50.a	convene an advisory board (Independent Tailings Review Board or ITRB);				1						4	Full Compliance	TSF Cell 2 Stage 8 Raise to RL 10,063 Independent Technical Review Board Report dated Aug2023 ITRB Site Visit Report February 2024 dated May2024	Bruce Brown, David Williams, Tamie Weaver continue to be the ITRB members and prepared the Cell 2 Stage 8 Raise Report Aug2023 and were on site Feb2024.
50.b	50.b	ensure the ITRB:											Refer to sub conditions		
50.b.i	50.b.i	membership includes independent geotechnical, tailings, and groundwater specialists;				1						4	Full Compliance	TSF Cell 2 Stage 8 Raise to RL 10,063 Independent Technical Review Board Report dated Aug2023 ITRB Site Visit Report February 2024 dated May2024 Curriculum vitae for ITRB members Dr. Tamie Weaver and Prof. David Williams Letter Operator to Department subject RE: MRM ITRB - Appointment of New Tailings Independent review board (ITRB) member (before audit period). Curriculum vitae for ITRB members Dr. Tamie Weaver and Prof. David Williams show their experience to meet this condition. Dr. Bruce Brown's relevant experience that meets this condition is included in the letter Operator to Department subject RE: MRM ITRB - Appointment of New Tailings Independent review board (ITRB) member (before audit period).	Bruce Brown, David Williams, Tamie Weaver continue to be the ITRB members and prepared the Cell 2 Stage 8 Raise Report Aug2023 and were on site Feb2024.
50.b.ii	50.b.ii	meets regularly to advise on operation of the TSF and any future modifications to its design;				1						4	Full Compliance	ITRB Meeting Presentation - May 2024 dated 20Jun2024 (outside audit period) TSF Cell 2 Stage 8 Raise to RL 10,063 Independent Technical Review Board Report dated Aug2023 ITRB Site Visit Report February 2024 dated May2024 (after audit period) ITRB Meeting Presentation - Feb 2024 dated Feb2024 Independent Tailing Review Board Document Comment Tracking Register - TSF Cell 1 Raise dated Dec2023 Email from ITRB to Operator subject: RE: MRM ITRB - Update Meeting dated May2024 (after audit period) Email from ITRB to Operator subject: Review of OMS manual dated Nov2023 Email from ITRB to Operator subject: RE: Cell 1 Raise 6 dated Oct2023 Email from ITRB to Operator subject: MRM ITRB Site Visit February 2024 dated Jun2024 (after audit period) Email from ITRB to Operator subject: MRM ITRB Review of Cell 2 Eastern Embankment Revised Buttress Design dated Jun2024 (after audit period) TSF Cell 2 Stage 8 Raise to RL 10,063 Independent Technical Review Board Report dated Aug2023 states "Provided that the minor matters raised above are adequately addressed by GHD, the Stage 8 Raise Design is endorsed by the ITRB as being more than adequate." All three members attended site on 15 February 2024. A variety of evidence has been sighted that demonstrated the ITRB met in the audit period and advised on operation of the TSF and future modifications.	

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
50.b.iii	50.b.iii	is required to meet within 90 days from commencement of construction to allow sufficient time for review of subsequent modification to the TSF;				1						4	Full Compliance	<p>TSF Cell 2 Stage 8 Raise to RL 10,063 Independent Technical Review Board Report dated Aug2023 Independent Tailing Review Board Document Comment Tracking Register - TSF Cell 1 Raise dated Dec2023 Email from ITRB to Operator subject: MRM ITRB Review of Cell 2 Eastern Embankment Revised Buttress Design dated Jun2024 (after audit period). Correspondence between ITRB internally cced and Operator subject: Re: ITRB Review Requirements. MRM TSF Quarterly Report - Q3 2023 JULY TO SEPTEMBER 2023 - draft. MRM TSF Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft.</p> <p>Based on draft quarterly report, Cell 1 Stage 6 construction commenced September 2023 and Cell 2 Stage 8 commenced August 2023 meeting the within 90 day ITRB review requirement.</p> <p>There was evidence of the Cell 2 Eastern Embankment Revised Buttress Design endorsement.</p> <p>There is evidence that the Operator provided the Buttress expansion letter and intermediate buttress design report to the ITRB in January 2023 and followed up with the ITRB to ensure they had them in April 2023. However, there is no evidence to show that they were reviewed/endorsed by the ITRB. As this is a historic issue from before the audit period, it has not been considered a part compliance for this condition but is covered in Condition 50.e.</p>	The Operator advised "The ITRB provides endorsement of raises prior to them commencing, which MRM would consider to meet this requirement."
50.c	50.c	provide details of the members of the ITRB panel and meeting frequency to the Department for endorsement by the Department;				1						4	Full Compliance	<p>TSF Cell 2 Stage 8 Raise to RL 10,063 Independent Technical Review Board Report dated Aug2023 ITRB Site Visit Report February 2024 dated May2024.</p> <p>Curriculum vitae for ITRB members Dr. Tamie Weaver and Prof. David Williams Letter Operator to Department subject RE: MRM ITRB - Appointment of New Tailings Independent review board (ITRB) member (before audit period).</p> <p>Curriculum vitae for ITRB members Dr. Tamie Weaver and Prof. David Williams show their experience to meet this condition. Dr. Bruce Brown's relevant experience that meets this condition is included in the letter Operator to Department subject RE: MRM ITRB - Appointment of New Tailings Independent review board (ITRB) member (before audit period).</p> <p>The Department advised the Independent Monitor in the 2020 audit that they had endorsed the members of the ITRB. There have been no changes in the audit period.</p>	Bruce Brown, David Williams, Tamie Weaver continue to be the ITRB members and prepared the Cell 2 Stage 8 Raise Report Aug2023 and were on site Feb2024.
50.d	50.d	together with the ICE, provide a written response to the satisfaction of the Department, in the event that future review of the designs by independent experts require additional matters to be addressed;				1						N/A	Not Applicable		No review of the designs by independent experts has occurred.
50.e	50.e	ensure ITRB endorses any future modifications to the TSF in writing, with all ITRB review comments appropriately addressed for both construction and future use of the structure. This includes, but is not limited to:				1						4	Full Compliance	<p>SITE INSTRUCTIONS AND NOTES_SI 2023_002 – Cell 2 Stage 8 Raise Independent Tailing Review Board Document Comment Tracking Register - TSF Cell 1 Raise 6 dated Dec2023 Email from ITRB to Operator subject: RE: MRM ITRB - Update Meeting dated May2024 (after audit period) Email from ITRB to Operator subject: Review of OMS manual dated Nov2023 Email from ITRB to Operator subject: RE: Cell 1 Raise 6 dated Oct2023 Email from ITRB to Operator subject: MRM ITRB Site Visit February 2024 dated Jun2024 (after audit period) Email from ITRB to Operator subject: MRM ITRB Review of Cell 2 Eastern Embankment Revised Buttress Design dated Jun2024 (after audit period) Construction Cell 2 Eastern Wall Revised Buttress Design dated Sep2023 Correspondence between ITRB internally cced and Operator subject: Re: ITRB Review Requirements. Memo ITRB to Operator June2024 subject: Review of Cell 2 Stage 7 Construction Phase - Buttress Expansion Revision</p> <p>An example of modifications is the Cell 2 eastern wall revised buttress design, which the ITRB reviewed and following those review comments being adequately addressed, ITRB accepted.</p> <p>Following review by the ITRB of the GHD Letter dated November 2021 titled "Review of Cell 2 Stage 7 Construction Phase - Buttress Expansion Revision" the ITRB stated "the revised buttress expansion was included in the Cell 2 Stage 8 Raise Detailed Design that was reviewed by the ITRB. The review was presented by the ITRB in a report dated 7 August 2023."</p>	

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
50.e.i	50.e.i	Studies and/or trials to inform future construction and/or operation of the structure;				1						N/A	Not Applicable		The Operator advised "Until MRM have completed CPTu drilling and a larger data set of shear strength / density testing, the beach improvement trial is still ongoing. Note there have not been any changes to design as a result of the beach improvement work at this stage, this will come in later stages of design."
50.e.ii	50.e.ii	The TSF Operations, Maintenance and Surveillance (OMS) manual, including the Trigger, Action and Response Plan (TARP) is updated regularly to accommodate any relevant changes to the structure that may impact on its stability and performance.				1						4	Full Compliance	TSF - Operations, Maintenance and Surveillance Manual revision 8 dated May2024 Email from ITRB to Operator subject: Review of OMS manual dated Nov2023 TSF - Operations, Maintenance and Surveillance Manual including ITRB review comments Email from ITRB to Operator subject: Review of OMS manual dated Nov2023 states "I have carried out a detailed review of the OMS manual and find it to be a comprehensive document that includes all elements required for a OMS manual." The TSF OMS was subsequently updated by the Operator after the audit period. The ITRB are yet to endorse revision 8 of the TSF OMS.	OBS: It is recommended that the revised TSF OMS (revision 8 or later) is endorsed by the ITRB prior to the next audit.
Waste Rock Management															
51	51	From the date of authorisation Non-benign Waste is to be permanently placed consistent with the approved MMP:											Refer to sub conditions		
51.a	51.a	above the 100 year ARI flood level, unless flood mitigation measures are provided consistent with the approved MMP and relevant Detailed Designs submitted to the Department in accordance with the conditions of this variation of Authorisation, with the exception of PAF(RE);										4	Full Compliance	NOEF North East Alpha Stage Complete Design Report version 3 dated Feb2022 (before audit period). NOEF North East Bravo Stage FOUNDATION DESIGN REPORT version 2 dated Aug2024 (after the audit period). NOEF North West Stage Foundation and Base Design Report version 4 dated Jul2022 (before audit period). January 2020 MMP EMR 2023-2024 dated Aug2024. Correspondence between ICE and Operator relating to Northern Overburden Emplacement Facility (NOEF), Independent Design Review of North-West Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024 NOEF North East Alpha Stage Complete Design Report states: "As shown in Figure 9, the vertical location is above the 100 year flood level, as the cells are located above the Wedge. It is also below the current 80m height limit." It also includes a design criteria of above Q100 flood level in Table 2. Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd states, related to North East Bravo "Construction works on Q100 flood levee was commenced in September to December of 2023. Due to the NE Bravo Stage located outside the existing barrier network around the NOEF, the non-benign materials stored within the stage will require flood protection from the northern extent of the stage." and "Following the installation of BGM, the crest and toe anchor trenches were backfilled to existing surface levels and this concludes the Q100 levee construction prior to December".	Peer Review of NOEF Annual Construction Report 2023 states "The design parameters of the PAF(RE) Cells are as below: [...] The PAF(RE) cells shall be at a minimum elevation of the Q100 flood level".
51.b	51.b	on a compacted clay liner (CCL) or low permeability material that satisfies the design objective in Condition 20 that slopes towards a Perimeter Runoff Dam (PROD) or an appropriately lined storage structure, as defined in Condition 58(a);										4	Full Compliance	NOEF North East Bravo Stage FOUNDATION DESIGN REPORT version 2 dated Aug2024 (after the audit period). NEB Permeability by Constant Head Test Report for samples June to October 2023. NB Permeability Data Table undated. NE Bravo Foundation Underdrain & VWP ITP 4B April to July 2023, 1B April to June 2023. NE Bravo CCL Box Out ITP 7A June to August 2023, 5B June to September 2023, NE Bravo CCL Box Out Inspection and Test Plan 3C June to July 2023, NE Bravo CCL Box Out Inspection and Test Plan 2A April to July 2023, and NE Bravo CCL Box Out Inspection and Test Plan 1C April to June 2023. The Northeast Bravo foundation results for permeability provided showed that the results were orders of magnitude smaller than the required 1 x 10 ⁻⁹ m/s. The ITPs provided included the CCL acceptance criteria of maximum hydraulic conductivity 1 x 10 ⁻⁹ m/s demonstrating low permeability. NOEF North East Bravo Stage FOUNDATION DESIGN REPORT states "Construction of the Wedge Zone above the Base Zone, which will be sloped generally south-east towards the dewatering sumps and nearest PROD (EPROD)." and "As shown in Figure 45, the top of the finished Wedge will slope south-east at approximately 1% to promote runoff toward the NEb and NEa dewatering sumps in the short term, and EPROD once the sumps have been filled in to Wedge level. [...] This will ensure surface flows directing west to east are redirected southeast towards the collection sumps or EPROD."	May 2022 Authorisation refers to condition 19. 18June2021 Authorisation and May 2023 Authorisation refer to condition 20 rather than condition 19. The Independent Monitor believes that condition 20 is the correct reference.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
51.c	51.c	PAF is emplaced in lift heights that minimises particle size segregation and creation of chimney structures, and must not exceed 7.5m taking into construction tolerances;						1				4	Full Compliance	NOEF North East Bravo Stage FOUNDATION DESIGN REPORT version 2 dated Aug2024 (after the audit period). ITPs Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024 Peer Review of NOEF Monthly Construction Report Reports January to April 2024 ITPs describe Hauling and Dumping of a 7.5m thick PAF(HC)/MS-NAF layer and particle size of 0.2m under Acceptance Checklists and Criteria.	
51.d	51.d	PAF(RE) is emplaced in dedicated cells in lift heights that minimises particle size segregation and creation of chimney structures, but must not exceed 2m taking into construction tolerances;						1				4	Full Compliance	NOEF North West Stage Foundation and Base Design Report version 4 dated Jul2022 (before audit period). NOEF North East Bravo Stage FOUNDATION DESIGN REPORT version 2 dated Aug2024 (after the audit period). ITPs Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024 Peer Review of NOEF Monthly Construction Report Reports January to April 2024 ITPs describe Hauling and Dumping of a maximum 2m thick PAF(RE) layer and particle size of 0.2m under Acceptance Checklists and Criteria. Peer Review of NOEF Annual Construction Report 2023 states "The design parameters of the PAF(RE) Cells are as below: ... Maximum lift height 2 m by paddock dumping"	
51.e	51.e	advection barriers of appropriate thickness and moisture condition are emplaced at suitable intervals that disrupt the formation of oxygen convection cycles;						1				4	Full Compliance	NOEF North West Stage Foundation and Base Design Report version 4 dated Jul2022 (before audit period). NOEF North East Bravo Stage FOUNDATION DESIGN REPORT version 2 dated Aug2024 (after the audit period). Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024 Peer Review of NOEF Monthly Construction Report Reports January to April 2024 ITPs Peer Review of NOEF Annual Construction Report 2023 states "The design parameters of the PAF(RE) Cells are as below: Advection barriers shall be placed on each lift with 0.1 m thick on top and 0.5 m thick on batters" and "The controls implemented to protect the PAF(RE) cell include additional compaction by limiting lift heights and employing flatter batter angles. This aims to restrict oxygen ingress and disrupt flow paths through the material." ITPs describe the placement of and thickness of the advection barriers, and also describes moisture condition by stating: "No moisture conditioning required".	
51.f	51.f	the ICE verifies the suitability of the PAF placement methodology with respect to particle size segregation and advection barriers;						1				4	Full Compliance	NOEF North East Bravo Stage FOUNDATION DESIGN REPORT version 2 dated Aug2024 (after the audit period). Peer Review of NOEF Annual Construction Report 2023 McArthur River Mining Pty Ltd rev 0 dated 26Apr2024 and rev 1 dated Aug2024 Peer Review of NOEF Monthly Construction Report Reports January to April 2024 ITPs All ITPs are signed by the ICE, which includes PAF placement methodology.	
51.g	51.g	construction of the NOEF stages, as defined in Conditions 52 and 53 is undertaken in accordance with a valid AAPA certificate;						1				4	Full Compliance	AAPA Authority Certificate C2004/014 dated Jan2004. AAPA Authority Certificate C2004/084 dated Jun2004. Two examples of height checks of the NOEF - undated. NOEF North East Bravo Stage FOUNDATION DESIGN REPORT version 2 dated Aug2024 (after the audit period). Evidence of the AAPA certificates and compliance with height requirements were sighted. NOEF North East Bravo Stage FOUNDATION DESIGN REPORT "NB: upper-slope sections would only be developed upon receiving the relevant approvals and Aboriginal Area Protection Authority (AAPA) certificates"	Condition previously referenced Conditions 53 and 54 rather than 52 and 53.

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement										Score	Compliance level		
51.h	51.h	design of the NOEF is flexible to accommodate changes, if required, to comply with archaeological site MRM4 matters under Condition 31;						1				4	Full Compliance	NOEF North East Bravo Stage FOUNDATION DESIGN REPORT version 2 dated Aug2024 (after the audit period). NOEF North East Bravo Stage FOUNDATION DESIGN REPORT "NB: upper-slope sections would only be developed upon receiving the relevant approvals and Aboriginal Area Protection Authority (AAPA) certificates"	Planning of stages avoided MRM4 in the audit period.
51.i	51.i	in the event that future review of the designs or as-built structure by independent experts require additional matters to be addressed, the Operator together with the ICE must provide a written response to the satisfaction of the Department;						1				N/A	Not Applicable		The Independent Panels are yet to be formed, and as such there was no independent expert review of NOEF designs or as-built structures over the audit period.
51.j	51.j	at mine closure, non-benign waste rock is encapsulated and fully contained within an engineered cover system consistent with the Overburden Management Project, or an alternative cover system endorsed by the relevant independent technical panels to the satisfaction of the Department.						1				N/A	Not Applicable		Future item. Mine closure is not relevant to the audit period.
Construction of CWNOEF															
52	52	From the date of authorisation of the Overburden Management Project, the Operator is approved to construct, operate and maintain the following stages for permanent placement of Waste Rock in the NOEF:						1				4	Full Compliance	EMR 2023-2024 dated 31Aug2024 Table 5 of the EMR 2023-2024 shows the waste dumping locations, which include the below areas of NOEF in addition to stockpiles that are not permanent.	The Operator advised that the GPS management system for the trucks reduces potential errors associated with waste placement.
52.a	52.a	West A, B, C and D;						1					-		Compliance scored under condition 52.
52.b	52.b	CW (alpha, bravo and charlie);						1					-		Compliance scored under condition 52.
52.c	52.c	CE (alpha and bravo);						1					-		Compliance scored under condition 52.
52.d	52.d	SE;						1					-		Compliance scored under condition 52.
52.e	52.e	NW;						1					-		Compliance scored under condition 52.
52.f	52.f	NE.						1					-		Compliance scored under condition 52.
53	53	The Operator must develop the NOEF Stages defined in Condition 52 in accordance with Concept designs presented in the approved MMP.	1					1				4	Full Compliance	EMR 2023-2024 31Aug2024 EMR 2023-2024 31Aug2024 states "MRM cleared approximately 66.2 ha around the NOEF area during the reporting period and constructed approximately 20.0 ha of Basal Compacted Clay Liners (CCL). These works were carried out in accordance with the January 2020 MMP. Figure 5 shows the cleared area at the NOEF and the constructed CCL in the NOEF area. The various stages of the NOEF and the NE Bravo Stage foundation were constructed as per the OMP EIS methodology and consistent with the approved January 2020 MMP." EMR 2023-2024 states "During the reporting period, MRM operated the Mine in accordance with the January 2020 MMP. " No examples of the NOEF stages being developed contrary to the concept designs presented in the approved MMP were identified.	
54	54	During construction of the NOEF, the Operator must ensure:											Refer to sub conditions		
54.a	54.a	engagement of the ICE consistent with Condition 48;						1				4	Full Compliance		Refer to condition 48 for further detail of compliance.
54.b	54.b	waste rock management requirements comply with Condition 51.						1				4	Full Compliance		Refer to condition 51 for further details of compliance.
Remaining Waste Rock Management Facilities															
55	55	From the date of authorisation of the Overburden Management Project, temporary placement of non-benign waste is authorised for the following:											Refer to sub conditions		
55.a	55.a	EOEF (except for PAF(RE));						1				N/A	Not Applicable		There was no placement of waste on EOEF in the audit period.
55.b	55.b	stockpiles on NOEF, SOEF and WOEF;						1				4	Full Compliance	EMR 2023-2024 dated 31Aug2024 Table 5 of the EMR 2023-2024 shows the waste dumping locations, which include the NOEF in addition to stockpiles that are not permanent.	Waste only on NOEF.
55.c	55.c	ROM Pad;						1				4	Full Compliance	EMR 2023-2024 dated 31Aug2024 Table 5 of the EMR 2023-2024 shows the waste dumping locations, which include the NOEF in addition to stockpiles that are not permanent.	Ore is stored on the ROM pad, part of which becomes non-benign waste.
55.d	55.d	any other location approved by Department in writing.						1				N/A	Not Applicable		No other areas were approved or used.

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
56	56	The Operator must ensure that non-benign waste temporarily placed outside of the NOEF:											Refer to sub conditions		There are minor grammatical changes between May 2022 and May 2023 Authorisations, however the requirements of the condition are identical. The Operator advised "All in a controlled area and would transport to dams and sumps".
56.a	56.a	has suitable water management structures (e.g. drains and sumps) in place to contain and manage poor quality drainage in accordance with the approved MMP;					1	1				4	Full Compliance	Ore is stored on the ROM pad, part of which becomes non-benign waste.	ROM pad is the only relevant area. The Operator advised "All in a controlled area and would transport to dams and sumps".
56.b	56.b	has installed water diversion structures that allow segregation of mine-affected drainage from non-mine affected drainage;					1	1				4	Full Compliance	Ore is stored on the ROM pad, part of which becomes non-benign waste.	ROM pad is the only relevant area. The Operator advised "All in a controlled area and would transport to dams and sumps".
56.c	56.c	has monitoring and management measures, in accordance with the AMP, implemented to ensure environmental objectives defined in the approved MMP are satisfied;						1				4	Full Compliance	Ore is stored on the ROM pad, part of which becomes non-benign waste.	ROM pad is the only relevant area. The Operator advised "All in a controlled area and would transport to dams and sumps".
56.d	56.d	is removed and managed at cessation of mining in accordance with the approved MMP;						1				N/A	Not Applicable		Future item as cessation of mining has not occurred.
56.e	56.e	is removed and managed in accordance with the approved MMP in the event of unplanned closure;						1				N/A	Not Applicable		Future item as there have been no unplanned closures.
56.f	56.f	has oversight provided by ICE as per Condition 48.						1				N/A	Not Applicable		Only the NOEF used as relevant to the ICE in the audit period. The ROM pad has no ICE involvement.
Ore Processing and Milling															
57	57	Surface water management infrastructure associated with the lead filtration facility at the Mine must be suitably designed and constructed to contain a 100 year ARI rainfall event.	1				1					4	Full Compliance	Flood extents for 1% Annual Exceedance Probability rainfall event. Sighted area during the site visit in August 2024.	The Operator advised "The lead filtration facility is currently under construction, however is not anticipated to be completed until Q3 or Q4 in 2025. The filtration facility is currently being constructed in the Mill, within the Mine Levee Wall. Attached is a map showing the flood extents in a 1 in 100 year ARI rainfall event, demonstrating that this area is above this level."
58	58	From the date of authorisation of the Overburden Management Project, the Operator is authorised to expand the ore processing and associated milling and storage facilities in accordance with concepts and management systems detailed in the approved MMP including:	1										Refer to sub conditions		
58.a	58.a	ensuring the structures to be developed are suitably designed and constructed to allow management of poor quality drainage in accordance with the Water Management Plan that is generated from the construction and future operation of the structures;	1									4	Full Compliance	Extract from the WMP: McArthur River Mine 2021-22 Site Configuration and Water Management Infrastructure dated May2022. Extract from the WMP: Schematic of the 2021_22 - 2024_25 McArthur River Mine Water Management System dated May2022. The Operator has provided evidence of the location of the Reagent Mining Facility, Copper Mud Facility, Gypsum Plant, Lead Storage Facility and the expansion of the concentrate storage shed, which is within the defined catchment suitable to manage poor quality water in accordance with the Water Management Plan.	
58.a.i	58.a.i	construction and development of Gypsum Plant;	1									4	Full Compliance	2023/24 ANNUAL SITE WATER BALANCE FOR THE MCARTHUR RIVER MINE Water balance forecast report dated Jan2024. Independent Monitor sighted the foundations installed June 2023 in a bunded area near the reverse osmosis plant. There is no reference to the Gypsum Plant in the EMR 2023-2024. No evidence has been provided relating to the design and construction in accordance with the WMP.	"The Gypsum Plant is still under construction and is currently expected to be commissioned in April 2025." 2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report state "The purpose of the Gypsum Plant is to: • treat PbOx excess water to a suitable water quality before it re-enters the Mine water management system; and • provide opportunities for potential end uses after treatment" The Operator advised "These facilities are located within the mine levee wall and as such drainage during construction reports to the open pit or the nearest sump in accordance with the WMP."
58.a.ii	58.a.ii	construction and development of Caustic Facility;	1									N/A	Not Applicable		Construction for the Caustic Facility was completed before the audit period. Located in the mill area and runoff from that area is contained and managed. The Operator advised "These facilities are located within the mine levee wall and as such drainage during construction reports to the open pit or the nearest sump in accordance with the WMP."

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement										Score	Compliance level		
58.a.iii	58.a.iii	construction and development of Reagent Mixing Facility;	1												The Operator has advised that construction for the Reagent Mixing Facility was completed before the audit period. The Operator advised "These facilities are located within the mine levee wall and as such drainage during construction reports to the open pit or the nearest sump in accordance with the WMP."
58.a.iv	58.a.iv	construction and development of Copper Mud Facility;	1												The Operator has advised that construction for the Copper Mud Facility was completed before the audit period. The Operator advised "These facilities are located within the mine levee wall and as such drainage during construction reports to the open pit or the nearest sump in accordance with the WMP."
58.a.v	58.a.v	construction and development of Lead Concentrate Storage Facility;	1												The lead concentrate facility is currently still in concept phase and construction has not commenced.
58.a.vi	58.a.vi	expansion of the concentrate storage shed and use of external hardstand area;	1												The expansion of the existing concentrate storage facility also has not commenced.
58.b	58.b	Wastes generated from the operation of the Gypsum Plant must be managed in accordance with Condition 63.	1												Future item. Gypsum Plant is under construction expected to be commissioned in April 2025.
Water Management and Storage															
59	59	Until the AMP (including Environmental Management Plans and sub-plans) is approved by the Department in writing, the Operator must prepare, review and include the following for each MMP and where appropriate each MMP amendment, a Water Management Plan which includes:					1			1					Condition is completed. AMP was submitted with the January 2020 MMP and approved 13Nov2020. This condition is marked as completed in the Authorisation dated 17May2023.
59.a	59.a	modelling of surface water at and around the Mine;					1								Condition is completed. AMP was submitted with the January 2020 MMP and approved 13Nov2020. This condition is marked as completed in the Authorisation dated 17May2023.
59.b	59.b	a whole of Mine water balance which takes account of the modelling of surface water;					1								Condition is completed. AMP was submitted with the January 2020 MMP and approved 13Nov2020. This condition is marked as completed in the Authorisation dated 17May2023.
59.c	59.c	calibration of the modelling of surface water to confirm its accuracy;					1								Condition is completed. AMP was submitted with the January 2020 MMP and approved 13Nov2020. This condition is marked as completed in the Authorisation dated 17May2023.
59.d	59.d	a written plan detailing how water at the Mine will be managed for the forthcoming wet season;					1								Condition is completed. AMP was submitted with the January 2020 MMP and approved 13Nov2020. This condition is marked as completed in the Authorisation dated 17May2023.
59.e	59.e	a plan of actions which will be undertaken to reduce the risk of any releases from AMD storage structures;					1								Condition is completed. AMP was submitted with the January 2020 MMP and approved 13Nov2020. This condition is marked as completed in the Authorisation dated 17May2023.
59.f	59.f	a plan of actions, including engineers' reporting schedules, which will be undertaken to ensure the structural integrity of all AMD storage structures;					1								Condition is completed. AMP was submitted with the January 2020 MMP and approved 13Nov2020. This condition is marked as completed in the Authorisation dated 17May2023.
59.g	59.g	a plan of actions which will be undertaken to ensure seepage from AMD storage structures is minimised including, where required, timelines for repairing damaged or installing new seepage management infrastructure.					1								Condition is completed. AMP was submitted with the January 2020 MMP and approved 13Nov2020. This condition is marked as completed in the Authorisation dated 17May2023.

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
60	60	From 13 November 2020 (i.e. the date of authorisation of the Overburden Management Project), water-related activities involving interfering with waterway and water extraction must be undertaken in accordance with the Water Act 1992, and where required, appropriate licenses/approvals are obtained from the responsible agency prior to commencement of the works. The Operator must ensure:					1					4	Full Compliance	2024 Annual Report for the Northern Cleanwater Drain authorised under Permit to Interfere with a Waterway - IWW:MRM-001. dated Jul2024 (after the audit period). Email Operator to DEPWS MRM Notification of Completion - Northern Cleanwater Drain Works dated Dec2023. Email Operator to DEPWS RE: BCPNA07137 - MRM Application for a Bore Work Permit - Tailings Storage Facility Monitoring and Investigation dated Feb2024 Sighted notification of completion for the NOEF Cleanwater Drain that was submitted to the Water Licencing team within DEPWS and the annual report. The annual report dated Jul2024 referred to a previous annual report dated Jul2023. Sighted Bore Work permit. The Northern Cleanwater Drain was visited during the site visit August 2024.	
60.a	60.a	activities involving disturbance must not commence until required studies and/or trials to inform future design, construction and/or operation, as detailed in the approved MMP, are completed;					1					N/A	Not Applicable		There were no specific requirements specified in the MMP.
60.b	60.b	works are conducted in accordance with a valid AAPA certificate;	1				1					4	Full Compliance	AAPA certificate 2004/84 The relevant AAPA certificate for construction of the NOEF (inclusive of the Northern Cleanwater Drain) is 2004/84.	
60.c	60.c	detailed designs, where nominated in the approved MMP, are developed and implemented in consultation with required experts, including but not limited to ecology, engineering and any other experts as appropriate;					1					N/A	Not Applicable		The MMP does not include requirements for bores or drains.
60.d	60.d	regular inspections and maintenance are undertaken to ensure design objectives continue to be satisfied.					1					4	Full Compliance	2024 Annual Report for the Northern Cleanwater Drain authorised under Permit to Interfere with a Waterway - IWW:MRM-001. dated Jul2024. Sighted NOEF Cleanwater Drain annual report. This report refers to an assessment of revegetation and erosion processes (IPE, 2024). 2023 LiDAR imagery will be used as a baseline dataset from which to compare future erosion.	
61	61	The Operator must complete translocation of the Purple-crown Fairy Wren in accordance with the approved MMP, prior to commencement of works on the Old McArthur River Channel plug.	1									N/A	Not Applicable		Historical item. Completed before the audit period. The Operator advised that annual monitoring of the translocation area occurs. This condition is marked as completed in the Authorisation dated 17May2023.
62	62	The Operator must erect and maintain warning signage that:											Refer to sub conditions		
62.a	62.a	is permanent and weatherproof;								1		4	Full Compliance	Memo subject 'Warning Signage Inspection - January 2023 dated Mar2023 (before audit period) Warning Signage Inspection – August 2024 (after audit period) Signage appears permanent and waterproof.	
62.b	62.b	contains specific wording agreed to by the Chief Health Officer (CHO) of the Northern Territory;								1		4	Full Compliance	Memo subject 'Warning Signage Inspection - January 2023 dated Mar2023 (before audit period) Warning Signage Inspection – August 2024 (after audit period)	
62.c	62.c	is located:											Refer to sub conditions		
62.c.i	62.c.i	at appropriate distances and frequency along the waterway;								1		4	Full Compliance	Memo subject 'Warning Signage Inspection - January 2023 dated Mar2023 (before audit period) Warning Signage Inspection – August 2024 (after audit period)	
62.c.ii	62.c.ii	as a minimum at all access points, including but not limited to crossings, vehicle tracks and walking tracks.								1		4	Full Compliance	Memo subject 'Warning Signage Inspection - January 2023 dated Mar2023 (before audit period) Warning Signage Inspection – August 2024 (after audit period) Signage appears to be located at all access points, including but not limited to crossings, vehicle tracks and walking tracks based on aerial photography and the Warning Signage Inspection - August 2024.	Signage at location 41 was removed in the previous audit period. The Operator advised that location 41 is well within the fenced area and the access would be from location 6 where a sign remains.
62.c.iii	62.c.iii	along the length of:											Refer to sub conditions		

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
62.c.iii.a	62.c.iii.a	Barney Creek downstream to its junction with the McArthur River;								1		4	Full Compliance	Memo subject 'Warning Signage Inspection - January 2023 dated Mar2023 (before audit period) Warning Signage Inspection – August 2024 (after audit period)	
62.c.iii.b	62.c.iii.b	Barney Creek upstream to a point a short distance upstream of where the Carpentaria Highway crosses Barney Creek;								1		4	Full Compliance	Memo subject 'Warning Signage Inspection - January 2023 dated Mar2023 (before audit period) Warning Signage Inspection – August 2024 (after audit period) Warning Signage Inspection - August 2024 viewed confirming no access signage is in place in all locations (refer locations 7 and 8).	
62.c.iii.c	62.c.iii.c	Surprise Creek to approximately the location of SW29;								1		4	Full Compliance	Memo subject 'Warning Signage Inspection - January 2023 dated Mar2023 (before audit period) Warning Signage Inspection – August 2024 (after audit period) Warning Signage Inspection – August 2024 confirming no access signage is in place in all locations. Location 44 is the approximate location of SW29 (with 43 and 42 also relevant).	
62.c.iii.d	62.c.iii.d	the Bing Bong shipping channel and in the immediate area surrounding the shipping channel and the swing basin, unless otherwise agreed in writing by the CHO and the Department.								1	1	4	Full Compliance	Memo subject 'Warning Signage Inspection - January 2023 dated Mar2023 (before audit period) Warning Signage Inspection – August 2024 (after audit period) Email from DITT to Operator subject: MRM Technical Working Group - fortnightly meeting dated Jun2023 Email from DITT to Operator subject: RE: MRM Condition 62.c.iii.d - to discuss at TWG dated May2023 Warning Signage Inspection – August 2024 showed signage is located at each land entry point to the BBLF, which surround the water access. However, there was no evidence of signage along the length of the shipping channel and in the immediate area surrounding the shipping channel and swing basin. The Operator advised "MRM have provided correspondence to the Department on the intent of this condition." and "MRM are waiting on formal confirmation to be provided by the Department."	This condition now includes 'unless otherwise agreed in writing by the CHO and the Department.'
63	63	Wastes generated from operation of the Water Treatment Plant and Gypsum Plant must be disposed of in accordance with concepts and management systems detailed in the approved MMP, ensuring:											Refer to sub conditions		
63.i	63.a.i	trials for the permanent disposal of Gypsum Plant and Water Treatment Plant wastes must be undertaken to inform final material placement;		1								N/A	Not Applicable		Water Treatment Plant and Gypsum Plant are not operational.
63.ii	63.a.ii	the ITRB or an approved qualified and experienced independent third party endorse the waste disposal strategy, if the wastes are to be placed in the TSF; or		1	1							N/A	Not Applicable		Water Treatment Plant and Gypsum Plant are not operational.
63.iii	63.a.iii	the ICE or an approved qualified and experienced independent third party endorse the waste disposal strategy, if the wastes are to be placed in the NOEF.		1				1				N/A	Not Applicable		Water Treatment Plant and Gypsum Plant are not operational.
64	64	Water storage structures into which the Operator places or directs AMD must be designed, constructed and managed by the Operator to minimise to as low as reasonably practicable contaminants entering the Receiving Environment. In this regard the water storage structures into which the Operator is authorised to place or direct AMD whilst they continue to meet the requirements of this Condition are as follows:	1				1				1	3	Part Compliance (High)	2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report McArthur River Mine Jun2024 Screen shot of monthly inspections No evidence was provided for addressing the outstanding actions in the Full Recommendations Register - Mines Dams, which is Appendix D of the 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report McArthur River Mine June 2024. Evidence of monthly inspection actions being recorded was provided (screen shot of online system). However, there was no evidence provided to demonstrate progress to close the majority of the inspection actions in the audit period. Evidence provided was for after the audit period.	The Operator advised that the safety culture system lists actions required (after the audit period). OFI: Action and record evidence regarding addressing the outstanding actions in the Full Recommendations Register - Mines Dams, which is Appendix D of the 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report McArthur River Mine 7 June 2024. OFI: For monthly inspection actions, provide further information to record progress status and close out of the inspection actions.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
64.a	64.a	NOEF Southern Perimeter Runoff Dam (SPROD)					1					3	Part Compliance (High)	2023/24 Annual Site Water Balance for the McArthur River Mine Water. balance forecast report Jan2024, TARP included. Dams and Prods Register 2024. Photos and inspections in audit period. 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report McArthur River Mine Jun2024. NOEF Perimeter Runoff Dams Dam Safety Emergency Plan October 2022 (Draft document). NOEF Perimeter Runoff Dams Operations, Maintenance and Surveillance Manuals October 2022 (Draft document). 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report states that inspection frequency is okay. However, the NOEF Perimeter Runoff Dams Operations, Maintenance and Surveillance Manuals has not been updated to reflect the frequency of inspections that occurs and continues to include the requirement for daily to tri-weekly routine visual inspections aligned with ANCOLD (2003), which are not occurring.	OFl: Update and finalise the NOEF Perimeter Runoff Dams Operations, Maintenance and Surveillance Manuals (including but not limited to the recommended frequency of routine visual inspection for EPROD and SPROD, refer 2023 Mine Dam Inspection Report) and the NOEF Perimeter Runoff Dams Dam Safety Emergency Plan.
64.b	64.b	NOEF South East Perimeter Runoff Dam (SEPROD);					1					4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water. balance forecast report Jan2024, TARP included. Dams and Prods Register 2024. Photos and inspections in audit period. 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report McArthur River Mine Jun2024. 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report states that inspection frequency is okay.	
64.c	64.c	NOEF Western Perimeter Runoff Dam (WPROD);					1					4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water. balance forecast report Jan2024, TARP included. Dams and Prods Register 2024. Photos and inspections in audit period. 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report McArthur River Mine Jun2024. 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report states that inspection frequency is okay.	
64.d	64.d	NOEF Eastern Perimeter Runoff Dam (EPROD);					1					3	Part Compliance (High)	2023/24 Annual Site Water Balance for the McArthur River Mine Water. balance forecast report Jan2024, TARP included. Dams and Prods Register 2024. Photos and inspections in audit period. 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report McArthur River Mine Jun2024. NOEF Perimeter Runoff Dams Dam Safety Emergency Plan October 2022 (Draft document with no revision status). NOEF Perimeter Runoff Dams Operations, Maintenance and Surveillance Manuals October 2022 (Draft document with no revision status). EPROD Construction Report dated Nov2022. 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report states that inspection frequency is okay. However, the NOEF Perimeter Runoff Dams Operations, Maintenance and Surveillance Manuals has not been updated to reflect the frequency of inspections that occurs and continues to include the requirement for daily to tri-weekly routine visual inspections aligned with ANCOLD (2003), which are not occurring. Second stage of commissioning of EPROD (the reservoir to reach its Maximum Operating Level) not undertaken to date. Will be undertaken as part of the Operations, Maintenance and Surveillance Manual and a formal report provided.	EPROD Construction Report states "ANCOLD (2003) suggest that a Dam Safety Emergency Plan (DSEP) be prepared for all dams where there is a potential for the loss of life in the event of a dam failure. The EPROD DSEP is currently in draft form and is recommended it be completed and implemented in a timely manner. ANCOLD (2003) also recommends that all dams Consequence Category greater than "Very Low" should have an Operations, Maintenance and Surveillance (OMS) manual. The EPROD OMS manual is also in draft format at the time of writing and is recommended it be completed and implemented in a timely manner." OBS: Undertake and document the second stage of commissioning of EPROD (the reservoir to reach its Maximum Operating Level) under the Operations, Maintenance and Surveillance Manual and provide a formal report. OFl: Refer to Condition 64.a.
64.e	64.e	Mill Anti-Pollution Pond (Mill APP);					1					4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water. balance forecast report Jan2024, TARP included. Dams and Prods Register 2024. Photos and inspections in audit period. 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report McArthur River Mine Jun2024. 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report states that inspection frequency is okay.	Was flooded in March 2024.
64.f	64.f	Mill Concentrator Runoff Pond (Mill CRP);					1					4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024, TARP included, CCL, 27ML Dams and Prods Register 2024. Photos and inspections in audit period.	

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
64.g	64.g	Open Pit Van Duncan's Dam (OP VDD);					1					4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024, TARP included, no liner, 26ML Dams and Prods Register 2024. Photos and inspections in audit period.	Duncan's Dam in Dams and Prods Register 2024.
64.h	64.h	Open Pit Pete's Pond (OP PP);					1					4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024, TARP included, HDPE, 115ML Dams and Prods Register 2024. Photos and inspections in audit period.	
64.i	64.i	Open Pit Lake Archer (OP LA);					1					4	Full Compliance	2023/24 annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024, TARP included, HDPE, 25ML Dams and Prods Register 2024. Photos and inspections in audit period.	
64.j	64.j	Mill Old Stores Dam (Mill OSD);					1					4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024, 0.6 ML. No inspections monthly during the audit period. Mill OSD is not documented in the Dams and Sumps Registers. However, due to size, location and overflow this is considered acceptable.	The Operator advised two years ago "The Mill Old Stores Dam, is actually a small 5m x 5m sump. A pump was removed from the sump over the Dry Season. This is the only recent history of maintenance for this water storage, as it has been dry for some time now. MRM will seek to have it removed from the VoA in the next amendment." This sump has not been removed from the Authorisation dated 17May2023. The Operator advised in the previous audit period "Collects runoff from the mill and raw water overflow. Pumped back to mill or overflows to a drain that reports to Lake Archer. No documented inspections. Located in an operational area that has a high level of interaction, i.e. any issues would be picked up. Clay lined, not HDPE."
64.k	64.k	Open Pit Pond 2 (OP P2);					1					4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024, TARP included, HDPE, 65 ML Dams and Prods Register 2024. Photos and inspections in audit period. 2023 Mine Dam Inspection Report Annual Dam Safety Assessment Report McArthur River Mine Jun2024. No design or construction drawings.	
N/A	64.l	NOEF East Drain Sump (EDS);					1					N/A	Not Applicable		Decommissioned. No longer included in the 17May2023 Authorisation.
64.l	64.m	NOEF West D Sump (WDS);					1					4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024 no liner, 38.1 ML Dams and Prods Register 2024. Photos and inspections in audit period. Field sheet regarding water quality monitoring (Feb2024) Field sheet regarding water quality monitoring (Mar2023) (before the audit period).	
64.m	64.n	NOEF Mine Infrastructure Area Sump (MIAS);					1					4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024 HDPE, 15 ML Dams and Prods Register 2024. Photos and inspections in audit period.	
64.n	64.o	NOEF West A Sump (WAS);					1					4	Full Compliance	Field sheet regarding water quality monitoring (Feb2024). Field sheet regarding water quality monitoring (Mar2023) (before the audit period). WAS has water quality monitoring undertaken there and the Operator advised that any operational observations regarding risks would be raised.	OBS: Consider documenting inspections of all structures listed to store AMD.
64.o	64.p	NOEF North East Alpha Sump (NEAS);					1					4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024 no liner, 10 ML Central East Area Sump Basis of Design Report dated Apr2021 (before audit period). Field sheet regarding water quality monitoring (Mar2023) (before audit period) Field sheet regarding water quality monitoring (Apr2024) Field sheet regarding water quality monitoring (Mar2024) NEAS/NEAET has water quality monitoring undertaken there and the Operator advised that any operational observations regarding risks would be raised.	Sump is now rock-filled with an extraction tower. Although NEA sump and NEA extraction tower are shown as both being sampled on the same Upon Discharge Surface Water Sampling sheet on Apr2024. OBS: As sumps are converted to extraction towers, they should be renamed in the AMD storage structure list and be included in the monthly inspection program.

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			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
64.p	64.q	NOEF North West Sump (NWS);					1					4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024 no liner, 1.4 M. Field sheet regarding water quality monitoring (Mar2023) (before audit period) Field sheet regarding water quality monitoring (Mar2024) (no safe access) NWS/NWET has water quality monitoring undertaken there and the Operator advised that any operational observations regarding risks would be raised.	Sump is now rock-filled with an extraction tower. OBS: Refer to OBS in Condition 64.o.
64.q	64.r	NOEF North East Stilling Basin (NESB);					1					N/A	Not Applicable		Future item. Not yet constructed
64.r	64.s	NOEF Central East Bravo Sump (CEBS);					1					4	Full Compliance	2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024 no liner, 264 ML. CENTRAL EAST SUMP DESIGN drawings dated Aug2022 (before audit period). Central East Area Sump Basis of Design Report dated Apr2021 (before audit period). Field sheet regarding water quality monitoring (Apr2024) Field sheet regarding water quality monitoring (Mar2023) (before the audit period). CEBS/CEBET has water quality monitoring undertaken there and the Operator advised that any operational observations regarding risks would be raised.	Sump is now rock-filled with an extraction tower. OBS: Refer to OBS in Condition 64.o.
64.s	64.t	NOEF South Stilling Basin (SSB);					1					N/A	Not Applicable	2023/24 Annual Site Water Balance for the McArthur River Mine Water balance forecast report Jan2024 states "NOEF SSD will be constructed." and HDPE, 0.2 ML. ICE Review of Design and Design Changes (Southern Sediment Dam) dated Aug2024. NOEF Southern Sediment Dam Detailed Design Report dated Nov2023 ICE Review of Design and Design Changes (Southern Sediment Dam) "GHD considers that the designs (and subsequent design changes) presented are acceptable and the construction specifications are appropriate. It is recommended that MRM record all post IFC design changes in the as-constructed drawing set as per their Sediment Dam Construction Guideline which shall be developed on completion of the project."	Southern Sediment Dam (NOEF SSD) is SSB. Not constructed.
64.t	64.u	NOEF South East Alpha Sump (SEAS)					1					4	Full Compliance	SE Alpha Sump and Extraction Tower Basis of Design Report QC1019_003-REP-001-1 dated JAN2024. SOUTH EAST ALPHA DEWATERING SUMP drawings dated Nov2022 (before audit period). Field sheet regarding water quality monitoring (Mar2023) (before the audit period). Field sheet regarding water quality monitoring (Feb2024) Field sheet regarding water quality monitoring (Mar2024) SEAS/SEAET has water quality monitoring undertaken there and the Operator advised that any operational observations regarding risks would be raised.	Rock-filled with an extraction tower. OBS: Refer to OBS in Condition 64.o.
64.u	N/A	NOEF North East Bravo Sump					1					3	Part Compliance (High)	NE Bravo Sump and Extraction Tower Basis of Design Report QC1019_001-REP-001-0 JUN2024. Field sheet regarding water quality monitoring (Apr2024) unsafe access NEBET is listed to have water quality monitoring undertaken and the Operator advised that any operational observations regarding risks would be raised. However, the only monitoring record that was provided for NEBET showed that it was not monitored due to unsafe access.	Rock-filled with an extraction tower. OFI: Document operational activities for the North East Bravo Sump and NOEF South West Stilling Basin that demonstrate the potential for contaminants to enter the Receiving Environment is minimised (e.g., inspections). OBS: Refer to OBS in Condition 64.o.
64.v	N/A	NOEF North West Stilling Basin;					1					N/A	Not Applicable		Not constructed.
64.w	N/A	NOEF South West Stilling Basin;					1					3	Part Compliance (High)	Inspection test record #4 - Geomembrane installation dated Oct2022 (before audit period) Inspection test record #2 - Liner surface preparation dated Oct2022 (before audit period) No evidence related to management has been provided. While this structure is not commissioned it may still contain AMD so is triggered and part compliant.	Construction incomplete and not commissioned. OFI: Refer to OFI in Condition 64.u.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments	
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement														
64.x	N/A	NOEF Diamond Sump;					1					3	Part Compliance (High)	<p>NOEF Southern Sediment Dam Detailed Design Report dated Nov2023 Field sheet regarding water quality monitoring (Feb2024) (listed as SRSB) Field sheet regarding water quality monitoring (Mar2023) (listed as SRSB) (before the audit period). Water Management Plan 2022.</p> <p>NOEF Southern Sediment Dam Detailed Design Report dated Nov2023 states "As part of the drainage works associated with SSD, Engeny have been requested to update the design for the existing "diamond sump", which is an existing stilling basin located at the base of the NOEF ramp. The stilling basing requires update to the 0.1% AEP design event as per requirements outlined in Table 2.2."</p> <p>Dimond sump has water quality monitoring undertaken there and the Operator advised that any operational observations regarding risks would be raised.</p> <p>Water Management Plan 2022 lists South Stilling Basin as not developed with no mention of Diamond Sump. The Operator advised that Diamond Sump is incorporated into the Southern Sediment Dam also referred to as South Stilling Basin. However, there has been insufficient evidence to demonstrate that Diamond Sump was listed for storage of AMD before it was added to the Authorisation dated 17May 2023 and inadequate consistency regarding naming and demonstrating adequacy of the sump.</p>	<p>The Operator advised "The original Diamond Sump is a historical facility that was constructed circa 2018, however no construction records are available. [...] the Diamond Sump was redesigned and incorporated in with the South Sediment Dam design." and "Some temporary rectification works were completed during the audit period, however the permanent works as per the updated design are now planned to occur in 2025."</p> <p>OFI: Review all structures on site that store AMD and ensure a complete list is included in the Authorisation and structures are inspected regularly.</p> <p>OFI: To ensure consistency so a single name is used for each structure, review the list of AMD structures listed in the Authorisation against reporting records (e.g., inspection registers and monitoring sheets).</p>	
64.y	64.v	Southern Overburden Emplacement Facility Sump (SOEF Sump);					1					4	Full Compliance	Dams and Prods Register 2024. Photos and inspections in audit period.		
64.z	64.w	EOEF Low Grade Sump (LGS);					1					N/A	Not Applicable		Not constructed.	
64.aa	64.x	Bing Bong Surface Runoff Pond 1 (BBSRP1);					1				1	4	Full Compliance	2023/24 SITE WATER BALANCE FOR THE BING BONG LOADING FACILITY January 2024 27ML, TARP included Bing Bong Surface Runoff Ponds Routine Inspection Forms Jun2023, Oct2023, Feb2024 and May2024 (after audit period)		
64.bb	64.y	Bing Bong Surface Runoff Pond 2 (BBSRP2);					1				1	4	Full Compliance	2023/24 SITE WATER BALANCE FOR THE BING BONG LOADING FACILITY January 2024 30ML, TARP included Bing Bong Surface Runoff Ponds Routine Inspection Forms Jun2023, Oct2023, Feb2024 and May2024 (after audit period) "BB SRP2 and BB SRP3 are lined with a high-density polyethylene (HDPE) material to limit seepage"		
64.cc	64.z	Bing Bong Surface Runoff Pond (BBSRP3).					1				1	4	Full Compliance	2023/24 SITE WATER BALANCE FOR THE BING BONG LOADING FACILITY January 2024 17ML, TARP included Bing Bong Surface Runoff Ponds Routine Inspection Forms Jun2023, Oct2023, Feb2024 and May2024 (after audit period) "BB SRP2 and BB SRP3 are lined with a high-density polyethylene (HDPE) material to limit seepage"		
Water Transfer and Discharge																
65	65	The Operator must not transfer water to or discharge water from any water storage structure until:												Refer to sub conditions	<p>Memo MRM subject: Weekly Water Quality Review – 18th, 20th and 22nd of February 2024 dated Mar2024 Water Management Plan dated May2022 Water Discharge Procedure PRO-OP-0008-2200035 dated Nov2021 2023-24 Loads Estimate 2023-24 Waste Discharge Records - External Reporting Weekly Mine Water Report Spreadsheet dated Feb2024</p>	Samples are taken and wait for prelim results before discharge. Site water team are provided email results and base their decision on that. During flooding there were daily reports from the geochemist with the latest results (Daily Report for key storage being balanced at the time - viewed 16 April2024). Twice daily meeting General Manager, Mining Manager, Site Water Superintendent, Enviro Superintendent and couple of Dewatering staff.
65.a	65.a	water quality analysis has been received and interpreted by the Operator;					1					4	Full Compliance	<p>Memo MRM subject: Weekly Water Quality Review – 18th, 20th and 22nd of February 2024 dated Mar2024 Water Management Plan dated May2022</p> <p>Water Management Plan section 3.4.4 states: "Water is not transferred from any water storage structure until water quality analysis has been received and interpreted and the results confirm that the water is suitable for the destination."</p> <p>Memo MRM subject: Weekly Water Quality Review – 18th, 20th and 22nd of February 2024 dated Mar2024 states "Managed release from the Water Management Dam Release Point into Little Barney Creek occurred during the time of sampling." and shows that the water was acceptable for managed release.</p>		

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
65.b	65.b	results confirm the water is suitable for the destination, having regard to the requirements of this document, the approved MMP and any other relevant restrictions on transfer or discharge of water within or from the Mine.					1					4	Full Compliance	Memo MRM subject: Weekly Water Quality Review – 18th, 20th and 22nd of February 2024 dated Mar2024 Water Management Plan dated May2022 Water Management Plan section 3.4.4 states: "Water is not transferred from any water storage structure until water quality analysis has been received and interpreted and the results confirm that the water is suitable for the destination."	
66	66	The Operator is authorised to undertake works to release water from WMD to Little Barney Creek in accordance with previous approvals as defined in Schedule B.					1			1		N/A	Not Applicable		Construction was complete before the audit period. Schedule B included an MMP amendment to construct the additional discharge point.
67	67	From the date of authorisation of the Overburden Management Project, water releases are authorised from the following points: < Authorised Release Points, Receiving Water Body, Latitude, Longitude > *WMD, Little Barney Creek, -16.42635, 136.0693 *Mine Levee Release Point (MLRP), Barney Creek Diversion, -16.42743, 136.1114 *South-East Levee 1 Release Point (SEL1 RP), Barney Creek Diversion, -16.42394, 136.1082 *McArthur River Diversion Channel Release Point, McArthur River Diversion, -16.435385, 136.120196					1			1		4	Full Compliance	2023-24 Waste Discharge Records - External Reporting The 2023-24 Waste Discharge Records showed that water was released from WMD (WMD RP, MRDC DP and MLDP), NC1A (MLDP), SEPROD (CERP) and Pond 2 (MLDP). Identified release points during site visit August 2024.	Location coordinates for the McArthur River Diversion Channel Release Point were Latitude 16.43468 and Longitude 136.1207 in the May 2022 Authorisation.
68	68	The Operator must:											Refer to sub conditions		
68.a	68.a	ensure all offsite water discharges are undertaken in accordance with a valid WDL;	1				1			1		4	Full Compliance	2023-24 Waste Discharge Records 2023-24 Loads Estimate WDL 174 Annual Monitoring Report 2023-2024.	The WDL audit for the period 1May2023 to 30Apr2024 found that offsite water discharges were undertaken in accordance with the WDL. A total of approximately 3,887.5 ML of water was released from authorised discharge and release points to the McArthur River during the reporting period.
68.b	68.b	only release water for offsite discharge from the WDL approved points;					1			1		4	Full Compliance	2023-24 Waste Discharge Records - External Reporting The 2023-24 Waste Discharge Records showed that water was released from WMD (WMD RP, MRDC DP and MLDP), NC1A (MLDP), SEPROD (CERP) and Pond 2 (MLDP) and these are all approved in the WDL, noting some are only approved as temporary.	There is an additional on lease release point in the Authorisation.
68.c	68.c	interpret and report all data and results acquired as part of the activity in the Operator's Annual Environmental Mining Report;					1			1		4	Full Compliance	Surface Water Monitoring Report for the 2023/24 Reporting Period EMR 2023-2024 dated 31Aug2024 The Surface Water Monitoring Report has the detail regarding the data and results with the EMR 2023-2024 providing discussion around the "holistic review of the environmental performance".	
68.d	68.d	evaluate the performance of this activity in terms of its effectiveness as a management tool;					1			1		4	Full Compliance	Surface Water Monitoring Report for the 2023/24 Reporting Period EMR 2023-2024 dated 31Aug2024 EMR 2023-2024 states "A Level 3 TARP investigation is being undertaken for elevated bioavailable lead concentrations in fluvial sediment. The investigation is being undertaken to better understand the contributing sources of the fluvial sediment analyte exceedances and assess the effectiveness of the Mine's existing controls." The Surface Water Monitoring Report has the detail regarding the performance of monitoring but the EMR 2023-2024 has discussion around the "holistic review of the environmental performance" and "A weight-of-evidence assessment has been undertaken by considering results of key monitoring programs to determine whether there are any areas of environmental risk that require further actions for the protection of the McArthur River beneficial uses and community values from mining impacts."	EMR 2023-2024 states "In response to the Level 3 TARP for total lead, MRM has engaged specialist consultants to review the limits for managed release loads in the AMP to account for seasonal variations in rainfall as recommended by the NT EPA in Assessment Report 86. Potential impact associated with the Level 3 TARP is expected to be negligible in the context of the total background lead load transported by the McArthur River over the reporting period. To verify this, additional fluvial sediment sampling will be undertaken downstream of the Mine during the 2024 dry season."
68.e	68.e	by 30 June 2020, characterise total loads of mine-derived contaminants from all source inputs for the 2017-2018 period consistent with Condition 16.b), unless otherwise agreed in writing by the Department.					1			1		N/A	Not Applicable	Email Operator to Department subject MRM Variation of Authorisation Condition (38c); 2017-2018 Mine -Derived Loads dated May2020. 220508 MRM-DPIR_Condition 38 mine-derived loads. Attachment A - 2017-18 Mine Derived Analyte Loads Assessment.	Considered N/A as due and completed before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
69	69	The Operator must in relation to the WMD release point to Little Barney Creek undertake:												Refer to sub conditions	
69.a	69.a	release activity that minimises localised erosion, and utilises suitable energy dissipation and flow spreader structures (e.g. rock basin) and be monitored daily during release events;					1					4	Full Compliance	<p>2023-24 Loads Estimate 2023-24 Waste Discharge Records - External Reporting 2023-24 WMD Release Point Checklist dated May2024 Photo: Rock basin dated Mar2024</p> <p>The 2023-24 WMD Release Point Checklist spreadsheet states that the following is required "daily inspection of the rock basin at the release point to ensure erosion is being suitable controlled" and includes a prompt to advise if "rock basin erosion is controlled" . It also requires a cell to tick for photo evidence of rock basin. The release days in the 2023-24 WMD Release Point Checklist spreadsheet are identical to those in the 2023-24 Waste Discharge Records for WMD RP.</p> <p>Daily monitoring was not undertaken on 6 of the 54 discharge days due to access restrictions (from cyclone/ flooding and a safety incident) and on the final day of discharge.</p>	
69.b	69.b	remediation in the event of unacceptable erosion occurring at the Carpentaria Highway culvert system to the satisfaction of the Department of Infrastructure, Planning and Logistics and the Department;					1					N/A	Not Applicable	<p>Surface Water Monitoring Report for the 2023/24 Reporting Period WRM's "Review of Little Barney Creek geomorphic characteristics" is an attachment to the 23/24 Surface Water Quality Report.</p> <p>Review of Little Barney Creek geomorphic characteristics states "Based on the available aerial photography and LiDAR ground survey information there has been no significant change to the Little Barney Creek channel bed and banks downstream of the WMDRP."</p>	The Operator advised "No remediation occurred during the reporting period."
69.c	69.c	a cross-section profile survey immediately up-stream and down-stream of the Carpentaria Highway crossing, prior to and following each wet season;					1					4	Full Compliance	<p>Surface Water Monitoring Report for the 2023/24 Reporting Period WRM's "Review of Little Barney Creek geomorphic characteristics" is an attachment to the 23/24 Surface Water Quality Report.</p> <p>Surface Water Monitoring Report for the 2023/24 Reporting Period states "Appendix B presents a review of Little Barney Creek geomorphic characteristics downstream of WMD RP. This assessment was undertaken in accordance with conditions of the VoA. The findings of this assessment included:</p> <ul style="list-style-type: none"> • The 2023 LiDAR shows little to no changes to the banks of Little Barney Creek compared to 2018 LiDAR; • Minor gully erosion was observed on the northern bank, upstream of the Little Barney Creek culvert crossing; however, this is likely attributed to local catchment runoff inflows and not WMD RP releases as the discharge point does not release directly into the channel; and • There have been no significant changes to the Little Barney Creek channel, with no significant bed erosion along the length of the channel since 2018." LiDAR of Little Barney Creek upstream and downstream of the Carpentaria Highway culverts were included. 	
69.d	69.d	each wet season quantification of any significant changes to creek morphology as function of time by documenting at a minimum morphology prior to first water release, and following the last water release. This could be achieved, for example, using a drone survey of the drainage system between the flow outlet and Barney Creek Diversion using a consistent flight path, with the resulting image overlaid on appropriately sized grid (e.g. 2.5 x 2.5 m);					1					4	Full Compliance	<p>Surface Water Monitoring Report for the 2023/24 Reporting Period WRM's "Geomorphic characteristics of Little Barney Creek" is an attachment to the 23/24 Surface Water Quality Report.</p> <p>Surface Water Monitoring Report for the 2023/24 Reporting Period states "Appendix B presents a review of Little Barney Creek geomorphic characteristics downstream of WMD RP. This assessment was undertaken in accordance with conditions of the VoA. The findings of this assessment included:</p> <ul style="list-style-type: none"> • The 2023 LiDAR shows little to no changes to the banks of Little Barney Creek compared to 2018 LiDAR; • Minor gully erosion was observed on the northern bank, upstream of the Little Barney Creek culvert crossing; however, this is likely attributed to local catchment runoff inflows and not WMD RP releases as the discharge point does not release directly into the channel; and • There have been no significant changes to the Little Barney Creek channel, with no significant bed erosion along the length of the channel since 2018." 	

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
69.e	69.e	measure and record flow duration, flow rate and volume of all water released from WMD into Little Barney Creek;					1					3	Part Compliance (High)	2023-24 Waste Discharge Records - External Reporting 2023-24 WMD Release Point Checklist dated May2024 The 2023-24 Waste Discharge Records & Loads Tracking includes the flow duration, average flow rate and a volume based on the flow duration and average flow. No evidence of a process of measuring flow duration and volume of all water released from WMD into Little Barney Creek or recording flow rate of all water released from WMD into Little Barney Creek was provided. It appeared that the volume is calculated not measured. It appeared that there are flow meters but there is incomplete evidence of record keeping and measuring.	OFI: The current process relies on manual entries to create records of flow start, stop, rate and volume. The flow volume is determined based on calculations rather than measurements. Explore opportunities to automate the measurement and recording of data capture for discharge events.
69.f	69.f	ensure all evidence of continuous flow in Little Barney Creek along the length of the drainage system between WMD release outlet and Little Barney Creek Diversion Channel is available for inspection;					1					4	Full Compliance	Approval for temporary exemption to Condition 69f dated Mar2024 2023-24 WMD Release Point Checklist Rock Basin and Little Barney Creek Photos The 2023-24 WMD Release Point Checklist has a prompt to enter yes or no regarding "flow along drainage line" that has the answer Y for all releases (except for those where access was restricted due to cyclone/flooding and a safety incident). It also request a tick for a photo evidence of flow. Photos of Little Barney Creek showed flow.	Approval of an exemption to the requirement for flow in Little Barney Creek was provided in April, 2024 however, the Operator advised that discharge had ceased by this point and no discharges occurring under the exemption.
69.g	69.g	ensure the surface water monitoring schedule for the activity includes SW06, which must be assessed for identical parameters as defined for SW03. At monitoring points SW03 and SW06:					1					4	Full Compliance	2023-24 WMD Release Point Checklist 2021-22 MRM Environmental Monitoring Schedule I1001 Rev3 dated Oct2022. Correspondence between Operator and DITT with response February 2024 regarding Inclement Weather and Surface Water Monitoring. Upon Discharge Surface Water Sampling WDL 174-14 dated 11, 12 and 25Mar Upon Discharge Surface Water Field Sheet template has SW06/SW20. Surface Water Monitoring Report for the 2023/24 Reporting Period Surface Water Data extracted 240530 spreadsheet The 2021-22 MRM Environmental Monitoring Schedule I1001 Rev3 that was relevant for the audit period, has identical monitoring requirements for SW03 and SW06. The parameters at SW19 and SW20 are identical to SW03/SW06 but the frequency is only weekly and doesn't include the twice weekly requirement during discharge from the WMD RP. Upon Discharge Surface Water Sampling WDL 174-14 field sheets dated 11, 12 and 25Mar show SW20 substituted for SW06 using the same parameters as SW03. Surface Water Data extracted 240530 spreadsheet shows the same analysis were undertaken for SW20 as SW03. The example upon discharge field sheets viewed, Surface Water Monitoring Report for the 2023/24 Reporting Period and COC also indicate the same parameters were used.	2023-24 WMD Release Point Checklist does not include SW06 but states "SW20 (or SW19 if access is restricted)". The Operator advised "Due to AAPA restrictions, MRM was not able to collect water quality samples from SW06. Instead, sampling was conducted at SW03 and SW20. SW20 is located directly upstream of SW06 and is considered a suitable substitute." OBS: Update the monitoring schedule and Water Management Plan to reflect that SW06 is an alternative to SW20 (and even SW19 if SW20 not available) ensuring the same sampling requirements as SW03.
69.g.i	69.g.i	Field parameters must also be measured daily during water release from WMD into Little Barney;					1					4	Full Compliance	2023-24 WMD Release Point Checklist 2021-22 MRM Environmental Monitoring Schedule I1001 Rev3 dated Oct2022. Correspondence between Operator and DITT with response February 2024 regarding Inclement Weather and Surface Water Monitoring. Surface Water Monitoring Report for the 2023/24 Reporting Period Surface Water Monitoring Report for the 2023/24 Reporting Period Figure 4.9 WMD RP inspection summary, at downstream locations (SW03, SW19/SW20) shows that daily sampling was not undertaken after 19Mar2024 due to access and safety constraints.	"Sampling of rivers and creeks was suspended on Monday 15 April due to a near-miss incident with an Estuarine Crocodile." "As notified to the Administering Authority on 17 April 2024, the frequency of sampling at the natural surface water locations has been reduced as the field monitoring teams have recently reported increasing activity of estuarine crocodiles at the McArthur River monitoring points. This includes an observation at the McArthur River upstream control point SW21 the morning of Monday 15 April 2024. MRM notes that until such time as we can ensure the sampling can be undertaken in a safe manner by monitoring personnel, MRM intends to collect the samples during the managed releases approximately once per week." OBS: Refer to OBSs for condition 29.1 of the WDL.
69.g.ii	69.g.ii	The surface water monitoring analytical suite must include thallium, boron and cobalt;					1					4	Full Compliance	2021-22 MRM Environmental Monitoring Schedule I1001 Rev3 dated Oct2022. Surface Water Monitoring Report for the 2023/24 Reporting Period Surface Water Data extracted 240530 spreadsheet (laboratory results only) The Environmental Monitoring Schedule does include thallium, boron and cobalt, and the Surface Water Data extracted 240530 spreadsheet showed that SW03 and SW20 samples were all analysed for thallium, boron and cobalt.	

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
69.g.iii	69.g.iii	The surface water monitoring must be continued for a further two weeks following completion of the release activities for the season or until field parameters have returned to baseline levels;					1					4	Full Compliance	2023-24 Waste Discharge Records - External Reporting 2023-24 WMD Release Point Checklist dated May2024 Surface Water Monitoring Report for the 2023/24 Reporting Period Surface Water Monitoring Report for the 2023/24 Reporting Period Figure 4.9 WMD RP inspection summary, at downstream locations (SW03, SW19/SW20) shows that daily sampling was not undertaken after 19Mar2024 due to access and safety constraints.	OBS: Refer to OBSs for condition 29.1 of the WDL.
69.h	69.h	measure total loads of analytes (including lead and zinc) from all controlled discharge activities entering McArthur River at location SW06 or an alternate location as agreed by the Department; and					1					3	Part Compliance (High)	2023-24 WMD Release Point Checklist 2021-22 MRM Environmental Monitoring Schedule I1001 Rev3 dated Oct2022. Correspondence between Operator and DITT with response February 2024 regarding Inclement Weather and Surface Water Monitoring. Surface Water Data extracted 240530 spreadsheet (laboratory results only) The 2021-22 MRM Environmental Monitoring Schedule I1001 Rev3 that was relevant for the audit period, has analytes including lead and zinc and Surface Water Data extracted 240530 spreadsheet shows results for total loads of analytes including lead and zinc at SW20 in lieu of SW06. No sampling was undertaken at SW06. The Operator informed DITT on 16Feb2024 that they proposed to sample at SW20 in lieu of SW06 and commenced discharge on 17Feb2024. However, DITT advised that no alternate locations have been approved.	OFI: Seek formal agreement from DITT that SW19 or SW20 monitoring location is an acceptable alternative to SW06 related to monitoring during discharges from WMD into Little Barney Creek.
69.i	69.i	interpret the data acquired as part of the activity and its effectiveness and report in the Operator's Annual EMR in accordance with Condition 9.					1					4	Full Compliance	EMR 2023-2024 Correspondence between Operator and DITT relating to 2023-2024 EMR Submission (after the audit period). Related to this condition, correspondence between Operator and DITT relating to 2023-2024 EMR Submission states "Water management detailed in Section 3.1. Managed releases during the reporting period are detailed in Section 3.1.3." These are correct references and provide a high level interpretation with further detail in the Surface Water Monitoring Report for the 2023/24 Reporting Period.	
70	70	The Operator is authorised to undertake water management trial/s in accordance with:											Refer to sub conditions		
70.a	70.a	concepts detailed in the approved MMP, ensuring the trial/s is designed to manage and control all impacted surface water runoff in accordance with the Water Management Plan:					1					N/A	Not Applicable		Future item. No trials have occurred.
70.a.i	70.a.i	Irrigation of Treated Water – Open Woodland Irrigation;					1					N/A	Not Applicable		Future item. No trials have occurred.
70.a.ii	70.a.ii	Irrigation of Treated Water – Phytoremediation;					1					N/A	Not Applicable		Future item. No trials have occurred.
70.a.iii	70.a.iii	Lowering of surface water elevations – Evapotranspiration;					1					N/A	Not Applicable		Future item. No trials have occurred.
70.a.iv	70.a.iv	Sulfate Treatment System – Passive engineered wetland;					1					N/A	Not Applicable		Future item. No trials have occurred. Trials have not been completed because the Water Management Dam is already functioning as a passive water treatment wetland
70.a.v	70.a.v	Sulfate Treatment System – Active Bioreactor;					1					N/A	Not Applicable		Future item. No trials have occurred. There has been no progress on the Active Bioreactors, this project is unlikely to be feasible / practical.
70.b	70.b	detailed designs, where nominated in the approved MMP, are developed in accordance with the concepts outlined in the approved MMP, and endorsed by a relevant independent third party, prior to construction.					1					N/A	Not Applicable		Future item. There were no relevant designs in the audit period.
71	71	At the conclusion of the trials in Condition 70, the Operator must apply in writing to the Department for approval of full-scale implementation.					1					N/A	Not Applicable		Future item. No trials have occurred.
72	72	Water management using the Centre Pivot Irrigator is authorised:											Refer to sub conditions		
72.a	72.a	within the Mine Levee in accordance with the concept previously approved, as defined in Schedule B;					1					N/A	Not Applicable		Centre Pivot Irrigator not used in the audit period.
72.b	72.b	adjacent to the TSF in accordance with the concept presented in the approved MMP;					1					N/A	Not Applicable		Centre Pivot Irrigator not used in the audit period.
72.c	72.c	to be configured to maximise evaporation and minimise surface spray drift, surface runoff and infiltration into underlying natural soils.					1					N/A	Not Applicable		Centre Pivot Irrigator not used in the audit period.

Perimeter Run-Off Dams - SPROD, SEPROD, WPROD and EPROD

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement										Score	Compliance level	
73	73	The Operator is approved to develop SPROD and SEPROD in accordance with relevant documents defined in Schedule B;					1					N/A	Not Applicable	Operator advised that SPROD and SEPROD were constructed prior to the audit period. Liner and spillway construction were undertaken on SPROD 2019 and 2020 with a construction report prepared in the previous audit period.
74	74	The Operator is authorised to complete works to construct EPROD and WPROD in accordance with following:											Refer to sub conditions	
74.a	74.a	EPROD:											Refer to sub conditions	
74.a.i	74.a.i	as previously approved and defined in Schedule B, ensuring that only benign material be used in the construction of the western embankment wall;					1					N/A	Not Applicable	No EPROD construction occurred in the audit period.
74.b	74.b	WPROD:											Refer to sub conditions	
74.a.i	74.a.i	CWNOEF and NOEF West D Amendment, as defined in Schedule B; and					1					N/A	Not Applicable	Completed before the audit period. WPROD was completed in July 2017 (before the audit period commenced) and Independent Monitor sighted a completion report dated 14Jul2017.
74.a.ii	74.a.ii	WPROD and Western Surface Water Management Design Update (GHD Memo), as defined in Schedule B.					1					N/A	Not Applicable	Completed before the audit period. WPROD was completed in July 2017 (before the audit period commenced) and Independent Monitor sighted a completion report dated 14Jul2017.
75	75	The Operator must: (1) Construct EPROD and WPROD informed by the following monitoring regime in the event groundwater dewatering is											Refer to sub conditions	Note that the May 2022 Authorisation had slightly different wording and format but an equivalent intent for subcondition 75 (1).
75.a	75.a	six hourly monitoring of field parameters for the first 24 hours of dewatering. Should parameters not stabilise during the first 24 hours then six hourly monitoring must continue until stabilisation has occurred;					1					N/A	Not Applicable	The Operator advised "There were no further construction or commissioning works over the audit period. There are no plans to change the geometry of these structures at this stage"
75.b	75.b	field parameters must be taken daily following the first 24 hour period. Should parameters change more than 20% then the frequency must increase to every 12 hours until parameters have stabilised;					1					N/A	Not Applicable	The Operator advised "There were no further construction or commissioning works over the audit period. There are no plans to change the geometry of these structures at this stage"
75.c	75.c	field parameters must include pH, specific electrical conductivity (SEC), temperature, REDOX and dissolved oxygen;					1					N/A	Not Applicable	The Operator advised "There were no further construction or commissioning works over the audit period. There are no plans to change the geometry of these structures at this stage"
75.d	75.d	water samples must be taken and analysed at the commencement of dewatering at the end of the first 24 hours, and then weekly sampling and analysis of dewatering water for the remainder of the construction;					1					N/A	Not Applicable	The Operator advised "There were no further construction or commissioning works over the audit period. There are no plans to change the geometry of these structures at this stage"
75.e	75.e	additional sampling and analysis must be undertaken if there is a substantial change in field parameters (approximately 30%);					1					N/A	Not Applicable	The Operator advised "There were no further construction or commissioning works over the audit period. There are no plans to change the geometry of these structures at this stage"
75.f	75.f	analysis must include: specific electrical conductivity (SEC), major ions (Ca, K, Mg, Na, Cl, CO3, HCO3 and SO4), Al, As, Cd, Co, Cu, Fe, Mn, Ni, Pb, Se and Zn;					1					N/A	Not Applicable	The Operator advised "There were no further construction or commissioning works over the audit period. There are no plans to change the geometry of these structures at this stage"
75.g	75.g	field parameters and samples for analysis must be taken from the dewatering source, not the receiving storage;					1					N/A	Not Applicable	The Operator advised "There were no further construction or commissioning works over the audit period. There are no plans to change the geometry of these structures at this stage"
75.h	75.h	if flow meters fail, then dewatering must cease until they are repaired or replaced;					1					N/A	Not Applicable	The Operator advised "There were no further construction or commissioning works over the audit period. There are no plans to change the geometry of these structures at this stage"
75.i	75.i	field water quality parameters, flow meter volumes and laboratory analysis must be submitted to Department on a monthly basis;					1					N/A	Not Applicable	The Operator advised "There were no further construction or commissioning works over the audit period. There are no plans to change the geometry of these structures at this stage"
75.j	75.j	any indication of fracturing and/or caverns (Karstification/dissolution features) must be recorded during logging along with water strikes and estimated yields during drilling;					1					N/A	Not Applicable	The Operator advised "There were no further construction or commissioning works over the audit period. There are no plans to change the geometry of these structures at this stage"

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement														
75 (2)	75.k	Prior to use of the structure, submit to the Department construction reports including QA and QC data endorsed by the ICE within 60 days of construction being completed.					1					N/A	Not Applicable		The Operator advised "There were no further construction or commissioning works over the audit period. There are no plans to change the geometry of these structures at this stage"	
Tailings storage facility																
76	76	From the date of authorisation of the Overburden Management Project, tailings must be managed in accordance with the following:												Refer to sub conditions		
76.a	76.a	be deposited only in Cell 1, Cell 2 or combined Cell 1 and Cell 2;				1						4	Full Compliance	MRR TSF Quarterly Report - Q1 2023 January 2023 to March 2023. MRR TSF Quarterly Report - Q2 2023 April 2023 to June 2023. Review of the quarterly reports provided (relevant to a quarter of the audit period) do not indicate tailings being deposited outside of Cell 1 and Cell 2, in compliance with this condition.		
76.b	76.b	any construction of tailings lift, as approved in Condition 79, be reviewed and endorsed by independent oversight requirements in Condition 48 and 50 or an alternative independent qualified and experienced third party approved by the Department in writing;				1							-			Refer to compliance scored in conditions 48 and 50.
76.c	76.c	construction of the TSF lifts is undertaken in accordance with a valid AAPA certificate;	1			1						4	Full Compliance	Aboriginal Cultural Heritage Management Plan version 1.1 dated Jun2022. Aboriginal Cultural Heritage Management Plan advises that C2004/083 Variation to C2004/013 D89/199; 90/1015.1 is in place for the TSF.		
76.d	76.d	the TSF Seepage Interception Trench is fully operational by end of December 2020;				1						N/A	Not Applicable			The Independent Monitor was advised by the Operator that "The construction of the Surprise Creek Interception Trench was complete on 5 November 2020." Condition is obsolete. Evidence of operation was observed during the waste rock handling procedures audit conducted on 15June2022 OBS: DITT should consider marking this condition as complete given the TSF Seepage Interception Trench is fully operational.
76.e	76.e	in the event that future review of the designs or as-built structure by independent experts require additional matters to be addressed, the Operator together with the ICE must provide a written response that justifies the existing design or proposes an alternate design to the satisfaction of the Department.				1						N/A	Not Applicable			The Operator advised "there have been no changes to the general philosophy of the TSF over the reporting period".
TSF Cell 1 and 2 Construction																
77	77	From the date of authorisation of the Overburden Management Project, the Operator is approved to develop TSF Cell 1 , Cell 2 and Combined Cell 1 and 2 lifts in accordance with:				1						4	Full Compliance	TSF Cell 2 Stage 8 – Raise to RL 10064 Detailed Design Report McArthur River Mining Pty Ltd Aug2023 (neither J Castle or B Hanslow signed). TSF Cell 1 Stage 6 – Raise to RL 10061 Detailed Design Report McArthur River Mining Pty Ltd Oct2023 (J Castle is an author but not signed off by B Hanslow). MRR TSF Quarterly Report - Q1 2023 January 2023 to March 2023. MRR TSF Quarterly Report - Q2 2023 April 2023 to June 2023. MRR TSF Quarterly Report - Q3 2023 JULY TO SEPTEMBER 2023 - draft. MRR TSF Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft.		
77.a	77.a	McArthur River Mining Pty Ltd, Tailings Storage Facility, Design Development – Life of Mine Plan, May 2017, as defined in Schedule B;				1						4	Full Compliance	TSF Cell 2 Stage 8 – Raise to RL 10064 Detailed Design Report McArthur River Mining Pty Ltd Aug2023 (neither J Castle or B Hanslow signed). TSF Cell 1 Stage 6 – Raise to RL 10061 Detailed Design Report McArthur River Mining Pty Ltd Oct2023 (J Castle is an author but not signed off by B Hanslow). TSF Cell 1 Stage 6 – Raise to RL 10061 Detailed Design Report states "The TSF Life of Mine Plan (LOM) presents the design basis for operation and closure of the TSF (GHD 2017a). It is a critical reference document that describes the design criteria and should be referred to directly. Since completion of the 2017 TSF LOM plan, geotechnical design parameters are reviewed as new information becomes available and updated if necessary (GHD, 2022b). Geotechnical parameters used as part of the Cell 1 Stage 6 design are included in this report. " The TSF Cell 2 Stage 8 – Raise to RL 10064 Detailed Design Report has an equivalent section.		With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required.
77.b	77.b	the approved MMP for the following stages:											Refer to sub conditions			

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement										Score	Compliance level	
77.b.ii	77.b.ii	Cell 1 Raise 4 – 10,056.0 mRL;				1						N/A	Not Applicable	Historic item. Works completed before the audit period.
77.b.ii	77.b.ii	Cell 1 Raise 5 – 10,059.0 mRL;				1						N/A	Not Applicable	Historic item. Works completed before the audit period.
77.b.iii	77.b.iii	Cell 2 Raise 6 – 10,061.0 mRL;				1						N/A	Not Applicable	Historic item. Works completed before the audit period.
77.b.iv	77.b.iv	Cell 2 Raise 7 – 10,061.5 mRL;				1						N/A	Not Applicable	Historic item. Works completed before the audit period.
77.b.v	77.b.v	Combined Cell 1 and 2 Raise 1 – 10,062.6 mRL;				1						N/A	Not Applicable	N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
77.b.vi	77.b.vi	Combined Cell 1 and 2 Raise 2 – 10,063.8 mRL;				1						N/A	Not Applicable	N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
77.b.vii	77.b.vii	Combined Cell 1 and 2 Raise 3 – 10,065.0 mRL;				1						N/A	Not Applicable	N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which was above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
77.b.viii	77.b.viii	Combined Cell 1 and 2 Raise 4 – 10,066.2 mRL;				1						N/A	Not Applicable	N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
77.b.ix	77.b.ix	Combined Cell 1 and 2 Raise 5 – 10,067.4 mRL;				1						N/A	Not Applicable	N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
77.b.x	77.b.x	Combined Cell 1 and 2 Raise 6 – 10,068.6 mRL;				1						N/A	Not Applicable	N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
77.b.xi	77.b.xi	Combined Cell 1 and 2 Raise 7 – 10,069.8 mRL;				1						N/A	Not Applicable	N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
77.b.xii	77.b.xii	Combined Cell 1 and 2 Raise 8 – 10,071.0 mRL;				1						N/A	Not Applicable	N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
77.b.xiii	77.b.xiii	Combined Cell 1 and 2 Raise 9 – 10,072.2 mRL;				1						N/A	Not Applicable	N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
77.b.xiv	77.b.xiv	Combined Cell 1 and 2 Raise 10 – 10,073.4 mRL;				1						N/A	Not Applicable	N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
77.b.xv	77.b.xv	Combined Cell 1 and 2 Raise 11 – 10,074.6 mRL;				1						N/A	Not Applicable	N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
77.b.xvi	77.b.xvi	Combined Cell 1 and 2 Raise 12 – 10,075.8 mRL;				1						N/A	Not Applicable		N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
77.b.xvii	77.b.xvii	Combined Cell 1 and 2 Raise 13 – 10,077.0 mRL;				1						N/A	Not Applicable		N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
77.b.xviii	77.b.xviii	Combined Cell 1 and 2 Raise 14 – 10,078.0 mRL.				1						N/A	Not Applicable		N/A due to lift heights no longer being consistent with approved design. With respect to the discrepancy between the lift stages/heights in the Authorisation and the approved design for cell 2 stage 7, which is above this height already, DITT advised "Delegate decided formal record of discrepancy on file sufficient - no change to Authorisation required."
78	78	For each lift, the Operator must ensure detailed designs follow the approved McArthur River Mining Pty Ltd Tailings Storage Facility Raising General Specification for Design and Construction; with oversight provided by the ICE consistent with Condition 48.				1						4	Full Compliance	TSF Cell 2 Stage 8 – Raise to RL 10064 Detailed Design Report McArthur River Mining Pty Ltd Aug2023 (neither J Castle or B Hanslow signed). TSF Cell 1 Stage 6 – Raise to RL 10061 Detailed Design Report McArthur River Mining Pty Ltd Oct2023 (J Castle is an author but not signed off by B Hanslow). Letter GHD to Operator subject TSF Construction Works, May 2023 - April 2024, Engineer of Record Oversight dated Aug2024. TSF Cell 2 Stage 8 – Raise to RL 10064 Detailed Design Report states "Geometric parameters for the proposed Cell 2 Stage 8 raise are given in Table 2.4 and presented on the typical sections in Figure 3.1 and Figure 3.2, which are consistent with the currently approved TSF LOM Plan and the General Specification for Design and Construction (GHD, 2019f), included as Appendix I of the approved 2020 Mining Management Plan."	The ICE advised that the process followed is the design team prepare the design, the EOR/ICE review the design, then the ITRB review the design, the design team make updates with ICE oversight. There is then a construction endorsement letter by ICE after construction.
TSF Management															
79	79	The Operator must operate and maintain the TSF in accordance with the most up-to-date TSF Operations Maintenance and Surveillance manual, ensuring:				1						4	Full Compliance	MRM TSF Quarterly Report - Q1 2023 January 2023 to March 2023. MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023. MRM TSF Quarterly Report - Q3 2023 JULY TO SEPTEMBER 2023 - draft. MRM TSF Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft. Tailings Storage Facility – Operations, Maintenance and Surveillance Manual (version 7 dated Sep2023). No instances of not conforming with the TSF Operations Maintenance and Surveillance manual were identified for the audit period. Although identified in previous audits, the required tailings density remains inconsistent in the TSF OMS. MRM TSF Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft showed there were pockets of time where the tailings density was below the 50-55% target including 13 days in December 2023 and stated "A density lower than 50% is not considered to be a material concern on a short-term basis".	In the audit period, the routine daily inspection form format has changed to an online version. The new version appears to not include all checks daily. OBS: The routine inspection forms should be updated to incorporate the relevant requirements of the Authorisation. OBS: Table 7-2 (TSF Critical Operating Parameters) of the OMS Manual should be updated to be consistent with TARP Table 7-10 (Tailings density TARP) which specifies density >50% as the target normal range (repeat from 2022/2023). OBS: Obtain ITRB and ICE review of the following statement related to tailings density that is included in TSF Quarterly Reports "A density lower than 50% is not considered to be a material concern on a short-term basis" and if accurate include this concept in the TSF OMS. OBS: Examine schedule for the preparation for TSF "as-constructed" construction reports so they are submitted within 60 days of completion of construction.
79.a	79.a	no discharge of water into the TSF unless											Refer to sub conditions		
79.a.i	79.a.i	it is water contained within the Tailings stream which is at normal operational slurry densities; or				1						4	Full Compliance	MRM TSF Quarterly Report - Q1 2023 January 2023 to March 2023. MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023. MRM TSF Quarterly Report - Q3 2023 JULY TO SEPTEMBER 2023 - draft. MRM TSF Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft. TSF Domain - Routine Inspection Form 16Jun2023, 12Aug2023, 8Oct2023 and 15Mar2024. MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023 indicated that tailings was above 50%, as required and stated "Daily density readings for the tailings slurry pumped to the TSF over the reporting period are provided in Figure 1 below. The average density for tailings slurry during the reporting period was 53.5%, primarily within the nominal target density range. The few instances where densities fell below the target range were the result of minor mill processing issues which caused a higher water content in the slurry than desired; as discussed above, these short-term variations are not of significant concern. " There were pockets of time where the tailings density was below the 50% target including 13 days in December 2023. However, it was still a slurry and considered compliant.	

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
79.a.ii	79.a.ii	It is endorsed by the ITRB;				1						N/A	Not Applicable		The Operator advised "No additional water sources were released to the TSF during the reporting period."
79.b	79.b	all Tailings are deposited sub-aerially to allow proper beaching and drying between deposition cycles;				1						4	Full Compliance	MRM TSF Quarterly Report - Q1 2023 January 2023 to March 2023. MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023. MRM TSF Quarterly Report - Q3 2023 JULY TO SEPTEMBER 2023 - draft. MRM TSF Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft. MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023. states "The tailings are deposited sub-aerially through spigots at approximately 50 metre (m) intervals around the perimeter of the TSF embankment via three high density polyethylene (HDPE) perimeter pipelines." EMR 2023-2023 " Placement of tailings around the Cell 1 and Cell 2 perimeters using the subaerial spigot discharge system, as stipulated within the designs and TSF operational guidelines. A total of 2,852,207 tonnes (t) of tailings were deposited into the TSF during the reporting period." Sub-aerial deposition observed during site visit August 2024 (after the audit period).	
79.c	79.c	surface water levels are maintained in the TSF such that they do not come into contact with the embankment internal walls;				1						4	Full Compliance	MRM TSF Quarterly Report - Q1 2023 January 2023 to March 2023. MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023. MRM TSF Quarterly Report - Q3 2023 JULY TO SEPTEMBER 2023 - draft. MRM TSF Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft. MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023 states "The general design philosophy for water management at the TSF is the reduction of seepage through minimising the size of decant ponds and maximising evaporation. Minimising the size of decant ponds also acts to maximise the beach length, which controls the water table in embankments and thereby increases the stability of the structure." DITT site investigation notes from 27Mar2024 "TSF Cell 1 showing absence of pooled water against the embankment" including a photo.	
79.d	79.d	phreatic surface is managed to avoid compromising the integrity of the embankment.				1						4	Full Compliance	MRM TSF Quarterly Report - Q1 2023 January 2023 to March 2023. MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023. MRM TSF Quarterly Report - Q3 2023 JULY TO SEPTEMBER 2023 - draft. MRM TSF Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft. The TSF OMS states "Maintain as small a decant pond as possible" with the reasoning "Reduce pore pressures / phreatic surface level in the embankment and reduce the risk of embankment instability". MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023. states "The general design philosophy for water management at the TSF is the reduction of seepage through minimising the size of decant ponds and maximising evaporation. Minimising the size of decant ponds also acts to maximise the beach length, which controls the water table in embankments and thereby increases the stability of the structure." DITT site investigation notes from Mar2024 "TSF Cell 1 showing absence of pooled water against the embankment" including a photo.	
80	80	The Operator must provide quarterly to the Minister a written status report on the seepage and management of seepage from the TSF, including the following:	1			1						2	Part Compliance (moderate)	MRM TSF Quarterly Report - Q1 2023 January 2023 to March 2023. MRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023. MRM TSF Quarterly Report - Q3 2023 JULY TO SEPTEMBER 2023 - draft (after audit period). MRM TSF Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft (after audit period). The most recent TSF quarterly report submitted in the audit period was for Q2 2023 April 2023 to June 2023 on 20Sep2023. Draft TSF Quarterly Reports for Q3 2023 JULY TO SEPTEMBER 2023 and Q4 2023 OCTOBER TO DECEMBER 2023 were provided (after the audit period) but no evidence has been provided for their submission. TSF Cell 1 Stage 5 and TSF Cell 2 Stage 6 raise "as-constructed" construction reports were identified as not submitted in the AEPAR 2022 and 2023 although a DITT review of Quarterly Reports had requested "as constructed" construction reports be submitted. Evidence was provided that the TSF Cell 1 Stage 5 and TSF Cell 2 Stage 6 "as-constructed" construction reports were prepared before the audit but not submitted to DITT.	OFI: Submit TSF quarterly reports to DITT quarterly. OFI: Submit TSF Cell 1 Stage 5 and Cell 2 Stage 6 raises "as-constructed" construction reports to DITT (dated March 2022 and May 2022 respectively).

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments	
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement														
80.a	80.a	water levels in the TSF;				1						4	Full Compliance	MRRM TSF Quarterly Report - Q1 2023 January 2023 to March 2023. MRRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023. MRRM TSF Quarterly Report - Q3 2023 JULY TO SEPTEMBER 2023 - draft. MRRM TSF Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft. For example, in MRRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023 and Q3 2023 JULY TO SEPTEMBER 2023 (draft), water levels in the TSF were included in section 3.2.		
80.b	80.b	all monitoring data associated with the seepage (including geotechnical and environmental monitoring);				1						4	Full Compliance	MRRM TSF Quarterly Report - Q1 2023 January 2023 to March 2023. MRRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023. MRRM TSF Quarterly Report - Q3 2023 JULY TO SEPTEMBER 2023 - draft. MRRM TSF Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft. For example, in MRRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023 and Q3 2023 JULY TO SEPTEMBER 2023 (draft), seepage quality is discussed in section 3.4 with TSF stability and associated monitoring discussed in section 3.5.		
80.c	80.c	flow rate of each seep;				1						4	Full Compliance	MRRM TSF Quarterly Report - Q1 2023 January 2023 to March 2023. MRRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023. MRRM TSF Quarterly Report - Q3 2023 JULY TO SEPTEMBER 2023 - draft. MRRM TSF Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft. For example, section 3.3. of MRRM TSF Quarterly Reports - Q2 2023 April 2023 to June 2023 and Q3 2023 JULY TO SEPTEMBER 2023 (draft) includes seepage flow rates.		
80.d	80.d	all actions undertaken during the quarter associated with the seepage and management of Tailings;				1						4	Full Compliance	MRRM TSF Quarterly Report - Q1 2023 January 2023 to March 2023. MRRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023. MRRM TSF Quarterly Report - Q3 2023 JULY TO SEPTEMBER 2023 - draft. MRRM TSF Quarterly Report - Q4 2023 OCTOBER TO DECEMBER 2023 - draft. Attachment B - TSF Recommendation Instruction and Action Register of the MRRM TSF Quarterly Report - April 2023 to June 2023 includes the actions undertaken in the quarter.	Attachment B - TSF Recommendation Instruction and Action Register of the MRRM TSF Quarterly Report - April 2023 to June 2023 includes actions that were due but were incomplete. OBS: Recommendations in the TSF Recommendation Instruction and Action Register should be closed out by the due date. Where actions are not completed by the due date, stating "overdue" rather than "incomplete" and using a different colour of shading in the TSF Recommendation Instruction and Action Register, may prove helpful.	
80.e	80.e	all actions planned for the next quarter associated with seepage and management of Tailings.				1						4	Full Compliance	MRRM TSF Quarterly Report - Q1 2023 January 2023 to March 2023. MRRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023. MRRM TSF Quarterly Report - Q2 2023 April 2023 to June 2023 - Table 6 describes the ongoing operational actions by recommended frequency and the Attachment B - TSF Recommendation Instruction and Action Register also includes actions.		
Geochemical, Geotechnical and Hydrogeological Assessments and Investigation Drilling																
81	81	The Operator is authorised to undertake Drilling Investigations as outlined in relevant approved plans defined in Schedule B and approved MMP, ensuring adherence to industry best practice:											4	Full Compliance	EMR 2023 - 2024 dated 31Aug2024 EMR 2023-2024 Appendix A 2023-2024 Drilling Register dated August 2024 The Operator advised that there was no hydrogeological drilling in the audit period. This is supported by no Hydrogeological Drilling and Field Campaign report appendix with the EMR 2023-2024. The 2023-2024 Drilling Register includes one dewatering bore. EMR 2023 - 2024 states "Exploration and regional drilling works were undertaken within MA366, and mineral leases MLN1121 and MLN1222 during the reporting period. All drilling during the reporting period was undertaken in accordance with the January 2020 MMP. A drilling register for the reporting period is provided in Appendix A."	
81.i	81.i	in order to collect samples for waste rock characterisation and geochemical and geotechnical analyses;											4	Full Compliance	EMR 2023 - 2024 dated 31Aug2024 EMR 2023-2024 Appendix A 2023-2024 Drilling Register dated August 2024 2023-2024 Drilling Register has 41 boreholes for purposes of resource, dewatering or geotechnical.	
81.ii	81.ii	to characterise available construction and rehabilitation materials available within the Mine Levee Wall (including the pit) and areas surrounding the TSF and NOEF;											4	Full Compliance	EMR 2023 - 2024 dated 31Aug2024 EMR 2023-2024 Appendix A 2023-2024 Drilling Register dated August 2024 2023-2024 Drilling Register has 41 boreholes for purposes of resource, dewatering or geotechnical.	

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
81.iii	81.iii	to enable geochemical assessment of the overburden emplacement facility and underlying sediments;							1			4	Full Compliance	EMR 2023 - 2024 dated 31Aug2024 EMR 2023-2024 Appendix A 2023-2024 Drilling Register dated August 2024 2023-2024 Drilling Register has 41 boreholes for purposes of resource, dewatering or geotechnical.	
81.iv	81.iv	to obtain hydrogeological information associated with pit inflows, groundwater inputs into the underground void and installation of additional monitoring bores to inform site management.							1			N/A	Not Applicable	EMR 2023 - 2024 dated 31Aug2024 The Operator advised that there was no hydrogeological drilling in the audit period. This is supported by no Hydrogeological Drilling and Field Campaign report appendix with the EMR 2023-2024.	
82	82	The Operator must ensure the disturbances from the drilling and site investigation activities are rehabilitated consistent with industry best practice.							1			N/A	Not Applicable		The Operator advised "No geotechnical or hydrological investigative drilling that required revegetation occurred during the reporting period. The drilling registers will be included in Appendix A and Appendix J of the EMR." Noting that there is no Appendix J (related to hydrogeological drilling in previous years) in the 2023-2024 EMR as none was undertaken.
83	83	Characterisation data from the drilling must be kept and made available to the Minister on request; and reported in the Operator's EMR or an alternative format as agreed with the Department.							1			3	Part Compliance (High)	EMR 2023 - 2024 dated 31Aug2024 EMR 2023-2024 Appendix A 2023-2024 Drilling Register dated August 2024 Correspondence between Operator and DITT relating to MRM - 2023-2024 EMR Submission (after audit period). In the previous audit, the Operator advised "Characterisation data for Geochemical and Geotechnical exploration drilling is commercially sensitive information not suitable for inclusion in the EMR." Associated with this condition, the 2023-2024 EMR Submission Letter states "Drilling data included in Section 2.1, and Appendix A of the EMR." The drilling data is included but characterisation data is not reported in the EMR 2023 - 2024 and no alternative submission format was agreed by DITT.	Authorisation dated 5May2022 did not allow characterisation data to be submitted in an alternative format as agreed with the Department. No request was made in the audit period from the Minister for characterisation data from the drilling. OFI: Include characterisation data for geochemical and geotechnical exploration drilling in the EMR or an alternative format as agreed with DITT.
84	84	All documentation relating to the investigations undertaken is to be made available to the Department on request.	1						1			N/A	Not Applicable		There were no requests from DITT related to the investigations in the audit period
85	85	On completion of the investigation the disturbances are to be rehabilitated in accordance with the approved MMP and the basis for the proposed adjustment of total security adjustments required under Condition 11, are provided in the annual Unplanned Closure Plan report to the satisfaction of the Department.							1			N/A	Not Applicable		Investigations are not complete or in areas of ongoing disturbance. The Operator does not intend to seek to relinquish security from these areas until rehabilitated. The full security remains in place.
Exploration															
86	86	The Operator must ensure that:											Refer to sub conditions		
86.a	86.a	works are undertaken in accordance with management systems detailed in the approved MMP;							1			4	Full Compliance	Exploration Management Plan SPC-3100001 version 2 dated May2021. Exploration Management Plan SPC-3100001 version 3 effective April 2024 (end of audit period). Photo of Teena_230629 Teena Rehabilitation Work 2023 slides Photos of the Teena site post rehabilitation The proposed rehabilitation and photos post rehabilitation appear to show works in accordance with the requirements of this condition.	January 2020 MMP states "Following the completion of the drilling program and prior to the wet season, drill hole collars will be surveyed, plugged and backfilled with clean fill. Compacted ground will be ripped, with stockpiled topsoil and vegetation spread over the cleared area." The Operator advised "Exploration works were limited to the "Teena" prospect during the reporting period. During this time, the Teena site was closed for the short term. The site is expected to open for future exploration in 2024 and beyond. Rehabilitation work included minor ripping of compacted surfaces, sealing and grouting of bore casings and the spread of topsoil over cleared areas. A summary of planned temporary rehabilitation has been provided as well as photos showing the post rehabilitation condition in 2024. An inspection of the site will be completed during the next reporting period." OBS: Undertake the proposed inspection of Teena rehabilitation site in 2024/2025.
86.b	86.b	an environmental management plan is in place that addresses:							1				Refer to sub conditions		

Authorisation compliance workbook - Operator

Audit period 01 May 2023 to 30 April 2024

17 May 2023 Authorisation Condition No.
 5 May 2022 Authorisation Condition No.
 Condition/requirement

			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
86.b.i	86.b.i	chemical use and storage (e.g. hydrocarbons, drilling fluids);							1			4	Full Compliance	Exploration Management Plan SPC-3100001 May 2021, Version 2. Exploration Management Plan SPC-3100001 version 3 effective April 2024 (end of audit period). Photo of Teena_230629 Teena Rehabilitation Work 2023 slides Photos of the Teena site post rehabilitation The proposed rehabilitation by end of 2023 and photos post rehabilitation appear to show works in accordance with the requirements of this condition.	Section 3.1.2 of the Exploration Management Plan states "Hydrocarbon spills will be minimised using liners and drip trays under machinery, and appropriately sized spill-kits available in the event of a spill; • Hazardous substances (including hydrocarbons) will be stored and handled in accordance with relevant Australian standards; • Hydrocarbons will be stored in lined and banded areas;" and "Spill kits are located on drill sites for the duration of drilling activities and maintained in accordance with MRM's General Spill Response Procedure (PRO-2600047)." The proposed rehabilitation by end of 2023 and photos post rehabilitation appear to show works in accordance with the requirements of this condition.
86.b.ii	86.b.ii	erosion and sediment control;							1			4	Full Compliance	Exploration Management Plan SPC-3100001 May 2021, Version 2. Exploration Management Plan SPC-3100001 version 3 effective April 2024 (end of audit period). Photo of Teena_230629 Teena Rehabilitation Work 2023 slides Photos of the Teena site post rehabilitation The proposed rehabilitation by end of 2023 and photos post rehabilitation appear to show works in accordance with the requirements of this condition.	Section 3.1.1 of the Exploration Management Plan says "During the planning and construction of the drill area and when necessary, access tracks, the following will be considered: [...] *Vegetation clearing during, and immediately after rainfall events, will be avoided; * Vegetation clearing will be kept to a minimum required to safely traverse vehicles and drill rigs along tracks and drill pads; [...] *Methods to control erosion and sediment flow;" and "Appropriately size sumps and tanks to contain sufficient volumes of water, sediment and drilling fluids encountered during drilling;" The rehabilitation requirements are included "Access tracks will be rehabilitated, including pushing in all windrows, unless otherwise agreed in writing by the land holder or appropriate third party; * Appropriate erosion and sediment controls will be installed where erosion is evident or likely to occur; * Access through watercourses will be removed and banks restored; * All previously disturbed areas will be stable, with no evidence of active soil erosion".
86.b.iii	86.b.iii	dust;							1			4	Full Compliance	Exploration Management Plan SPC-3100001 May 2021, Version 2. Exploration Management Plan SPC-3100001 version 3 effective April 2024 (end of audit period). Photo of Teena_230629 Teena Rehabilitation Work 2023 slides Photos of the Teena site post rehabilitation The proposed rehabilitation by end of 2023 and photos post rehabilitation appear to show works in accordance with the requirements of this condition.	Section 3.1.2 of the Exploration Management Plan says "Controls to minimise airborne dust".
86.b.iv	86.b.iv	associated risks common for exploration works;							1			4	Full Compliance	Exploration Management Plan SPC-3100001 May 2021, Version 2. Exploration Management Plan SPC-3100001 version 3 effective April 2024 (end of audit period). Photo of Teena_230629 Teena Rehabilitation Work 2023 slides Photos of the Teena site post rehabilitation The proposed rehabilitation by end of 2023 and photos post rehabilitation appear to show works in accordance with the requirements of this condition.	There are controls for various other common risks included in the Exploration Management Plan.
86.c	86.c	rehabilitation is undertaken for locations not needed for further use;							1			4	Full Compliance	Photo of Teena_230629 Teena Rehabilitation Work 2023 slides Photos of the Teena site post rehabilitation The proposed rehabilitation and photos post rehabilitation appear to show works in accordance with the requirements of this condition.	Investigations are not complete or in areas of ongoing disturbance. The Operator does not intend to seek to relinquish security from these areas until rehabilitated. The full security remains in place. However, temporary rehabilitation has been undertaken The Operator advised " Exploration works were limited to the "Teena" prospect during the reporting period. During this time, the Teena site was closed for the short term. The site is expected to open for future exploration in 2024 and beyond. Rehabilitation work included minor ripping of compacted surfaces, sealing and grouting of bore casings and the spread of topsoil over cleared areas. A summary of planned temporary rehabilitation has been provided as well as photos showing the post rehabilitation condition in 2024. An inspection of the site will be completed during the next reporting period."
86.d	86.d	an exploration rehabilitation report including details regarding the status of disturbance, rehabilitated drill holes and the basis for the proposed adjustment of total security subject to Conditions 10, 11 and 12, be prepared, submitted and implemented to the satisfaction of the Department.							1			N/A	Not Applicable	Correspondence between Operator and DITT relating to MRM - 2023-2024 EMR Submission (after audit period). The 2023-2024 EMR Submission Letter states that: "Rehabilitation of disturbance related to investigation drilling has been undertaken progressively, and no adjustment to security is currently being sought"	May 2022 Authorisation did not specify "exploration" rehabilitation report and did not include "be prepared, submitted and implemented".

Non-mineral Waste Management

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Evidence		Comments		
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement										Score	Compliance level			
87	87	The Operator is authorised to complete works to prepare and construct a Centralised Waste Facility (CWF) for management of general, contaminated and putrescible wastes, in accordance with:											Refer to sub conditions		CWF has not been constructed.	
87.a	87.a	concept designs presented in the document entitled McArthur River Mine Mining Management Plan Amendment, January 2019, as defined in Schedule B, ensuring:		1									N/A	Not Applicable		CWF has not been constructed.
87.a.i	87.a.i	detailed designs follow the approved concepts for the facility (including 100 year ARI flood immunity, CCL and protective armour, drainage works and biosecurity control);		1									N/A	Not Applicable		CWF has not been constructed.
87.a.ii	87.a.ii	the structure design and construction is undertaken in accordance with independent oversight consistent with Conditions 48 and 50;		1									N/A	Not Applicable		CWF has not been constructed.
87.a.iii	87.a.iii	detailed designs include allowances for the installation of an adequate number of monitoring bores at suitable locations to monitor the environmental performance of the structure with respect to contaminant seepage. These monitoring locations must be integrated and reported within the site-wide water monitoring requirements.		1									N/A	Not Applicable		CWF has not been constructed.
88	88	The Operator must ensure the non-mineral waste facility, landfill or equivalent previously in use is rehabilitated following approval by the Department of a rehabilitation plan.		1									N/A	Not Applicable		Remains in use.
Rehabilitation Trials																
89	89	The Operator is authorised to undertake the following rehabilitation trials, in accordance with concepts defined in relevant documents in Schedule B and the approved MMP:												Refer to sub conditions		
89.a	89.a	Construction Test Pads (CTP) on NOEF West stage;						1					4	Full Compliance	EMR 2023-2024 dated 31Aug2024 EMR 2023-2024 states "NOEF Large-Scale West AB Rehabilitation Trial Large scale rehabilitation trials continued on the West AB batter to test aspects such as underliner, BGM installation, overliner, growth medium trials and performance monitoring. The results to date from the large-scale trials are currently being collated and analysed and will be presented in the Large Scale Cover System Trial Report." No instances were identified that trial were not in accordance with concepts defined in relevant documents in Schedule B and the approved MMP.	The Operator advised "The original CTPs are completed, however there are multiple ongoing constructability trials associated with the Cover System. These are currently being written into a report and will be available next year."
89.b	89.b	PAF(RE) Cell and Cover System Performance on NOEF Southeast stage;						1					4	Full Compliance	NOEF PAF(RE) Cell Field Trial Phase 1 Performance Monitoring Report 2022/2023 dated Mar2024 EMR 2023-2024 dated 31Aug2024 The EMR 2023-2024 only included findings from the 2022-2023 reporting period and that the 2023-2024 reporting period would be in the 2024-2025 EMR. No instances were identified that trial were not in accordance with concepts defined in relevant documents in Schedule B and the approved MMP.	
89.c	89.c	Mine Levee revegetation.			1								N/A	Not Applicable		The Operator advised that this trial will not be proceeding. A trial has been identified as not required and the Operator intends to monitor the revegetation on the NOEF itself (i.e. rather than doing a trial on the levee to inform the NOEF).
90	90	The Operator must ensure all contaminated runoff is contained and managed within the water management circuit and as detailed in the Water Management Plan.			1			1					4	Full Compliance	During the August 2024 site visit it was observed that trials were in the mine site water management area.	The Operator advised that the NOEF rehab trial area runoff all drains to within the on site water management system.
Bing Bong Loading Facility																
91	91	Dredging activities at the Bing Bong Port Facility are authorised, subject to:												Refer to sub conditions		

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
91.a	91.a	submission to the department of a Dredging and Dredge Spoil Management Plan;									1	4	Full Compliance	Correspondence between Operator and DITT relating to VOA 0059 - Dredging and Dredge Spoil Management Plan. Correspondence between Operator and DITT regarding 2023 MMP Amendment - Variation of Authorisation 0059 dated May2023 In February 2023 the Operator submitted a Dredging and Dredge Spoil Management Plan to DITT.	The Operator advised "There has been no revision of the February 2023 Dredging and Dredge Spoil Management Plan. No dredging activities have occurred during the audit period."
91.b	91.b	approval of the Plan by the Department;									1	4	Full Compliance	Correspondence between Operator and DITT regarding 2023 MMP Amendment - Variation of Authorisation 0059 dated May2023 DITT approved the Dredging and Dredge Spoil Management plan (DDSMP) on 17May2023.	The Operator advised "There has been no revision of the February 2023 Dredging and Dredge Spoil Management Plan. No dredging activities have occurred during the audit period."
91.c	N/A	subsequent provision of any required additional information (including but not limited to detailed designs) and written acceptance by the Department, prior to commencement of dredging.									1	N/A	Not Applicable		The Operator advised "There has been no revision of the February 2023 Dredging and Dredge Spoil Management Plan. No dredging activities have occurred during the audit period."
Environmental Monitoring and Management															
92	92	Environmental monitoring for the McArthur River Mine site (including BBLF) must be undertaken in accordance with requirements in Schedule D and reported as part of Condition 9.	1									4	Full Compliance	EMR 2023-2024 dated 31Aug2024. Environmental monitoring is discussed in the EMR 2023-2024 and includes BBLF.	Additional evidence is provided under the individual conditions from Schedule D.
Adaptive Management															
93	93	By 13 November 2021 (i.e. within 12 months of the date of authorisation of the Overburden Management Project), the Operator must submit a revised AMP as required under Conditions 45.	1									N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
94	94	The revised AMP must:											Refer to sub conditions		
94.a	94.a	address the comments from the Independent Monitor or independent third party review of the draft AMP and ensuring compliance with Condition 45;	1									N/A	Not Applicable		With respect to the next revision of the AMP "The IM's review comments will be addressed in the next revision of the Adaptive Management Plan, to be developed and submitted following consultation with the relevant panel on the Water Management Plan as required under Condition 27. Note that any changes to the Water Management Plan would likely trigger changes to the Adaptive Management Plan."
94.b	94.b	be consistent with the AMP required under the <i>Water Act 1992</i> and <i>Environment Protection and Biodiversity Conservation Act 1999</i> ;	1									4	Full Compliance	The AMP is the same document that is submitted to DEPWS under the WDL although some appendices (e.g., Rehabilitation Plan) are not relevant to the WDL and therefore not submitted to DEPWS. The AMP is therefore consistent (although appendices submitted are not identical) and compliant with the requirements of this condition. Revisions of the AMPs have been submitted to DEPWS (NT) and DCCEEW (Commonwealth) in	
94.c	94.c	be reviewed by a Department approved independent third-party at the discretion of the Minister;	1									4	Full Compliance	Correspondence between DITT and Operator relating to Amended Adaptive Management Plan (November 2021) confirmed approval. No DITT requests for independent third-party AMP review. However, an independent review of AMP-Revision C was conducted in response to a requirement under the Waste Discharge Licence (WDL) and finalised in March 2021. A copy of the independent review by the University of Queensland, Sustainable Minerals Institute was provided to DITT.	
94.d	94.d	be approved by the Minister;	1									4	Full Compliance	Correspondence between DITT and Operator relating to Amended Adaptive Management Plan (November 2021) confirmed approval. DITT approval letter August 2022 stated that the plan was assessed as meeting the requirements of conditions 45, 46, 93, 94 and 95 regarding the AMP.	
94.e	94.e	once approved, be implemented in full.	1									4	Full Compliance	EMR 2023-2024 dated 31Aug2024 EMR 2023-2024 states "The analysis of results in this EMR are used to determine environmental performance, compliance with the relevant approval conditions and assess whether the current controls are adequate in managing potential environmental risks. Additional controls, monitoring and/or investigations may be required where existing management controls are determined to be inadequate, performance does not meet relevant approvals, or if new risks have been identified. A description of actions is provided for each environmental management aspect (Sections 3 and 4) and is summarised in Section 6." Section 6 of the EMR demonstrates that the AMP is implemented. No situations where the AMP wasn't implemented were identified in this audit.	

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement										Score	Compliance level		
95	95	Any material changes to the AMP required by Condition 94 must be re-approved by the Minister.	1									N/A	Not Applicable	The Operator advised "There were no revisions to the Adaptive Management Plan over the reporting period."	
Mine Closure															
96	96	From the date of authorisation of the Overburden Management Project, the Operator must submit an updated Mine Closure Plan with each Amended MMP that builds upon the closure concepts defined in the Overburden Management Project.	1									4	Full Compliance	No Mine Closure Plan was submitted with the Amended MMP in the audit period. DITT did not request a mine closure plan from the Operator. The Regulator advised "The Unplanned Closure Plan will be implemented in the event of permanent closure." In May2023 the Operator submitted an MMP amendment. The Operator advised "The Mine Closure Plan remains unchanged from the plan that was submitted with the Overburden Management Project (OMP) Environment Impact Statement (EIS) as additional studies have not yet been undertaken to build on closure concepts. Note Condition 23 and Condition 24 of the VoA require strategies to be developed to inform long term closure of the Open Pit, TSF and NOEF domains, which are required to be reviewed by the relevant Independent Panel. These strategies include forward works programs (studies) to build on the concepts provided in the OMP EIS. The plan required by Condition 23 is yet to be approved and the tailings strategy required by Condition 24 is not due to the Department until 13 November 2025, after which point, further studies would then commence once the plan is approved by the Independent Panels. These studies would be used to inform an updated Mine Closure Plan. MRM considers the Unplanned Closure Plan fulfils the requirements of Condition 96 until such time that the plans required by Condition 23 and 24 are reviewed and approved. The Unplanned Closure Plan provides a updated immediate closure plan based on updated disturbance footprints."	
97	97	The Mine Closure Plan required under Condition 96 must:											Refer to sub conditions		
97.a	97.a	detail how key mine domains will be rehabilitated to achieve the Overburden Management Project closure objectives;	1									N/A	Not Applicable	No Mine Closure Plan was submitted with the Amended MMP in the audit period. DITT did not request a mine closure plan from the Operator. The Regulator advised "The Unplanned Closure Plan will be implemented in the event of permanent closure."	
97.b	97.b	address outcomes of the reviews by independent technical and closure panels in accordance with Condition 21 with respect to mine closure;	1									N/A	Not Applicable	No Mine Closure Plan was submitted with the Amended MMP in the audit period. DITT did not request a mine closure plan from the Operator. The Regulator advised "The Unplanned Closure Plan will be implemented in the event of permanent closure."	
97.c	97.c	incorporate relevant outcomes from rehabilitation trials defined in Condition 89.	1									N/A	Not Applicable	No Mine Closure Plan was submitted with the Amended MMP in the audit period. DITT did not request a mine closure plan from the Operator. The Regulator advised "The Unplanned Closure Plan will be implemented in the event of permanent closure."	
98	98	Five years prior to the planned closure of the mine, the Operator must:											Refer to sub conditions	Future item. Mine closure more than 5 years away.	
98.a	98.a	finalise the Mine Closure Plan required under Condition 96;	1									N/A	Not Applicable	Future item. Mine closure more than 5 years away.	
98.b	98.b	submit to the Department the plan for approval by the Minister;	1									N/A	Not Applicable	Future item. Mine closure more than 5 years away.	
98.c	98.c	implement the Mine Closure Plan in full, following its approval.	1									N/A	Not Applicable	Future item. Mine closure more than 5 years away.	
Unplanned Mine Closure															
99	99	From 13 November 2020 (i.e. the date of authorisation of the Overburden Management Project), the Operator must annually submit to the Department, unless otherwise agreed in writing by the Department, an Unplanned Mine Closure Plan on or before 31 August, starting 2021, that is accompanied by a related security estimate.	1									N/A	Not Applicable	Correspondence between Operator and DITT regarding this condition (in the audit period). The Operator stated "To streamline the approvals process and ensure continuity between documents, MRM wishes to align the submission of the next Unplanned Closure Plan and Security Assessment with the submission of the MMP amendment. The MMP amendment is planned to be submitted in Q2 2024." DITT agreed in writing with the Operator's approach.	Considered N/A as DITT agreed in writing for the UCP submission to be delayed to align with the next MMP submission outside the audit period.
Independent Monitoring Assessment Conditions															
100	100	The Operator must comply with the clauses pertaining to it in SCHEDULE C - INDEPENDENT MONITORING ASSESSMENT CONDITIONS.	1									N/A	Not Applicable	Assessed through individual conditions in Schedule C.	
SCHEDULE C - Independent Monitoring Assessment Conditions															
Schedule C - 1	Schedule C - 1	The purpose of the McArthur River Mine – Independent Monitoring Assessment Conditions" is to establish and set out the operational requirements for an independent monitoring assessment of the environmental performance of the Mine.											-	Commentary only.	
Schedule C -2	Schedule C -2	These Conditions may be cited as the "McArthur River Mine – Independent Monitoring Assessment Conditions".											-	Commentary only.	

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement										Score	Compliance level		
Schedule C -3	Schedule C -3	The purpose of these Conditions is to establish and set out the operational requirements for an independent monitoring assessment of the environmental performance of the Mine.											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -4	Schedule C -4	The Department will engage an Independent Monitor to undertake the independent monitoring assessment.											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -5	Schedule C -5	The Operator and the Department acknowledge that this independent monitoring assessment is in addition to their respective obligations and statutory responsibilities in relation to the Mine.	1										4	Full Compliance	The Operator has participated in the Independent Monitor assessment in addition to their respective obligations and statutory responsibilities.
Schedule C -6	Schedule C -6	The Independent Monitor will:											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -6.a	Schedule C -6.a	monitor the environmental performance of the Mine by reviewing:											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -6.a.i	Schedule C -6.a.i	environmental assessments and monitoring activities undertaken by the Operator; and											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -6.a.ii	Schedule C -6.a.ii	environmental assessments and audits undertaken by the Department; and											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -6.b	Schedule C -6.b	report to the Operator and the Department any urgent issues requiring investigation and reporting.											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -7	Schedule C -7	The Independent Monitor will not review:											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -7.a	Schedule C -7.a	Mine safety; or											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -7.b	Schedule C -7.b	social issues arising from the operation of the Mine in the McArthur River Region.											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -8	Schedule C -8	The Department will engage an Independent Monitor in accordance with its procurement processes.											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -9	Schedule C -9	The Independent Monitor may be (in order of preference): a. an environmental or mining agency in another jurisdiction in Australia; or b. university having the necessary expertise; or c. an environmental consultant that has the necessary expertise, relevant experience and the necessary resources.											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -10	Schedule C -10	Prior to advertising a tender seeking to engage an Independent Monitor, the Department must provide the Operator with a copy of the proposed tender documentation, including:											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -10.a	Schedule C -10.a	the Conditions of tendering; and											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -10.b	Schedule C -10.b	the scope of services; and											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -10.c	Schedule C -10.c	the assessment criteria; and											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -10.d	Schedule C -10.d	the Conditions of contract.											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -11	Schedule C -11	The Operator may, within 14 days of receiving the proposed tender documentation, provide comment on the proposed documentation to the Department and the Department must consider any comments provided by the Operator on the proposed documentation prior to advertising the tender.	1										N/A	Not Applicable	The extension of the Independent Monitor contract was provided by DITT to the Operator before the audit period. The Operator did not raise any comments.
Schedule C -12	Schedule C -12	The Department must provide the Community with an opportunity to provide submissions on the engagement of the Independent Monitor and the Department must consider any submissions provided by the Community on the engagement of the Independent Monitor prior to advertising the tender.											-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -13	Schedule C -13	The terms of engagement of the Independent Monitor may include the following:											-		These Independent Monitor conditions are not relevant to the Operator.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Evidence		Comments		
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement										Score	Compliance level			
Schedule C -13.a	Schedule C -13.a	a period of engagement between three and five years;											-		These Independent Monitor conditions are not relevant to the Operator.	
Schedule C -13.b	Schedule C -13.b	a statement acknowledging that the Operator is responsible for the costs of the Independent Monitor;												-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -13.c	Schedule C -13.c	a warranty by the Independent Monitor that it will:												-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -13.c.i	Schedule C -13.c.i	act independently of the Department, the Operator, the Minister and any other person; and												-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -13.c.ii	Schedule C -13.c.ii	act honestly, reasonably and with the degree of professional care, knowledge, experience, skill and diligence which may reasonably be expected; and												-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -13.c.iii	Schedule C -13.c.iii	act within the time prescribed under these Conditions, the terms of engagement, or where no time is prescribed, within a reasonable time; and												-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -13.c.iv	Schedule C -13.c.iv	immediately notify the Department in writing upon becoming aware of the existence or possibility of a conflict of interest;												-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -13.d	Schedule C -13.d	an obligation on the Independent Monitor to keep all information provided to the Independent Monitor confidential.												-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -14	Schedule C -14	If the Independent Monitor requires an indemnity, the Operator must enter into a binding agreement providing a reciprocal indemnity to the Department.	1										N/A	Not Applicable		The Independent Monitor did not require an indemnity.
Schedule C -15	Schedule C -15	The Department must notify the Operator of the appointment of the Independent Monitor and must provide the Operator with a copy of the terms of engagement.												-		These Independent Monitor conditions are not relevant to the Operator.
Schedule C -16	Schedule C -16	The Operator and the Department must not interfere or attempt to influence the Independent Monitor in its assessment of environmental performance under these Conditions.	1										4	Full Compliance		The Operator has not interfered or attempted to influence the Independent Monitor.
Schedule C -17	Schedule C -17	The Operator and the Department must each:												Refer to sub conditions		Provided for context of the subconditions.
Schedule C -17.a	Schedule C -17.a	cooperate with the Independent Monitor; and	1										4	Full Compliance		The Independent Monitor confirms that the Operator cooperated with the Independent Monitor.
Schedule C -17.b	Schedule C -17.b	provide all necessary information and documents within their possession, custody or control to the Independent Monitor; and	1										4	Full Compliance		The Independent Monitor confirms that the Operator provided all necessary information and documents within their possession, custody or control.
Schedule C -17.c	Schedule C -17.c	procure for the Independent Monitor access to such premises owned, leased, or licensed by it as may be reasonably necessary,	1										4	Full Compliance		An Independent Monitor site visit was undertaken in August 2024.
Schedule C -17.d	Schedule C -17.d	to enable the Independent Monitor to undertake its assessment of environmental performance under these Conditions.	1										4	Full Compliance		The Independent Monitor confirms that the Operator enabled the Independent Monitor to undertake their assessment.
Schedule C -18	Schedule C -18	The Independent Monitor must engage with the Operator, the Department and the Community in undertaking the independent monitoring assessment.												-		Not included as there is no requirement for the Operator. This is an Independent Monitor requirement only.
Schedule C -19	Schedule C -19	If the Independent Monitor identifies an issue it considers requires urgent investigation and reporting:	1											Refer to sub conditions		The Independent Monitor did not identify any issue it considered required urgent investigation and reporting during the audit period.
Schedule C -19.a	Schedule C -19.a	the Independent Monitor must advise the Operator and the Department of the issue as soon as practicable and may include recommendations as to action to be taken; and												-		Not included as there is no requirement for the Operator.
Schedule C -19.b	Schedule C -19.b	the Operator must consider the advice, and any recommendations, from the Independent Monitor and notify the Department and the Independent Monitor of the action the Operator proposes to take; and	1										N/A	Not Applicable		The Independent Monitor did not identify any issue it considered required urgent investigation and reporting during the audit period.
Schedule C -19.c	Schedule C -19.c	the Department may, where appropriate, advise the Operator and the Independent Monitor of action the Department proposes to take; and												-		Not included as there is no requirement for the Operator.

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level			
Schedule C -19.d	Schedule C -19.d	the Independent Monitor may provide further advice to the Operator, and where appropriate the Department, regarding the proposed action and the Operator and the Department must consider the further advice; and	1									N/A	Not Applicable			The Independent Monitor did not identify any issue it considered required urgent investigation and reporting during the audit period.
Schedule C -19.e	Schedule C -19.e	if, after providing further advice, the Independent Monitor is not satisfied with the proposed action, the Independent Monitor may notify the Operator and the Department of the Independent Monitor's intention to undertake its own investigation and report; and											-			Not included as there is no requirement for the Operator.
Schedule C -19.f	Schedule C -19.f	the Operator and the Department must facilitate the Independent Monitor's investigation and report.	1									N/A	Not Applicable			The Independent Monitor did not identify any issue it considered required urgent investigation and reporting during the audit period.
Schedule C -20	Schedule C -20	The independent monitoring assessment is to be conducted, where practical, in a manner that complements the existing annual environmental assessment and audit processes undertaken by the Operator and the Department.											-			Not included as there is no requirement for the Operator. This is an Independent Monitor requirement only.
Schedule C -21	Schedule C -21	The Independent Monitor must prepare and provide a report:											-			Not included as there is no requirement for the Operator. This is an Independent Monitor requirement only.
Schedule C -21.a	Schedule C -21.a	annually to the Minister to assist with the review of the Mining Management Plan; and											-			Not included as there is no requirement for the Operator.
Schedule C -21.b	Schedule C -21.b	on request by the Minister.											-			Not included as there is no requirement for the Operator.
Schedule C -22	Schedule C -22	The Minister must provide a report received from the Independent Monitor to the Operator and the Department within 14 days of receiving the report.											-			Not included as there is no requirement for the Operator.
Schedule C -23	Schedule C -23	The Independent Monitor must prepare an additional report in a form suitable for distribution to the Community.											-			Not included as there is no requirement for the Operator.
Schedule C -24	Schedule C -24	The Operator and the Department acknowledge that the report from the Independent Monitor will be made publicly available (including publication on an appropriate internet site) and may include data used in the preparation of the report.	1									4	Full Compliance	Letter DITT to Operator Re: Independent Monitor Annual Environmental Performance Audit Report 2023 - request for comment dated Dec2023. The AEPAR 2023 was sent to the Operator from DITT on behalf of the Minister for Mining on Dec2023 and it included reference to the report being made publicly available. Independent Monitor Report (AEPAR) made publicly available by posting on NT.GOV.AU website (viewed by Independent Monitor on 9Aug2024). https://nt.gov.au/industry/mining/decisions/independent-monitor-for-the-mcarthur-river-mine/reports-and-documents		
Schedule C -25	Schedule C -25	Prior to being made publicly available, the Minister must request from the Operator and the Department any comments on the Independent Monitor's report. Such comments must be provided within 28 days of the Minister's request and must be made publicly available with the Independent Monitor's report.	1									4	Full Compliance	Letter DITT to Operator Re: Independent Monitor Annual Environmental Performance Audit Report 2023 - request for comment dated Dec2023. Letter Operator to DITT subject: Independent Monitor Annual Environmental Performance Audit Report 2023 - McArthur River Mine dated Jan2024 The AEPAR 2023 was sent to the Operator from DITT on behalf of the Minister for Mining on Dec2023 and requested the Operator's comment. The Operator responded on 11 Jan2024, within the required 28 days of receipt.		Request from the Minister and response from Operator and DITT were within 28 days from the request.
Schedule C -26	Schedule C -26	The Operator acknowledges that it is responsible for all costs of the independent monitoring assessment other than those costs directly attributable to those elements of the independent monitoring assessment associated with Condition 21(b)) which are the responsibility of the Department.	1									4	Full Compliance			The Operator has paid the DITT invoices.
Schedule C -27	Schedule C -27	The Department may provide to the Operator, from time to time, a notice setting out amounts due and payable under the terms of the engagement of the Independent Monitor.											-			Not included as there is no requirement for the Operator.
Schedule C -28	Schedule C -28	The Operator must pay an amount notified in accordance with Condition 27 within seven (7) days of receiving such notice.	1									4	Full Compliance	Invoice payment issues did occur in the audit period due to PO changes between 2022 and 2023. However, all invoices were paid.		DITT invoices require payment in a month rather than within seven days of receipt as stated in this condition. This longer timeframe appears acceptable and DITT amend the condition.
Schedule C -29	Schedule C -29	If the Operator disputes a notice provided by the Department under Condition 27:											Refer to sub conditions			Provided for context of the subconditions.

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement										Score	Compliance level		
Schedule C -29.a	Schedule C -29.a	the Operator must pay the amount specified in the notice in accordance with Condition 28; and	1									N/A	Not Applicable		The Independent Monitor is not aware of any disputes in the audit period.
Schedule C -29.b	Schedule C -29.b	the Operator must notify the Department in writing within 14 days of receiving the notice, setting out the reasons why the Operator disputes the notice; and	1									N/A	Not Applicable		The Independent Monitor is not aware of any disputes in the audit period.
Schedule C -29.c	Schedule C -29.c	the Chief Executive of the Operator and the Chief Executive of the Department must meet within five (5) working days to resolve the dispute.	1									N/A	Not Applicable		The Independent Monitor is not aware of any disputes in the audit period.
Schedule C -30	Schedule C -30	If there is a dispute (other than a dispute mentioned in Condition 29) between the Operator and the Department as to any matter or thing arising out of these Conditions (the "Dispute"), the party claiming that a Dispute has arisen must notify the other party to the Dispute and the Chief Executive of the Operator, the Chief Executive of the Department and the Independent Monitor must meet within five (5) working days to resolve the Dispute.	1									N/A	Not Applicable		The Independent Monitor is not aware of any disputes in the audit period.
Schedule C -31	Schedule C -31	If the Chief Executive of the Operator, the Chief Executive of the Department and the Independent Monitor are unable to resolve a Dispute within ten (10) working days of meeting in accordance with Condition 30, the Operator and the Department may agree to the appointment of an independent party to assist in the resolution of the Dispute.	1									N/A	Not Applicable		The Independent Monitor is not aware of any disputes in the audit period.
Schedule C -32	Schedule C -32	If, within five (5) working days of either the Operator or the Department nominating a person to be the independent party, no agreement is reached as to who is to be appointed as the independent party, either the Operator, the Department or both may refer the matter to the President of the Law Society of the Northern Territory.	1									N/A	Not Applicable		The Independent Monitor is not aware of any disputes in the audit period.
Schedule C -33	Schedule C -33	The President of the Law Society Northern Territory may nominate a person to be the independent party and the parties to the Dispute are bound to accept the appointment of that person.	1									N/A	Not Applicable		The Independent Monitor is not aware of any disputes in the audit period.
Schedule C -34	Schedule C -34	The role of the independent party is to assist in negotiating a resolution of the Dispute and the independent party cannot make a decision that is binding on either the Operator or the Department.	1									N/A	Not Applicable		The Independent Monitor is not aware of any disputes in the audit period.
Schedule C -35	Schedule C -35	The Operator and the Department must make available to the independent party all materials requested by it and must provide the independent party with all other materials relevant to the Dispute.	1									N/A	Not Applicable		The Independent Monitor is not aware of any disputes in the audit period.
Schedule C -36	Schedule C -36	The Operator and the Department must:											Refer to sub conditions		Provided for context of the subconditions.
Schedule C - 36.a	Schedule C - 36.a	Bear their own costs of resolving the Dispute under this Condition; and	1									N/A	Not Applicable		The Independent Monitor is not aware of any disputes in the audit period.
Schedule C - 36.b	Schedule C - 36.b	Bear equally the costs of any independent party engaged.	1									N/A	Not Applicable		The Independent Monitor is not aware of any disputes in the audit period.
SCHEDULE D - ENVIRONMENTAL MONITORING AND MANAGEMENT															
Schedule D - 1	Schedule D - 1	If the Operator establishes a new surface water monitoring location, a written notice of the location (in GDA 94 format) and nature of the monitoring must be given to the Department within 30 days of its establishment.					1			1		N/A	Not Applicable		No new surface water monitoring locations were established in the audit period.
Schedule D - 2	Schedule D - 2	The Operator must maintain continuous monitoring having regard to:								1		4	Full Compliance	SW Loggers Master Continuous Data Records 2023-2024 Continuous monitoring was evident at all sites.	
Schedule D - 2.a	Schedule D - 2.a	devices installed at the following locations:											Refer to sub conditions		
Schedule D - 2.a.i	Schedule D - 2.a.i	SW29 (upstream Surprise Creek outside the zone of influence of TSF);								1		4	Full Compliance	SW Loggers Master A logger was deployed at this location.	

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
Schedule D - 2.a.ii	Schedule D - 2.a.ii	SCGS (Surprise Creek gauge station between the TSF and the Mine);								1		4	Full Compliance	SW Loggers Master A logger was deployed at this location.	SW02 (SCGS)
Schedule D - 2.a.iii	Schedule D - 2.a.iii	SW30 (upstream Emu Creek);								1		4	Full Compliance	SW Loggers Master Two loggers were deployed at this location. One was lost in flooding but the other provided data.	
Schedule D - 2.a.iv	Schedule D - 2.a.iv	USGS (upstream at the McArthur River gauge station);								1		4	Full Compliance	SW Loggers Master A logger was deployed at this location although it was inaccessible at 15Aug2024 however continuous data exists from the gauging station.	SW10 was inaccessible 15/8/2024
Schedule D - 2.a.v	Schedule D - 2.a.v	BCGS (upstream at the Barney Creek gauge station);								1		4	Full Compliance	SW Loggers Master A logger was deployed at this location.	SW04 (BCGS)
Schedule D - 2.a.vi	Schedule D - 2.a.vi	SW12 (immediately downstream of the Mine capturing outflow from Emu Creek, Barney Creek, drainage lines from SEPROD, Old McArthur River Channel and the McArthur River diversion channel but before the Glyde River joins the McArthur River channel);								1		4	Full Compliance	SW Loggers Master A logger was deployed at this location.	
Schedule D - 2.b	Schedule D - 2.b	devices must at a minimum measure electrical conductivity, and may measure additional parameters such as pH;								1		4	Full Compliance	SW Loggers Master All devices at least measured EC.	
Schedule D - 2.c	Schedule D - 2.c	the Operator must from 30 August 2017 include data from these devices in data submission under Condition 7 of Schedule A.	1									3	Part Compliance (High)	There was no data submitted under condition 7 in the audit period.	OFI: Refer to OFI condition 7.a.
Schedule D - 3	Schedule D - 3	From the date of authorisation of the Overburden Management Project the Operator is approved to install and manage the following gauging stations at:											Refer to sub conditions	Enviromon Memo: Derivation of Discharge rating for monitoring site at Emu Creek for Xylem dated Nov2023	This condition changed from "must" install to "is approved to" install in the May 2023 authorisation.
Schedule D - 3.a	Schedule D - 3.a	Emu Creek;								1		4	Full Compliance	Enviromon Memo: Derivation of Discharge rating for monitoring site at Emu Creek for Xylem dated Nov2023 The Emu Creek gauging station was installed over the reporting period.	
Schedule D - 3.b	Schedule D - 3.b	Glyde River.								1		4	Full Compliance	There is no gauging station installed on the Glyde River. However, this condition no longer states "must" install so this is compliant.	AAPA certificate not in place for construction access. There is existing access to approximately 100m from site. Proposing to proceed with helicopter bringing in larger materials. OBS: Construct the permanent gauging station on the Glyde River.
Schedule D - 4	Schedule D - 4	The Operator must ensure groundwater monitoring bores and extraction bores are constructed, maintained and decommissioned in compliance with the document entitled Minimum construction requirements for water bores in Australia published by the National Uniform Drillers Licensing Committee (third edition, February 2012 or a current version of the document). In this regard:	1									N/A	Not Applicable	McArthur River Mining Pty Ltd Annual Groundwater Report 2023/2024 Final August 2024 (EMR 2023-2024 Appendix I). The Operator advised that there was no hydrogeological drilling in the audit period. This is consistent with there being no Hydrogeological Drilling and Field Campaign report appendix with the EMR 2023-2024. However, the 2023-2024 Drilling Register includes one dewatering bore MUDS_TEST hole, which the Operator advised "was a test hole to assess the target galleries. This hole was not completed to meet the intended purpose for dewatering bore." No construction, maintenance or decommissioning of groundwater monitoring bores and extraction bores occurred in the audit period.	
Schedule D - 4.a	Schedule D - 4.a	construction logs and bore location coordinates in GDA 94 format must be available to the Minister on request and provided to the Minister annually in the EMR;	1									N/A	Not Applicable	McArthur River Mining Pty Ltd Annual Groundwater Report 2023/2024 Final August 2024 (EMR 2023-2024 Appendix I) South MUDS 2 Bore Completion Diagram The 2023-2024 Drilling Register includes one dewatering bore MUDS_TEST hole, which the Operator advised "was a test hole to assess the target galleries. This hole was not completed to meet the intended purpose for dewatering bore." No construction of groundwater monitoring bores and extraction bores occurred in the audit period.	DITT advised that there were no requests by the Minister in the audit period.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
Schedule D - 4.b	Schedule D - 4.b	logs of maintenance activities must be kept available to the Minister on request;	1									N/A	Not Applicable	Slides regarding GW18013, GW18016S, GW19051 and SS2-1 McArthur River Mining Pty Ltd Annual Groundwater Report 2023/2024 Final August 2024 (EMR 2023-2024 Appendix I) Annual Groundwater Report 2022/2023 dated Jun2023. While previous audit periods have indicated via sampling results that bores SS2-1, GW18013, GW18016S and GW19051 had damage or blockages a review by the Operator indicated GW18013, GW18016S and GW19051 are "functioning well according to the monthly sampling and dip measurement biannually" and "SS2-1 is no longer in operation, having been removed during mine expansion works prior to this reporting period." Annual Groundwater Report 2024 stated "Bore blocked at 5.50 m" for GW132 and "Unable to sample, permanent pump detached from the tubing*" in the 2023 Report but there is no evidence of maintenance. Annual Groundwater Report 2023 stated "Bore collapsed at the screen" for GWNOEF1S and while there is no longer a comment in the 2024 report that bore was not sampled but there is no evidence of maintenance. Annual Groundwater Report 2023 stated "Pump stuck in bore. No air valve" for GW043B but no comment in 2024 and there is no evidence of maintenance. Annual Groundwater Report 2023 stated "Permanent pump stuck, bore casing bent at ground level" for GWBB006C and in 2024 "Blocked access". The Operator advised "No maintenance activity occurred during the reporting period 01/05/23 to 30/4/24."	DITT advised that there were no requests by the Minister in the audit period. The Operator advised there were no maintenance activities during audit period. OBS: There appear to be bores that are damaged and unserviceable that should be maintained to keep the monitoring bores available for monitoring. In the event they can't be used, perhaps they should be maintained, rehabilitated (to repair a bore that has failed) or decommissioned.
Schedule D - 4.c	Schedule D - 4.c	logs of bore decommissioning activities must be kept and made available to the Minister on request and reported in the Operator's Annual EMR or an alternative format as agreed with the Department.	1									N/A	Not Applicable	McArthur River Mining Pty Ltd Annual Groundwater Report 2023/2024 Final August 2024 (EMR 2023-2024 Appendix I) Annual Groundwater Report 2022/2023 dated Jun2023. Annual Groundwater Report 2023/2024 stated "Sampling numbers were lower than planned, with many bores decommissioned due to operational activities / changes." No decommissioning of groundwater monitoring bores and extraction bores occurred in the audit period.	DITT advised that there were no requests by the Minister in the audit period.
Schedule D - 5	Schedule D - 5	The Operator must take appropriate action to reduce the risk to mining operations associated with livestock on the adjoining pastoral property by maintaining an Exclusion Area and managing livestock as appropriate in consultation with the Chief Veterinary Officer.	1									4	Full Compliance	2018-2019 cattle management plan was submitted in the January 2020 MMP, which was not approved until 13Nov2020. 2023/24 MRM Cattle Muster / Aerial Inspection Register. MRM Cattle management fence line inspections register. 240325 - Flood Damage - Fence Inspection Example EMR 2023-2024 dated 31Aug2024. The Cattle Management Fence Line Inspections Register provided evidence that approximately weekly inspections were performed in the dry season during the audit period. Seven aerial musters were documented in the 2023/24 MRM Cattle Muster / Aerial Inspection Register between 13Jun2023 and 29Apr2024, and also confirmed in the EMR 2023-2024.	OBS: Document weekly inspections of the cattle exclusion zone fence undertaken, or amend the inspection schedule in the Cattle Management Plan to reflect what is practical.
Schedule D - 6	Schedule D - 6	From the date of authorisation of the Overburden Management Project the Operator must undertake monitoring in accordance with the following Environmental Management Plans approved in the MMP:											Refer to sub conditions		
Schedule D - 6.a	Schedule D - 6.a	Adaptive Management Plan, which includes:											Refer to sub conditions		Adaptive Management Plan The AMP is a framework document and does not require monitoring specifically, but rather makes reference to monitoring contained within specific management plans such as the WMP, AQMP and RMP.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
Schedule D - 6.a.i	Schedule D - 6.a.i	Water Management Plan					1			1		3	Part Compliance (High)	<p>Water Management Plan dated 13May2022.</p> <p>IndoPacific McArthur River Freshwater Macroinvertebrate Assessment 2023 dated May2024</p> <p>IndoPacific Monitoring Of Select Analytes and Lead Isotope Ratios in fluvial Sediments, Fish and Molluscs of the McArthur River 2023 dated Feb2024</p> <p>IndoPacific Aquatic Fauna Abundance and Diversity of the McArthur River, NT, Early Dry Season 2023 dated Jan2024</p> <p>IndoPacific Report on the Aquatic Fauna of the McArthur River, NT, Late Dry Season 2023 dated May2024</p> <p>2021-22 MRM Environmental Monitoring Schedule dated Oct2022</p> <p>WRM 2023/24 Annual Site Water Balance for the McArthur River Mine Water Balance Forecast Report dated Jan2024 (includes TARPS)</p> <p>Annual Groundwater Report 2023/2024 Final Aug 2024 (EMR 2023-2024 Appendix I)</p> <p>SURFACE WATER MONITORING REPORT FOR THE 2023/24 REPORTING PERIOD dated Aug2024 (EMR 2023-2024 Appendix C)</p> <p>Correspondence between Operator and DITT February 2024 regarding Inclement Weather and Surface Water Monitoring.</p> <p>Surface Water Data extracted 240530 spreadsheet (laboratory results only).</p> <p>The 2021-22 MRM Environmental Monitoring Schedule I1001 Rev3 (relevant to the audit period), has monitoring required at SW06. No sampling was undertaken at SW06 in the audit period. The Operator informed DITT on 16Feb2024 that they proposed to sample at SW20 in lieu of SW06. However, DITT advised that no alternate monitoring locations have been approved.</p> <p>This condition is compliant for the Groundwater and Aquatic Fauna Environmental Aspects but part compliant (high) for the Surface Water, and Monitoring and Reporting Environmental Aspects.</p>	<p>Water Management Plan May 2022 states "A water balance for the Mine site is undertaken annually to assess the historical performance of the water management system as well as outline the strategy and forecast performance over a forward period. The water balance model is an essential risk management tool for the Mine site." and "The water storage TARPs are developed annually prior to wet season to reflect current water management conditions."</p> <p>Annual Groundwater Report 2023/2024 states "Update the monitoring program to remove monitoring locations that have been decommissioned/destroyed. Where monitoring bores have become dry, consider if a replacement bore, screened in a deeper unit, is required (e.g. GW074)."</p> <p>SURFACE WATER MONITORING REPORT FOR THE 2023/24 "Surface water quality monitoring will continue to be undertaken in accordance with the currently approved Water Management Plan and monitoring results in the following reporting period will continue to be assessed under the Mine's Adaptive Management Plan."</p> <p>OBS: Revise TARPs annually prior to each wet season to ensure they are up to date and the WMP should be updated accordingly.</p> <p>OBS: Consider addressing the McArthur River Mining Pty Ltd Annual Groundwater Report 2023/2024 (Klohn Crippen Berger, August 2024) recommendations that remain unactioned from previous years.</p> <p>OFI: Update the Water Management Plan and monitoring schedule regarding the use of SW20 and SW19 in lieu of SW06.</p>
Schedule D - 6.a.ii	Schedule D - 6.a.ii	Air Quality	1									4	Full Compliance	<p>Todorski Ambient Air Monitoring Report - McArthur River Mine and Bing Bong Facility May 2023 - April 2024 dated 9 Jul2024</p> <p>Todorski Ambient Air Monitoring Report states "The air quality monitoring network at the Mine currently consists of one High Volume Air Sampler (HVAS), two sulfur dioxide (SO2) monitors, 23 deposited dust gauges and three DustTrak monitors. The BBLF monitoring network currently consists of six deposited dust gauges. The deposited dust gauge bottle samples and HVAS filter papers are analysed at a laboratory for metal concentrations."</p> <p>There was insufficient data in the 2023-2024 EMR period related to HVAS and deposition dust gauges (e.g., low dust levels, inability to access locations). The Todorski Ambient Air Monitoring Report provides recommendations on opportunities to improve the mass of dust collected and the quality of the data collected (e.g., method/sampling technique).</p>	<p>Todorski Ambient Air Monitoring Report stated "SO2 monitoring was conducted at the 'SO2VAN01' monitoring site, which was relocated during the review period to the western edge of the Northern Overburden Emplacement Facility, and at the 'SO2VILL02' located at the workers village. The data indicate that 1-hour and 24-hour SO2 concentrations at the SO2VAN01 monitoring site exceeded the adopted air quality goals on occasion. However, investigations found that the maximum SO2 concentrations at the off-site locations of Borrooloola and Goolminyini (44km and 28km away respectively) were significantly lower than the adopted air quality goals."</p> <p>"HVAS monitoring is conducted approximately every 6 days for a 24-hour monitoring period".</p> <p>OBS: Consider the opportunities raised in the Ambient Air Monitoring Report McArthur River Mine and Bing Bong Loading Facility May 2023 – April 2024 (Todorski, 9 July 2024) to improve the monitoring.</p>
Schedule D - 6.a.iii	Schedule D - 6.a.iii	Rehabilitation Management Plan	1									4	Full Compliance	<p>Indopacific McArthur River Acoustic Monitoring Program 2023 Assessment of Largetooh Sawfish and Barramundi dated May2024</p> <p>Indopacific McArthur River and Barney Creek Revegetation Monitoring Report 2023 Jul2024</p> <p>McArthur River Riparian Bird Monitoring Early Dry Season Report May 2023 dated Jun2024</p> <p>McArthur River Riparian Bird Monitoring Late Dry Season Report November 2023 dated Jun2024</p> <p>Rehabilitation Management Plan dated Mar2021.</p> <p>Noting for the reports above, fieldwork was undertaken in the audit period and reporting after the audit period.</p> <p>The RMP requires annual monitoring of revegetation in April/May and the Revegetation and Monitoring Report dated May2023 states "Revegetation monitoring in 2023 was undertaken between the 20th and 24th of April within the Barney Creek domain and the 15th and 19th of June within the McArthur River domain. Monitoring within the McArthur River domain was undertaken later as a result of the elevated water levels present in April when many monitoring plots were still partially submerged." and "To meet statutory requirements, annual revegetation monitoring along the McArthur River and Barney Creek diversion channels has been undertaken since 2012. The data collection and assessment in 2023 were conducted as per McArthur River Mines (MRM) 2021-2023 Rehabilitation Management Plan (RMP) and Adaptive Management Plan (AMP) Trigger Action Response Plan (TARP)".</p>	<p>Section 9.1 of the RMP states "In order to determine the short-term success of revegetation works prior to their first wet season rainfall; fortnightly visual inspections of the rehabilitation area will be completed by a member of the Rehabilitation Team. Aspects such as vegetation health and mortality rate will be assessed in accordance with the Channel Revegetation Assessment Procedure." Evidence of this fortnightly monitoring has not been provided.</p> <p>OBS: Ensure that records of fortnightly visual inspections by a member of the Rehabilitation Team of the rehabilitation area are kept prior to their first wet season rainfall.</p> <p>Section 9.2.3 of the RMP states: "Monitoring of rehabilitation will be conducted annually and will consist of an intensive data collection period (fieldwork), data analysis and reporting." Indopacific McArthur River and Barney Creek Revegetation Monitoring Report 2023 Jul2024 is evidence of this.</p>

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
Schedule D - 6.b.	Schedule D - 6.b.	Waste Management Plan	1	1								4	Full Compliance	Waste Management Plan 2018-2020 dated 2020. Environmental Monitoring Schedule Rev 3 dated Oct2022. EMR 2023-2024 dated 31Aug2024. Spreadsheet of monthly waste records. Screenshot regarding quarterly commentary on recycling data. Email trail demonstrating quarterly corporate reporting. Quantities of landfill and recyclable waste streams are provided in Table 8 of the EMR 2023-2024. Evidence was provided demonstrating that waste records are reported and that temporal variations in data are investigated quarterly rather than monthly.	Section 8 of the Waste Management Plan details monitoring, which states: "Waste records are submitted to the Environment Department on a monthly basis and analysed against previous quarter's volumes. Any significant changes in volumes are investigated further with the respective department." OBS: The Waste Management Plan should be updated to reflect the process occurring on site (quarterly rather than monthly) for submission of waste records and analysis against the previous quarter's data.
Schedule D - 6.c	Schedule D - 6.c	NOEF Management Plan						1				4	Full Compliance	NOEF Management Plan dated 31Jan2020. ICE Endorsement of the NOEF Management Plan dated Jan2020. EMR 2023-2024 dated 31Aug2024 EMR 2023-2024 states "The NOEF temperature monitoring program results over the reporting period are presented in Appendix E. Results obtained over the reporting period show that the temperatures within the NOEF are stable and that overall, the PAF cells are maintaining an average background temperature between 50 and 70°C."	Evidence of implementation is reflected in the ICE Design Reviews, Construction Reports and ITPs that are included in this audit workbook. The requirement for material tracking through use of a Global Positioning System (GPS) tracking system as required by the NOEF Management Plan was observed by the Independent Monitor during a site visit in 2023 (e.g., Fleet Management System) and the Operator confirmed this remained in place over the audit period.
Schedule D - 6.d	Schedule D - 6.d	BBLF Environment Management Plan									1	4	Full Compliance	Indopacific Annual Seagrass Survey of the Bing Bong Loading Facility 2023 dated Jun2024 (EMR 2023-2024 Appendix W) BBLF EMP dated Mar2021. EMR 2023-2024 dated 31Aug2024. Metal and Metalloid Concentrations of Near Shore Sediment of Bing Bong Loading Facility, 2023 dated 2024 (EMR 2023-2024 Appendix U) Metals and Lead in Marine Water (DGT) Monitoring 2023-2024 dated Aug2024 ANNUAL MARINE MONITORING PROGRAM OF THE BING BONG LOADING FACILITY, 2023 dated Aug2024 ((EMR 2023-2024 Appendix S) Todorski Ambient Air Monitoring Report - McArthur River Mine and Bing Bong Facility May 2023 - April 2024 dated 9 Jul2024 (EMR 2023-2024 Appendix H) Annual Groundwater Report 2023/2024 Final August 2024 (EMR 2023-2024 Appendix I) 2023/24 Bing Bong Loading Facility Site Runoff Pond Wet Season TARPs Worksheet dated Jan2024 WRM 2023/24 Site Water Balance for the Bing Bong Loading Facility dated 31Jan2024 SURFACE WATER MONITORING REPORT FOR THE 2023/24 REPORTING PERIOD dated Aug2024 (EMR 2023-2024 Appendix C) Monitoring reports as appendices to the EMR 2023-2024 demonstrated the monitoring is occurring.	Section 6 of the BBLF EMP outlines monitoring programs consisting of Surface Water, Groundwater, Depositional Dust, and Marine. Section 6.3 of the BBLF EMP states: "Depositional dust is monitored at five potential impact sites near or within operational areas, and one control site located 2 km southwest of the BBLF (Figure 5 and Appendix E). The sampling period is approximately one month (30 ±2 days)." Todorski Ambient Air Monitoring Report states "The BBLF monitoring network currently consists of six deposited dust gauges. The deposited dust gauge bottle samples and HVAS filter papers are analysed at a laboratory for metal concentrations." that meets this requirement. Section 6.1 of the BBLF EMP states: "These monitoring programs are Surface water quality samples are collected in accordance with MRM Artificial Surface Water Monitoring Procedure (PRO-2200025)." Section 6.2 of the BBLF EMP states: "Groundwater quality samples are collected in accordance with MRM Groundwater Monitoring Procedure (PRO-2200024)." Section 6.4.2 of the BBLF EMP states: "The monitoring program consists of seven sampling zones which are presented in Figure 7, and listed in Appendix G. Data from the near shore sediment monitoring sites is collected annually, and samples are analysed for."
Schedule D - 6.e	Schedule D - 6.e	Unplanned Closure Plan	1									4	Full Compliance	Unplanned Closure Plan dated Jan2023. EMR 2023-2024 dated 31Aug2024. The Unplanned Closure Plan references various monitoring as included in the WMP, AQMP and RMP, which are assessed under Schedule D Condition 6 - a. Unique to the UCP in terms of monitoring is that related to the rehabilitation trials. For example the Geosynthetic Liner Cover System Plan would be relevant but it is not approved. The EMR 2023-2024 discusses monitoring that is related to rehabilitation trials.	Any monitoring required post unplanned closure is not applicable as the site is operational.
Schedule D - 7	Schedule D - 7	Any required material changes to the Environmental Management Plans mentioned in Condition 6 of this Schedule must be approved by the Department in writing.	1									N/A	Not Applicable		The Operator advised "There has been no change to the approved EMPs over the audit period."
Schedule D - 8	Schedule D - 8	For the purposes of managing chemicals and flammable or combustible liquids, the Operator must:											Refer to sub conditions		
Schedule D - 8.a	Schedule D - 8.a	store and handle all hazardous chemicals, toxic substances, gases and dangerous goods associated with the Mine in accordance with the current Australian Standard where such is applicable, and the laws of the Northern Territory;	1									4	Full Compliance	Environmental Inspection (Concentrator, Concentrator Shed and Fuel Farm) Dec2023. Environmental Inspection (P2, PP, Duncan Dam and New Fuel Farm) Dec2023. Chemical storage inspection INS-0154458 dated Feb2024 Chemical storage inspection INS-0154459 dated Feb2024 PO for chemical inspection by Risk Management Technologies May2024 (after audit period) Evidence of inspections indicated compliance with appropriate storage of hazardous chemicals, toxic substances, gases and dangerous goods.	The Operator advised that they schedule a Chemalert inspection every three to four years. A PO was provided as evidence to demonstrate that MRM is organising an inspection, which is planned for Q4 2024.

Authorisation compliance workbook - Operator Audit period 01 May 2023 to 30 April 2024			Governance/ General	Non-mineral Waste Management	Open Pit/ Underground Workings	Tailings Storage Facility	Water Management and Storages	Overburden Emplacement Facilities	Exploration	Waterways (including river diversion)	Bing Bong Loading Facility	Score	Compliance level	Evidence	Comments
17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement													
Schedule D - 8.b	Schedule D - 8.b	include bulk storage tanks and associated infrastructure on a maintenance schedule which conforms with the current Australian Standard where such is applicable, and the laws of the Northern Territory;	1									4	Full Compliance	<p>Leach Tank 36-TK-08 10 year Condition Assessment Report Apr2024</p> <p>Spreadsheet of PM work orders - TK030 and TK031</p> <p>Maintenance work order - Thickness test sulphuric acid tank dated June2024 (after audit period)</p> <p>Monthly level control alarm checks on diesel storage tank #1 work orders January to April 2024.</p> <p>Monthly level control alarm checks on diesel storage tank #1 work order dated May and June2024 (after audit period)</p> <p>Monthly visual tank inspection tank #2 July and August 2024 (after audit period)</p> <p>Monthly visual tank inspection tank #1 August 2024 (after audit period).</p> <p>Forecast acid tank 2 (sfleming2 v1) Schedule.</p> <p>Forecast acid tank 2 Schedule.</p> <p>Forecast fuel farm tank 1 (sfleming2 v1) Schedule.</p> <p>Forecast fuel farm tank 1 Schedule.</p> <p>The spreadsheet of work orders provided for TK030 and TK031 appeared to list a number of inspections (pro-active items) as outstanding while reactive maintenance items were closed. No evidence of the TK030 or TK031 inspections for pro-active items was provided. The Operator advised the inspections are ongoing in accordance with maintenance schedules.</p>	OBS: Close out work orders related to bulk storage tank inspections including for pro-active items with evidence of them occurring.
Schedule D - 8.c	Schedule D - 8.c	include regular integrity testing to ensure loss of containment or failure of bulk storage tanks does not occur.	1									4	Full Compliance	<p>230204 26PI01 THICKNESS ACID SYSTEM dated 22Jan2023 (before audit period).</p> <p>Leach Tank 36-TK-08 10 year Condition Assessment Report Apr2024</p> <p>Spreadsheet of PM work orders - TK030 and TK031</p> <p>Maintenance work order - Thickness test sulphuric acid tank dated June2024 (after audit period)</p> <p>Monthly level control alarm checks on diesel storage tank #1 work orders January to April 2024.</p> <p>Monthly level control alarm checks on diesel storage tank #1 work order dated May and June2024 (after audit period)</p> <p>Monthly visual tank inspection tank #2 July and August 2024 (after audit period)</p> <p>Monthly visual tank inspection tank #1 August 2024 (after audit period).</p> <p>Forecast acid tank 2 (sfleming2 v1) Schedule.</p> <p>Forecast acid tank 2 Schedule.</p> <p>Forecast fuel farm tank 1 (sfleming2 v1) Schedule.</p> <p>Forecast fuel farm tank 1 Schedule.</p>	

Appendix B. Waste Discharge Licence compliance workbook - Operator

Waste Discharge Licence compliance workbook - Operator 2024 - audit period 01 May 2024 to 30 April 2024

Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments	
WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)	WDL174-14 (26 May 2023 - 25 May 2025)	WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)	RULES FOR INTERPRETING THE CONDITIONS OF THIS LICENCE					
1	1	Included as a bullet point but not a condition.	Where there is a discrepancy between the conditions of this licence and any plan, standard, guideline or other document referred to in this licence, the conditions of this licence prevail to the extent of the inconsistency.	N/A	Not Applicable			
2	2	Included as a bullet point but not a condition.	Any reference to any standard, guideline or code of practice (Australian or international) in this licence means the relevant parts of the current version of that standard, guideline or code of practice.	N/A	Not Applicable		WDL 174-13 included two separate bullet points equivalent to this condition.	
3	3	Included as a bullet point but not a condition.	In this licence, unless the contrary intention appears, words that are defined in the Water Act are intended to have the meaning given to them in that Act.	N/A	Not Applicable			
4	4	N/A	In this licence, unless a contrary intention appears, terms are defined in the Definitions at the end of this licence.	N/A	Not Applicable			
5	5	N/A	In this licence a reference to an Item is a reference to an Item specified in Schedule 1.	N/A	Not Applicable			
GENERAL								
6	6	1	The licensee must ensure the contact details recorded with the Administering Agency for this licence are correct at all times.	4	Full Compliance	Contact details for Adam Hatfield and Simon Longhurst were sighted and are recorded and relevant.		
7	7	2	The licensee must at all times have a 24 hour emergency contact.	4	Full Compliance	Communications Plan (2023-2025) The emergency number 08 8975 8222 is included on the front of the Communications Plan (2023-2025).		
8	8	3	The licensee must notify the Administering Agency prior to making any operational change that will cause, or is likely to cause, an increase in the potential for environmental harm.	N/A	Not Applicable		The Operator advised that they do a self assessment if there are any operational changes to determine if they will, or are likely to cause, an increase in the potential for environmental harm. In the audit period, the minor amendment approved under the Authorisation and also the amendment submitted in the audit period but not approved under the Authorisation until after the audit period both included self assessments that the Operator indicated would not cause or be likely to cause an increase in the potential for environmental harm. Southern water dam changes also had a self assessment where the Operator advised that it would not increase the potential for environmental harm.	
9	9	4	The Licensee must display clear and legible signage, in English, in a prominent location at each public entrance to the premises of the Licensed Action that includes the following details:		Refer to subconditions		Word change but equivalent requirement between WDL174-13 and 14.	
9.1	9.1	4.1	waste discharge licence number issued under the Water Act; and	4	Full Compliance	Photo: MRM Gate Sign WDL174-14. Photo: Entrance to TSF Sign WDL174-14 (not a public access). Photo: BBLF Sign WDL174-13. Signage was observed at the TSF fence on the site visit in August 2024 (after audit period). Photos of signage were provided showing the licence number WDL174 but outdated versions.	OBS: The signage included outdated license version numbers and the Operator may consider not including the version on the signage.	

Waste Discharge Licence compliance workbook - Operator 2024 - audit period 01 May 2024 to 30 April 2024

Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
<p>WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)</p> <p>WDL174-14 (26 May 2023 - 25 May 2025)</p> <p>WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)</p>							
9.2	9.2	4.2	24 hour emergency contact details.	4	Full Compliance	Signage was observed at the TSF fence on the site visit in August 2024 with the emergency number (after audit period). The signage at the MRM entrance gate, TSF entrance and Bing Bong entrance includes the 24 hour emergency number of "8975 8222".	
10	10	5	The Licensee must cause a hard copy of this licence to be available for inspection, at the premises of the Licensed Action, by any person on request.	4	Full Compliance	During the site visit in August 2024 an up to date version of the WDL (WDL 174-15) was observed on site (after the audit period). The Independent Monitor was also shown a copy of WDL 174-14 (relevant 26May2023 to 25May25) via video from the site over Microsoft teams during the audit period. This demonstrated that the relevant WDL was available on site for inspection by any person, in hard copy form.	Word change but equivalent requirement between WDL174-13 and 14.
11	11	6	Unless otherwise specified, within 10 business days of a request, the Licensee must provide to the Administering Agency a copy of any record, document, monitoring data or other information in relation to the Licensed Action in electronic form by emailing environmentalregulation@nt.gov.au.	4	Full Compliance	Correspondence between DEPWS and Operator April 2024 Correspondence was sighted by the IM showing DEPWS requesting information on related to issues associated with the flooding on 2/4/2024 and the Operator responding on 15/4/2024, which was within 10 business days. The email was sent to the relevant people but not the specific email address required by the condition.	Word change but equivalent requirement between WDL174-13 and 14 except a time other than 10 days can be specified in WDL 174-14. OBS: The Operator should ensure that correspondence is emailed to environmentalregulation@nt.gov.au as required by the condition.
12	12	7	All notices, reports, documents or other correspondence required to be provided as a condition of this licence, unless otherwise specified as a condition of this licence, must be provided in electronic form by emailing environmentalregulation@nt.gov.au.	4	Full Compliance	Documents provided as evidence were generally emailed to environmentalregulation@nt.gov.au. As discussed in condition 11, there was one instance identified where this did not occur.	Word change to include the email address in WDL174-14. OBS: Refer to OBS in condition 11.
13	13	8	The Licensee must maintain, implement and comply with the current version of the documents specified in Item 4.		-		Word change but equivalent requirement between WDL174-13 and 14.

Waste Discharge Licence compliance workbook - Operator 2024 - audit period 01 May 2024 to 30 April 2024

Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)	WDL174-14 (26 May 2023 - 25 May 2025)	WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)					
Item 4: Licence Documents (a)	Item 4: Licence Documents (a)	Table 1 : Document Number 2	Emergency Response Plan McArthur River Mining	4	Full Compliance	<p>Emergency Response Plan (ERP) ERT calendar for 2024. Emergency response coverage March 2023. ERT Statistics for a day in May 2024.</p> <p>No instances of not complying with the ERP were identified in the audit.</p> <p>The ERP includes an environmental incident in section 12.5 of Flood Waters Overtopping NOEF Flood Barriers, which did occur in the audit period in March 2024 and appears to generally be followed.</p> <p>The ERP says it is version 11 effective 31/10/2023 but the change information has version 12 dated 18/1/2024 (plant changes) and version 13 dated 20/5/2024 (flood water rescue) with changes.</p> <p>Fire fighting training was evident based on the documents provided.</p>	<p>The Operator advised that there was partial overtopping of the 20 year levee and the steps in ERP section 12.5 were generally followed.</p> <p>The Operator advised that there is always environmental coverage and a dewatering person on site. There is a back to back arrangement for environment and for dewatering. There may not always be an environmental representative on the ERP coverage but there is always the ability to engage with the environmental team.</p> <p>The Operator advised "We began preparations for the weather event on Tuesday 12 March, upon first indication that a cyclone could potentially form in the Gulf Region. We convened our Incident Management Team, which met daily, and participated in the Local Emergency Committee meetings organised by Borroloola Police. We arranged daily updates with the Bureau of Meteorology so we were across accurate and timely information. We thoroughly checked all key water infrastructure including dams, piping and pumps, which were found to be in good condition. Cyclone checklists were distributed to MRM departments on Wednesday 13 March to guide preparations in each area of the mine site and Bina Bona."</p>
Item 4: Licence Documents (b)	Item 4: Licence Documents (b)	Table 1 : Document Number 1	Communication Plan Waste Discharge Licence (WDL 174)	4	Full Compliance	<p>Communications Plan (2023-2025) Print out titled Communications during which Environment was raised as a topic</p> <p>No instances of not complying with the Communications Plan were identified in the audit.</p> <p>The document provided was Communication Plan WDL174-14 version 1.1 issued 29Mar2024. However, WDL124-15 was the relevant WDL at that time.</p>	<p>Listed as Communication Plan Waste Discharge Licence (WDL 174-10) in WDL 174-13.</p> <p>The Operator advised that the community are not informed of planned or unplanned discharges at the time but unplanned releases are discussed with the CRG. The community would be informed immediately if there was a risk to the downstream environment.</p>
Item 4: Licence Documents (c)	Item 4: Licence Documents (c)	17 and Table 1 : Document Number 3	Adaptive Management Plan McArthur River Mine	4	Full Compliance	<p>Adaptive Management Plan version E dated 27May2022. EMR 2023-2024</p> <p>No instances of not complying with the AMP were identified in the audit.</p>	<p>Covers condition 17 from the WDL 174-13.</p> <p>Evidence of implementation of the AMP and the associated Trigger Action Response Plans (TARPs) is provided within all the environmental managements plans that sit under that overarching AMP.</p>
14	14	9	Within 10 business days of any amendment being made to a document listed specified in Item 4, the Licensee must provide the amended document to the Administering Agency, along with:	3	Part Compliance (High)	<p>Emergency Response Plan (ERP)</p> <p>The ERP says it is version 11 effective 31/10/2023 but the change information has version 12 dated 18/1/2024 (plant changes) and version 13 dated 20/5/2024 (flood water rescue) with changes. The ERP was updated by the safety team in the audit period and was not provided to the Administering Agency.</p>	<p>Word change but equivalent requirement between WDL174-13 and 14.</p> <p>OFI: The Operator should issue the updated Emergency Response Plan to DEPWS along with a tabulated summary of the amendments, reasons for amendments and an assessment of environmental risk associated with the amendments.</p> <p>OFI: The Operator should have a system to ensure that changes are not made to the Emergency Response Plan without input from the environment team so that they are aware of when it needs to be resubmitted to the Administering Agency.</p>

Waste Discharge Licence compliance workbook - Operator 2024 - audit period 01 May 2024 to 30 April 2024

Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
<p>WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024) WDL174-14 (26 May 2023 - 25 May 2025) WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)</p>							
14.1	14.1	9.1	a tabulated summary of the amendment(s) with document references;	3	Part Compliance (High)	Emergency Response Plan (ERP) The ERP says it is version 11 effective 31/10/2023 but the change information has version 12 dated 18/1/2024 (plant changes) and version 13 dated 20/5/2024 (flood water rescue) with changes. The ERP was updated by the safety team in the audit period and was not provided to the Administering Agency.	OFI: Refer to OFI in condition 14.
14.2	14.2	9.2	reasons for the amendment(s) ; and	3	Part Compliance (High)	Emergency Response Plan (ERP) The ERP says it is version 11 effective 31/10/2023 but the change information has version 12 dated 18/1/2024 (plant changes) and version 13 dated 20/5/2024 (flood water rescue) with changes. The ERP was updated by the safety team in the audit period and was not provided to the Administering Agency.	OFI: Refer to OFI in condition 14.
14.3	14.3	9.3	an assessment of environmental risk associated with the amendment(s).	3	Part Compliance (High)	Emergency Response Plan (ERP) The ERP says it is version 11 effective 31/10/2023 but the change information has version 12 dated 18/1/2024 (plant changes) and version 13 dated 20/5/2024 (flood water rescue) with changes. The ERP was updated by the safety team in the audit period and was not provided to the Administering Agency.	OFI: Refer to OFI in condition 14.
15	15	10	The Administering Agency may require the Licensee to revise or amend and resubmit any document provided in accordance with this licence. Where the Administering Agency requires any document to be revised or amended, the Licensee must submit it to the Administering Agency by the date specified by the Administering Agency.	N/A	Not Applicable		No requests in the audit period.
16	16	11 and 12	The Licensee must operate and maintain a community feedback telephone number enabling members of the public to contact, at any time, a person or voice mail system that can accept, on behalf of the Licensee, enquiries or complaints about the Licensed Action, and to which the Licensee must respond. The community feedback telephone number must be displayed:		Refer to subconditions		Word change and combing two conditions into one but equivalent requirement between WDL174-13 and 14.
16.1	16.1	12.1	where the Licensee has a website, in a prominent location on the Licensee's website;	4	Full Compliance	Site switchboard: +61 8 8975 8179 Information line: 1800 211 573	
16.2	16.2	12.2	in the Consultation and Communication Plan; and	4	Full Compliance	Communications Plan (2023-2025) Communications Plan (2023-2025) includes MRM information line, 1800 211 573 and MRM Emergency hotline (08) 8975 8222.	WDL174-13 refers to in Communication Plan Waste Discharge Licence, which is considered to be equivalent.
16.3	16.3	12.3	in other publicly available documents relating to the Licensed Action.	N/A	Not Applicable	No relevant documents were found in the audit period.	

Waste Discharge Licence compliance workbook - Operator 2024 - audit period 01 May 2024 to 30 April 2024

Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)	WDL174-14 (26 May 2023 - 25 May 2025)	WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)					
17	17	13 and 14	The Licensee must maintain a register of complaints that records the details of each complaint received in relation to the Licensed Action and provide a copy to the Administering Agency on request. Details of the complaints must (as is reasonably practicable) include the following information:		Refer to subconditions		Word change and combing two conditions into one but equivalent requirement between WDL174-13 and 14.
17.1	17.1	14.1	the person to whom the complaint was made;	4	Full Compliance	<p>Entries of complaints/grievances from Borealis run by the Community team.</p> <p>The Borealis (a system run by the Operator Community team to track interactions with the community) entries showed complaints direct from the community and those received from the community via DITT.</p> <p>The entries included the person to whom the complaint was made.</p>	
17.2	17.2	14.2	the person responsible for managing the complaint;	4	Full Compliance	<p>Entries of complaints/grievances from Borealis run by the Community team.</p> <p>The Borealis (a system run by the Operator Community team to track interactions with the community) entries showed complaints direct from the community and those received from the community via DITT.</p> <p>The entries included the person responsible for managing the complaint.</p>	
17.3	17.3	14.3	the date and time the complaint was reported;	4	Full Compliance	<p>Entries of complaints/grievances from Borealis run by the Community team.</p> <p>The Borealis (a system run by the Operator Community team to track interactions with the community) entries showed complaints direct from the community and those received from the community via DITT.</p> <p>The entries included the date and reporting time.</p>	
17.4	17.4	14.4	the date and time of the event(s) that led to the complaint;	4	Full Compliance	<p>Entries of complaints/grievances from Borealis run by the Community team.</p> <p>The Borealis (a system run by the Operator Community team to track interactions with the community) entries showed complaints direct from the community and those received from the community via DITT.</p> <p>The entries included the date of the event but not the time.</p>	OBS: Update the complaints/grievances register in Borealis to include a prompt to capture the time of the event and the nature of event(s) leading to the complaint.

Waste Discharge Licence compliance workbook - Operator 2024 - audit period 01 May 2024 to 30 April 2024

Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)	WDL174-14 (26 May 2023 - 25 May 2025)	WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)					
17.5	17.5	14.5	the contact details of the complainant if known, or where no details are provided a note to that effect;	4	Full Compliance	<p>Entries of complaints/grievances from Borealis run by the Community team.</p> <p>The Borealis (a system run by the Operator Community team to track interactions with the community) entries showed complaints direct from the community and those received from the community via DITT.</p> <p>No contact details were provided. However, the Operator advised these are kept and have not been provided for privacy reasons.</p>	
17.6	17.6	14.6	the nature of the complaint;	4	Full Compliance	<p>Entries of complaints/grievances from Borealis run by the Community team.</p> <p>The Borealis (a system run by the Operator Community team to track interactions with the community) entries showed complaints direct from the community and those received from the community via DITT.</p> <p>The entries included a heading for complaint details.</p>	
17.7	17.7	14.7	the nature of event(s) giving rise to the complaint;	4	Full Compliance	<p>Entries of complaints/grievances from Borealis run by the Community team.</p> <p>The Borealis (a system run by the Operator Community team to track interactions with the community) entries showed complaints direct from the community and those received from the community via DITT.</p> <p>Has a heading for complaint details that is not as specific as this condition but considered acceptable.</p>	OBS: Refer to OBS in Condition 17.4.
17.8	17.8	14.8	prevailing weather conditions at the time (where relevant to the complaint)	4	Full Compliance	<p>Entries of complaints/grievances from Borealis run by the Community team.</p> <p>The Borealis (a system run by the Operator Community team to track interactions with the community) entries showed complaints direct from the community and those received from the community via DITT.</p> <p>The entries included a heading for environmental conditions.</p>	
17.9	17.9	14.9	the action taken in relation to the complaint, including any follow-up contact with the complainant; and	4	Full Compliance	<p>Entries of complaints/grievances from Borealis run by the Community team.</p> <p>The Borealis (a system run by the Operator Community team to track interactions with the community) entries showed complaints direct from the community and those received from the community via DITT.</p> <p>The entries included immediate response, investigation, actions and complainant response headings.</p>	

Waste Discharge Licence compliance workbook - Operator 2024 - audit period 01 May 2024 to 30 April 2024

Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)							
WDL174-14 (26 May 2023 - 25 May 2025)							
WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)							
17.10	17.10	14.10	if no action was taken, why no action was taken.	4	Full Compliance	<p>Entries of complaints/grievances from Borealis run by the Community team.</p> <p>The Borealis (a system run by the Operator Community team to track interactions with the community) entries showed complaints direct from the community and those received from the community via DITT.</p> <p>Action was taken where required and where no action as taken the entries stated why (e.g., event not related to the Operator).</p>	
EARLY SURRENDER OF LICENCE							
N/A	N/A	15	Any reports, records or other information required or able to be provided by the licensee under this licence must be submitted to the Administering Agency prior to the licensee surrendering the licence. If the date on which a report, record or other information is required falls after the date the licensee requests to surrender this licensee, the licensee must provide the report, record or information as far as possible using data available to the licensee up to and including the date the request to surrender the licence is made.	N/A	Not Applicable		The licensee did not surrender the licence.
OPERATIONAL							
18	18	N/A	Without limiting the conditions of this licence, in conducting the Licensed Action, the Licensee must do all things reasonable and practicable to:		Refer to subconditions		
18.1	18.1	N/A	minimise the likelihood of waste coming into contact with water or water being polluted as a result of, or in connection with, the Licensed Action;	3	Part Compliance (High)	<p>EMR 2023-2024</p> <p>Evidence was not provided to demonstrate that the waste area on site adjacent to the WMD had minimised the likelihood of waste coming into contact with water or water being polluted as a result of, or in connection with, the Licensed Action.</p>	OFI: The Operator should close and remediate the waste management area adjacent to the Water Management Dam and progress the planning and design of the purpose built waste management facility.
18.2	18.2	N/A	prevent and minimise the likelihood of environmental harm occurring as a result, or in connection with, the Licensed Action;	4	Full Compliance	<p>EMR 2023-2024</p> <p>The preparation prior to cyclone Megan is an example of preventing and minimising potential for environmental harm.</p>	
18.3	18.3	N/A	effectively investigate, monitor and report on water being polluted as a result of, or in connection with, the Licensed Action;	4	Full Compliance	<p>EMR 2023-2024</p> <p>Surface Water Monitoring Annual Report 2023-2024 dated 30 August 2024</p> <p>Routine and investigation related monitoring (specifically from flooding) are evidence of compliance with this condition.</p>	
18.4	18.4	N/A	effectively investigate, monitor and report on environmental harm and the risk of environmental harm occurring as a result of or in connection with the Licensed Action; and	4	Full Compliance	<p>EMR 2023-2024</p> <p>Surface Water Monitoring Annual Report 2023-2024 dated August 2024</p> <p>Routine and investigation related monitoring (specifically from flooding) are evidence of compliance with this condition.</p>	

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Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)	WDL174-14 (26 May 2023 - 25 May 2025)	WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)					
18.5	18.5	N/A	apply the principles of ecologically sustainable development.	4	Full Compliance	EMR 2023-2024 Email Operator to DEPWS subject: MRM Uncontrolled Release dated Mar2024 Waste Discharge Licence 174-15 Monitoring Report 1 May 2023 to 30 April 2024 dated 31Aug2024 The precautionary principle was evident from immediately ceasing managed releases when the seepage was observed from site on 26Mar2024. Ecologically sustainable development was part of the preparation for and response to ex-Tropical Cyclone Megan.	
19	19	16	The Licensee must, without limiting any other condition of this licence, in conducting the Licensed Action do all things reasonable and practicable to minimise adverse effects to any:		Refer to subconditions		Incorporates Condition 16 from the WDL 174-13.
19.1	19.1	16	declared beneficial use, quality, standard or objectives declared under section 73 of the Water Act; including, but not limited to, those specified in Items 1, 2 and 3 [Item 1 : refers to Marine and tidal waters: McArthur River Area: Aquatic ecosystem protection, recreational water quality and aesthetics (Gazette G9 11 March 1998 and G20 27 May 1998 (corrigendum)). McArthur River catchment: McArthur River Catchment Area: Environment, cultural and riparian (Gazette G10 14 March 2001)]. sites of conservation significance; or	4	Full Compliance	EMR 2023-2024 Surface Water Monitoring Annual Report 2023-2024 dated August 2024 The Surface Water Monitoring Annual Report 2023-2024 stated "The review concluded that the beneficial uses and community values of the McArthur River continue to be protected from potential mine derived impacts."	
19.2	19.2	16	including, but not limited to, those specified in Items 1, 2 and 3 [Item 2: refers to SOCS Number 33: Sir Edward Pellew Island group; SOCS Number 34: McArthur River coastal floodplain; and SOCS Number 35: Borroloola area.]	4	Full Compliance	EMR 2023-2024 Surface Water Monitoring Annual Report 2023-2024 dated August 2024 The Surface Water Monitoring Annual Report 2023-2024 stated "The review concluded that the beneficial uses and community values of the McArthur River continue to be protected from potential mine derived impacts."	
19.3	19.3	16	designated Ramsar wetlands, including, but not limited to, those specified in Items 1, 2 and 3. [Item 3: no specific Ramsar wetlands stated]	N/A	Not Applicable		
N/A	N/A	19	No change, replacement or alteration of plant and equipment is permitted if the change, replacement or alteration increases the risk of environmental harm for the licenced activity, unless approved by the Administering Agency.	N/A	Not Applicable		The Operator advised that no change, replacement or alteration of plant and equipment that would increase the risk of environment harm occurred in the audit period.

DISCHARGES

Waste Discharge Licence compliance workbook - Operator 2024 - audit period 01 May 2024 to 30 April 2024

Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)	WDL174-14 (26 May 2023 - 25 May 2025)	WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)					
20	20	22	The Licensee must only discharge waste to water from the authorised discharge points specified in Item 5.	3	Part Compliance (High)	<p>2023-24 Waste Discharge Records PRO-OP-0008-2200035 Discharge Procedure Email from Department to Operator subject RE MRM November 2020 VOA Conditions 59 and 68 dated Nov2020. Email Operator to DEPWS subject: MRM Uncontrolled Release dated Mar2024</p> <p>Based on the 2023-24 Waste Discharge Records, in the audit period prior to 29 March 2024 (when WDL 174-15 commenced) discharges occurred from WMD RP, WRDC DP and MLDP.</p> <p>Based on the 2023-24 Waste Discharge Records from 29 March 2024 (when WDL 174-15 commenced) discharges occurred from WMD RP, WRDC DP, MLDP and CERP, which is Central East Release Point from (SEPROD as approved in Appendix 9 of WDL 174-15.</p> <p>Discharges are in accordance with either this condition prior to 29 March or from that date with this condition and Condition 44 of Appendix 9 of WDL 174-15 with the exception of the releases through embankments on 26Mar2024 (i.e., seepage).</p> <p>Part compliance high as the risk of environmental harm was assessed as low in the incident investigations.</p>	<p>WDL 174-13 was worded "licence authorises discharge to water".</p> <p>Email from Department to Operator subject RE MRM November 2020 VOA Conditions 59 and 68 dated Nov2020 agreed that the Water Management Dam (WMD) Siphons Release Point, which is also referred to as WMD RP, was an onsite water release/transfer point and not relevant to the WDL.</p> <p>The release of mine-affected water as seepage observed on 26Mar2024 on the north and north-east sides of the NOEF, and at the SEL1 spillway appear to be a result of factors such as significant rainfall, flooding and power loss leading to inability to use extraction towers. The incident investigation states "the environmental risk in the McArthur River at or downstream of the Surface Water 11 (SW11) compliance point on 26Mar2024 or thereafter is considered to be low" and on that basis this condition is considered part compliance high.</p> <p>OFI: Implement appropriate remediation and corrective actions to address potential impacts from the seepage incident, and to prevent recurrence.</p> <p>OFI: Continue the Emu Creek monitoring program for metals in sediment and aquatic fauna to confirm levels have returned to expected ranges.</p>
Item 5: Authorised Discharge Points	Item 5: Authorised Discharge Points	22	Mine Levee Discharge Point(s) (MLDP) Location - Latitude: -16.427523 Longitude: 136.111403		-		This is the authorised discharge point from Item 5.
Item 5: Authorised Discharge Points	Item 5: Authorised Discharge Points	22	South-East Levee 1 Discharge Point (SEL1 DP) Location - Latitude: -16.423824 Longitude: 136.108302		-		This is the authorised discharge point from Item 5.
Item 5: Authorised Discharge Points	Item 5: Authorised Discharge Points	22	McArthur River Diversion Channel Discharge Point(s) (MRDC DP) Adaptive Management Plan McArthur River Mine Location - Latitude: -16.435385 Longitude: 136.120196		-		This is the authorised discharge point from Item 5.
Item 5: Authorised Discharge Points	Item 5: Authorised Discharge Points	22	Bing Bong Dredge Discharge Point (BBDDP) Location - Latitude: -15.629683 Longitude: 136.394778		-		This is the authorised discharge point from Item 5.
21	21	23	Discharges from each authorised discharge point must:		Refer to subconditions		

Waste Discharge Licence compliance workbook - Operator 2024 - audit period 01 May 2024 to 30 April 2024

Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)	WDL174-14 (26 May 2023 - 25 May 2025)	WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)					
21.1	21.1	23	consist only of waste from the source(s) specified in Item 6;	4	Full Compliance	<p>2023-24 Waste Discharge Records</p> <p>Based on the 2023-24 Waste Discharge Records, in the audit period prior to 29 March 2024 (when WDL 174-15 commenced) water that was discharged came from WMD, NC1A and Pond 2.</p> <p>Based on the 2023-24 Waste Discharge Records from 29 March 2024 (when WDL 174-15 commenced) water that was discharged came from WMD, NC1A, Pond 2 and SEPROD. WMD, NC1A and Pond 2 are approved under this condition while SEPROD is approved in Condition 44 of Appendix 9 of WDL 174-15.</p> <p>Therefore, the discharges are in accordance with either this condition prior to 29 March or from that date with this condition and Condition 44 of Appendix 9 of WDL 174-15.</p>	
Item 6: Sources of waste	Item 6: Sources of waste	23	<p>Mine Levee Discharge Point (MLDP):</p> <ol style="list-style-type: none"> 1. Water from the Water Management Dam. 2. Treated water from the Water Treatment Plant via Pond 2 (P2). 3. Groundwater from dewatering bores around main pit collected in and then discharged from Pond 2 (P2). 4. Rain water collecting in the old McArthur River Channel (NC1A) inside the Mine levee. 		-		This is the source specified in Item 6.
Item 6: Sources of waste	Item 6: Sources of waste	23	<p>South-East Levee 1 Discharge Point (SEL1 DP)</p> <p>Rainwater runoff, separated from all contaminated seepages, collected in, and discharged from the South-East Levee 1.</p>		-		This is the source specified in Item 6.
Item 6: Sources of waste	Item 6: Sources of waste	23	<p>McArthur River Diversion Channel Discharge Point(s) (MRDC DP)</p> <ol style="list-style-type: none"> 1. Water from the Water Management Dam. 2. Treated water from the Water Treatment Plant via Pond 2 (P2). 3. Groundwater from dewatering bores around main pit collected in and then discharged from Pond 2 (P2) 		-		This is the source specified in Item 6.
Item 6: Sources of waste	Item 6: Sources of waste	23	<p>Bing Bong Dredge Discharge Point (BBDDP)</p> <p>The Bing Bong Dredge Discharge Point (BBDDP) receives overflow from:</p> <ol style="list-style-type: none"> 1. the final dredge spoil emplacement area cell when in operation; 2. saline water from the perimeter drain which surrounds the dredge spoil emplacement area. <p>For the purposes of clarity, this licence does not authorise dredging and/or pumping or disposal of dredge slurry to the Dredge Spoil Emplacement Area.</p>		-		This is the source specified in Item 6.

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Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
<p>WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)</p> <p>WDL174-14 (26 May 2023 - 25 May 2025)</p> <p>WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)</p>							
21.2	21.2	N/A	not exceed the trigger value limits specified in Item 7 [limits for parameters listed in Appendix 3] at the compliance point specified in Item 8; and	4	Full Compliance	Internal Operator Memo subject: Exceedance of the WDL 174-14 SSTVs for filtered aluminium and filtered iron at SW11 dated February 2024 Email Operator to environmentalregulation@nt.gov.au subject:RE: MRM WDL 174-15 Notifiable Incident dated April 2024 It is noted that during flooding experienced as a result of Ex-Tropical Cyclone Megan, a sample was over the site-specific trigger value (SSTV) for zinc at a site indicative of the SW11 location. An investigation was undertaken by the Operator and the exceedance is not as a result of the Operator activities so this condition is considered a full compliance.	Note that this condition doesn't mention the requirement to exceed the trigger value three times, and is only once.
Item 8: Compliance points	Item 8: Compliance points	N/A	SW11 as shown on the plan at Appendix 2, Figure 3. Location - Latitude: -16.407386 Longitude: 136.144785		-		This is the compliance point specified in Item 8.
Item 8: Compliance points	Item 8: Compliance points	N/A	BBDDP as shown on the plan at Appendix 2, Figure 5. Location - Latitude: -15.629683 Longitude: 136.394778		-		This is the compliance point specified in Item 8.
21.3	21.3	N/A	comply with the limitations specified in Item 9.		Refer to subconditions		
21.3 Item 9: Limitations of discharge	21.3 Item 9: Limitations of discharge	N/A	Authorised discharge must only occur in accordance with MRM Waste Discharge Procedure PRO-OP-0008-2200035. Discharge from SEL1 DP can only occur when flow as measured in the McArthur River at the downstream gauging station (SW11) is in excess of 20m ³ /s.	4	Full Compliance	2023-24 Waste Discharge Records PRO-OP-0008-2200035 Discharge Procedure No discharges for SEL1DP were shown in the 2023-24 Waste Discharge Records. No actions contravening PRO-OP-0008-2200035 Discharge Procedure were found by the Independent Monitor during the audit preparation.	
22	22	24	The Licensee must, for authorised discharge points MLDP, SEL1 DP, abs MRDC DP install, operate and maintain a device to measure and record, for each discharge event:		Refer to subconditions	Screen shot of calendar (July 2023) showing camera and solar panel inspections scheduled weekly on a Wednesday. Photos of the flow sensors/meters for the following were provided: 1) P2 -> MLDP 2) WMD -> MLDP / MRDC DP 3) SEL1 -> SEL1 DP 4) NC1A -> MLDP	The Operator advised "The flow meters only record flow rate. However MRM considers that the intent of this condition has been met through the manual recording of release times and ability to calculate release volumes based on the duration of release. The valves for release are manually turned on and off for release, at which point manual recordings of release times are taken." The flow meters only measure flow rate and do not record or transmit that data anywhere.
22.1	22.1	24.1	the time the discharge commenced and the duration of the discharge;	3	Part Compliance (High)	Sighted text messages confirming example start and stop times. No evidence of a device that records time or duration of discharge or a register of recorded time the discharge commenced.	OFI: Explore opportunities to automate the measurement and recording of data capture for discharge events. The current process relies on manual entries to create records of flow start, stop, rate and volume. The flow volume is determined based on calculations rather than measurements.

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Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
<p>WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)</p> <p>WDL174-14 (26 May 2023 - 25 May 2025)</p> <p>WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)</p>							
22.2	22.2	24.2	the discharge rate of flow; and	3	Part Compliance (High)	Example images of flow rate on photos of flow meters were shown. No evidence of a device that records discharge rate of flow or a register of recorded discharge rate of flow.	OFI: Refer to OFI in condition 22.1.
22.3	22.3	24.3	the discharge volume.	3	Part Compliance (High)	2023-24 Waste Discharge Records No evidence of a device that records discharge volume.	OFI: Refer to OFI in condition 22.1.
23	23	25	Discharges from each authorised discharge point must not:		Refer to subconditions		
23.1	23.1	25.1	contain any floating debris, oil, grease, petroleum hydrocarbon sheen, scum, litter or other objectionable matter;	4	Full Compliance	NSW240312MW_Discharge - Field Sheet dated Mar2024 There is a prompt for comment on the upon discharge monitoring field form and the example provided for Mar2024 did not have any impacts from the discharges. No complaints from community members in the complaints/grievances register were related to any visual complaints of water issues.	
23.2	23.2	25.2	cause or generate odours which would adversely affect the use of surrounding waters;	4	Full Compliance	NSW240312MW_Discharge - Field Sheet dated Mar2024 There is a prompt for comment on the upon discharge monitoring field form and the example provided for Mar2024 did not have any impacts from the discharges. No complaints from community members in the complaints/grievances register were related to any odour complaints.	
23.3	23.3	25.3	cause algal blooms in the receiving water;	4	Full Compliance	NSW240312MW_Discharge - Field Sheet dated Mar2024 There is a prompt for comment on the upon discharge monitoring field form and the example provided for Mar2024 did not have any impacts from the discharges. No complaints from community members in the complaints/grievances register were related to any algal bloom complaints.	
23.4	23.4	N/A	pollute groundwater;	4	Full Compliance	NSW240312MW_Discharge - Field Sheet dated Mar2024 There is a prompt for comment on the upon discharge monitoring field form and the example provided for Mar2024 did not have any impacts from the discharges. No complaints from community members in the complaints/grievances register were related to any groundwater pollution.	
23.5	23.5	25.4	cause visible change in the behaviour of fish or other aquatic organisms in the receiving water;	4	Full Compliance	NSW240312MW_Discharge - Field Sheet dated Mar2024 There is a prompt for comment on the upon discharge monitoring field form and the example provided for Mar2024 did not have any impacts from the discharges. No complaints from community members in the complaints/grievances register were related to any fish or other aquatic organism changes.	

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Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)	WDL174-14 (26 May 2023 - 25 May 2025)	WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)					
23.6	23.6	25.5	cause mortality of fish or other aquatic organisms; or	4	Full Compliance	NSW240312MW_Discharge - Field Sheet dated Mar2024 There is a prompt for comment on the upon discharge monitoring field form and the example provided for Mar2024 did not have any impacts from the discharges. No complaints from community members in the complaints/grievances register were related to any fish or other aquatic organism deaths.	
23.7	23.7	N/A	cause erosion or degradation to the beds and banks of a watercourse; or	4	Full Compliance	NSW240312MW_Discharge - Field Sheet dated Mar2024 There is a prompt for comment on the upon discharge monitoring field form and the example provided for Mar2024 did not have any impacts from the discharges. No complaints from community members in the complaints/grievances register were related to erosion or degradation to the beds and banks of a watercourse.	
23.8	23.8	25.6	cause adverse impacts on plants or animals.	4	Full Compliance	NSW240312MW_Discharge - Field Sheet dated Mar2024 There is a prompt for comment on the upon discharge monitoring field form and the example provided for Mar2024 did not have any impacts from the discharges.	"or animals" added to the WDL 174-14.
INVESTIGATIONS AND NOTIFICATIONS							
24	24	N/A	Following any exceedance of a trigger value limit specified in Item 7 at the compliance points specified in Item 8, the Licensee must:		Refer to subconditions		Item 7 is trigger values - The limits for parameters listed in Appendix 3. Item 8 is compliance points SW11 and BBDDP. The Operator advised "Once laboratory and field data water quality results are imported into the MRM MonitorPro database, it sends an automated email notification of any exceedance of a trigger value limit specified in Item 7 at the compliance points specified in Item 8. This then triggers investigation of the exceedance, and any targeted monitoring that may be required in addition to routine monitoring."
24.1	24.1	N/A	investigate the exceedance, including undertaking targeted monitoring, in addition to routine monitoring; and	4	Full Compliance	WDL Exceedances Register 2023-24 Internal Operator Memo subject: Exceedance of the WDL 174-14 SSTVs for filtered aluminium and filtered iron at SW11 dated Feb2024 The WDL Exceedances Register 2023-24 refers to incident investigations where relevant. Regarding Feb2024 exceedance SW21 monitoring site is located upstream of any potential influence from the Mine and had elevated filtered aluminium.	
24.2	24.2	N/A	take corrective action to mitigate any environmental harm and ensure the exceedance does not reoccur; and	4	Full Compliance	WDL Exceedances Register 2023-24 Internal Operator Memo subject: Exceedance of the WDL 174-14 SSTVs for filtered aluminium and filtered iron at SW11 dated Feb2024 Regarding Feb2024 exceedance the elevated levels were not related to the mine. However, MRM were proactive and ceased discharging pending investigation.	

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Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
<p>WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024) WDL174-14 (26 May 2023 - 25 May 2025) WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)</p>							
24.3	24.3	N/A	make a record of:		Refer to subconditions		
24.3.1	24.3.1	N/A	when the exceedance was detected and by whom;	4	Full Compliance	<p>WDL Exceedances Register 2023-24 Internal Operator Memo subject: Exceedance of the WDL 174-14 SSTVs for filtered aluminium and filtered iron at SW11 dated Feb2024</p> <p>Included in the WDL Exceedances Register 2023-24.</p> <p>Regarding Feb2024 exceedance the investigation states "Environmental Monitoring Team on 12 February 2024 upon receipt of the preliminary results from the MRM Environmental Laboratory. The results were confirmed on 17 February 2024 upon receipt of the final results from the MRM Environmental Laboratory. "</p>	
24.3.2	24.3.2	N/A	the date and time of the exceedance;	4	Full Compliance	<p>Internal Operator Memo subject: Exceedance of the WDL 174-14 SSTVs for filtered aluminium and filtered iron at SW11 dated Feb2024</p> <p>Included in the WDL Exceedances Register 2023-24.</p> <p>Regarding Feb2024 exceedance the investigation includes the date and time of the sampling.</p>	
24.3.3	24.3.3	N/A	the actual and potential causes and contributing factors to the exceedance;	4	Full Compliance	<p>Internal Operator Memo subject: Exceedance of the WDL 174-14 SSTVs for filtered aluminium and filtered iron at SW11 dated Feb2024.</p> <p>Not included in Included in the WDL Exceedances Register 2023-24 but included in the incident investigation.</p> <p>Regarding Feb2024 exceedance, the investigation includes the other sampling locations that had elevated levels, including upstream of the mine.</p>	
24.3.4	24.3.4	N/A	the risk of environmental harm arising from the exceedance;	4	Full Compliance	<p>Internal Operator Memo subject: Exceedance of the WDL 174-14 SSTVs for filtered aluminium and filtered iron at SW11 dated Feb2024</p> <p>Included in the WDL Exceedances Register 2023-24.</p> <p>Regarding Feb2024 exceedance, risk of harm arising from the exceedances and additional monitoring was included.</p>	
24.3.5	24.3.5	N/A	exceedances and details of the investigation and corrective action taken; and	4	Full Compliance	<p>Internal Operator Memo subject: Exceedance of the WDL 174-14 SSTVs for filtered aluminium and filtered iron at SW11 dated Feb2024</p> <p>The WDL Exceedances Register 2023-24 refer to relevant investigation reports.</p> <p>Regarding Feb2024 exceedance, this incident is about the exceedance so that is included in the report.</p>	

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Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
<p>WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)</p> <p>WDL174-14 (26 May 2023 - 25 May 2025)</p> <p>WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)</p>							
24.3.6	24.3.6	N/A	if no action was taken, why no action was taken.	4	Full Compliance	Internal Operator Memo subject: Exceedance of the WDL 174-14 SSTVs for filtered aluminium and filtered iron at SW11 dated Feb2024. Regarding Feb2024 exceedance, why no action was taken is included.	
25	25	37	If one of the incidents specified in Item 10 occurs, the Licensee must notify the Administering Agency by emailing environmentalregulation@nt.gov.au as soon as practicable after (and in any case within 24 hours after) first becoming aware of the incident, including the following information:	4	Full Compliance	Email Operator to environmentalregulation@nt.gov.au subject:RE: MRM WDL 174-15 Notifiable Incident dated April 2024 Email Operator to DEPWS subject: MRM Uncontrolled Release dated Mar2024 The administering agency was informed the next day after detection via the final laboratory report but not within 24 hours.	WDL-173 did not refer to specific incidents in terms of reporting but required any non-compliance with the licence to be reported. OBS: Ensure that notifications of incidents to DEPWS occur within 24 hours.
25 Item 10 notifiable incidents	25 Item 10 notifiable incidents	N/A	Item 10 notifiable incidents (a) An exceedance of a trigger value specified in Item 7 at the compliance point in Item 8, on three consecutive sampling occasions; (b) A measurement outside the range for pH or dissolved oxygen specified in Item 7 at the compliance point in Item 8, on three consecutive sampling occasions; (c) An exceedance of three or more times a trigger value specified in Item 7 at the compliance point in Item 8; (d) A discharge of mine-affected water at a point not specified in Item 5 or authorised by another relevant regulatory approval; (e) A discharge of mine-affected water from a source not specified in Item 6 or authorised by another relevant regulatory approval; or (f) A failure to comply with condition 23.	-	-	Email Operator to DEPWS subject: MRM Uncontrolled Release dated Mar2024	Included for context of condition 25. WDL 174-13 refers to non-compliances not notifiable incidents.
25.1	25.1	38.1	when the incident was detected and by whom;	4	Full Compliance	Email Operator to environmentalregulation@nt.gov.au subject:RE: MRM WDL 174-15 Notifiable Incident dated April 2024 Email Operator to DEPWS subject: MRM Uncontrolled Release dated Mar2024 The notification related to exceedance includes that the incident was detected "on receipt of the final laboratory report" and the relevant date and time. The notification related to release stated when the seepage was observed but by whom is not specified.	WDL 174-13 refers to non-compliances not notifiable incidents. OBS: Improve the incident notifications by ensuring who detected the incident, the timing of the incident (or stating unknown if that is the case), whether discharge is still occurring and a date for submission of the investigation report are included in the submission to DEPWS.
25.2	25.2	38.2	the date and time of the incident;	4	Full Compliance	Email Operator to environmentalregulation@nt.gov.au subject:RE: MRM WDL 174-15 Notifiable Incident dated April 2024 Email Operator to DEPWS subject: MRM Uncontrolled Release dated Mar2024 The time and date of the sampling related to the exceedance is included. There is no date and time relating to the release stated.	WDL 174-13 refers to non-compliances not notifiable incidents. OBS: refer to OBS in Condition 25.1.

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Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
<p>WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)</p> <p>WDL174-14 (26 May 2023 - 25 May 2025)</p> <p>WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)</p>							
25.3	25.3	38.3	whether discharge was occurring at the time of the incident and the source of the discharge;	4	Full Compliance	Email Operator to environmentalregulation@nt.gov.au subject:RE: MRM WDL 174-15 Notifiable Incident dated April 2024 Email Operator to DEPWS subject: MRM Uncontrolled Release dated Mar2024 This is included in the notifications.	WDL 174-13 refers to non-compliances not notifiable incidents. OBS: refer to OBS in Condition 25.1.
25.4	25.4	N/A	whether discharge is still occurring; and	4	Full Compliance	Email Operator to environmentalregulation@nt.gov.au subject:RE: MRM WDL 174-15 Notifiable Incident dated April 2024 Email Operator to DEPWS subject: MRM Uncontrolled Release dated Mar2024 This does not appear to be stated in the exceedance notification but is included in the release notification.	OBS: refer to OBS in Condition 25.1.
25.5	25.5	38.4	a date (within 10 business days of the incident) when an investigation report will be submitted to the Administering Agency.	4	Full Compliance	Email Operator to environmentalregulation@nt.gov.au subject:RE: MRM WDL 174-15 Notifiable Incident dated April 2024 Email Operator to DEPWS subject: MRM Uncontrolled Release dated Mar2024 No date when an investigation report will be submitted was included in the notifications. The exceedance notification states "As required under Condition 26 of WDL 174-15, McArthur River Mining Pty Ltd (MRM) will provide an investigation report within 10 business days of this notification. "	WDL 174-13 refers to non-compliances not incidents. WDL 174-13 does not refer to within 10 business days in condition 38.4 but it is required in condition 39. OBS: refer to OBS in Condition 25.1.
26	26	39	Within 10 business days of notifying the Administering Agency of an incident specified in Item 10, the Licensee must provide the Administering Agency an investigation report that includes:	3	Part Compliance (High)	Email Operator to environmentalregulation@nt.gov.au subject: MRM WDL 174-15 Notifiable Incident dated April 2024 Email Operator to NT EPA subject: RE: MRM S14 Notification - Flood Event incidents Evidence was provided that the administering agency was emailed an investigation report 10 business days after the original notification in Apr2024 related to the exceedance. However, related to the notification of seepage in Mar2024, it was more than 10 business days when NT EPA was provided an investigation in May2024, which was not provided to DEPWS.	WDL 174-13 refers to non-compliances not incidents. It is noted that while the sample in this exceedance incident was over the site-specific trigger value (SSTV) for zinc it was not collected from the exact SW11 location due to the flooding experienced as a result of Ex-Tropical Cyclone Megan. However, an investigation was still undertaken by the Operator. OFI: Submit incident investigations within 10 business days of notifying the Administering Agency of an incident.
26 Item 10: Notifiable incidents	26 Item 10: Notifiable incidents	N/A	(a) An exceedance of a trigger value specified in Item 7 at the compliance point in Item 8, on three consecutive sampling occasions; (b) A measurement outside the range for pH or dissolved oxygen specified in Item 7 at the compliance point in Item 8, on three consecutive sampling occasions; (c) An exceedance of three or more times a trigger value specified in Item 7 at the compliance point in Item 8; (d) A discharge of mine-affected water at a point not specified in Item 5 or authorised by another relevant regulatory approval; (e) A discharge of mine-affected water from a source not specified in Item 6 or authorised by another relevant regulatory approval; or		-		Provided for context of Condition 39.

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Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)	WDL174-14 (26 May 2023 - 25 May 2025)	WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)					
26.1	26.1	39.1	when the incident was detected and by whom;	4	Full Compliance	Email Operator to environmentalregulation@nt.gov.au subject: MRM WDL 174-15 Notifiable Incident dated April 2024 Email Operator to NT EPA subject: RE: MRM S14 Notification - Flood Event incidents dated May2024 The exceedance investigation report stated that the incident was confirmed by the Operator's environment team in the final laboratory report and included the date. The seepage investigation report stated that the incident was detected by MRM via observation and included the date and time.	WDL 174-13 refers to non-compliances not incidents.
26.2	26.2	39.2	the date and time of the incident;	4	Full Compliance	Email Operator to environmentalregulation@nt.gov.au subject: MRM WDL 174-15 Notifiable Incident dated April 2024 Email Operator to NT EPA subject: RE: MRM S14 Notification - Flood Event incidents dated May2024 The investigation report included the time of sampling. The seepage investigation report references the March 2024 significant rainfall and the date and time seepage was observed.	WDL 174-13 refers to non-compliances not incidents.
26.3	26.3	39.3	whether discharge was occurring at the time of the incident and the source of the discharge;	4	Full Compliance	Email Operator to environmentalregulation@nt.gov.au subject: MRM WDL 174-15 Notifiable Incident dated April 2024 Email Operator to NT EPA subject: RE: MRM S14 Notification - Flood Event incidents dated May2024 Both investigation reports stated that discharge was occurring.	WDL 174-13 refers to non-compliances not incidents and also adds the source of the monitoring data.
26.4	26.4	39.4	the actual and potential causes and contributing factors to the incident;	4	Full Compliance	Email Operator to environmentalregulation@nt.gov.au subject: MRM WDL 174-15 Notifiable Incident dated April 2024 Email Operator to NT EPA subject: RE: MRM S14 Notification - Flood Event incidents dated May2024 Multiple actual and potential causes were included in the exceedance investigation report. The seepage investigation includes the cause related to the significant rainfall but further detail is not included and it states that an incident investigation is ongoing.	WDL 174-13 refers to non-compliances not incidents.
26.5	26.5	39.6	monitoring data of the discharge, and upstream and downstream water of the incident, collected for the date the incident was detected and three sampling rounds prior;	4	Full Compliance	Email Operator to environmentalregulation@nt.gov.au subject: MRM WDL 174-15 Notifiable Incident dated April 2024 Email Operator to NT EPA subject: RE: MRM S14 Notification - Flood Event incidents dated May2024 Section 3.5 of attachment 1 of the exceedance investigation report (i.e., WRM's investigation report) includes the monitoring data. The seepage investigation includes monitoring data after the incident but not for before. However, that same monitoring data was submitted for the exceedance investigation report given the incident occurred at the same time.	WDL 174-13 refers to non-compliances not incidents and also stated "all water quality monitoring data collected in accordance with Appendix 4 for monitoring sites SW08, SW09, SW11, SW12, SW21, SW28, SW29, SW31, and SW32 (as shown in Appendix 2)" that is covered in Condition 43 of WDL 174-14.

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Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)		WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)					
26.6	WDL174-14 (26 May 2023 - 25 May 2025)	39.7	available flow rates to demonstrate any influence streams and rivers may have had on the incident;	4	Full Compliance	<p>Email Operator to environmentalregulation@nt.gov.au subject: MRM WDL 174-15 Notifiable Incident dated April 2024</p> <p>Email Operator to NT EPA subject: RE: MRM S14 Notification - Flood Event incidents dated May2024</p> <p>Section 3.3 of the attachment 1 of the exceedance investigation report (i.e., WRM's investigation report) includes the streamflow rates.</p> <p>For the seepage investigation report, flow rates are not included but the relevant flows are those submitted to the regulator already in the exceedance investigation report.</p>	WDL 174-13 refers to non-compliances not incidents and specified "available flow rates for the McArthur River, Barney Creek, Surprise Creek, Emu Creek and Glyde River flow rate at SW11".
26.7	26.7	39.8	rainfall recorded at the site prior to the incident;	4	Full Compliance	<p>Email Operator to environmentalregulation@nt.gov.au subject: MRM WDL 174-15 Notifiable Incident dated April 2024</p> <p>Email Operator to NT EPA subject: RE: MRM S14 Notification - Flood Event incidents dated May2024</p> <p>Section 3.2 of the attachment 1 of the exceedance investigation report (i.e., WRM's investigation report) includes the rainfall data.</p> <p>The seepage investigation report includes the summary of rainfall event. It does not include a breakdown of daily rainfall data.</p>	WDL 174-13 refers to exceedance of trigger values and non-compliances not incidents.
26.8	26.8	39.5	the risk of environmental harm arising from the incident;	4	Full Compliance	<p>Email Operator to environmentalregulation@nt.gov.au subject: MRM WDL 174-15 Notifiable Incident dated April 2024</p> <p>Email Operator to NT EPA subject: RE: MRM S14 Notification - Flood Event incidents dated May2024</p> <p>Both investigation reports include statements regarding the risk of environmental harm.</p>	WDL 174-13 refers to non-compliances not incidents.
26.9	26.9	39.9	the action(s) that have or will be undertaken to mitigate any environmental harm arising from the incident;	4	Full Compliance	<p>Email Operator to environmentalregulation@nt.gov.au subject: MRM WDL 174-15 Notifiable Incident dated April 2024</p> <p>Email Operator to NT EPA subject: RE: MRM S14 Notification - Flood Event incidents dated May2024</p> <p>The exceedance investigation report includes the actions that were undertaken in response to the incident. The seepage investigation report includes the clean-up works.</p>	WDL 174-13 refers to non-compliances not incidents.
26.10	26.10	39.10	corrective actions that have or will be undertaken to ensure the incident does not reoccur; and	4	Full Compliance	<p>Email Operator to environmentalregulation@nt.gov.au subject: MRM WDL 174-15 Notifiable Incident dated April 2024</p> <p>Email Operator to NT EPA subject: RE: MRM S14 Notification - Flood Event incidents</p> <p>Both reports refer to an investigation being undertaken at the NOEF to identify improvements and additional measures to minimise the recurrence of a similar event.</p>	WDL 174-13 refers to non-compliances not incidents.
26.11	26.11	39.11	if no action was taken, why no action was taken.	N/A	Not Applicable	<p>Email Operator to environmentalregulation@nt.gov.au subject: MRM WDL 174-15 Notifiable Incident dated April 2024</p> <p>Email Operator to NT EPA subject: RE: MRM S14 Notification - Flood Event incidents</p>	<p>WDL 174-13 refers to non-compliances not incidents.</p> <p>This condition is N/A as immediate actions were undertaken and given the extenuating circumstances of the event the broader corrective actions continue to be developed as part of the incident investigation.</p>

MONITORING

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Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
<p>WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024) WDL174-14 (26 May 2023 - 25 May 2025) WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)</p>							
27	27	26, 27, 28	From the Commencement Date of this licence, the Licensee must implement and comply with the Monitoring Program specified in Item 11.	4	Full Compliance	<p>2021-22 MRM Environmental Monitoring Schedule I001 Rev0 ASW230902JD_BB - Field Sheet ASW231101JD_BB - Field Sheet ASW240213RH_BB - Field Sheets ASW240307BC_BB - Field Sheet NSW230611KL - Field Sheets NSW231126JD - Field Sheets NSW231217RH - Field Sheet NSW240331JD_Weekly - Field Sheets</p> <p>No evidence of sampling not complying with the required monitoring program were identified.</p>	The Operator advised "A gauging station was installed on Emu Creek at SW31 prior to the start of the 2023-24 wet season. [...] Dataloggers were deployed to meet the continuous monitoring requirements for the Glyde River in lieu of a gauging station."
27 Item 11: Monitoring Program	27 Item 11: Monitoring Program	26,27,28	The Monitoring Program includes: (a) Surface water monitoring in accordance with Appendices 4 and 5; (b) Fluvial sediment monitoring in accordance with Appendices 6 and 7; and (c) Biota monitoring in accordance with Appendix 8.		-		These are the monitoring programs specified in Item 11 relevant to condition 27 in WDL 174-14.
28	28	29	The Licensee must, to the extent practicable, collect samples that are representative of discharge conditions that maximises the ability to detect potential impact from the Licenced Action, including collecting samples at sampling points.	4	Full Compliance	<p>2021-22 MRM Environmental Monitoring Schedule I001 Rev0 Upon Discharge Surface Water Sampling WDL 174-14 form example dated Mar2024 PRO-GP-0008-2200023 NSW MWa PRO-GP-0008-2200023 NSW Procedure Mwi Email Operator to NT EPA subject: RE: MRM S14 Notification - Flood Event incidents dated May2024</p> <p>The Email to NT EPA on May2024 stated "Due to the significant flooding occurring in the McArthur River following the cyclone, access to the regular SW11 compliance monitoring point was restricted for a number of days. Accordingly, MRM obtained samples from the nearby SW11 west and SW11 east locations on 26Mar2024 due to the floodwater access restrictions".</p>	WDL 174-14 has adapted the wording to allow "to the extent practicable" and is more specific but generally equivalent to WDL 174-13.
29	29	N/A	In implementing the Monitoring Program the Licensee must, to the extent practicable, that samples collected at the sampling points are collected:		Refer to subconditions		
29.1	29.1	N/A	on the same date as discharge event; and	4	Full Compliance	<p>2021-22 MRM Environmental Monitoring Schedule I001 Rev0 Upon Discharge Surface Water Sampling WDL 174-14 form example dated Mar2024</p> <p>The monitoring schedule and Upon Discharge Surface Water Sampling WDL 174-14 form includes the requirement to monitor daily when discharging, including within 2 hours of a commencement of discharge at SW28, SW29, SW31, SW09 and SW12.</p>	<p>OBS: Consider opportunities to request amendments on the requirements for daily monitoring.</p> <p>OBS: Continue to consider opportunities for alternative sampling methods that are safe while still meeting the requirements of this approval (e.g., use of drones, automatic samplers).</p>
29.2	29.2	N/A	from the part of the waterway that provides representative (well mixed) samples.	4	Full Compliance	<p>Email Operator to environmentalregulation@nt.gov.au subject: MRM WDL 174-15 Notifiable Incident dated April 2024</p> <p>Challenges may have occurred based on access to sampling locations caused by flood waters. An example of seeking to fulfil this condition is that samples were taken</p>	

Waste Discharge Licence compliance workbook - Operator 2024 - audit period 01 May 2024 to 30 April 2024

Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)	WDL174-14 (26 May 2023 - 25 May 2025)	WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)					
30	30	N/A	If a sample is missed or cannot be collected at a sampling point at a frequency set in the Monitoring Program for any reason, the Licensee must revisit the sampling point to collect a sample as soon as possible after the missed collection.	4	Full Compliance	PRO-2200023 Natural Surface Water Monitoring Procedure version 4. Example Training - Calibration + Sampling by MW dated Mar2024, RH dated Dec2024 and EE dated Jan2024 for version 3 of PRO-2200023 Natural Surface Water Monitoring Procedure. The condition requirement has been added to PRO-2200023 Natural Surface Water Monitoring Procedure in version 4.	The Operator advised "Sampling of rivers and creeks was suspended on Monday 15 April due to a near-miss incident with an Estuarine Crocodile." The Operator advised "As notified to the Administering Authority on 17 April 2024, the frequency of sampling at the natural surface water locations has been reduced as the field monitoring teams have recently reported increasing activity of estuarine crocodiles at the McArthur River monitoring points. This includes an observation at the McArthur River upstream control point SW21 the morning of Monday 15 April 2024. MRM notes that until such time as we can ensure the sampling can be undertaken in a safe manner by monitoring personnel, MRM intends to collect the samples during the managed releases approximately once per week." Daily sampling did not recommence in the audit period. OBS: Ensure that when water sampling procedures are amended all team members are trained in the changes with records retained. OBS: Refer to OSBs in condition 29.1.
31	31	30	The Licensee must ensure that all samples and field environmental data are collected in accordance with recognised Australian Standards and guidelines (such as AS/NZS 5667.1 1998, ANZG (2018), as updated from time to time).	4	Full Compliance	PRO-2200023 Natural Surface Water Monitoring Procedure version 4. PRO-2200025 Artificial Surface Water Monitoring Procedure version 4.0 Waste Discharge Procedure version 3 dated Nov2021. Example Training - Calibration + Sampling by MW dated Mar2024, RH dated Dec2024 and EE dated Jan2024. PRO-2200023 Natural Surface Water Monitoring Procedure has been updated from version 3 to 4 at some time as version 3 was provided in the previous audit period. The document is not dated.	WDL 174-13 states "such as AS/NZS 5667, ANZECC/ARMCANZ)." The Operator advised "MRM environmental technicians are trained in, and follow procedural guidelines and water sampling methods to ensure, to the extent practicable, water samples collected are representative of discharge conditions. Monitoring is conducted in accordance with Monitoring Program specified in Item 11 of the WDL, this includes collecting samples from the designated sampling points." Note, this procedure refers to AS/NZS 5667.11 1998 that is for sampling of groundwater rather than AS/NZS 5667.1 1998 that is more broad.
32	32	31	For the parameters that require analysis at a laboratory, the Licensee must ensure that:		Refer to subconditions		
32.1	32.1	31	all samples are analysed at a laboratory with current NATA accreditation or equivalent; and	4	Full Compliance	https://nata.com.au/accredited-organisation/mcarthur-river-mining-environmental-laboratory-19675-22853/?highlight=mr The Operator's laboratory has NATA accreditation for the sampling undertaken based on https://nata.com.au/accredited-organisation/mcarthur-river-mining-environmental-laboratory-19675-22853/?highlight=mr . Accreditation No. 19675	

Waste Discharge Licence compliance workbook - Operator 2024 - audit period 01 May 2024 to 30 April 2024

Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
<p>WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)</p> <p>WDL174-14 (26 May 2023 - 25 May 2025)</p> <p>WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)</p>							
32.2	32.2	N/A	detection and reporting limits are appropriate to determine compliance with this licence.	3	Part Compliance (High)	<p>ENV2400029 Final Report</p> <p>ENV2400033 Final Report</p> <p>ENV2400074 Final Report</p> <p>ENV2400076 Final Report</p> <p>ENV2400222</p> <p>The only discrepancy identified was for aluminium as the BBDDP trigger is 0.5 µg/L but the detection limit on the ENV2400222 for sampling on Apr2024 was 5 µg/L.</p>	<p>OFI: Confirm the laboratory's ability to measure with a detection limit for aluminium for the Bing Bong Dredge Discharge Point samples to a maximum of 0.5 mg/L and check the method for determining if SSTVs are exceeded.</p>
33	33	34	The Licensee must ensure any samples collected in accordance with the Monitoring Program or in connection with the Licensed Action or this licence, are obtained by, or under the supervision of a qualified sampler.	4	Full Compliance	<p>Example Training - Calibration + Sampling by MW dated Mar2024, RH dated Dec2024 and EE dated Jan2024.</p> <p>Signed training sheets were provided for environmental monitoring staff new to MRM. There was no evidence (e.g., field sheets) that indicated any sampling that was not in compliance with this condition.</p>	<p>Qualified sampler has the definition "a person who has training and experience in obtaining samples from the relevant environmental medium."</p> <p>The Operator advised "New team members are always supervised during sampling. Note that water sampling is conducted by two people from a safety perspective, so any new personnel would always be sampling with an experienced employee."</p>
34	34	18	The Licensee must ensure any plant and equipment used by the Licensee in conducting the Monitoring Program:		Refer to subconditions		
34.1	34.1	18.1	is reasonably fit for the purpose and use to which it is put, including that it is properly calibrated;	3	Part Compliance (High)	<p>Example Training - Calibration + Sampling by MW dated Mar2024, RH dated Dec2024 and EE dated Jan2024.</p> <p>Calibration Records (Water Quality Probe) dated Apr2024 by initial JD.</p> <p>Certificate of Operation for sea rangers vessels - Certificate Number: COO-370-007</p> <p>The evidence provided demonstrated that multiple team members have undertaken the training for calibration in the audit period and specific evidence for a calibration event for a trained team member was provided for Apr2024.</p> <p>The calibration provided appears to show that the pH probe was not in the correct pH mV for calibration value of 4 and 10 on Apr2024.</p>	<p>OFI: Have spare probes on site for redundancy and if probes do not pass calibration, send them off site for maintenance.</p>
34.2	34.2	18.2	is maintained and operational; and	3	Part Compliance (High)	<p>Certificate of Operation for sea rangers vessels - Certificate Number: COO-370-007 expires 2May2029</p> <p>No evidence was provided for maintenance of monitoring probes or that the vessel used for monitoring was maintained and operational.</p>	<p>The Operator advised "Pre-start records are managed by the Local Indigenous Sea Ranger unit. MRM does not have any visibility to these records. The fact that this vessel was used during the audit period demonstrates that it was fit for purpose, was maintained and operational. The intent of this condition is more related to the use of environmental monitoring equipment for the purposes of collecting accurate data, specifically in relation to monitoring probes."</p> <p>OFI: Document evidence of the monitoring vessel provider's maintenance and management records.</p> <p>OFI: Refer to OFI for Condition 34.1.</p>

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Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)	WDL174-14 (26 May 2023 - 25 May 2025)	WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)					
34.3	34.3	18.3	is operated by a person trained to use the plant and equipment.	4	Full Compliance	Example Training - Calibration + Sampling by MW dated Mar2024, RH dated Dec2024 and EE dated Jan2024. NSW240312MW_Discharge - Field Sheet dated Mar2024 Field sheet provided indicates sampling by MW and relevant signed training document viewed.	
35	35	35	The licensee must ensure that, for each sample collected in accordance with the monitoring documents or the activity the following information must be recorded and retained:		Refer to subconditions		
35.1	35.1	35.1	the date on which the sample was collected;	4	Full Compliance	NSW240312MW_Discharge - Field Sheet dated Mar2024	
35.2	35.2	35.2	the time at which the sample was collected;	4	Full Compliance	NSW240312MW_Discharge - Field Sheet dated Mar2024	
35.3	35.3	35.3	the location at which the sample was collected;	4	Full Compliance	NSW240312MW_Discharge - Field Sheet dated Mar2024	
35.4	35.4	35.4	the name of the person who collected the sample;	4	Full Compliance	NSW240312MW_Discharge - Field Sheet dated Mar2024 Initials are used rather than names.	
35.5	35.5	35.5	the chain of custody forms relating to the sample;	4	Full Compliance	NSW240312MW_Discharge - Field Sheet dated Mar2024. Screenshots of COC for upon discharge samples Mar2024 (noting there were two as some samples were more urgent than others). Consistency between fieldsheet and COCs demonstrated compliance.	
35.6	35.6	35.6	the field measurements (if any) and analytical results (if any) relating to the sample; and	4	Full Compliance	NSW240312MW_Discharge - Field Sheet dated Mar2024 Field measurements were included on the sheet.	
35.7	35.7	35.7	laboratory quality assurance and quality control documentation.	4	Full Compliance	NSW240312MW_Discharge - Field Sheet dated Mar2024 ENV2400074 Final Report ENV2400076 Final Report Documents demonstrated requirements met for sampling on March 2024 as an example of the process followed.	
36	36	33	The Licensee must for all land based monitoring points specified in the Monitoring Program:		Refer to subconditions		WDL174-13 states "water" monitoring points.
36.1	36.1	33.1	install and maintain appropriate identification signage so that they are reasonably identifiable at all times; and	3	Part Compliance (High)	Signage was observed during the site visit in August 2024 for SW13 (after the audit period) noting flooding may have impacted sign locations. No evidence was provided of confirmation of signage at all monitoring locations such as an annual land based monitoring points inspection.	OFI: Undertake an annual inspection of land based monitoring points for signage and safe access.
36.2	36.2	33.2	maintain safe access and egress, as is reasonably practicable.	3	Part Compliance (High)	Challenges were noted due to potential crocodile activity impacting on safe access to monitoring points due to flooding in the audit period. No evidence of confirmation of safe access and egress at all monitoring locations such as an annual land based monitoring points inspection.	OFI: Refer to OFI in Condition 36.1.

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Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
<p>WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024) WDL174-14 (26 May 2023 - 25 May 2025) WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)</p>							
N/A	N/A	32	The licensee must ensure that any proposed revisions to the monitoring required by Condition 26 to 28 (other than typographical changes or revisions to formatting or referencing) are:		Refer to subconditions		No revisions to the monitoring were proposed during the time this condition was valid.
N/A	N/A	32.1	reviewed by a Qualified Person, who must produce a written report about their review;	N/A	Not Applicable		No revisions to the monitoring were proposed during the time this condition was valid.
N/A	N/A	32.2	submitted to the Administering Agency with justification for revisions; and	N/A	Not Applicable		No revisions to the monitoring were proposed during the time this condition was valid.
N/A	N/A	32.3	submitted to the Administering Agency, in both hard copy and electronic form (with a complete copy of the qualified professional's review), 20 business days prior to the proposed implementation date.	N/A	Not Applicable		No revisions to the monitoring were proposed during the time this condition was valid.
RECORDING AND REPORTING							
37	37	36	The Licensee must keep records of all contraventions with this licence. These records must be adequate to enable the Licensee to comply with the notification and reporting conditions of this licence.	4	Full Compliance	WDL Non-Compliances Register 2023-24 The register showed no non-compliances that occurred during the audit period but ones relevant to the previous audit period (i.e. 2022-2023) were identified in this audit period and reported to the EPA via email and in the annual return Aug2024. No inconsistencies between the Non-Compliances register, other evidence and the annual return were found.	WDL 174-13 used the terminology "non-compliances" instead of "contraventions".
N/A	N/A	41	The licensee must keep records of all exceedances of trigger values specified in Appendix 3 Table 1. These records must be adequate to enable the licensee to comply with the non-compliance notification conditions of this licence.	N/A	Not Applicable		There were no exceedances of trigger values while this condition was valid.
38	38	42	The Licensee must submit a completed Annual Return, by emailing environmentalregulation@nt.gov.au as specified in Item 12.	4	Full Compliance	Email Operator to environmentalregulation@nt.gov.au dated Aug2023 subject: MRM WDL Annual Return and Monitoring Report. Email Operator to environmentalregulation@nt.gov.au dated Aug2024 subject: MRM 2024 WDL Annual Return and Monitoring Report. The Annual Return submitted in the audit period was submitted on Aug2023 to the required email address.	WDL 174-13 did not specify the email address or that the 12-month period for the Annual Return ended 31 July.
38 Item 12: Annual Return	38 Item 12: Annual Return	42	The Annual Return is due on 31 August each year for the preceding 12-month period ending 31 July during the term (or part thereof).		-		Provided for context relevant to WDL174-14 and 15 Condition 38. WDL174-13 did not specify that the 12-month period for the Annual Return ended 31 July.
39	39	43	The Licensee must complete and provide to the Administering Agency a report of data and information obtained through the implementation and performance of the Monitoring Program (the Monitoring Report), as prescribed by this licence, on the dates specified in Item 13.	4	Full Compliance	Email Operator to environmentalregulation@nt.gov.au dated Aug2023 subject: MRM WDL Annual Return and Monitoring Report. Email Operator to environmentalregulation@nt.gov.au dated Aug2024 subject: MRM 2024 WDL Annual Return and Monitoring Report. The WDL Monitoring Report submitted in the audit period was submitted on Aug2023 to the required email address.	Word change but equivalent requirement between WDL174-13 and 14.

Waste Discharge Licence compliance workbook - Operator 2024 - audit period 01 May 2024 to 30 April 2024

Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
<p>WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)</p> <p>WDL174-14 (26 May 2023 - 25 May 2025)</p> <p>WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)</p>							
39 Item 13: Monitoring Report	39 Item 13: Monitoring Report	43	The Monitoring Report is due on: (a) 31 August each year for the preceding period 1 May to 30 April, and (b) the Expiry Date of this licence; and (c) in the event the Licensee applies to renew the licence, 90 days prior to the Expiry Date.		-		Provided for context relevant to Condition 30. WDL 174-13 did not include mention of any reports due related to the expiry date of the licence.
40	40	44	The Licensee must ensure that each Monitoring Report:		Refer to subconditions		WDL174-13 had different requirements than WDL174-14 for the monitoring report but given the monitoring report relevant to this audit period was due at the time WDL 174-14 was the licence, the conditions of WDL 174-14 only are audited. The subcondition number from WDL 174-13 is still listed for subconditions where historical comparison might be relevant.
40.1	40.1	N/A	is prepared in accordance with the requirements of the Administering Agency 'Guideline for Reporting on Environmental Monitoring' (or any other guideline as adopted by the Administering Agency from time to time);	4	Full Compliance	Waste Discharge Licence 174-13 Monitoring Report 1 May 2022 to 30 April 2023 dated Aug2023 Section 4 of the guideline includes the minimum monitoring report requirements that have generally been included in the monitoring report such as title page, executive summary, monitoring objective, monitoring method, monitoring results - presentation, monitoring results, (QA/QC in appendix), discussion, conclusion, certification, abbreviations, references and appendices. Some minor potential inconsistencies might be that the guideline requires the executive summary to have a succinct summary for each report section while that does not appear to have been included. The title page does not have a version number for the report.	There are potentially some opportunities for improvement here. OBS: Improve the WDL Monitoring Report's level of fulfillment of the requirements of the Guideline for Reporting on Environmental Monitoring.
40.2	40.2	44.2	includes a tabulation, in Microsoft® Excel® format or another format requested by the Administering Agency, of all monitoring data required to be collected in accordance with this licence for the preceding 12 month period;	4	Full Compliance	Email Operator to environmentalregulation@nt.gov.au dated Aug2023 subject: MRM WDL Annual Return and Monitoring Report Attachment 5 Tabulated Monitoring Data 2022-23 [Final] Attachment 5 Tabulated Monitoring Data 2022-23 [Final] included the excel spreadsheet of monitoring data required by conditions 26 and 27 of WDL174-13 from the previous audit period. Table 1 of the monitoring report states "Tabulation of data required under the monitoring schedules listed in Conditions 26 and 27 is provided in electronic Microsoft Excel format (Attachment 6). The data required under the specialist biota monitoring listed in Condition 28 is provided in the EMR (Attachment 2) and its Appendices."	Word change but equivalent requirement between WDL174-13 and 14.

Waste Discharge Licence compliance workbook - Operator 2024 - audit period 01 May 2024 to 30 April 2024

Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)		WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)					
40.3	WDL174-14 (26 May 2023 - 25 May 2025)	44.4	includes a tabulation of monthly and annual contaminant loads discharged from the authorised discharge point specified in Item 5 for the preceding 12 month period. Contaminant loads must be calculated for metals, metalloids, nutrients and other parameters (excluding field parameters) listed in the monitoring program specified in Item 11. The calculations must be based on the daily discharge volume and the concentration of contaminant present in the discharge on that day. On the days when a sample was not taken then the concentration of the contaminant must be estimated using Linear Interpolation methodology;	4	Full Compliance	Email Operator to environmentalregulation@nt.gov.au dated Aug2023 subject: MRM WDL Annual Return and Monitoring Report Table 1 of the monitoring report states "Refer to Section 5 and Attachment 4." Attachment 4 is the Mine Derived Analyte Loads Assessment 2022/23.	Condition 44.4 in WDL 174-13 is similar.
40.4	40.4	44.3	includes long term trend analysis of monitoring data to demonstrate any environmental impact associated with the Licensed Action over a minimum period of three years (of part thereof);	4	Full Compliance	Email Operator to environmentalregulation@nt.gov.au dated Aug2023 subject: MRM WDL Annual Return and Monitoring Report Table 1 of the monitoring report states "A summary of long-term trends for surface water sites in the McArthur River has been provided from 1 January 2008 (where data was available) in Section 4.3 of this report. " That section does have long term trend analysis.	
40.5	40.5	N/A	includes a summary of any investigations undertaken by the Licensee in accordance	4	Full Compliance	Email Operator to environmentalregulation@nt.gov.au dated Aug2023 subject: MRM WDL Annual Return and Monitoring Report Section 6 of the monitoring report includes a summary of the one investigation in the previous audit period.	
40.6	40.6	N/A	includes an assessment of environmental impact from the Licensed Action.	4	Full Compliance	Email Operator to environmentalregulation@nt.gov.au dated Aug2023 subject: MRM WDL Annual Return and Monitoring Report The long term trend analysis includes environmental impacts and the discussion section includes potential impacts and the Surface Water Monitoring Annual Report 2022-2023, which is attachment 4, includes discussion regarding impacts.	
41	41	15	If the licence expires or is otherwise surrendered, suspended or revoked and the licence contained a condition that the Licensee provide a notice, report, record or other information after that date, the Licensee must provide any report, record, information or data available to the Licensee up to and including the date the licence expired or was surrendered, suspended or revoked.	N/A	Not Applicable		Word change but equivalent requirement between WDL174-13 and 14. The licence did not expire nor was it otherwise surrendered, suspended or revoked in the audit period.
42	42	N/A	A copy of the documents listed specified in Item 14 will be placed on the Register.	N/A	Not Applicable		There is no action by the Operator. The required documents are on the NT EPA Licences and approvals register on the internet.

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Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)							
WDL174-14 (26 May 2023 - 25 May 2025)							
WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)							
42 Item 14. Documents placed on Register	42 Item 14. Documents placed on Register	N/A	(a) The Licence Documents specified in Item 4; (b) The Monitoring Report provided in accordance with condition 39; and (c) The Annual Return in accordance with condition 38.		-		Provided for context of condition 42
N/A	N/A	40	The licensee must ensure there is no:		Refer to subconditions		
N/A	N/A	40.1	exceedance of a trigger value at SW11, as specified in Appendix 3, on three consecutive sampling occasions as a result of the activity; or	4	Full Compliance	Attachment 3 Tabulated Monitoring Data 2023-24. Email Operator to environmentalregulation@nt.gov.au subject: MRM WDL 174-15 Notifiable Incident dated April 2024 WDL Exceedances Register 2023-24 The WDL Exceedances Register 2023-24 refers to incident investigations where relevant.	Condition only relevant until 25 May 2023.
N/A	N/A	40.2	exceedance greater than or equal to three times a trigger value at SW11 as a result of the activity;	4	Full Compliance	Attachment 3 Tabulated Monitoring Data 2023-24. Email Operator to environmentalregulation@nt.gov.au subject: MRM WDL 174-15 Notifiable Incident dated April 2024 WDL Exceedances Register 2023-24	Condition only relevant until 25 May 2023.
SPECIAL CONDITIONS							
43	43	N/A	The Licensee must comply with the conditions specified in Item 15.		Refer to subconditions		
43 (1) Item 15: Special conditions	43 (1) Item 15: Special conditions	20	Dredging 1. The licensee must submit a Dredging and Dredge Spoil Management Plan to the Administering Agency 20 business days prior to the commencement of any dredging activities;	N/A	Not Applicable		No dredging activities have occurred during the audit period and therefore this condition is a future item. A Dredging and Dredge Spoil Management Plan (DDSMP) was submitted on February 2023 (outside of the audit period) under the Authorisation. The DDSMP was approved on 17 May 2023 by DITT.
43 (2) Item 15: Special conditions	43 (2) Item 15: Special conditions	21	Dredging 2. The licensee must comply with the Dredging and Dredge Spoil Management Plan.	N/A	Not Applicable		No dredging activities have occurred during the audit period and therefore this condition is a future item.
43 Investigation Reports Item 15: Special conditions	43 Investigation Reports Item 15: Special conditions	N/A	Investigation Reports Any investigation report provided in accordance with condition 26 must include, in addition to the requirements of condition 26		Refer to subconditions		
43 (3) Item 15: Special conditions	43 (3) Item 15: Special conditions	39.6	3. all water quality monitoring data collected in accordance with Appendix 4 for monitoring sites SW08, SW09, SW11, SW12, SW21, SW28, SW29, SW31 and SW32 (as shown in Appendix 2) collected for the date the notifiable incident was triggered and three sampling rounds prior to the notifiable incident being detected;	4	Full Compliance	WRM report: IR020 – NOTIFIABLE INCIDENT EX-TROPICAL CYCLONE MEGAN SURFACE WATER INVESTIGATION REPORT FOR FILTERED ZINC AT SW11 WEST ON 26 MARCH 2024 dated Apr2024 While monitoring data was submitted some results were limited by access restrictions caused by flooding.	The Operator advised "Three rounds of sampling data from before 26 March are included in the Investigation Report (refer to Attachment A of WRM's report where there is data for 23 to 25 March as well as 15 and 19 March). Note that due to extensive flooding, not all sample sites were accessible during the three sampling rounds prior to the incident." OBS: If limited previous results are available, provide adequate data to establish pre-incident conditions.

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Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)		WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)					
43 (4) Item 15: Special conditions	43 (4) Item 15: Special conditions	39.7	4. available flow rates for the McArthur River, Barney Creek, Surprise Creek, Emu Creek and Glyde River and flow rate at SW11 to demonstrate any influence these creeks and rivers may have had on the notifiable incident.	4	Full Compliance	WRM report: IR020 – NOTIFIABLE INCIDENT EX-TROPICAL CYCLONE MEGAN SURFACE WATER INVESTIGATION REPORT FOR FILTERED ZINC AT SW11 WEST ON 26 MARCH 2024 dated Apr2024. WRM report dated Apr2024 states "The available data is presented in this report. The SW11 east sample was collected from the east bank of the main McArthur River channel. The SW11 west sample was taken from an overbank channel on the western side of the main channel as access to the main channel was not possible due to floodwaters. Flow data shows that the sample collected at SW11 west was not representative of mixed McArthur River water at that location." Refer to sections 3.3. and 3.5. There are no available flow rates for Glyde River but others are included.	
43 Monitoring Reports Item 15: Special conditions	43 Monitoring Reports Item 15: Special conditions	44	Monitoring Reports In addition to the requirements in condition 40, the licensee must ensure that each Monitoring Report is prepared in the format described in the National Water Quality Management Strategy, Australian Guidelines for Water Quality Monitoring and Reporting, Chapter 7 and must include:	4	Full Compliance	Waste Discharge Licence 174-13 Monitoring Report 1 May 2022 to 30 April 2023 dated Aug2023. "This Monitoring Report and its appendices have been generally structured consistent with Chapter 7 of the Guideline. This includes the provision of the executive summary and primary technical report. "	
43 (5) Item 15: Special conditions	43 (5) Item 15: Special conditions	44.1	5. a data analysis and interpretation using the National Water Quality Management Strategy, Australian Guidelines for Water Quality Monitoring and Reporting, Chapter 6;	4	Full Compliance	Waste Discharge Licence 174-13 Monitoring Report 1 May 2022 to 30 April 2023 dated Aug2023 "This Monitoring Report has been generally structured consistent with Chapter 6 of the Guideline. This includes: • analysis of changes in time and space (Section 4); • checks for data integrity (Appendix A); • comparison of site and water quality guidelines (Section 6); and • interpretation in relation to study objectives (Section 7)." 	
43 (6) Item 15: Special conditions	43 (6) Item 15: Special conditions	44.2	6. a tabulation of all monitoring data collected as required as a condition of this licence and any additional data used as part of the analysis and interpretation undertaken in the report, to be submitted in electronic Microsoft Excel format;	4	Full Compliance	Attachment 3 Tabulated Monitoring Data 2023-24. Data was provided in Attachment 3 Tabulated Monitoring Data 2023-24.	
43 (7) Item 15: Special conditions	43 (7) Item 15: Special conditions	44.4	7. includes total mine-derived loads entering the McArthur River from the mine site for the contaminants listed in Appendix 3 Table 1;	4	Full Compliance	Email Operator to environmentalregulation@nt.gov.au dated Aug2024 subject: MRM WDL Annual Return and Monitoring Report Waste Discharge Licence 174-13 Monitoring Report 1 May 2022 to 30 April 2023 dated Aug2023 Attachment 4 of the monitoring report is the Mine Derived Analyte Loads Assessment 2022/23.	
43 (8) Item 15: Special conditions	43 (8) Item 15: Special conditions	44.5	8. a comparison between the mine-derived load for each contaminant listed in Appendix 3 table 1 and the background loads in the McArthur River (SW11 andSW21) and Glyde River (SW09);	4	Full Compliance	Waste Discharge Licence 174-13 Monitoring Report 1 May 2022 to 30 April 2023 dated Aug2023 Refer to Section 5 and Attachment 4.	

Waste Discharge Licence compliance workbook - Operator 2024 - audit period 01 May 2024 to 30 April 2024

Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)							
WDL174-14 (26 May 2023 - 25 May 2025)							
WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)							
43 (9) Item 15: Special conditions	43 (9) Item 15: Special conditions	44.6	9. a comparison of the mine-derived contaminant loads, referred to in paragraph 7 of this item, against contaminant loads reporting to the McArthur River from July 2017 to June 2018;	4	Full Compliance	Waste Discharge Licence 174-13 Monitoring Report 1 May 2022 to 30 April 2023 dated Aug2023 Refer to Section 5 and Attachment 4.	
43 (10) Item 15: Special conditions	43 (10) Item 15: Special conditions	44.7	10. an assessment of all monitoring data (including flow rate and calculated volume from each river contributing to water quality at SW11) and whether the activity has been conducted in a manner that has ensured the McArthur River is being protected at all times from mine related impacts.	4	Full Compliance		
43 (11) Item 15: Special conditions	N/A	N/A	Temporary Permitted Discharges 11. The licensee may discharge in accordance with the conditions set out in Appendix 9 for the period 26 March 2024 to 30 June 2024 inclusive.		-		Compliance is assessed against the conditions in Appendix 9 individually (i.e., conditions 44 to 48).
43 (12) Item 15: Special conditions	N/A	N/A	Temporary Permitted Discharges 12. During this period all other licence conditions apply.		-		Noted
Appendix 9: Temporary licence conditions							
44	N/A	N/A	In addition to the sources of waste specified in Item 6 and the Authorised Discharge Points listed in Appendix 2, discharge from the source water bodies specified in Table 2 is permitted through the Temporary Discharge Locations in Table 2 and shown in Figure 6 of this Appendix.	4	Full Compliance	2023-24 Waste Discharge Records Based on the 2023-24 Waste Discharge Records from March 2024 (when WDL 174-15 commenced) discharges occurred from WMD RP, WRDC DP, MLDP and CERP, which is Central East Release Point from (SEPROD as approved in Appendix 9 of WDL 174-15). WMD RP does not require approval as it is an internal release. MLDP DP and MLDP are approved under Condition 20. CERP is approved under condition 44. Based on the 2023-24 Waste Discharge Records from March 2024 (when WDL 174-15 commenced) water that was discharged came from WMD, NC1A, Pond 2 and SEPROD. WMD, NC1A and Pond 2 are approved under condition 21 while SEPROD is approved in Condition 44 of Appendix 9 of WDL 174-15. Therefore, the discharges are in accordance with either condition 20 and 21.1 prior to 29 March or from that date with Condition 20 and 21.1 or Condition 44 of Appendix 9 of WDL 174-15.	
Table 2. Temporary Discharge Locations and source water bodies	N/A	N/A	Temporary Discharge Location Location: Central Release Point Source water body: WPROD Discharge location latitude: -16.422297 Discharge location longitude: 136.101389		-		Refer to condition 44 for compliance score.

Waste Discharge Licence compliance workbook - Operator 2024 - audit period 01 May 2024 to 30 April 2024

Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
<p>WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024) WDL174-14 (26 May 2023 - 25 May 2025) WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)</p>							
Table 2. Temporary Discharge Locations and source water bodies	N/A	N/A	Temporary Discharge Location Location: Central East Release Point Source water body: SEPROD Discharge location latitude: -16.423233 Discharge location longitude: 136.107667		-		Refer to condition 44 for compliance score.
Table 2. Temporary Discharge Locations and source water bodies	N/A	N/A	Temporary additional source water bodies for Authorised Discharge Points and Temporary Discharge Locations Location: Mine Levee Discharge Point (MLDP) Source water body: Peter's Pond, Underground, WPROD, SEPROD, VDD, Open cut operation sumps Discharge location latitude: -16.427423 Discharge location longitude: 136.111403		-		Refer to condition 44 for compliance score.
Table 2. Temporary Discharge Locations and source water bodies	N/A	N/A	Temporary additional source water bodies for Authorised Discharge Points and Temporary Discharge Locations Location: McArthur River Diversion Channel Discharge Point(s) (MRDC DP) Source water body: Peter's Pond, Underground, WPROD, SEPROD, VDD, Open cut operation sumps Discharge location latitude: -16.435385 Discharge location longitude: 136.120196		-		Refer to condition 44 for compliance score.
45	N/A	N/A	In addition to the monitoring required by condition 27 of this licence, while any discharges through Temporary Discharge Locations or discharges from additional source water bodies pursuant to condition 44 are occurring, the licensee must:		Refer to subconditions		
45.1	N/A	N/A	Monitor the quality of all source water bodies from which these discharges are occurring for all parameters listed in Appendix 4 of WDL 174-15 on a daily basis; and	4	Full Compliance	Enclosure 1 - Water Quality Data (28 March to 3 April) Spot checks of Enclosure 1 - Water Quality Data (28 March to 3 April) were done. These showed that although P2 had a discharge on 29 March there was no monitoring that day. Other sources were monitored for each day of a release.	No evidence was provided of monitoring of P2 on 29 March 2024.
45.2	N/A	N/A	Monitor discharge flow rates and volumes from all Authorised and Temporary Discharge Locations at the Mine site listed in Table 2 of Appendix 9 and Schedule 1 item 5, on a daily basis.	3	Part Compliance (High)	2023-24 Waste Discharge Records 2023-24 Waste Discharge Records show the daily volumes from each release point. A flow meter was observed at the WMD during the site visit in August 2024 (not operating) (after the audit period). Photos were provided of the flow meters and flow sensors. The Operator advised that the dewatering team check the flows daily during discharges but there is no record keeping at this point.	OFI: Refer to OFI in condition 22.1.

Waste Discharge Licence compliance workbook - Operator 2024 - audit period 01 May 2024 to 30 April 2024

Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)	WDL174-14 (26 May 2023 - 25 May 2025)	WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)					
46	N/A	N/A	In addition to the monitoring required by condition 27 of this licence, while discharges are occurring pursuant to condition 44 from the Mine site, including via an Authorised Discharge Point or a Temporary Discharge Location and for two weeks following the cessation of any discharges from the Mine site pursuant to condition 44, the licensee must conduct daily monitoring at site SW11, SW12, SW32, and SW8 for the parameters listed in Appendix 4.	3	Part Compliance (High)	<p>Enclosure 1 - Water Quality Data (28 March to 3 April) Waste Discharge Licence 174-15 Condition 47 Report dated April related to 18 April to 24 April</p> <p>Spot checks of Enclosure 1 - Water Quality Data (28 March to 3 April) were done. These showed that SW11, SW12, SW32 and SW8 were monitored on the days of releases between 28 March and 3 April. There were no turbidity, TSS and TDS results provided, however, these were subsequently provided as Enclosure 2 in the submissions on 19 and 26 April 2024. No evidence was provided for monitoring of field measurements (DO and temperature) that are required by Appendix 4.</p> <p>No evidence was provided to demonstrate that all monitoring data related to temporary discharges had been provided to the regulator. Given when the last email regarding discharges was sent not all laboratory data was available.</p>	<p>No DO or temperature that are field measurements provided. All missing SO4, Cl and NO3 on 3/4/24.</p> <p>"Sampling of rivers and creeks was suspended on Monday 15 April due to a near-miss incident with an Estuarine Crocodile."</p> <p>"As notified to the Administering Authority on 17 April 2024, the frequency of sampling at the natural surface water locations has been reduced as the field monitoring teams have recently reported increasing activity of estuarine crocodiles at the McArthur River monitoring points. This includes an observation at the McArthur River upstream control point SW21 the morning of Monday 15 April 2024. MRM notes that until such time as we can ensure the sampling can be undertaken in a safe manner by monitoring personnel, MRM intends to collect the samples during the managed releases approximately once per week."</p> <p>No OFI has been prepared as this has been broadly completed through the submission of the annual report.</p>
47	N/A	N/A	From the commencement of any discharges through Temporary Discharge Locations or discharges from additional source water bodies pursuant to condition 44 to the cessation of discharges pursuant to condition 44, the licensee must report the following to <i>environmentalregulation@nt.gov.au</i> on a weekly basis:	4	Full Compliance	<p>Email Operator to <i>environmentalregulation@nt.gov.au</i> dated Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (28 March to 3 April)</p> <p>Email Operator to <i>waste.ntepa@nt.gov.au</i> dated Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (3 to 10 April)</p> <p>Email Operator to <i>environmentalregulation@nt.gov.au</i> dated Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (11 to 17 April)</p> <p>Email Operator to <i>environmentalregulation@nt.gov.au</i> dated Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (18 to 24 April)</p> <p>2023-24 Waste Discharge Records</p> <p>Weekly emails were sent during temporary discharges.</p>	Note one weekly email is not sent to the correct email address.
47.1	N/A	N/A	Daily discharge volumes from all Temporary Discharge Locations and Authorised Discharge Points;	4	Full Compliance	<p>Email Operator to <i>environmentalregulation@nt.gov.au</i> dated Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (28 March to 3 April)</p> <p>Email Operator to <i>waste.ntepa@nt.gov.au</i> dated Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (3 to 10 April)</p> <p>Email Operator to <i>environmentalregulation@nt.gov.au</i> dated Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (11 to 17 April)</p> <p>Email Operator to <i>environmentalregulation@nt.gov.au</i> dated Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (18 to 24 April)</p> <p>2023-24 Waste Discharge Records</p>	<p>One is not sent to correct email address.</p> <p>2023-24 Waste Discharge Records show week of 18/4/2024 to 24/4/2024 total discharge from WMD Release Point as 144.4 ML versus 126.4 ML in the WDL 174-15 Condition 47 Report (18 to 24 April). Discharges for 22 to 24Apr2024 are 14.70ML daily in the 2023-24 Waste Discharge Records and 8.6 ML daily in the weekly report.</p>

Waste Discharge Licence compliance workbook - Operator 2024 - audit period 01 May 2024 to 30 April 2024

Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)	WDL174-14 (26 May 2023 - 25 May 2025)	WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)					
47.2	N/A	N/A	Cumulative discharge volumes for all discharge locations, including the Authorised Discharge Points and Temporary Discharge Locations;	4	Full Compliance	<p>Email Operator to environmentalregulation@nt.gov.au dated Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (28 March to 3 April)</p> <p>Email Operator to waste.ntepa@nt.gov.au dated Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (3 to 10 April)</p> <p>Email Operator to environmentalregulation@nt.gov.au dated Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (11 to 17 April)</p> <p>Email Operator to environmentalregulation@nt.gov.au dated Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (18 to 24 April)</p> <p>2023-24 Waste Discharge Records</p> <p>Each email included the relevant Waste Discharge Licence 174-15 Condition 47 Report as a memo. Each memo included Table 2 Cumulative discharge volumes in megalitres (ML) since 28 March 2024.</p>	Cumulative discharge volumes only include volumes where there were discharges after commencement of WDL 174-15 (from 28Mar2024), which is valid as that is when this condition commenced.
47.3	N/A	N/A	Monitoring results obtained in accordance with conditions 45 and 46;	3	Part Compliance (High)	<p>Email Operator to environmentalregulation@nt.gov.au dated Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (28 March to 3 April)</p> <p>Email Operator to waste.ntepa@nt.gov.au dated Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (3 to 10 April)</p> <p>Email Operator to environmentalregulation@nt.gov.au dated Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (11 to 17 April)</p> <p>Email Operator to environmentalregulation@nt.gov.au dated Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (18 to 24 April)</p> <p>2023-24 Waste Discharge Records</p> <p>Each email included an Enclosure 1 Water Quality Data spreadsheet. The reports noted that results may be preliminary or pending and would be provided in subsequent submissions.</p> <p>Spot checks of Enclosure 1 - Water Quality Data (28 March to 3 April) were done. No evidence was provided for field measurements (DO and temperature) being submitted that are required by Appendix 4 and therefore condition 44 and 45.</p> <p>No evidence was provided to demonstrate that all monitoring data related to temporary discharges had been provided to the regulator. Given when the last email regarding discharges was sent not all laboratory data was available.</p>	<p>Email MRM to environmentalregulation@nt.gov.au dated 19Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (11 to 17 April) stated "As notified to the Administering Authority on 17 April 2024, the frequency of sampling at the natural surface water locations has been reduced as the field monitoring teams have recently reported increasing activity of estuarine crocodiles at the McArthur River monitoring points. This includes an observation at the McArthur River upstream control point SW21 the morning of Monday 15 April 2024. MRM notes that until such time as we can ensure the sampling can be undertaken in a safe manner by monitoring personnel, MRM intends to collect the samples during the managed releases approximately once per week."</p> <p>Spot checks of Enclosure 1 - Water Quality Data (28 March to 3 April) were done. These showed that SW11, SW12, SW32 and SW8 were monitored on the days of releases between 28 March and 3 April. There were no turbidity, TSS and TDS results provided, however, these were subsequently provided as Enclosure 2 in the submission on 26 April 2024 except for P2. Metals and metalloids required total and filtered but only filtered were in the spreadsheet submitted on 5April2024. However, the totals were provided on 26April2024 except for P2.</p> <p>No OFI has been prepared as this has been broadly completed through the submission of the annual report.</p>

Waste Discharge Licence compliance workbook - Operator 2024 - audit period 01 May 2024 to 30 April 2024

Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)	WDL174-14 (26 May 2023 - 25 May 2025)	WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)					
47.4	N/A	N/A	Storage volumes in the Mine's water storages compared with the Upper Operating Limit (UOP), Maximum Operating Limit (MOL) and the Full Supply Limit (FSL) of each water storage;	4	Full Compliance	Email Operator to environmentalregulation@nt.gov.au dated Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (28 March to 3 April) Email Operator to waste.ntepa@nt.gov.au dated Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (3 to 10 April) Email Operator to environmentalregulation@nt.gov.au dated Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (11 to 17 April) Email Operator to environmentalregulation@nt.gov.au dated Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (18 to 24 April) 2023-24 Waste Discharge Records Each email included the relevant Waste Discharge Licence 174-15 Condition 47 Report as a memo. Each memo included water storage volumes in table.	
47.5	N/A	N/A	Dilution calculator outputs (in accordance with the McArthur River Mining Waste Discharge Procedure PRO-OP-0008-2200035 or the most current version that may be issued from time to time) demonstrating that measured concentrations of parameters will remain within SSTVs at SW11; and	4	Full Compliance	Email Operator to environmentalregulation@nt.gov.au dated 5Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (28 March to 3 April) Email Operator to waste.ntepa@nt.gov.au dated 12Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (3 to 10 April) Email Operator to environmentalregulation@nt.gov.au dated 19Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (11 to 17 April) Email Operator to environmentalregulation@nt.gov.au dated 26Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (18 to 24 April) 2023-24 Waste Discharge Records Each email included the relevant Enclosure of Dilution Calculator and no exceedances of SSTVs were evident.	
47.6	N/A	N/A	Any other relevant update on the site's water balance and discharge performance.	4	Full Compliance	Email Operator to environmentalregulation@nt.gov.au dated Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (28 March to 3 April) Email Operator to waste.ntepa@nt.gov.au dated Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (3 to 10 April) Email Operator to environmentalregulation@nt.gov.au dated Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (11 to 17 April) Email Operator to environmentalregulation@nt.gov.au dated Apr2024 Subject: MRM WDL 174-15 Condition 47 Report (18 to 24 April) Each email included the relevant Waste Discharge Licence 174-15 Condition 47 Report as a memo. Each memo included additional discussion and water storage volumes in the Open Pit.	

Waste Discharge Licence compliance workbook - Operator 2024 - audit period 01 May 2024 to 30 April 2024

Condition no.	Condition no.	Condition no.	Condition/requirement	Score	Compliance level	Evidence	Comments
WDL174-15 (26 May 2023 - 25 May 2025, amended 27 March 2024)	WDL174-14 (26 May 2023 - 25 May 2025)	WDL174-13 (25 May 2021 - 25 May 2023, amended 10 March 2022)					
48	N/A	N/A	The licensee must notify <i>environmentalregulation@nt.gov.au</i> within 24 hours of when discharges from Temporary Discharge Locations or additional source water bodies pursuant to condition 44 cease.	4	Full Compliance	<p>Email Operator to environmentalregulation@nt.gov.au dated Apr2024 Subject: MRM WDL 174-15 Condition 47 Report</p> <p>Email Operator to environmentalregulation@nt.gov.au dated May2024 Subject: RE:MRM WDL 174-15 Condition 47 Report</p> <p>The regulator was advised by the Operator on Apr2024 "River levels remain favourable for managed release and as such release is currently ongoing."</p> <p>The regulator was advised by the Operator on May2024 "Discharges from Temporary Discharge Locations and additional source water bodies have not occurred since 21 April 2024" and "In accordance with Condition 48, MRM has now decided to formally cease any further discharges from Temporary Discharge Locations and additional source water bodies pursuant to Condition 44." No evidence was provided for notification to the regulator 24 hours from ceasing temporary discharge. However, notification of intention to officially cease was issued.</p>	

Appendix C. Authorisation compliance workbook – DITT

Authorisation compliance workbook - DITT audit period 01 May 2023 to 30 April 2024

17 May 2023 5 May 2022
 Authorisation Authorisation
 Condition No. Condition No.

Condition/requirement	Score	Compliance level	Evidence	Comments		
SCHEDULE A						
Mining management plan and reporting						
6	6	The Operator must on 31 August 2021 and on each anniversary of that date (or such other date as nominated by the Operator and approved by the Minister), review the approved MMP and if necessary, amend the MMP.	4	Full Compliance	Operator letter accompanying submission of EMR 2022-23 in August 2023 communicated no requirement for amendment [ie compliant].	
7	7	The Operator must submit annually all environmental monitoring data which has been collected since the previous data submission. The data submission must be provided in the approved form (being an MS Excel template that can be provided on request) and include laboratory and field data for the following:		Refer to sub conditions		
7.a	7.a	surface water;	3	Part Compliance (High)	Evidence of submission of the environmental monitoring data for the reporting period 1 May 2021 to 30 April 2022 and DITT acknowledgment of receipt was sighted from April/May 2023. Therefore the 2022 to 2023 data was due April 2024 from the Operator in order to be "annually". No evidence provided that DITT requested the two years of monitoring data that had not been provided in the audit period, which remained unsubmitted in September 2024.	OFI: Liaise with the Operator on submissions that are due including annual environmental monitoring data and TSF quarterly reports to ensure timely delivery.
7.b	7.b	groundwater;	3	Part Compliance (High)	Evidence of submission of the environmental monitoring data for the reporting period 1 May 2021 to 30 April 2022 and DEPSW acknowledgment of receipt was sighted from April/May 2023. Therefore the 2022 to 2023 data was due April 2024 from the Operator in order to be "annually". No evidence provided that DITT requested the two years of monitoring data that had not been provided in the audit period, which remained unsubmitted in September 2024.	OFI: Refer to OFI condition 7.a.
7.c	7.c	dust	3	Part Compliance (High)	Evidence of submission of the environmental monitoring data for the reporting period 1 May 2021 to 30 April 2022 and DEPSW acknowledgment of receipt was sighted from April/May 2023. Therefore the 2022 to 2023 data was due April 2024 from the Operator in order to be "annually". No evidence provided that DITT requested the two years of monitoring data that had not been provided in the audit period, which remained unsubmitted in September 2024.	OFI: Refer to OFI condition 7.a.
7.d	7.d	sediments;	3	Part Compliance (High)	Evidence of submission of the environmental monitoring data for the reporting period 1 May 2021 to 30 April 2022 and DEPSW acknowledgment of receipt was sighted from April/May 2023. Therefore the 2022 to 2023 data was due April 2024 from the Operator in order to be "annually". No evidence provided that DITT requested the two years of monitoring data that had not been provided in the audit period, which remained unsubmitted in September 2024.	OFI: Refer to OFI condition 7.a.

Authorisation compliance workbook - DITT audit period 01 May 2023 to 30 April 2024

17 May 2023 Authorisation Condition No.
5 May 2022 Authorisation Condition No.

17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Score	Compliance level	Evidence	Comments
7.e	7.e	gas; and	3	Part Compliance (High)	Evidence of submission of the environmental monitoring data for the reporting period 1 May 2021 to 30 April 2022 and DEPSW acknowledgment of receipt was sighted from April/May 2023. Therefore the 2022 to 2023 data was due April 2024 from the Operator in order to be "annually". No evidence provided that DITT requested the two years of monitoring data that had not been provided in the audit period, which remained unsubmitted in September 2024.	OFI: Refer to OFI condition 7.a.
7.f	7.f	water transfers and discharges (including dates, times and volumes).	3	Part Compliance (High)	Evidence of submission of the environmental monitoring data for the reporting period 1 May 2021 to 30 April 2022 and DEPSW acknowledgment of receipt was sighted from April/May 2023. Therefore the 2022 to 2023 data was due April 2024 from the Operator in order to be "annually". No evidence provided that DITT requested the two years of monitoring data that had not been provided in the audit period, which remained unsubmitted in September 2024.	OFI: Refer to OFI condition 7.a.
8	8	From 13 November 2020 (i.e. the date of authorisation of the Overburden Management Project) the Operator must:		Refer to sub conditions		
8.a	N/A	annually submit to the Department, unless otherwise agreed to in writing by the Department, a list of structures scheduled to be constructed in the coming year that will have an "as-constructed" construction report developed subject to Condition 48(g) and in accordance with the approved MMP; and	4	Full Compliance	List of structures scheduled to be constructed that will have "as-constructed" reports was submitted by the Operator and acknowledged by DITT in August 2023. Of the five structures in the list due for completion in the audit period, only the Cell 2 Stage 8 Raise had reached practical completion at the end of the audit period. If the works has been completed as scheduled, there would be five "as constructed" construction reports due in the audit period. No evidence on the forecast progress of the structures or that "as constructed" reports would not be required. DITT advised that no "as-constructed" reports were submitted.	OBS: DITT could add the list of structures to be constructed and progress as a standing agenda item for meetings with the Operator. OBS: Update Condition 48.g. so that "as-constructed" construction reports for stages of the NOEF are required annually.
8.b	8 cont	submit the "as -constructed" construction reports subject to the above condition for each structure to the Department within 60 days or an alternate date agreed to by the Department in writing, upon construction being finalised.	N/A	Not Applicable	For the audit period, this condition is considered not applicable as within 60 days of construction being finalised was not triggered for any of the structures.	
9	9	The Operator must submit on or before 31 August 2021 and on each anniversary of that date (or such other date as nominated by the Operator and approved by the Minister), an EMR for the previous year in the reporting period as agreed with the Department.	4	Full Compliance	Evidence of review of the 2022-2023 EMR and acceptance of it were sighted.	
Security and Levy						
10	10	The Operator must provide to the Minister a security of \$479,200,853 in the form of cash or an unconditional bank guarantee prior to undertaking any mining activities authorised by this Variation of Authorisations 0059-01 and 0059-02.	4	Full Compliance	Evidence of correspondence relating to the increase to the security were sighted.	Security was \$476,476,968 in 5May2022 Authorisation and \$479,200,853 in the 17May2023 Authorisation.
11	11	The security provided for under Condition 10 will be reassessed, and may be revised, following the submission, assessment and approval of an:		Refer to sub conditions		

Authorisation compliance workbook - DITT audit period 01 May 2023 to 30 April 2024

17 May 2023
Authorisation
Condition No.

5 May 2022
Authorisation
Condition No.

17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Score	Compliance level	Evidence	Comments
11.a	11.a	independent third party assessment of the security by a qualified person approved by the Minister (also refer to Condition 40);	4	Full Compliance	The 2023 Unplanned Closure Plan and Independent Security Audit was submitted to DITT 23Jan2023 (before the audit period) and approved on 17May2023 (in the audit period).	There was no third party assessment of security during the audit period. An updated Unplanned Closure Plan and security assessment that covers MMP amendment activities was submitted 31May2024 (after the audit period).
11.b	11.b	amended MMP;	4	Full Compliance	2024 MMP Submission March 2024 was acknowledged by DITT in March 2024. DITT requested further information from the Operator in July 2024 which were provided in July 2024 (after the audit period). 2024 MMP Submission was approved 23Jul2024 (after the audit period).	
11.c	11.c	amendment to the Unplanned Closure Plan.	4	Full Compliance	The 2023 Unplanned Closure Plan and Independent Security Audit was submitted to DITT Jan2023 (before the audit period) and approved on 17May2023 (in the audit period). Evidence sighted of DITT granting extension of UCP due date until submission of AMMP in 2024.	There was no amendment to the Unplanned Closure Plan in the audit period. Unplanned Closure Plan was due to be submitted in August 2023, but extension granted until submission of Amended MMP in 2024. An updated Unplanned Closure Plan and security assessment that covers MMP amendment activities was submitted May2024 (after the audit period).
12	12	The revised security amount to be provided under Condition 10 is to be provided prior to creating the new disturbance, covered under the revised security as per written notification from the Department. For the avoidance of doubt, the Operator must provide the revised security amount in the form of cash or an unconditional bank guarantee to the Minister.	4	Full Compliance	Evidence provided supports disturbance occurred after the additional security payment was made.	
13	13	Each financial year, upon receipt of a written notice by the Minister as to the levy payable for that financial year, the Operator must pay a levy to the Mining Remediation Fund of an amount calculated in accordance with the Act and as stated by the Minister in the notice.	4	Full Compliance	Evidence sighted of levy payment made against invoice.	
Overburden Management Project						
Explanatory note:	Explanatory note:	The following conditions were introduced in the previous variation, dated 15 August 2019 to reflect the intent of the thirty recommendations made by the NT EPA in the making of their Assessment Report 86 published July 2018. The NT EPA articulated an overarching environmental objective to be achieved during operation of the Mine: to ensure the health of McArthur River is protected along its whole length at all times from mine related impacts. The Minister accepted the recommendations as overarching conditions for the life of the project and have been retained to achieve transparency.		-		
15	15	The Operator must provide written notice to the Minister and NT EPA if it alters or proposes to alter the McArthur River Mine Overburden Management Project and/or commitments, safeguards or mitigation measures in the Environmental Impact Statement in such a manner that the environmental significance of the action may have changed. The referral should be made in accordance with the Environment Protection Act 2019.	N/A	Not Applicable		No notice submitted by the Operator, condition not triggered.

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16	16	By 13 May 2022 (i.e. within 18 months of the date of authorisation of the Overburden Management Project), unless otherwise agreed in writing by the Department, the Operator must submit a plan to the Department for review, that:	N/A	Not Applicable		Relevant plan is the Water Management Plan dated 13May2022 with no subsequent plans submitted in the audit period.
16.a	16.a	Enables measurement of total loads of lead and zinc and is consistent with requirements of Condition 27;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
16.b	16.b	Quantifies and ensures annual loads of lead and zinc discharged to the McArthur River in future years (July to June) do not exceed the loads discharged in 2017-2018 (as per Condition 68(e)) taking into account seasonal variations in rainfall, and subject to future annual load calculations;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
16.c	16.c	addresses recommendations and outcomes arising from audits of loads by the Independent Monitor;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
16.d	16.d	include sufficient detail to inform the development of monitoring and management measures (including but not limited to early warning alerts and intervention levels), as part of the site wide AMP (Condition 45);	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
16.e	16.e	once approved by the Department, be implemented by the Operator.	3	Part Compliance (High)	No formal approval of the plan by DITT has occurred.	Relevant plan is the Water Management Plan dated 13May2022 submitted before the audit period. No subsequent plans submitted in the audit period. OFI: Provide more timely responses from DITT on review/approval of submitted documents.
17	17	By 13 May 2022, the Operator must:		Refer to sub conditions		
17.a	17.a	submit a plan to the Department for review, that shall include:	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
17.a.i	17.a.i	site-specific trigger values determined in accordance with Australian and New Zealand Guidelines for Fresh and Marine Water Quality, 2018 framework, incorporating ANZECC (2000) guidelines, at appropriate monitoring locations, in accordance with Condition 27;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
17.a.ii	17.a.ii	a commitment that creeks on the mine site show long-term improving trends in water quality within 20 years after cessation of mining;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
17.a.iii	17.a.iii	methodology to calculate contaminant loads and contaminant concentrations entering creeks and the McArthur River using system modelling that must:	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.

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17.a.iii.a	17.a.iii.a	use suitable site-specific data collected as part of Condition 26;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
17.a.iii.b	17.a.iii.b	be subject to review by the relevant independent panel;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
17.a.iii.c	17.a.iii.c	detail specific assumptions to be tested including but are not limited to:	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
17.a.iii.c.i	17.a.iii.c.i	groundwater flow paths;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
17.a.iii.c.ii	17.a.iii.c.ii	attenuation of metals from mine-derived wastes;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023. Condition was due and WMP submitted before the audit period.
17.b	17.b	once approved by the Department, implement the plan;	3	Part Compliance (High)	No formal approval of the plan by DITT has occurred.	Relevant plan is the Water Management Plan dated 13May2022 submitted before the audit period. No subsequent plans submitted in the audit period. OFI: Refer to OFI in condition 16.e.
17.c	17.c	incorporate the relevant findings from the plan into the AMP.	N/A	Not Applicable		
18	18	The Operator must provide a written response to the Department, if an independent technical panel's, required under Condition 21, review of the models and modelling outputs, and the data collection programs that informed the model development at Condition 17(a)(iii) address recommendations for improvements. All relevant outputs must be used to inform and update the AMP.	N/A	Not Applicable		No Independent technical panels have been established.
19	19	Every three (3) years from the date of authorisation of the Overburden Management Project, an independent environmental audit of the Quality Assurance (QA) and Quality Control (QC) procedures and waste rock identification and handling performance must be undertaken and:	N/A	Refer to sub conditions		Next audit by Independent Monitor is due 13Nov2026.
19.a	19.a	the results of the audit be provided within six (6) weeks to the Department and to the relevant independent panel;	N/A	Not Applicable		Next audit by Independent Monitor is due 13Nov2026.
19.b	19.b	the Operator must provide a written response to the satisfaction of the Department where findings from the audit and review by the relevant panel includes matters that need to be addressed or areas for improvement.	4	Full Compliance	The Operator has not prepared a written response. DITT received the IM report and advised that they discussed opportunities for improvement with the Operator. The NOEF Independent Panel did not review the audit report as the panel is yet to be established.	OBS: DITT should ensure the Operator prepares a written response to the satisfaction of DITT on the waste rock handling procedures audit findings following the establishment of the NOEF Independent Panel.

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21	21	The Operator must provide funding and assist the Department to establish and operate an independent panel(s) of experts to advise on matters affecting the environmental performance of the NOEF, TSF and mine closure planning.	3	Part Compliance (High)	Evidence of appointment of Dr Alan Robertson by the Minister for Mining as the Independent Chairperson for the NOEF Panel and TSF Panel in Jan2024 was sighted along with advertising for the Mine Closure Panel Independent Chairperson. Clear steps were outlined in a letter from the Minister to the Operator regarding the NOEF Panel that is identified as the priority. The Independent Panels were not operational in the audit period.	OFI: Prioritise and provide oversight to the establishment of the operation of the Independent Panels (NOEF and TSF) as soon as practical to enable the approval requirements, dependent on the Independent Panels operation, to progress.
22	22	By 13 November 2021 (i.e. within 12 months of date of authorisation of the Overburden Management Project), the Operator must submit a report to the Department for review, detailing the results of relevant studies undertaken to inform the requirements for implementation (including timelines) of a NOEF groundwater seepage interception and recovery system that:	3	Part Compliance (High)	The Independent Monitor has sighted evidence that the NOEF Report was submitted by the Operator on time in compliance with condition 22 (before the audit period). The Delegate has deferred the decision until the report has been considered by the NOEF Independent Expert Panel. Appointment of Dr Alan Robertson by the Minister for Mining as the Independent Chairperson for the NOEF Panel in Jan2024 is public on website https://industry.nt.gov.au/boards-and-committees/mcarthur-river-mine-independent-expert-panels . The Independent Panels were not operational in the audit period.	The Operator advised that NOEF seepage interception is of no value until 2027. This condition is marked as completed in the Authorisation dated 17May2023. However, DITT advised that they intend to obtain expert advice related to seepage interception from the NOEF independent panel and consider the matter is low risk and of a non-urgent nature. OFI: DITT to establish the Independent Panel (NOEF), or use an alternative expert review in the interim, to assess requirement for the NOEF seepage interception trench and recovery system.
22.a	22.a	controls seepage to the Barney Creek diversion channel and the McArthur River;	N/A	Not Applicable		Satisfied before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
22.b	22.b	achieves a recovering trend in the Barney Creek diversion channel and the old McArthur River channel (at SW06) water quality within 20 years of cessation of mining;	N/A	Not Applicable		Satisfied before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
22.c	22.c	facilitates achieving requirements of Conditions 16 and 17.	N/A	Not Applicable		Satisfied before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
23	23	By 13 November 2022 (i.e. within 24 months of date of authorisation of the Overburden Management Project), the Operator must submit a NOEF geosynthetic liner cover system plan to the Department for review. The plan must:	N/A	Not Applicable		A working draft plan was due and submitted before the audit period.
23.a	23.a	outline a process (including timelines) to test and evaluate (i.e. criteria) the constructability and effectiveness of geosynthetic liner cover options including a geosynthetic liner /compacted clay layer combination;	N/A	Not Applicable		Satisfied before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
23.b	23.b	include implementation of trials on rehabilitated stages of the NOEF;	N/A	Not Applicable		Satisfied before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.

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23.c	23.c	identify relevant performance parameters that must be monitored, including but not limited to:	N/A	Not Applicable		Satisfied before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
23.c.i	23.c.i	slope stability during extreme events;	N/A	Not Applicable		Satisfied before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
23.c.ii	23.c.ii	cover performance as a result of heat effects;	N/A	Not Applicable		Satisfied before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
23.c.iii	23.c.iii	tolerance of the geosynthetic liner to expected differential settlement;	N/A	Not Applicable		Satisfied before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
23.c.iv	23.c.iv	veracity of cover longevity predictions;	N/A	Not Applicable		Satisfied before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
23.c.v	23.c.v	likely long-term maintenance requirements.	N/A	Not Applicable		Satisfied before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
23.d	23.d	Include reporting of trial results and monitoring outcomes:		Refer to sub conditions		
23.d.i	23.d.i	within three years from the submission of the plan;	N/A	Not Applicable		Future item. Due 12 November 2025.
23.d.ii	23.d.ii	every three years thereafter, to the relevant independent panel and the Community Reference Group for review, and shall be audited by the Independent Monitor. The Operator must provide a written response to the Department, if review from the relevant panels and Community Reference Group require matters to be addressed;	N/A	Not Applicable		Future item. Due three years after submission related to condition 23.d.i.
23.d.iii	23.d.iii	must be used to inform the AMP and closure planning for the mine.	N/A	Not Applicable		Future item for the Operator as the plan has not been approved.
23.e	23.e	The NOEF geosynthetic liner cover system plan, once approved by the Department, must be implemented by the Operator.	3	Part Compliance (High)	NOEF Geosynthetic Liner Cover System Plan dated 31Oct2022 has not been approved by DITT. The Operator advised that the plan submitted was "a working draft that is not suitable for review and approval at this stage". Almost two years later, the final report remains unsubmitted by the Operator. It is noted that a revised Geosynthetic Liner Testing Plan was submitted to the Commonwealth for review and approval in the audit period.	OFI: DITT should request the final NOEF geosynthetic liner cover system plan for their review and approval.

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24	24	By 13 November 2025 (i.e. within five (5) years of the date of authorisation of the Overburden Management Project), the Operator must submit a strategy to the Department that details the long-term disposal management of tailings into the mine pit void, submerged under a suitable depth of pit water. The plan must:	N/A	Not Applicable		Future requirement - 13Nov2025.
24.a	24.a	include strategies on the tailings reprocessing and assessment of residual chemical contaminants that may likely impact on meeting the requirements of Condition 16;	N/A	Not Applicable		Future requirement - 13Nov2025.
24.b	24.b	be reviewed by the relevant independent panel.	N/A	Not Applicable		Future requirement - 13Nov2025.
25	25	Once approved by the Department, the strategy developed in accordance with Condition 24 must be used to develop a plan five (5) years prior to cessation of mining, for approval by the Department. Any requirement to vary the approved disposal strategy or plan must be:	N/A	Not Applicable		Future requirement - five years before mine closure.
25.a	25.a	applied for in writing to the Minister;	N/A	Not Applicable		Future requirement - five years before mine closure.
25.b	25.b	based on leading practice and site conditions;	N/A	Not Applicable		Future requirement - five years before mine closure.
25.c	25.c	supported by the relevant independent panel;	N/A	Not Applicable		Future requirement - five years before mine closure.
25.d	25.d	notified to the NT EPA in accordance with Condition 15.	N/A	Not Applicable		Future requirement - five years before mine closure.
26	26	By 13 November 2021 (i.e. within 12 months of date of authorisation of the Overburden Management Project), the Operator must review and synthesise all available and relevant information to submit a revised water monitoring plan (surface water and groundwater) to the Department for review, ensuring the plan is capable of identifying and quantifying impacts of mining activities on the environmental values and beneficial uses of the McArthur River.	N/A	Not Applicable		N/A as satisfied before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
27	27	The plan required under Condition 26 must:		Refer to sub conditions		
27.a	27.a	allow for assessment of compliance with Condition 16 and include sufficient detail to inform/develop/update the AMP;	N/A	Not Applicable		N/A as satisfied before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
27.b	27.b	at a minimum:		Refer to sub conditions		
27.b.i	27.b.i	quantify loads of lead and zinc entering the McArthur River each year;	N/A	Not Applicable		N/A as satisfied before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
27.b.ii	27.b.ii	quantify impacts to water quality and trends in groundwater to determine that objectives and targets are being met, including the effectiveness of source control to reduce loads to as low as is reasonably practicable;	N/A	Not Applicable		N/A as satisfied before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.

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27.b.iii	27.b.iii	develop appropriate future trigger values for waterways on the mine site and the McArthur River in accordance with the ANZECC Guidelines. In the interim, the trigger values in the most current WDL shall be used;	N/A	Not Applicable		N/A as satisfied before the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
27.c	27.c	be prepared in consultation with the NT EPA;	4	Full Compliance	No evidence provided (e.g., ongoing TWG agenda) of an ongoing prompt to ensure that the WMP is updated based on the NT EPA input (that was provided in the previous audit period).	This condition is marked as completed in the Authorisation dated 17May2023. OBS: DITT to create a mechanism or prompt (e.g., ongoing meetings with the Operator) to ensure that the WMP is updated based on the NT EPA input (that was provided in the previous audit period).
27.d	27.d	be prepared in consultation with the relevant independent panel;	3	Part Compliance (High)	The twelve month timeframe for this plan to be prepared has passed and no independent panel for consultation about the plan had been established in the audit period so a part compliance has been recorded.	OFI: Refer to OFI in Condition 21.
27.e	27.e	once approved by the Department, be implemented by the Operator;	3	Part Compliance (High)	Plan is pending letter of approval from DITT.	OFI: Refer to OFI in condition 16.e.
27.f	27.f	be subject to consultation with the relevant independent panel in the event that the plan requires updating (e.g.to maintain the currency of the monitoring network);	N/A	Not Applicable		The Operator advised "The water management plan did not require updating during the reporting period." so this condition is not triggered.
27.g	27.g	ensure results of the program:		Refer to sub conditions		
27.g.i	27.g.i	are reported annually to the Department;	4	Full Compliance	Reported in EMR 2022-2023 and EMR 2023-2024 Correspondence between Operator and DITT relating to 2023-2024 EMR Submission (after the audit period).	OBS: Refer to OFI in condition 7.a.
27.g.ii	27.g.ii	are audited by the Independent Monitor every three years;	N/A	Not Applicable		Future requirement due 13May2025.
27.g.iii	27.g.iii	be published on the Operator's website.	3	Part Compliance (High)	DITT's delayed approval of the WMP is delaying the requirement for the Operator to publish the results of the WMP program on their website.	The Department advised that this condition is not referring to these requirements being included as content of the plan. As the Water Management Plan that this condition refers to is not approved, it does not need to be implemented and this condition is considered a future requirement for the Operator. OFI: Refer to OFI in condition 16.e.
28	28	By 13 May 2022 (i.e. within 18 months of date of authorisation of the Overburden Management Project), the Operator must submit a research and investigation program to the Department for review that establishes the concentration of mine-derived contaminants at which chronic and acute impacts to biota of relevance to the McArthur River system occur using recognised and accepted eco-toxicological testing, and:	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
28.a	28.a	the results of this program must be integrated with other relevant programs, monitoring programs and management plans;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.

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28.b	28.b	the plan once approved by the Department must be implemented by the Operator.	4	Full Compliance	Correspondence between DITT and Operator relating to Auth 0059 Condition 28 - MRM Ecotox research and investigation program. DITT approval of ecotox report. Correspondence between DITT and Operator relating to Acceptance and Approval Letter. EMR 2023-2024 Implementation of the Ecotoxicology Research and Investigation Program is demonstrated in the AMP and EMR 2023-2024.	
29	29	By 13 May 2022 the Operator must provide to the department a monitoring program that provides improved understanding of aquatic ecosystems in the McArthur River from changing water flows, levels and quality. The program must:	N/A	Not Applicable		Considered N/A as the Aquatic Ecology Monitoring Plan was due before the audit period and Rev 1 and 2 were submitted to DITT before the audit period.
29.a	29.a	be consistent with the aquatic ecology monitoring and management plan required under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) Approval 2014/7210;	N/A	Not Applicable		Considered N/A as the Aquatic Ecology Monitoring Plan was due before the audit period and Rev 1 and 2 were submitted to DITT before the audit period.
29.b	29.b	include monitoring of relevant parameters at appropriate frequencies to allow for implementation of applicable Trigger Action Response Plans (TARPs) included in the Adaptive Management Plan (AMP);	N/A	Not Applicable		Considered N/A as the Aquatic Ecology Monitoring Plan was due before the audit period and Rev 1 and 2 were submitted to DITT before the audit period and verbally approved before the audit period.
29.c	29.c	be implemented by the Operator, once approved by the Department.	3	Part Compliance (High)	MRM TWG Meeting Minutes (verbal approval) (previous audit period). NT Government action subject to Commonwealth approval. No indication of timeline has been provided. No evidence of approval of the Aquatic Ecology Management Plan was provided.	OFI: Refer to OFI in condition 16.e.
30	30	At all times, the Operator must conduct works consistent with the Northern Territory Aboriginal Sacred Sites Act 1989 and valid AAPA certificate. All conditions of the AAPA certificate must be complied with (including but not limited to NOEF height restrictions), and evidence produced to demonstrate compliance, when requested by the Minister.	N/A	Not Applicable		No requests from Minister during audit period.
31	31	The Operator must not disturb or encroach within 5m of archaeological site MRM4, until a design of the NOEF is agreed in writing by the Department. Consultation between the Operator and Minister for Arts, Culture and Heritage must be undertaken prior to seeking endorsement of the design.	N/A	Not Applicable		No disturbance of MRM4. No design has been proposed for consideration.
32	32	By 13 May 2021 (i.e. within six months of date of authorisation of the Overburden Management Project), the Operator must provide a report to the Minister, and AAPA or the Minister for Arts, Culture and Heritage (where relevant) that demonstrates the consultation process undertaken or provide a plan to the Minister that details consultation activities and timeliness to identify and engage with appropriate custodians and traditional owners with an interest in land that would be or may be affected by the Overburden Management Project.	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.

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33	33	By 13 November 2021 (i.e. within 12 months of date of authorisation of the Overburden Management Project), the Operator must develop or revise and submit to the Department for review an existing air quality monitoring plan that monitors sulfur dioxide emissions at an appropriate location between the NOEF and sensitive receptors determined in consultation with NT EPA.	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
34	34	The air quality monitoring plan required under Condition 33 must include:		Refer to sub conditions		
34.a	34.a	objectives, locations, frequency of monitoring, trigger values and reporting commitments to manage and protect any potential air quality risk to human health outside of the mineral lease;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
34.b	34.b	evidence of consultation with the NT EPA to be provided at the time of the plan submission;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
34.c	34.c	once approved by the Department, be implemented by the Operator.	4	Full Compliance	EMR 2022-2023 EMR 2023-2024 Implementation is part of condition 7 related to environmental data and condition 9 related to the EMR.	
35	35	The results of the air quality plan for each reporting frequency must be:		Refer to sub conditions		
35.a	35.a	made available on the Operator's website. Initial monitoring results to be reported within 6 months of the plan being accepted by the Department or an alternative timeframe as agreed in writing with the Department;	4	Full Compliance	Monthly SO2 reports (online).	
35.b	35.b	incorporated where relevant in the AMP.	4	Full Compliance	Adaptive Management Plan Version E dated 27May2022. The AQMP has been incorporated into the AMP before the audit period. No changes were identified in the audit period indicating a requirement to update the AMP.	
36	36	By 13 November 2022 (i.e. within 24 months of date of authorisation of the Overburden Management Project), the Operator must submit a monitoring and management plan to the Department for review that manages risks of metal toxicity from human consumption of aquatic fauna obtained from the McArthur River. The plan must:	N/A	Not Applicable		Considered N/A as the Aquatic Ecology Monitoring Plan was due before the audit period and Rev 1 and 2 were submitted to DITT before the audit period and included the requirements of this condition.
36.a	36.a	determine if aquatic fauna obtained from any reach of the McArthur River, that may be impacted by the mine's operations, is safe to eat;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
36.b	36.b	include demonstrated evidence of consultation with NT EPA;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
36.c	36.c	detail public reporting of the monitoring results, including at appropriate locations in the Borroloola region;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.

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36.d	36.d	include provisions for implementation and maintenance of signage at waterways at the MRM site in accordance with the requirements of Condition 62 until the risk of contamination from consumption of this aquatic fauna is demonstrated to be acceptable by the Department;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
36.e	36.e	once approved by the Department, be implemented by the Operator.	3	Part Compliance (High)	DITT approved verbally at the TWG Jan2023 but it is not formally approved.	OFI: Refer to OFI in condition 16.e.
37	37	By 13 November 2022 (i.e. within 24 months of date of authorisation of the Overburden Management Project), the Operator must submit a plan to the Department for review that outlines a monitoring program for management of Largetooth Sawfish. The plan must:	N/A	Not Applicable		Considered N/A as a monitoring and management plan for the largetooth sawfish that included the requirements of this condition was included in the Aquatic Ecology Management Plan due and submitted before the audit period.
37.a	37.a	include a sampling strategy for Largetooth Sawfish that is non-lethal;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
37.b	37.b	include details of parameters and criteria, from which the results could be used to define specific (measurable and time-bound) performance indicators to abate a significant decline in Largetooth Sawfish movement;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
37.c	37.c	include trigger levels for investigation and implementation of management measures;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
37.d	37.d	once approved by the Department, be implemented by the Operator.	3	Part Compliance (High)	DITT approved verbally at the TWG Jan2023 but it is not formally approved.	OFI: Refer to OFI in condition 16.e.
38	38	Within six months following the establishment of the required panels and groups in accordance with Condition 21, the Operator must:		Refer to sub conditions		
38.a	38.a	develop environmental objectives for a Care and Maintenance Plan in consultation with the relevant Independent Panels, CRG, custodians and traditional owners;		-		Provided for context related to condition 38.b.
38.b	38.b	submit this to the Department for review.	N/A	Not Applicable		Future item. CRG established in the audit period, no independent panels established in the audit period so this condition is not triggered. OBS: Delays in establishing the independent panels, and therefore the Operator's ability to develop the environmental objectives for a Care and Maintenance Plan, will delay implementation of approved measures to manage environmental risks.
39	39	By 13 November 2025 (i.e. within five years of date of authorisation of the Overburden Management Project), the environmental objectives arising from Condition 38 must be used to develop a Care and Maintenance Plan in consultation with the Department.	N/A	Not Applicable		Future item. Due by 13Nov2025.

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Score	Compliance level	Evidence	Comments
40	40	The Operator must facilitate an independent third-party assessment of the security for rehabilitation of disturbances resulting from authorised activities in the approved MMP that is consistent with requirements under Conditions 10, 11 and 12, to the satisfaction of the Department, and every 3 years thereafter if the security has been re-calculated or adjusted.	N/A	Not Applicable		This is N/A as there were no independent third party assessments of the security due or undertaken in the audit period. McArthur River Mining – 2023 Unplanned Closure Plan and Independent Security Audit was submitted to DITT 23Jan2023 (before the audit period) and approved on 17May2023 (in the audit period).
41	41	The Operator, consistent with Condition 40, must:		Refer to sub conditions		
41.a	41.a	commission a qualified person to review the security amount whose appointment is accepted by the Minister;	N/A	Not Applicable		Triggered 3 years after the 13Nov2020, which was 13Nov2023 that was in the audit period. Considered N/A as it was undertaken before the audit period. Independent third-party assessments of the security have been done as per the evidence included for conditions 10 to 13.
41.b	41.b	ensure that the security is reviewed and delivered to the Department within six months of acceptance of the qualified person.	N/A	Not Applicable		Triggered 3 years after the 13Nov2020, which was 13Nov2023 that was in the audit period. Considered N/A as it was undertaken before the audit period. The Operator considers that they have complied with this condition as their submissions in previous audit periods were by qualified persons accepted previously by DITT (although not submitted within 6 months of that acceptance). DITT advised that the condition had been satisfied. OBS: DITT should consider changing condition wording if reapproval of acceptance of the qualified person to undertake the independent third-party assessment of the security is not required.
42	42	For every approved MMP and MMP amendment, the Operator must provide a revised copy of the approved document that removes commercially sensitive information, includes an overview and environmental section, and is suitable for publication on the Department's website, or provide written approval to make the complete documents publicly accessible.	3	Part Compliance (High)	DITT's letter on 17May 2023 requested a revised copy of the approved MMP amendment that removes commercially sensitive information suitable for publication on the Department's website. The Authorisation and AMP are on the Department's website. No evidence was provided of the MMP amendment on the Department's website.	OFI: DITT to follow-up with operator and government webservices to ensure most recently approved MMP is publicly available.
43	43	The Operator must assist, as required, the Department to establish and operate a Community Reference Group (CRG).	4	Full Compliance	The CRG was established with general members appointed in June 2023 and the inaugural meeting held on 27July2023. Details of meetings are available at https://industry.nt.gov.au/boards-and-committees/mcarthur-river-mine-community-reference-group	
44	44	By 13 May 2022, (i.e. within 18 months of date of authorisation of the Overburden Management Project), the Operator must undertake a synthesis of all environmental monitoring programs (Condition 26) that assess impacts of mining activities on the environmental values and beneficial uses of the McArthur River, in accordance with NT EPA's overarching environmental outcome. The revised monitoring programs must:	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
44.a	44.a	use outputs generated for review and synthesis of water monitoring programs, as part of addressing Condition 26;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.

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44.b	44.b	demonstrate how all monitoring data collected under various monitoring programs and management plans were considered and synthesised (e.g. conceptual site models, trend analysis);	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
44.c	44.c	be incorporated in the AMP.	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
45	45	By 13 May 2022, (i.e. within 18 months of date of authorisation of the Overburden Management Project), the Operator must submit an AMP to the Department:	N/A	Not Applicable		This was due and the AMP submitted before the audit period.
45.a	45.a	The AMP must include the following key elements:		Refer to sub conditions		This condition is marked as completed in the Authorisation dated 17May2023.
45.a.i	45.a.i	clear, measurable environmental objectives for all significant environmental risks and potential impacts;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
45.a.ii	45.a.ii	measurable performance indicators to show that objectives are on target to be met;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
45.a.iii	45.a.iii	pre-determined triggers to warn of potential for performance indicators to be exceeded, as informed by monitoring;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
45.a.iv	45.a.iv	realistic and achievable contingency interventions to maintain performance indicators if triggers are consistently exceeded;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
45.a.v	45.a.v	clearly defined management measures/actions that are capable of being implemented in a timely way to meet performance indicators and environmental objectives;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
45.a.vi	45.a.vi	monitoring in accordance with relevant Recommendations in NT EPA Assessment Report 86 to determine whether management measures are effective and to inform the need for adjustments to management measures or need for alternatives;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
45.a.vii	45.a.vii	a continual feedback system to inform appropriate actions to be initiated when triggered and environmental objectives are always being met;	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
45.a.viii	45.a.viii	continual development of new management actions as required based on knowledge gained from experience at the site and elsewhere across industry.	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
45.b	45.b	The AMP must be reviewed by the Independent Monitor or an appropriately qualified, independent third party, and updated with inputs from the CRG (once established under Condition 43);	3	Part Compliance (High)	Independent Monitor's Review of the Adaptive Management Plan dated July 2023. No evidence was provided to demonstrate that DITT had approached the Operator regarding their plan to update the AMP based on the Independent Monitor's review comments or to obtain inputs from the CRG on the AMP.	OFI: DITT to follow up with the Operator to update the AMP based on the Independent Monitor's review comments and obtaining inputs from the CRG (when available).

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Score	Compliance level	Evidence	Comments
45.c	45.c	all review findings and CRG input requirements are to be provided to the Department for approval.	3	Part Compliance (High)	Independent Monitor's Review of the Adaptive Management Plan dated July 2023. No evidence was provided to demonstrate that DITT had approached the Operator regarding their plan to update the AMP based on the Independent Monitor's review comments or to obtain inputs from the CRG on the AMP.	Delayed establishment of the CRG has resulted in this task being delayed. OFI: Refer to OFI in Condition 45.b.
46	46	Unless agreed otherwise in writing by the Department, the AMP must:		Refer to sub conditions		
46.a	46.a	clearly set out the required management objectives and performance indicators;	N/A	Not Applicable		Satisfied as the AMP was submitted and approved before the audit period.
46.b	46.b	provide clarity on the triggers for changes to management actions, and responsibility and evidentiary basis for decision-making;	N/A	Not Applicable		Satisfied as the AMP was submitted and approved before the audit period.
46.c	46.c	establish the timeframe for initiation of certain actions if triggers are exceeded, including decisions to discontinue an activity and clarify responsibility and evidentiary basis for decision-making;	N/A	Not Applicable		Satisfied as the AMP was submitted and approved before the audit period.
46.d	46.d	establish a process for adjusting triggers that includes the regulator;	N/A	Not Applicable		Satisfied as the AMP was submitted and approved before the audit period.
46.e	46.e	establish transparent monitoring, reporting and review requirements;	N/A	Not Applicable		Satisfied as the AMP was submitted and approved before the audit period.
46.f	46.f	establish processes to achieve transparency and stakeholder engagement in AMP design and implementation that includes NT EPA, DCCEEW and CRG;	N/A	Not Applicable		Satisfied as the AMP was submitted and approved before the audit period.
46.g	46.g	set out the mechanism for periodic review by the Independent Monitor, which must not exceed a frequency of every three years;	N/A	Not Applicable		Satisfied as the AMP was submitted and approved before the audit period.
46.h	46.h	be provided to the Department for re-approval in the event that any material changes are made to the AMP.	N/A	Not Applicable		The Operator advised "No changes were made to the AMP during the reporting period."
47	47	The Operator must provide written notice to the Minister and to the NT EPA where trends indicate performance indicators and environmental objectives will not, or are unlikely to be, met by implementing the AMP.	N/A	Not Applicable		No written notice was provided to the Minister. The Independent Monitor did not identify any documents stating trends indicate performance indicators and environmental objectives will not, or are unlikely to be, met.
Independent Tailings Review Board (ITRB)						
50	50	The Operator must:		Refer to sub conditions		
50.a	50.a	convene an advisory board (Independent Tailings Review Board or ITRB);		-		Included for condition wording related to 50c. Condition not assessed.

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50.c	50.c	provide details of the members of the ITRB panel and meeting frequency to the Department for endorsement by the Department;	4	Full Compliance	ITRB endorsement letter re Cell 2 Raise 8 was submitted to DITT. Evidence of ITRB endorsement in the audit period was provided by the Operator as required by Condition 50.b.iii. DITT had not followed up to ensure the Cell 2 Stage 7 raise buttressing had been endorsed by the ITRB, which was identified as required in the previous audit period (no evidence was provided by the Operator to demonstrate that Cell 2 Stage 7 raise buttressing was endorsed as required by Condition 50.b.iii). DITT has not included ITRB matters as a standing item in meetings with the Operator.	OBS: DITT to consider a standing agenda item for meetings with the Operator regarding ITRB matters to provide oversight of ITRB activities (e.g., design changes to the Cell 2 Stage 7 raise buttressing).
50.d	50.d	together with the ICE, provide a written response to the satisfaction of the Department, in the event that future review of the designs by independent experts require additional matters to be addressed;	N/A	Not Applicable		DITT received no correspondence from the Operator triggering this requirement in the audit period.
Waste Rock Management						
51	51	From the date of authorisation Non-benign Waste is to be permanently placed consistent with the approved MMP:		Refer to sub conditions		
51.i	51.i	in the event that future review of the designs or as-built structure by independent experts require additional matters to be addressed, the Operator together with the ICE must provide a written response to the satisfaction of the Department;	N/A	Not Applicable		DITT is not aware of any reviews of the designs or as-built structure by independent experts and has not received any correspondence from the Operator relevant to this condition.
51.j	51.j	at mine closure, non-benign waste rock is encapsulated and fully contained within an engineered cover system consistent with the Overburden Management Project, or an alternative cover system endorsed by the relevant independent technical panels to the satisfaction of the Department.	N/A	Not Applicable		Not triggered until mine closure
Remaining Waste Rock Management Facilities						
55	55	From the date of authorisation of the Overburden Management Project, temporary placement of non-benign waste is authorised for the following:		Refer to sub conditions		Provided for context for subconditions. No DITT action.
55.a	55.a	EOEF (except for PAF(RE));		-		Provided for context for subconditions. No DITT action.
55.b	55.b	stockpiles on NOEF, SOEF and WOEF;		-		Provided for context for subconditions. No DITT action.
55.c	55.c	ROM Pad;		-		Provided for context for subconditions. No DITT action.
55.d	55.d	any other location approved by Department in writing.	N/A	Not Applicable		No approval sought for non-benign waste storage during the reporting period. Last submission was received in early 2023.
Water Management and Storage						
59	59	Until the AMP (including Environmental Management Plans and sub-plans) is approved by the Department in writing, the Operator must prepare, review and include the following for each MMP and where appropriate each MMP amendment, a Water Management Plan which includes:	N/A	Not Applicable		AMP was approved therefore this condition is N/A. This condition is marked as completed in the Authorisation dated 17May2023.
62	62	The Operator must erect and maintain warning signage that:		Refer to sub conditions		Provided for context for subconditions. No DITT action.

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62.a.	62.a.	is permanent and weatherproof;		-		Provided for context for subconditions. No DITT action.
62.b.	62.b.	contains specific wording agreed to by the Chief Health Officer (CHO) of the Northern Territory;		-		Provided for context for subconditions. No DITT action.
62.c.	62.c.	is located:		-		Provided for context for subconditions. No DITT action.
62.c.i	62.c.i	at appropriate distances and frequency along the waterway;		-		Provided for context for subconditions. No DITT action.
62.c.ii.	62.c.ii.	as a minimum at all access points, including but not limited to crossings, vehicle tracks and walking tracks.		-		Provided for context for subconditions. No DITT action.
62.c.iii.	62.c.iii.	along the length of:		-		Provided for context for subconditions. No DITT action.
62.c.iii.d	62.c.iii.d	Bing Bong shipping channel and in the immediate area surrounding the shipping channel and the swing basin, unless otherwise agreed in writing by the CHO and the Department.	3	Part Compliance (High)	The Operator emailed DITT in Nov2022 regarding this condition, which DITT responded to in May2023. DITT did not provide evidence of meeting minutes relevant to this condition, however the Operator did for June2023 regarding the action for DITT to "liaise with CHO to obtain relevant correspondence and agreement for approach to erecting warning signage at the Bing Bong Loading Facility". The Department advised that DITT had not discussed erecting warning signage at the Bing Bong Loading Facility with the Chief Health Officer (CHO) of the Northern Territory.	Authorisation dated 17 May 2023 added in the option for signage different to what is stated in the condition if agreed in writing by the Department. OFI: DITT to liaise with Chief Health Officer to obtain relevant correspondence and agreement for approach to erecting warning signage at the Bing Bong Loading Facility.
Water Transfer and Discharge						
68	68	The Operator must:		Refer to sub conditions		
68.e	68.e	by 30 June 2020, characterise total loads of mine-derived contaminants from all source inputs for the 2017-2018 period consistent with Condition 16.b, unless otherwise agreed in writing by the Department.	N/A	Not Applicable		Was complied with prior to the audit period (Operator provided a loads report and acknowledgement of receipt was emailed). Not relevant in the audit period. This condition is marked as completed in the Authorisation dated 17May2023.
69	69	The Operator must in relation to the WMD release point to Little Barney Creek undertake:		Refer to sub conditions		
69.b	69.b	remediation in the event of unacceptable erosion occurring at the Carpentaria Highway culvert system to the satisfaction of the Department of Infrastructure, Planning and Logistics and the Department;	N/A	Not Applicable		No unacceptable erosion has been identified.
69.h	69.h	measure total loads of analytes (including lead and zinc) from all controlled discharge activities entering McArthur River at location SW06 or an alternate location as agreed by the Department; and	3	Part Compliance (High)	The Operator informed DITT on 16Feb2024 that they proposed to sample at SW20 in lieu of SW06 for cultural heritage reasons and commenced discharge on 17Feb2024. However, DITT advised that no alternate monitoring locations have been approved.	OFI: Provide formal agreement that SW19 or SW20 monitoring location is an acceptable alternative to SW06 related to monitoring during discharges from WMD into Little Barney Creek or liaise with the Operator on the requirement to monitor at SW06.
71	71	At the conclusion of the trials in Condition 70, the Operator must apply in writing to the Department for approval of full-scale implementation.	N/A	Not Applicable		Trials are ongoing.
Perimeter Run-Off Dams - SPROD, SEPROD, WPROD and EPROD						
75	75	The Operator must:		Refer to sub conditions		Provided for context for subconditions. No DITT action.
75.(1)	75	Construct EPROD and WPROD informed by the following monitoring regime in the event groundwater dewatering is necessary:		Refer to sub conditions		Provided for context for subconditions. No DITT action.

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75.(1)i	75.i	field water quality parameters, flow meter volumes and laboratory analysis must be submitted to Department on a monthly basis;	N/A	Not Applicable		Construction was completed more than a year before the audit period. Stage
75.(2)	75.k	Prior to use of the structure, submit to the Department construction reports including QA and QC data endorsed by the ICE within 60 days of construction being completed.	3	Part Compliance (High)	No evidence was provided regarding liaison about the commissioning of stage 2 of EPROD. No evidence was provided regarding the DITT review of the Eastern Perimeter Runoff Dam Construction Report (EPROD Construction Report) dated November 2022 or discussion with the Operator on the conclusions and recommendations in that report.	Condition worded so that report only required if there was dewatering in the Authorisation dated 5 May 2022 and within 30 days. OBS: Refer to OBS for Condition 8.a. OFI: Review the Eastern Perimeter Runoff Dam Construction Report (EPROD Construction Report) dated November 2022 and discuss the conclusions and recommendations with the Operator.
Tailings storage facility						
76	76	From the date of authorisation of the Overburden Management Project, tailings must be managed in accordance with the following:		Refer to sub conditions		
76.b	76.b	any construction of tailings lift, as approved in Condition 79, be reviewed and endorsed by independent oversight requirements in Condition 48 and 50 or an alternative independent qualified and experienced third party approved by the Department in writing;	N/A	Not Applicable		There were no alternative independent qualified and experienced third parties approved by DITT.
76.e	76.e	in the event that future review of the designs or as-built structure by independent experts require additional matters to be addressed, the Operator together with the ICE must provide a written response that justifies the existing design or proposes an alternate design to the satisfaction of the Department.	N/A	Not Applicable		The Operator advised "there have been no changes to the general philosophy of the TSF over the reporting period". No review of the designs or as-built structure by independent experts requiring additional matters to be addressed.
TSF Management						
80	80	The Operator must provide quarterly to the Minister a written status report on the seepage and management of seepage from the TSF, including the following:	2	Part Compliance (moderate)	Evidence sighted of submission by the Operator and acknowledgement by DITT for two of the four TSF quarterly reports provided in the audit period. There was no evidence of formal review of the reports and no evidence of DITT discussing the overdue TSF quarterly reports. The last TSF quarterly report submitted in the audit period was in September 2023. There was no evidence of review of the TSF quarterly reports after November 2022 (this includes previous and current audit period). DITT advised during the 2022 AEPAR audit that the annual independent audit report (Annual Dam Safety Assessment) be provided by the Operator progressively. There was no evidence provided to indicate DITT has followed up on this request with the Operator. There has been no evidence provided that the Operator submitted as built construction reports for the TSF Cell 1 Stage 5 or Cell 2 Stage 6 raises that were completed before the audit period, requested by DITT as a response to submission of TSF quarterly reports and identified as not submitted in the AEPAR in 2023	OFI: Refer to OFI condition 7.a. OFI: DITT to formally review and assess TSF Quarterly Reports in a more timely fashion. OFI: DITT to formally review and assess TSF Quarterly Reports received after November 2022 and advise the Operator in writing when reports are accepted. OFI: DITT to follow up with the Operator regarding submission of the Annual Dam Safety Assessment and TSF Cell 1 Stage 5 and Cell 2 Stage 6 raises "as-constructed" construction reports.

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80.a	80.a	water levels in the TSF;	4	Full Compliance	MRM TSF Quarterly Report - Q1 2023. MRM TSF Quarterly Report - Q2 2023. For the two quarterly reports submitted in the audit period, water levels in the TSF were included.	
80.b	80.b	all monitoring data associated with the seepage (including geotechnical and environmental monitoring);	4	Full Compliance	MRM TSF Quarterly Report - Q1 2023. MRM TSF Quarterly Report - Q2 2023. Seepage quality and TSF stability and associated monitoring are discussed in the submitted reports.	
80.c	80.c	flow rate of each seep;	4	Full Compliance	MRM TSF Quarterly Report - Q1 2023. MRM TSF Quarterly Report - Q2 2023. Seepage flow rates included in submitted reports.	
80.d	80.d	all actions undertaken during the quarter associated with the seepage and management of Tailings;	4	Full Compliance	MRM TSF Quarterly Report - Q1 2023. MRM TSF Quarterly Report - Q2 2023. Actions on seepage and management of tailings undertaken in the quarter included in the appendices of submitted reports.	OBS: DITT should consider if the TSF Recommendation, Instruction and Action Register should identify actions that are overdue (rather than calling them incomplete) and if ongoing actions beyond their due date are acceptable.
80.e	80.e	all actions planned for the next quarter associated with seepage and management of Tailings.	4	Full Compliance	MRM TSF Quarterly Report - Q1 2023. MRM TSF Quarterly Report - Q2 2023. Detail on future actions on seepage and management of tailings is included in the appendices of the submitted reports.	
Geochemical, Geotechnical and Hydrogeological Assessments and Investigation Drilling						
83	83	Characterisation data from the drilling must be kept and made available to the Minister on request; and reported in the Operator's EMR or an alternative format as agreed with the Department.	3	Part Compliance (High)	EMR 2022-2023 No request was made by the Minister for non-hydrogeological characterisation data. No alternative format for non-hydrogeological characterisation data was requested by the Operator or agreed by DITT. No non-hydrogeological characterisation data was provided in the EMR 2022-2023 or otherwise.	The Authorisation 17 May 2023 added in that an alternative format as agreed with the Department would be acceptable. OFI: Request the Operator to provide characterisation data from the drilling.
84	84	All documentation relating to the investigations undertaken is to be made available to the Department on request.	N/A	Not Applicable		DITT did not make any requests for information.
85	85	On completion of the investigation the disturbances are to be rehabilitated in accordance with the approved MMP and the basis for the proposed adjustment of total security adjustments required under Condition 11, are provided in the annual Unplanned Closure Plan report to the satisfaction of the Department.	N/A	Not Applicable		Investigations are not complete or in areas of ongoing disturbance.
Exploration						
86	86	The Operator must ensure that:		Refer to sub conditions		

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86.d	86.d	an exploration rehabilitation report including details regarding the status of disturbance rehabilitated drill holes and the basis for the proposed adjustment of total security subject to Conditions 10, 11 and 12, be prepared, submitted and implemented to the satisfaction of the Department.	N/A	Not Applicable	Correspondence between Operator and DITT relating to MRM - 2023-2024 EMR Submission (after audit period). The 2023-2024 EMR Submission Letter states that: "Rehabilitation of disturbance related to investigation drilling has been undertaken progressively, and no adjustment to security is currently being sought"	May 2022 Authorisation did not specify "exploration" rehabilitation report and did not include "be prepared, submitted and implemented".
Non-mineral Waste Management						
88	88	The Operator must ensure the non-mineral waste facility, landfill or equivalent previously in use is rehabilitated following approval by the Department of a rehabilitation plan.	N/A	Not Applicable		The non-mineral waste facility/landfill remains in use.
Bing Bong Loading Facility						
91	91	Dredging activities at the Bing Bong Port Facility are authorised, subject to:		Refer to sub conditions		
91.a	91.a	submission to the department of a Dredging and Dredge Spoil Management Plan;	4	Full Compliance	Operator submitted the Dredging and Dredge Spoil Management Plan before the audit period and DITT acknowledged receipt of the plan.	The Operator advised "There has been no revision of the February 2023 Dredging and Dredge Spoil Management Plan. No dredging activities have occurred during the audit period."
91.b	91.b	approval of the Plan by the Department prior to commencement of dredging.	4	Full Compliance	DITT approved the plan prior to commencement of dredging in the audit period.	The Operator advised "There has been no revision of the February 2023 Dredging and Dredge Spoil Management Plan. No dredging activities have occurred during the audit period."
91.c	N/A	subsequent provision of any required additional information (including but not limited to detailed designs) and written acceptance by the Department,	N/A	Not Applicable		The Operator advised "There has been no revision of the February 2023 Dredging and Dredge Spoil Management Plan. No dredging activities have occurred during the audit period."
Adaptive Management						
93	93	By 13 November 2021 (i.e. 12 months of the date of authorisation of the Overburden Management Project), the Operator must submit a revised AMP as required under Conditions 45.	N/A	Not Applicable		This condition is marked as completed in the Authorisation dated 17May2023.
94	94	The revised AMP must:		Refer to sub conditions		
94.a	94.a	address the comments from the Independent Monitor or independent third party review of the draft AMP and ensuring compliance with Condition 45;	N/A	Not Applicable		Condition is N/A as comments from the Independent Monitor were incorporated into the AMP version dated November 2021 before the audit period.
94.b	94.b	be consistent with the AMP required under the Water Act 1992 and Environment Protection and Biodiversity Conservation Act 1999;	N/A	Not Applicable		Approved by DITT before the audit period. The AMP is the same document that is submitted to DEPWS under the WDL although some appendices (e.g., Rehabilitation Plan) are not relevant to the WDL and therefore not submitted to DEPWS. The AMP is therefore consistent (although appendices submitted are not identical) and compliant with the requirements of this condition. Revisions of the AMPs have been submitted to DEPWS (NT) and DCCEEW (Commonwealth) in accordance with legislative requirements.
94.c	94.c	be reviewed by a Department approved independent third-party at the discretion of the Minister;	N/A	Not Applicable		Approved by DITT before the audit period.

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Score	Compliance level	Evidence	Comments
94.d	94.d	be approved by the Minister;	N/A	Not Applicable		Approved by DITT before the audit period.
94.e	94.e	once approved, be implemented in full.	4	Full Compliance	EMR 2023-2024 states "The analysis of results in this EMR are used to determine environmental performance, compliance with the relevant approval conditions and assess whether the current controls are adequate in managing potential environmental risks. Additional controls, monitoring and/or investigations may be required where existing management controls are determined to be inadequate, performance does not meet relevant approvals, or if new risks have been identified. A description of actions is provided for each environmental management aspect (Sections 3 and 4) and is summarised in Section 6." Section 6 of the EMR demonstrates that the AMP is implemented. No situations where the AMP wasn't implemented were identified in this audit.	
95	95	Any material changes to the AMP required by Condition 94 must be re-approved by the Minister.	N/A	Not Applicable		The Operator advised "There were no revisions to the Adaptive Management Plan over the reporting period."
Mine Closure						
96	96	From the date of authorisation of the Overburden Management Project, the Operator must submit an updated Mine Closure Plan with each Amended MMP that builds upon the closure concepts defined in the Overburden Management Project.	N/A	Not Applicable		No Mine Closure Plan was submitted with the Amended MMP in the audit period. The Mine Closure Plan remains unchanged.
97	97	The Mine Closure Plan required under Condition 96 must:		Refer to sub conditions		
97.a	97.a	detail how key mine domains will be rehabilitated to achieve the Overburden Management Project closure objectives;	N/A	Not Applicable		No Mine Closure Plan was submitted with the Amended MMP in the audit period. The Mine Closure Plan remains unchanged.
97.b	97.b	address outcomes of the reviews by independent technical and closure panels in accordance with Condition 21 with respect to mine closure;	N/A	Not Applicable		No Mine Closure Plan was submitted with the Amended MMP in the audit period. The Mine Closure Plan remains unchanged.
97.c	97.c	incorporate relevant outcomes from rehabilitation trials defined in Condition 89.	N/A	Not Applicable		No Mine Closure Plan was submitted with the Amended MMP in the audit period. The Mine Closure Plan remains unchanged.
98	98	Five years prior to the planned closure of the mine, the Operator must:		Refer to sub conditions		
98.a	98.a	finalise the Mine Closure Plan required under Condition 96;		-		Provided for context.
98.b	98.b	submit to the Department the plan for approval by the Minister;	N/A	Not Applicable		Not triggered as not required until five years before planned closure of the mine.
98.c	98.c	implement the Mine Closure Plan in full following its approval.	N/A	Not Applicable		Not triggered as not required until five years before planned closure of the mine.

Unplanned Mine Closure

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17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Score	Compliance level	Evidence	Comments
99	99	From 13 November 2020 (i.e. The date of authorisation of the Overburden Management Project), the Operator must annually submit to the Department, unless otherwise agreed in writing by the Department, an Unplanned Mine Closure Plan on or before 31 August, starting 2021, that is accompanied by a related security estimate.	4	Full Compliance	Correspondence between Operator and DITT regarding this condition (in the audit period). The Operator stated "To streamline the approvals process and ensure continuity between documents, MRM wishes to align the submission of the next Unplanned Closure Plan and Security Assessment with the submission of the MMP amendment. The MMP amendment is planned to be submitted in Q2 2024." DITT agreed in writing with the Operator's approach. Deemed compliant as written agreement obtained by the Operator to alter timing for submission.	
SCHEDULE C - Independent Monitoring Assessment Conditions						
Schedule C - 1	Schedule C - 1	The purpose of the McArthur River Mine – Independent Monitoring Assessment Conditions” is to establish and set out the operational requirements for an independent monitoring assessment of the environmental performance of the Mine.		-		Note for context
Schedule C - 2	Schedule C - 2	These Conditions may be cited as the “McArthur River Mine – Independent Monitoring Assessment Conditions”.		-		Note for context
Schedule C - 3	Schedule C - 3	The purpose of these Conditions is to establish and set out the operational requirements for an independent monitoring assessment of the environmental performance of the Mine.		-		Duplicate of Schedule C, item 1.
Schedule C - 4	Schedule C - 4	The Department will engage an Independent Monitor to undertake the independent monitoring assessment.	4	Full Compliance	Notification of Independent Monitor services acceptance letter DITT to Advisian (before the audit period). Option to extend the contract until 2025 was received and accepted by the Independent Monitor in July 2022.	
Schedule C - 5	Schedule C - 5	The Operator and the Department acknowledge that this independent monitoring assessment is in addition to their respective obligations and statutory responsibilities in relation to the Mine.	4	Full Compliance	DITT acknowledged that this assessment was in addition to their normal work.	OBS: DITT acknowledged the Independent Monitor assessment was in addition to DITT obligations and statutory responsibilities. During the assessment period it was obvious that DITT staff resourcing was a significant constraint on DITT team member’s availability and to the provision of audit evidence.
Schedule C - 6	Schedule C - 6	The Independent Monitor will:		Refer to sub conditions		
Schedule C - 6.a	Schedule C - 6.a	monitor the environmental performance of the Mine by reviewing:		Refer to sub conditions		
Schedule C - 6.a.i	Schedule C - 6.a.i	environmental assessments and monitoring activities undertaken by the Operator; and		-		No DITT action. Included for context of subconditions.
Schedule C - 6.a.ii	Schedule C - 6.a.ii	environmental assessments and audits undertaken by the Department; and	4	Full Compliance	Evidence was provided of incident investigation, compliant investigation, participation in the CRG and a site inspection in the audit period.	
Schedule C - 6.b	Schedule C - 6.b	report to the Operator and the Department any urgent issues requiring investigation and reporting.	N/A	Not Applicable		Note: no urgent issues have been identified by the Independent Monitor to date.
Schedule C -7	Schedule C -7	The Independent Monitor will not review:		-		No DITT action. Included for completeness.
Schedule C -7.a	Schedule C -7.a	Mine safety; or		-		No DITT action. Included for completeness.
Schedule C -7.b	Schedule C -7.b	social issues arising from the operation of the Mine in the McArthur River Region.		-		No DITT action. Included for completeness.

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Schedule C - 8	Schedule C - 8	The Department will engage an Independent Monitor in accordance with its procurement processes.	4	Full Compliance	The IM engagement in ongoing.	Notification of Independent Monitor services acceptance letter from DITT to Worley (formerly Advisian) (before the audit period). Option to extend the contract until 2025 was received and accepted by the Independent Monitor in July 2022.
Schedule C - 9	Schedule C - 9	The Independent Monitor may be (in order of preference): a. an environmental or mining agency in another jurisdiction in Australia; or b. a university having the necessary expertise; or c. an environmental consultant that has the necessary expertise, relevant experience and the necessary resources.	4	Full Compliance	The IM engagement in ongoing.	Note: Independent Monitor appointed is option c.
Schedule C - 10	Schedule C - 10	Prior to advertising a tender seeking to engage an Independent Monitor, the Department must provide the Operator with a copy of the proposed tender documentation, including:	N/A	Not Applicable		Engagement of the Independent Monitor occurred before the audit period.
Schedule C - 10.a	Schedule C - 10.a	the Conditions of tendering; and	N/A	Not Applicable		Engagement of the Independent Monitor occurred before the audit period.
Schedule C - 10.b	Schedule C - 10.b	the scope of services; and	N/A	Not Applicable		Engagement of the Independent Monitor occurred before the audit period.
Schedule C - 10.c	Schedule C - 10.c	the assessment criteria; and	N/A	Not Applicable		Engagement of the Independent Monitor occurred before the audit period.
Schedule C - 10.d	Schedule C - 10.d	the Conditions of contract.	N/A	Not Applicable		Engagement of the Independent Monitor occurred before the audit period.
Schedule C - 11	Schedule C - 11	The Operator may, within 14 days of receiving the proposed tender documentation, provide comment on the proposed documentation to the Department and the Department must consider any comments provided by the Operator on the proposed documentation prior to advertising the tender.	N/A	Not Applicable		Engagement of the Independent Monitor occurred before the audit period.
Schedule C - 12	Schedule C - 12	The Department must provide the Community with an opportunity to provide submissions on the engagement of the Independent Monitor and the Department must consider any submissions provided by the Community on the engagement of the Independent Monitor prior to advertising the tender.	N/A	Not Applicable		Engagement of the Independent Monitor occurred before the audit period.
Schedule C - 13	Schedule C - 13	The terms of engagement of the Independent Monitor may include the following:		Refer to sub conditions		
Schedule C - 13.a	Schedule C - 13.a	a period of engagement between three and five years;	N/A	Not Applicable		Engagement was for three years with an option for extension.
Schedule C - 13.b	Schedule C - 13.b	a statement acknowledging that the Operator is responsible for the costs of the Independent Monitor;	N/A	Not Applicable		Engagement of the Independent Monitor occurred before the audit period.
Schedule C - 13.c	Schedule C - 13.c	a warranty by the Independent Monitor that it will:		Refer to sub conditions		
Schedule C - 13.c.i	Schedule C - 13.c.i	act independently of the Department, the Operator, the Minister and any other person; and	N/A	Not Applicable		Engagement of the Independent Monitor occurred before the audit period.
Schedule C - 13.c.ii	Schedule C - 13.c.ii	act honestly, reasonably and with the degree of professional care, knowledge, experience, skill and diligence which may reasonably be expected; and	N/A	Not Applicable		Engagement of the Independent Monitor occurred before the audit period.

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Schedule C - 13.c.iii	Schedule C - 13.c.iii	act within the time prescribed under these Conditions, the terms of engagement, or where no time is prescribed, within a reasonable time; and	N/A	Not Applicable		Engagement of the Independent Monitor occurred before the audit period.
Schedule C - 13.c.iv	Schedule C - 13.c.iv	immediately notify the Department in writing upon becoming aware of the existence or possibility of a conflict of interest;	N/A	Not Applicable		Engagement of the Independent Monitor occurred before the audit period.
Schedule C - 13.d	Schedule C - 13.d	an obligation on the Independent Monitor to keep all information provided to the Independent Monitor confidential.	N/A	Not Applicable		Engagement of the Independent Monitor occurred before the audit period.
Schedule C - 14	Schedule C - 14	If the Independent Monitor requires an indemnity, the Operator must enter into a binding agreement providing a reciprocal indemnity to the Department.	N/A	Not Applicable		None requested by Independent Monitor.
Schedule C - 15	Schedule C - 15	The Department must notify the Operator of the appointment of the Independent Monitor and must provide the Operator with a copy of the terms of engagement.	N/A	Not Applicable		Engagement of the Independent Monitor occurred before the audit period.
Schedule C - 16	Schedule C - 16	The Operator and the Department must not interfere or attempt to influence the Independent Monitor in its assessment of environmental performance under these Conditions.	4	Full Compliance		The Operator and the DITT have not interfered or attempted to influence the Independent Monitor.
Schedule C - 17	Schedule C - 17	The Operator and the Department must each:		Refer to sub conditions		
Schedule C - 17.a	Schedule C - 17.a	cooperate with the Independent Monitor; and	4	Full Compliance		High level of cooperation from DITT in assisting the Independent Monitor.
Schedule C - 17.b	Schedule C - 17.b	provide all necessary information and documents within their possession, custody or control to the Independent Monitor; and	4	Full Compliance		OBS: DITT provided all necessary information and documents to the Independent Monitor; however, based upon the level of collaboration in previous years it was apparent DITT staff resourcing and reduced availability was a significant constraint on DITT's capacity to collate and provide audit evidence.
Schedule C - 17.c	Schedule C - 17.c	procure for the Independent Monitor access to such premises owned, leased, or licensed by it as may be reasonably necessary,	4	Full Compliance		DITT's offices were available for interviews with IM attendance during the audit period.
Schedule C - 17.d	Schedule C - 17.d	to enable the Independent Monitor to undertake its assessment of environmental performance under these Conditions.	4	Full Compliance		DITT has facilitated and assisted the Independent Monitor to undertake its assessment of environmental performance against Authorisation Conditions.
Schedule C - 18	Schedule C - 18	The Independent Monitor must engage with the Operator, the Department and the Community in undertaking the independent monitoring assessment.	4	Full Compliance		Independent Monitor face to face consultation with Borroloola community facilitated by local NT business in October 2023. Various interviews were held with DITT and the Operator during the audit.
Schedule C - 19	Schedule C - 19	If the Independent Monitor identifies an issue it considers requires urgent investigation and reporting:		Refer to sub conditions		
Schedule C - 19.a	Schedule C - 19.a	the Independent Monitor must advise the Operator and the Department of the issue as soon as practicable and may include recommendations as to action to be taken; and	N/A	Not Applicable		No issues were identified by the Independent Monitor.
Schedule C - 19.b	Schedule C - 19.b	the Operator must consider the advice, and any recommendations, from the Independent Monitor and notify the Department and the Independent Monitor of the action the Operator proposes to take; and	N/A	Not Applicable		No issues were identified by the Independent Monitor.

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Schedule C - 19.c	Schedule C - 19.c	the Department may, where appropriate, advise the Operator and the Independent Monitor of action the Department proposes to take; and	N/A	Not Applicable		No issues were identified by the Independent Monitor.
Schedule C - 19.d	Schedule C - 19.d	the Independent Monitor may provide further advice to the Operator, and where appropriate the Department, regarding the proposed action and the Operator and the Department must consider the further advice; and	N/A	Not Applicable		No issues were identified by the Independent Monitor.
Schedule C - 19.e	Schedule C - 19.e	if, after providing further advice, the Independent Monitor is not satisfied with the proposed action, the Independent Monitor may notify the Operator and the Department of the Independent Monitor's intention to undertake its own investigation and report; and	N/A	Not Applicable		No issues were identified by the Independent Monitor.
Schedule C - 19.f	Schedule C - 19.f	the Operator and the Department must facilitate the Independent Monitor's investigation and report.	N/A	Not Applicable		No issues were identified by the Independent Monitor.
Schedule C - 20	Schedule C - 20	The independent monitoring assessment is to be conducted, where practical, in a manner that complements the existing annual environmental assessment and audit processes undertaken by the Operator and the Department.	4	Full Compliance		The audit period aligns with the Operator's EMR dates and the AEPAR will be provided in the same calendar year as the EMR.
Schedule C - 21	Schedule C - 21	The Independent Monitor must prepare and provide a report:		Refer to sub conditions		
Schedule C - 21.a	Schedule C - 21.a	annually to the Minister to assist with the review of the Mining Management Plan; and	N/A	Not Applicable		The AEPAR fulfills this condition.
Schedule C - 21.b	Schedule C - 21.b	on request by the Minister.	N/A	Not Applicable		No report has been requested by the Minister.
Schedule C - 22	Schedule C - 22	The Minister must provide a report received from the Independent Monitor to the Operator and the Department within 14 days of receiving the report.	4	Full Compliance	Letter sent to MRM by DITT within 14 days of Minister receiving AEPAR 2023	
Schedule C - 23	Schedule C - 23	The Independent Monitor must prepare an additional report in a form suitable for distribution to the Community.	4	Full Compliance	Annual Report Card 2023 summarising the Independent Monitor findings was prepared in the audit period. This is aimed at and provided to the community.	
Schedule C - 24	Schedule C - 24	The Operator and the Department acknowledge that the report from the Independent Monitor will be made publicly available (including publication on an appropriate internet site) and may include data used in the preparation of the report.	4	Full Compliance	Independent Monitor Report (2023 AEPAR) made publicly available by posting on DITT website. https://industry.nt.gov.au/publications/mining-and-energy/public-environmental-reports/mining/mcarthur-river-independent-monitor .	AEPAR Report 2023 and all previous reports are accessible on the internet: https://industry.nt.gov.au/publications/mining-and-energy/public-environmental-reports/mining/mcarthur-river-independent-monitor .
Schedule C - 25	Schedule C - 25	Prior to being made publicly available, the Minister must request from the Operator and the Department any comments on the Independent Monitor's report. Such comments must be provided within 28 days of the Minister's request and must be made publicly available with the Independent Monitor's report.	4	Full Compliance	Correspondence between DITT and Operator. The AEPAR 2023 was sent to the Operator from DITT on behalf of the Minister for Mining requesting the Operator's comment. The Operator responded, within the required 28 days of receipt.	Request from the Minister and response from Operator and DITT were within 28 days from the request.
Schedule C - 26	Schedule C - 26	The Operator acknowledges that it is responsible for all costs of the independent monitoring assessment other than those costs directly attributable to those elements of the independent monitoring assessment associated with Condition 21(b)) which are the responsibility of the Department.	N/A	Not Applicable		No report has been requested by the Minister under condition 21.b.

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Schedule C - 27	Schedule C - 27	The Department may provide to the Operator, from time to time, a notice setting out amounts due and payable under the terms of the engagement of the Independent Monitor.	4	Full Compliance	DITT issued invoices to the Operator for reimbursement of expenses incurred by DITT in the administration of contract D19-0053 for Independent Monitor Services.	
Schedule C - 28	Schedule C - 28	The Operator must pay an amount notified in accordance with Condition 27 within seven (7) days of receiving such notice.	3	Part Compliance (High)	DITT advised "Payment within 7 days is no longer a requirement of NTG processes."	OFI: Given invoices are not due within 7 days, update the condition to reflect the actual invoice payment timeframe.
Schedule C - 29	Schedule C - 29	If the Operator disputes a notice provided by the Department under Condition 27:		Refer to sub conditions		
Schedule C - 29.a	Schedule C - 29.a	the Operator must pay the amount specified in the notice in accordance with Condition 28; and	N/A	Not Applicable		No disputes in the audit period
Schedule C - 29.b	Schedule C - 29.b	the Operator must notify the Department in writing within 14 days of receiving the notice, setting out the reasons why the Operator disputes the notice; and	N/A	Not Applicable		No disputes in the audit period
Schedule C - 29.c	Schedule C - 29.c	the Chief Executive of the Operator and the Chief Executive of the Department must meet within five (5) working days to resolve the dispute.	N/A	Not Applicable		No disputes in the audit period
Schedule C - 30	Schedule C - 30	If there is a dispute (other than a dispute mentioned in Condition 29) between the Operator and the Department as to any matter or thing arising out of these Conditions (the "Dispute"), the party claiming that a Dispute has arisen must notify the other party to the Dispute and the Chief Executive of the Operator, the Chief Executive of the Department and the Independent Monitor must meet within five (5) working days to resolve the Dispute.	N/A	Not Applicable		No disputes in the audit period
Schedule C - 31	Schedule C - 31	If the Chief Executive of the Operator, the Chief Executive of the Department and the Independent Monitor are unable to resolve a Dispute within ten (10) working days of meeting in accordance with Condition 30, the Operator and the Department may agree to the appointment of an independent party to assist in the resolution of the Dispute.	N/A	Not Applicable		No disputes in the audit period
Schedule C - 32	Schedule C - 32	If, within five (5) working days of either the Operator or the Department nominating a person to be the independent party, no agreement is reached as to who is to be appointed as the independent party, either the Operator, the Department or both may refer the matter to the President of the Law Society of the Northern Territory.	N/A	Not Applicable		No disputes in the audit period
Schedule C - 33	Schedule C - 33	The President of the Law Society Northern Territory may nominate a person to be the independent party and the parties to the Dispute are bound to accept the appointment of that person.	N/A	Not Applicable		No disputes in the audit period
Schedule C - 34	Schedule C - 34	The role of the independent party is to assist in negotiating a resolution of the Dispute and the independent party cannot make a decision that is binding on either the Operator or the Department.	N/A	Not Applicable		No disputes in the audit period

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Schedule C - 35	Schedule C - 35	The Operator and the Department must make available to the independent party all materials requested by it and must provide the independent party with all other materials relevant to the Dispute.	N/A	Not Applicable		No disputes in the audit period
Schedule C - 36	Schedule C - 36	The Operator and the Department must:		Refer to sub conditions		No disputes in the audit period
Schedule C - 36.a	Schedule C - 36.a	Bear their own costs of resolving the Dispute under this Condition; and	N/A	Not Applicable		No disputes in the audit period
Schedule C - 36.b	Schedule C - 36.b	Bear equally the costs of any independent party engaged.	N/A	Not Applicable		No disputes in the audit period
SCHEDULE D - ENVIRONMENTAL MONITORING AND MANAGEMENT						
Schedule D - 1	Schedule D - 1	If the Operator establishes a new surface water monitoring location, a written notice of the location (in GDA 94 format) and nature of the monitoring must be given to the Department within 30 days of its establishment.	N/A	Not Applicable		DITT confirmed that the Operator has not established a new surface water monitoring location during the audit period as far as they are aware.
Schedule D - 2	Schedule D - 2	The Operator must maintain continuous monitoring having regard to:		Refer to sub conditions		
Schedule D - 2.a	Schedule D - 2.a	devices installed at the following locations:		-		Provided for context
Schedule D - 2.a.i	Schedule D - 2.a.i	SW29 (upstream Surprise Creek outside the zone of influence of TSF);		-		Provided for context
Schedule D - 2.a.ii	Schedule D - 2.a.ii	SCGS (Surprise Creek gauge station between the TSF and the Mine);		-		Provided for context
Schedule D - 2.a.iii	Schedule D - 2.a.iii	SW30 (upstream Emu Creek);		-		Provided for context
Schedule D - 2.a.iv	Schedule D - 2.a.iv	USGS (upstream at the McArthur River gauge station);		-		Provided for context
Schedule D - 2.a.v	Schedule D - 2.a.v	BCGS (upstream at the Barney Creek gauge station);		-		Provided for context
Schedule D - 2.a.vi	Schedule D - 2.a.vi	SW12 (immediately downstream of the Mine capturing outflow from Emu Creek, Barney Creek, drainage lines from SEPROD, Old McArthur River Channel and the McArthur River diversion channel but before the Glide River joins the McArthur River channel);		-		Provided for context
Schedule D - 2.b	Schedule D - 2.b	devices must at a minimum measure electrical conductivity, and may measure additional parameters such as pH;		-		Provided for context
Schedule D - 2.c	Schedule D - 2.c	the Operator must from 30 August 2017 include data from these devices in data submission under Condition 7 of Schedule A.	3	Part Compliance (High)	There was no data submitted under condition 7 in the audit period and no evidence that DITT followed up regarding this data with the Operator.	OFI: Refer to OFI condition 7.a.
Schedule D - 4	Schedule D - 4	The Operator must ensure groundwater monitoring bores and extraction bores are constructed, maintained and decommissioned in compliance with the document entitled Minimum construction requirements for water bores in Australia published by the National Uniform Drillers Licensing Committee (third edition, February 2012 or a current version of the document). In this regard:		Refer to sub conditions		

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Schedule D - 4.a	Schedule D - 4.a	construction logs and bore location coordinates in GDA 94 format must be available to the Minister on request and provided to the Minister annually in the EMR;	4	Full Compliance	Coordinates and borelogs have been provided for new bores constructed during the 2022-2023 Hydrogeological Drilling and Field Campaign.	No requests were made by the Minister in the audit period. McArthur River Mining Pty Ltd Annual Groundwater Report 2023/2024 Final August 2024 (EMR 2023-2024 Appendix I) (after audit period) The 2023-2024 Drilling Register includes one dewatering bore MUDS_TEST hole, which the Operator advised "was a test hole to assess the target galleries. This hole was not completed to meet the intended purpose for dewatering bore."
Schedule D - 4.b	Schedule D - 4.b	logs of maintenance activities must be kept available to the Minister on request;	N/A	Not Applicable		No requests were made by the Minister in the audit period.
Schedule D - 4.c	Schedule D - 4.c	logs of bore decommissioning activities must be kept and made available to the Minister on request and reported in the Operator's Annual EMR or an alternative format as agreed with the Department.	4	Full Compliance	Operator report states "Within the 2022-2023 reporting period there was a total of eight monitoring groundwater bores and two Vibrating Wire Piezometers (VWPs) decommissioned due to ongoing pit expansion and NOEF expansion."	The Operator advised that there were no requests by the Minister in the audit period. Section 4.6.5 of the 2022-2023 EMR states that: "No monitoring bores were decommissioned across the Mine during the reporting period." and this appears to be incorrect according to 2022-2023 Hydrological Drilling and Field Campaign.
Schedule D - 6	Schedule D - 6	From the date of authorisation of the Overburden Management Project the Operator must undertake monitoring in accordance with the following Environmental Management Plans approved in the MMP:		Refer to sub conditions		
Schedule D - 6.a	Schedule D - 6.a	Adaptive Management Plan, which includes:	4	Full Compliance	EMR 2022-2023 DITT EMR approval letter August 2023 stated "These reports document the environmental performance of McArthur River Mining Pty Ltd (MRM) for the nominated period against the approved Mining Management Plan (MMP) and associated environmental management plans for the mine site." and "The department considers that the MRM 2022 -2023 EMR meets the requirements of Authorisation 0059 and the MMA and is hereby accepted."	
Schedule D - 6.a.i	Schedule D - 6.a.i	Water Management Plan – surface water, groundwater and fluvial sediments;	4	Full Compliance	EMR 2022-2023 DITT EMR approval letter August 2023 stated "These reports document the environmental performance of McArthur River Mining Pty Ltd (MRM) for the nominated period against the approved Mining Management Plan (MMP) and associated environmental management plans for the mine site." and "The department considers that the MRM 2022 -2023 EMR meets the requirements of Authorisation 0059 and the MMA and is hereby accepted."	

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Schedule D - 6.a.ii	Schedule D - 6.a.ii	Air Quality;	4	Full Compliance	EMR 2022-2023 DITT EMR approval letter August 2023 stated "These reports document the environmental performance of McArthur River Mining Pty Ltd (MRM) for the nominated period against the approved Mining Management Plan (MMP) and associated environmental management plans for the mine site." and "The department considers that the MRM 2022 -2023 EMR meets the requirements of Authorisation 0059 and the MMA and is hereby accepted."	
Schedule D - 6.a.iii	Schedule D - 6.a.iii	Rehabilitation Management Plan	4	Full Compliance	EMR 2022-2023 DITT EMR approval letter August 2023 stated "These reports document the environmental performance of McArthur River Mining Pty Ltd (MRM) for the nominated period against the approved Mining Management Plan (MMP) and associated environmental management plans for the mine site." and "The department considers that the MRM 2022 -2023 EMR meets the requirements of Authorisation 0059 and the MMA and is hereby accepted."	
Schedule D - 6.b.	Schedule D - 6.b.	Waste Management Plan	4	Full Compliance	EMR 2022-2023 DITT EMR approval letter August 2023 stated "These reports document the environmental performance of McArthur River Mining Pty Ltd (MRM) for the nominated period against the approved Mining Management Plan (MMP) and associated environmental management plans for the mine site." and "The department considers that the MRM 2022 -2023 EMR meets the requirements of Authorisation 0059 and the MMA and is hereby accepted."	
Schedule D - 6.c	Schedule D - 6.c	NOEF Management Plan	4	Full Compliance	EMR 2022-2023 DITT EMR approval letter August 2023 stated "These reports document the environmental performance of McArthur River Mining Pty Ltd (MRM) for the nominated period against the approved Mining Management Plan (MMP) and associated environmental management plans for the mine site." and "The department considers that the MRM 2022 -2023 EMR meets the requirements of Authorisation 0059 and the MMA and is hereby accepted."	
Schedule D - 6.d	Schedule D - 6.d	BBLF Environment Management Plan	4	Full Compliance	EMR 2022-2023 DITT EMR approval letter August 2023 stated "These reports document the environmental performance of McArthur River Mining Pty Ltd (MRM) for the nominated period against the approved Mining Management Plan (MMP) and associated environmental management plans for the mine site." and "The department considers that the MRM 2022 -2023 EMR meets the requirements of Authorisation 0059 and the MMA and is hereby accepted."	
Schedule D - 6.e	Schedule D - 6.e	Unplanned Closure Plan	4	Full Compliance	Implementation is reviewed as part of the EMR review and at each Unplanned Closure Plan submission.	

Authorisation compliance workbook - DITT audit period 01 May 2023 to 30 April 2024

17 May 2023 Authorisation Condition No.	5 May 2022 Authorisation Condition No.	Condition/requirement	Score	Compliance level	Evidence	Comments
Schedule D - 7	Schedule D - 7	Any required material changes to the Environmental Management Plans mentioned in Condition 6 of this Schedule must be approved by the Department in writing.	4	Full Compliance	Letter accepting the 2022-2023 EMR reminded the Operator of the requirement for material changes to environmental management plans to be submitted for their approval.	



Appendix D. NT EPA recommendations compliance workbook – DITT

NT EPA recommendations compliance workbook - 2024 DITT

Audit period 1 May 2023 to 30 April 2024

NT EPA recommendation no.	NT EPA recommendation	Score	Compliance level	Evidence	Comments
1	The Proponent shall ensure that the McArthur River Mine Overburden Management Project is implemented in accordance with all environmental commitments and safeguards:	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 14. sub parts a, b and c.	<p>Note: "Confirmed condition in Authorisation 0059 dated 05May22 - Condition 14 and dated 17May 2023" text in the evidence column is referring to whether the NT EPA Recommendation was adopted into an Authorisation condition and references the corresponding condition number. This approach is used throughout this NT EPA Recommendations Compliance Workbook - DITT in the evidence column.</p> <p>In January 2020, as required under Section 41 of the Mining Management Act 2001 (MMA), the Operator submitted for assessment an amended Mining Management Plan (MMP) for the OMP works addressing commitments made in the EIS, the NT EPA recommendations and EPBC Act approval conditions.</p> <p>DITT completed assessment of the 2020 MMP. Authorisation 0059 issued under section 38 of the MMA on 13Nov2020 approved the 2020 MMP proposing the OMP related activities.</p> <p>The commitments and safeguards made in relation to the OMP by the Operator and NT EPA in their recommendations were first incorporated as conditions where relevant in Authorisation 0059 issued 15Aug2019 and retained in all subsequent Authorisations.</p> <p>Future action: Compliance monitoring will be ongoing. Examples include continuation of health of McArthur River monitoring, specifically bio-uptake of metals in flora and fauna and NOEF monitoring including infrared to measure heat (west stage with high convective oxidation). Monitoring program reports to be submitted with the EMR annually.</p>
1.i	identified in the final Environmental Impact Statement for the McArthur River Mine Overburden Management Project (draft Environmental Impact Statement, Supplement to the draft Environmental Impact Statement and additional information)	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 14.a). 2024 EMR Appendix B - Reconciliation of Commitments and Actions (incorporating EIS and MMP commitments)	<p>In January 2020, as required under Section 41 of the MMA, the Operator submitted for assessment an amended MMP for the OMP works addressing commitments made in the EIS, the NT EPA recommendations and EPBC Act approval conditions.</p> <p>EMR 2024 contains Appendix B - Reconciliation of Commitments and Actions to address implementation of EIS and MMP commitments.</p>
1.ii	recommended in this Assessment Report 86.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May22 and 17May2023 - Condition 14.b).	<p>No action for DITT.</p> <p>TSF, EPROD, CW Charlie basal construction (NT EPA recommended a 0.5m CCL), bridging MMP was approved consistent with NT EPA recommendations before they were a requirement or commenced construction.</p>
1 continued	The Northern Territory Environment Protection Authority considers that all safeguards and mitigation measures outlined in the Environmental Impact Statement are binding commitments made by the Proponent. Where there is an inconsistency between the commitments made by the Proponent and these recommendations, the recommendations will take precedence.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 14.c). Note: The Authorisation shall prevail, rather than the Recommendations, in the event of an inconsistency.	<p>Inconsistency addressed in condition in Authorisation 0059 dated 18June21/05May 2022 and 17May2023 - Condition 14.c). "the most recent Authorisation shall prevail to the extent of any inconsistency".</p> <p>The role of DITT is to ensure actions are not contrary to the NT EPA recommendations and that their intent has been complied with.</p> <p>Operator commitments are listed in 2023 Environmental Monitoring Report, Appendix B - Reconciliation of Commitments and Actions.</p>
2	The Proponent shall provide written notice to the Northern Territory Environment Protection Authority and the responsible Minister if it alters or proposes to alter the McArthur River Mine Overburden Management Project and/or commitments, safeguards or mitigation measures in the Environmental Impact Statement in such a manner that the environmental significance of the action may have changed, in accordance with clause 14A of the Environmental Assessment Administrative Procedures.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 15.	<p>The 2020 MMP has been assessed by DITT and conforms to the NT EPA Recommendations.</p> <p>Future action to confirm if DITT assessed recent MMP amendments against NT EPA Recommendations.</p> <p>Situation has not arisen. Would be considered on a case by case basis.</p>

NT EPA recommendations compliance workbook - 2024 DITT

Audit period 1 May 2023 to 30 April 2024

NT EPA recommendation no.	NT EPA recommendation	Score	Compliance level	Evidence	Comments
3	The Proponent shall ensure that the commitments and safeguards listed in the EIS for the McArthur River Mine Overburden Management Project and recommended in this Assessment Report 86 are implemented in a manner and to the extent that ensures the health of the McArthur River is protected along its whole length at all times from mine related impacts. This is the overarching environmental outcome that is required to be achieved in respect of the Proposal and all future stages of the mine.	4	Full Compliance	<p>Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 16.</p> <p>Note: the explanatory note above condition 14 in the Authorisation states "The NT EPA articulated an overarching environmental objective to be achieved during operation of the Mine: to ensure the health of McArthur River is protected along its whole length at all times from mine related impacts."</p> <p>Note: The overarching environmental outcome is not specifically stated in the Authorisation however, the Authorisation contains requirements that contribute to achieving the outcome.</p>	Compliance monitoring by DITT subject to NT legislation will be ongoing. Annual EMR report (latest 31 August 2024) informed by expert consultants engaged by Operator. Experts review and assess the data. EMR comments on how Operator intends to action recommendations and report on monitoring programs. WDL annual return with water quality monitoring reporting requirements also submitted 31 August 2024 under the Water Act. DITT reviews previous EMRs to determine if issues have been addressed and if recommendations have been actioned. DITT notifies operator via letter of acceptance (or otherwise) of EMR.
3 continued	To ensure the protection of the McArthur River from mine related impacts, the Proponent shall ensure that the annual loads of lead and zinc discharged to the McArthur River in future years (July to June) do not exceed the loads discharged in 2017-2018, taking into account seasonal variations in rainfall, and subject to future annual load calculations.	4	Full Compliance	<p>Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 16.b. This condition is marked as completed in the Authorisation dated 17May2023.</p> <p>MRM Mine Derived Analyte Loads criteria for 2017-18 submitted to DITT via May20.</p> <p>EMR 2023 Executive Summary table ES-5 Fluvial Sediments and EMR 2023 Appendix J - 2021 Monitoring of Metals/Lead in Fluvial Sediments and Aquatic Fauna assess performance during the reporting period and discusses zinc and lead concentration in fluvial sediment.</p>	<p>The Independent Monitor reviewed the Adaptive Management Plan (AMP) in May 2020 and advised it is appropriate for the current stage of the Project.</p> <p>The Independent Monitor reviewed the AMP (Rev E, 13May2022) in December 2022 and assessed that the AMP has been developed and implemented consistent with the requirements of Authorisation. The sixth iteration (Rev E) of the AMP better fulfils aspects of the Authorisation requirements, including the addition of new sections and figures that provide greater clarity, rigour, structure and definition of the processes.</p> <p>DITT will oversee implementation by the Operator of the AMP, in accordance with NT EPA recommendation 28, which allows for management measures and interventions to be adapted if necessary to achieve this overarching environmental outcome.</p> <p>Related to NT EPA recommendation 27 which refers to a review within nine months following OMP authorisation, the next AMP review by Independent Monitor scheduled for late 2022 and was issued July 2023.</p> <p>Future action: Condition recognises that the AMP will change over time and provides an approval requirement. Compliance monitoring will be ongoing. Operator submitted loads criteria for 2017-2018 on 08May2020 in response to Condition 38 of the Authorisation. Subsequent annual EMRs, including the current EMR 2024, report against those values.</p>
3 continued	The Proponent shall implement a monitoring program, developed in accordance with Recommendation 13, within six months of authorisation of the Proposal, to the satisfaction of the relevant regulator. The monitoring program shall quantify the annual loads of lead and zinc entering the main channel of the McArthur River and be used to assess whether or not the load limits specified herein have been met. A load summation shall be provided to the Independent Monitor for auditing at three yearly intervals.	4	Full Compliance	<p>Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 16.c. This condition is marked as completed in the Authorisation dated 17May2023. There is also Condition 16.e that requires the relevant plan to be implemented and Condition Schedule D-6.a.i requiring monitoring to be undertaken as included in the Water Management Plan.</p> <p>Operator future requirement.</p> <p>Timeframe for the requirement to prepare a plan for monitoring is stated as 18 months in the OMP Authorisation rather than 6 months as stated in the NT EPA recommendations.</p>	<p>Timeframe for the requirement to prepare a plan for monitoring is stated as 18 months in the OMP Authorisation rather than 6 months as stated in the NT EPA recommendations.</p> <p>DITT advises 18 month timeframe is in recognition of adequate time to undertake a quality review including incorporating results from other relevant studies.</p>

NT EPA recommendations compliance workbook - 2024 DITT

Audit period 1 May 2023 to 30 April 2024

NT EPA recommendation no.	NT EPA recommendation	Score	Compliance level	Evidence	Comments
3 continued	The Proponent shall implement an Adaptive Management Plan, to be developed in accordance with Recommendation 28, to allow for management measures and interventions to be adapted if necessary to achieve this overarching environmental outcome.	4	Full Compliance	Confirmed conditions in Authorisation 0059 dated 05May2022 and 17May2023 - Conditions 94.e related to implementing the AMP. Operator requirement to implement AMP once approved by DITT.	The Independent Monitor has reviewed the Adaptive Management Plan (AMP) version 31Jan2020 and provided comments 15 May 2020. The Independent Monitor reviewed the AMP (Rev E, 13 May 2022) in December 2022 and assessed that the AMP has been developed and implemented consistent with the requirements of Authorisation. The sixth iteration (Rev E) of the AMP better fulfils aspects of the Authorisation requirements, including the addition of new sections and figures that provide greater clarity, rigour, structure and definition of the processes. The review found the AMP adequately meets the Authorisation as it 'partly satisfies' or 'satisfies' all of the active requirements of the Authorisation's key Conditions 45, 46 and 47 as well as sixteen other relevant conditions. These findings were based upon document reviews, interviews and monitoring evidence obtained that demonstrated a high level of implementation action that supports the overall conclusion that the Operator is meeting the required outcomes as stated in the key environmental objectives. DITT will oversee implementation by the Operator of the AMP, consistent with NT EPA recommendation 28, which allows for management measures and interventions to be adapted if necessary to achieve this overarching environmental outcome. The next Independent Monitor review of the AMP is scheduled for 2025.
4	The Proponent shall implement all stages of the Proposal to meet the NT EPA's overarching environmental outcome provided for in Recommendation 3 to the satisfaction of the relevant regulator. In doing so, the Proponent shall ensure:	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 17.	Refer to NT EPA recommendation 13. The ecotoxicological research and investigation program is complete and the WDL now has amended SSTVs criteria to monitor against. Amended SSTVs approved under Water Act by DEPWS 10Mar2022 and WDL174 -13 was issued (subsequent versions of the WDL relevant to the audit period also contain the SSTVs). Operator submitted an amended AMP incorporating the revised SSTVs to DITT for review under MMA on 13Nov2021. Revised AMP (AMP-D) approved 15Aug22.
4.i	water quality in the McArthur River meets site-specific trigger values determined in accordance with ANZECC (2000) guidelines at appropriate monitoring locations determined in accordance with Recommendation 13	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 17. a) i. Monitoring locations in accordance with recommendation 13 are referenced in Condition 17.a).i. and have been incorporated in Condition 27.b). i, ii and iii.	Operator requirement: within 18 months of the authorisation of the OMP i.e. by 13May2022. Ecotoxicological program completed within 18month of OMP approval, submitted to DITT 25Oct21. The Operator submitted an amended AMP incorporating the revised SSTVs (AMP-D) to DITT for review on 13Nov2021. DITT determined AMP-D to meet the requirements of Schedule D Conditions 6 and 7 and approved AMP-D, 15Aug2022.
4.ii	creeks on the mine site show long-term improving trends in water quality within 20 years after cessation of mining.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 17. a) ii.	Future item: 20 years after cessation of mining. Historic water quality data held by DITT will provide a basis for comparison. EMR 2023 describes Barney Creek and Surprise Creek in similar condition to previous recent year's condition. Barney Creek haul road bridge targeted sediment removal (2021 and 2022) and TSF interception trench (commissioned 2020) adjacent to Surprise Creek have resulted in creek's water quality monitoring data improvements.
5	Approvals and decisions in relation to the Proposal shall include conditions that require the Proponent to calculate contaminant loads and contaminant concentrations entering creeks and the McArthur River using models that have been regularly reviewed and recalibrated. Specific assumptions to be tested include but are not limited to:	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 17. a) iii.	
5.i	groundwater flow paths	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 17.a) iii.c.i. Hydrogeological investigations to be undertaken.	Advised by DITT that the Operator has commissioned additional hydrogeological investigations to increase site data and increase certainty around calibration of the model.
5.ii	attenuation of metals from mine-derived wastes.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 17.a) .iii.c.ii.	Advised EPBC conditions has further prescriptive requirements to do studies.

NT EPA recommendations compliance workbook - 2024 DITT

Audit period 1 May 2023 to 30 April 2024

NT EPA recommendation no.	NT EPA recommendation	Score	Compliance level	Evidence	Comments
5 continued	Updated modelling shall use suitable site-specific data collected in the monitoring program. Models and modelling outputs, and the data collection programs to inform model updates, shall be reviewed at three year intervals by relevant Independent Panels appointed in accordance with Recommendations 8, 11 and 23, and the outputs used to inform the Adaptive Management Plan, to be developed in accordance with Recommendation 28.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 18. Future requirement.	Independent Panel responsibility, (Condition 17.a.iii.b), to review models and modelling outputs and the data collection programs that informed the model development in future. Once accepted or otherwise, information to be incorporated into AMP. Future requirement as the Independent Panel(s) of experts is yet to be established, noting TORs for Independent Panels for both NOEF and TSF approved 12Dec22 and approved TOR for Mine Closure Independent Expert Panel is dated June 2023. TSE and NOEF Panel Chair Alan Robertson appointed Jan 2024
6	Approvals and decisions in relation to the Proposal shall include conditions that require an audit to be conducted of the Proponent's Quality Assurance / Quality Control procedures and waste rock identification and handling performance every three years and reported to the relevant Independent Panel and the relevant regulator.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 19. Independent Monitor Audit of Waste Rock Handling Procedures conducted 13-15 June 2022.	The Independent Monitor June 2022 audit reviewed the Operator processes associated with waste rock classification, mining and haulage as well as the NOEF design, construction and operation. The audit assessed the Operator to be achieving a "good to very good" level of implementation of the Management Plan requirements. The Operator has demonstrated effective action to address stated objectives for the design, construction and operation of the NOEF. Overall, the collective advancements in waste rock handling procedures since the OMP EIS provide an elevated level of environmental protection for the receiving environment including the McArthur River. The audit report highlights some medium and some longer-term opportunities for improvement in relation to greater resolution in waste rock classification, monitoring NOEF seepage, cover trials, NOEF revegetation trials and collating existing monitoring data for further analysis. The next Waste Rock Handling Procedures Audit by the Independent Monitor is due in 2025.
7	The basal layer of the NOEF foundation shall be constructed with a compacted clay layer of at least 0.5 m thickness to limit seepage to groundwater during construction of the NOEF.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 20. NOEF CWE ICE Review Letter Apr2020 Advised DITT assessment of structure complies with 0.5m CCL for CENOEF. Independent Monitor Waste Rock Audit site visit (13-15June2022) observed CCL Northern NOEF under construction and geotechnical laboratory materials testing of clay properties.	For approval of any OMP-related activities, Operator to prepare and submit an amended MMP under Section 41 of the MMA that details the construction details of the NOEF. DITT assessed the MMP and the proposed NOEF construction and development satisfied regulatory requirements as part of OMP Authorisation 13Nov20. Conditions included in Authorisation 0059 effective from the Authorisation issued on 15Aug2019 specific to the construction of the NOEF. DITT advised that relevant conditions have been in all Authorisations since 12Oct2018.
8	Approvals and decisions in relation to the proposal will include conditions requiring the Proponent to provide funding to establish and operate a panel of independent experts to:	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 21.	Arrangements for Independent Panel of Experts establishment underway. TSF and NOEF Panel Chair Alan Robertson appointed January 2024.
8.i	review every three years the outcomes of the Proponent's management program for the NOEF, including the stability, surface condition, internal temperature, reactions and seepage quantity and characteristics of the NOEF to ensure the overarching environmental outcome can be met	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 23.d).ii. refers to NOEF rehabilitation trial result and monitoring outcomes. No reference to a requirement to review the NOEF Management Program every three years in the Authorisation. NOEF Independent Panel ToR (approval 12Dec22), Section 2 includes a technical review every three years. NOEF Panel Chair Alan Robinson appointed Jan 2024, NOEF yet to commence.	NOEF geosynthetic liner cover system plan (dated 12Nov22) submitted to the DITT. Three year NOEF Independent Panel review is incorporated into Final TOR, approved 12Dec22.
8.ii	review NOEF runoff and seepage monitoring results, and in particular trends in the contaminant concentrations in groundwater, and loads entering creeks and the McArthur River	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 22.a), b) and c). NOEF seepage and runoff, contaminate concentrations in groundwater loads reported in 2023 EMR - Appendix H - Groundwater Monitoring Report and Appendix M - Monitoring of Select Analytes & Lead in Fluvial Sediments & Aquatic Fauna.	A NOEF Interception Scheme Report Authorisation Condition 22 was submitted to DITT on 13Nov2021, which was on the due date. Although not stated in the Authorisation conditions, submission by the Operator of documents in compliance with relevant conditions of Authorisation are to be reviewed by the relevant expert panel with subsequent advice to inform DITT assessment and regulatory action.

NT EPA recommendations compliance workbook - 2024 DITT

Audit period 1 May 2023 to 30 April 2024

NT EPA recommendation no.	NT EPA recommendation	Score	Compliance level	Evidence	Comments
8.iii	review the cover trial results, construction quality records, critical controls, stability assessments, cover performance and performance of progressive rehabilitation of the NOEF.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 21. Cover trial 10ha BGM (Bituminous Geomembrane) liner installed on section of southern NOEF batter in late 2021.	Refer to 8.ii. Future ask Operator to provide update on BGM progress.
8 continued	The panel shall provide a report every three years to the relevant regulator and the Independent Monitor and the report made available to the Proponent, government agencies, the Community Reference Group and the public. The panel is to be formed:	4	Full Compliance	Confirmed establishment and operation of an Independent panel(s) of experts in condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 21. No requirement in the Authorisation for the panel to provide a report every three years.	The NOEF Panel TOR (approved 12Dec22) states that the Panel will undertake a technical review once every three years focused on the: 1. outcomes of the NOEF management program 2. NOEF seepage monitoring results and the appropriateness of the monitoring program 3. cover trial results, construction quality records, critical controls, stability assessments, cover performance and performance of progressive rehabilitation of the NOEF. Three year NOEF Independent Panel review is incorporated into Final TOR, approved 12Dec22.
8.iv	with an independent chair, appointed by the responsible Minister in consultation with the Minister for Environment and Natural Resources	4	Full Compliance	Confirmed establishment and operation of an Independent panel(s) of experts in condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 21. Reference to panel Independent Chair has been removed from Authorisation 13Nov2020, 18Jun2021, 05May2022 and 17May2023.	The Independent Chair requirement is incorporated into Final TOR, approved 12Dec22, refer Excerpt 1: The Panel is to be formed: iv. with an independent chair, appointed by the responsible Minister in consultation with the Minister for Environment and Natural Resources. In January 2024, Dr Alan Robertson was appointed by the Minister for Mining as the Independent Chairperson for the NOEF Panel.
8.v	on the advice of the Department of Environment and Natural Resources, the Department of Primary Industry and Resources, and the Proponent.	4	Full Compliance	Confirmed establishment and operation of an Independent panel(s) of experts in condition in Authorisation 0059 dated 05May22 and 17May2023 - Condition 21. No reference to advice from DEPWS or the Operator in the Authorisation (noting the Department of Primary Industry and Resources relevant to this recommendation was DITT in the audit period and Department of Environment and Natural Resources is DEPWS).	DITT, with support from the Operator, developed a Terms of Reference, for NOEF, TSF and mine closure planning. Draft Terms of Reference for NOEF Independent Panel were circulated for comment to DEPWS, NT EPA and DAWE in July 2021. Final TORs for NOEF and TSF Independent Panels were approved 12 Dec22. Approved TOR for Mine Closure Independent Expert Panel were dated June 2023. TSF and NOEF Panel Chair Alan Robertson appointed Jan 2024.
8 continued	Terms of Reference for the panel shall set out the terms for roles and responsibilities, membership, timeframe for commencement and scope, reporting obligations and transparency and accountability. The Terms of Reference shall be finalised by the responsible Minister, in consultation with the Minister for Environment and Natural Resources acting on advice from the NT EPA, within three months of authorisation of the Proposal.	4	Full Compliance	Confirmed establishment and operation of an Independent panel(s) of experts in condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 21. Final ToRs for NOEF and TSF Independent Panels were approved 12 Dec22, after the three months of Authorisation. Reference to terms of reference requirements has been removed from Authorisation 13Nov2021, 18June2021, 05May2023 and 17May2023. ToRs for NOEF and TSF Independent panels include references to roles, responsibilities, membership, scope, reporting, transparency and accountability.	Draft Terms of Reference for NOEF were circulated for comment to DITT, DEPWS, NT EPA and DAWE in July 2021. NOEF Independent Panel TOR Final Draft version August 2022. Final TOR for NOEF and TSF Independent Panels, approved 12Dec22. OBS: The establishment of the Independent Panel(s) of experts has taken an unduly long time. Not having an Independent Panel in place is now impacting on the ability to fulfil Authorisation conditions where the Panel's involvement is a prerequisite.
8 continued	The structure of the panel and its Terms of Reference shall be reviewed by the Responsible Minister, in consultation with the Minister for Environment and Natural Resources every six years from the date the Terms of Reference are finalised.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 21. No reference to six year review of structure of the panel and ToR in the Authorisation.	Final TOR for NOEF and TSF Independent Panels, approved 12Dec22 contains six year period of review, in Section 7.

NT EPA recommendations compliance workbook - 2024 DITT

Audit period 1 May 2023 to 30 April 2024

NT EPA recommendation no.	NT EPA recommendation	Score	Compliance level	Evidence	Comments
9	Approvals and decisions in relation to the Proposal shall include conditions that require the Proponent to implement a groundwater interception and recovery system for the NOEF. The system is to be designed to:	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 22. Operator requirement: within 12 months of the authorisation of the OMP. Operator's NOEF groundwater interception report has been submitted to DITT by the due date 13Nov2021.	DITT advised that the Operator has prepared a report proposing that the NOEF interception trench is not needed until 2067. OBS: Independent Panel not yet established and unable to review the report and provide an assessment on need and timing for NOEF Interception Trench. (Note: Independent Panel review is not an Authorisation requirement). OBS: DITT response to Operator's NOEF Groundwater Seepage and Recovery System report submission is unduly slow and alternative expert advice could be sought rather than awaiting the establishment of the NOEF Independent Panel. Also Refer to NT EPA Recommendations 3, 4 and 13 above.
.	control seepage to Barney Creek diversion and the McArthur River over the life of the NOEF to as low as reasonably practicable	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 22.a).	Refer to NT EPA Recommendation 9 comments above.
.	achieve a recovering trend in the Barney Creek diversion and the old McArthur River channel water quality within 20 years of cessation of mining.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 22.b).	Operator future requirement: within 20 year of cessation of mining.
9 continued	The system design and performance shall be reviewed by the Independent Panel, appointed in accordance with Recommendation 8, and approved by the relevant regulator/s.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 21. Note: the Authorisation requirement is more overarching regarding the panel requirement and not specific to the groundwater interception and recovery system for the NOEF.	Operator's NOEF groundwater interception report has been submitted to DITT by the due date 13Nov2021. Authorisation requires interception report within 12 months of OMP approval and NT EPA recommendation states system design and performance shall be reviewed by the NOEF Independent Panel. OBS: The establishment of the Independent Panel(s) of experts has taken an unduly long time. Not having an Independent Panel in place is now impacting on the ability to fulfil groundwater interception and recovery system Authorisation conditions where the panel's involvement is a prerequisite.
10	Approvals and decisions in relation to the Proposal shall include conditions that require the Proponent to undertake constructability tests for geosynthetic liner cover options, including a geosynthetic liner /compacted clay layer combination, and monitor the options on rehabilitated stages of the NOEF to determine all relevant performance parameters including:	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 23. a) and b).	Addressed in the 2020 MMP, which appropriately details the proposed liner trials and works to be implemented to develop a NOEF cover system. Also included in the 2019 bridging MMP.
.	slope stability during extreme events	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 23. c).i.	
.	cover performance as a result of heat effects	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 23. c).ii.	
.	tolerance of the geosynthetic liner to expected differential settlement	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 23. c).iii.	
.	veracity of cover longevity predictions	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 23. c).iv.	
.	likely long-term maintenance requirements.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 23. c).v.	
10 continued	Reporting of trial results and monitoring outcomes shall be provided every three years to the relevant Independent Panel and the Community Reference Group for review, and shall be audited by the Independent Monitor. Outcomes of trials and monitoring shall be used to inform the Adaptive Management Plan, to be developed in accordance with Recommendation 28, and the Closure Plan for the mine.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 23. d) ii and 23. d) iii.	NOEF geosynthetic liner cover system plan (dated 12Nov22) submitted to DITT. Operator future requirement: d): Include reporting of trial results and monitoring outcomes: i. within three years from the submission of the plan; ii. every three years thereafter, to the relevant independent panel and the Community Reference Group for review, and shall be audited by the Independent Monitor.

NT EPA recommendations compliance workbook - 2024 DITT

Audit period 1 May 2023 to 30 April 2024

NT EPA recommendation no.	NT EPA recommendation	Score	Compliance level	Evidence	Comments
11	Approvals and decisions in relation to the proposal will include conditions requiring the Proponent to provide funding to establish and operate a panel of independent experts to:	4	Full Compliance	Confirmed establishment and operation of an Independent panel(s) of experts in condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 21.	DITT, with support from the Operator, is managing the process to establish and operate an Independent Panel of experts. Final Terms of Reference for TSF and NOEF Panels were approved on 12Dec22. Approved Terms of Reference for Mine Closure Panel were dated June 2023. TSF and NOEF Panel Chair Alan Robertson appointed Jan 2024.
11.i	review every three years the outcomes of the Proponent's management program for the TSF including the berm stability, risk of overtopping, seepage and other aspects of the TSF that could impact on site water quality and the McArthur River, including the risk of catastrophic failure of any component of the TSF, to ensure that the overarching environmental outcome can be met	4	Full Compliance	Independent Panel review of Proponent's TSF management every three years in not contained in the Authorisation 05May2022 or 17May2023. The TSF Independent Panel TOR Final (approved 12Dec22) has a requirement (Section 6 - Reporting Obligations and Process, paragraph 1) for a TSF Independent panel review report on the TSF performance every three years. TSF operated and maintained in accordance with the most up to date TSF Operations Maintenance and Surveillance Manual ensuring Condition 79.a) no discharge of water condition 79.d) integrity of the embankment.	Would be undertaken by the yet to be established TSF Independent Panel required by Authorisation 05May22 and 17May2023 Condition 21 The Operator must provide funding and assist the Department to establish and operate an independent panel(s) of experts to advise on matters affecting the environmental performance of the NOEF, TSF and mine closure planning. Operator must provide quarterly report to the Ministers on TSF seepage and seepage management (Condition 80). Three year TSF Independent Panel review is incorporated into Final TOR, approved 12Dec22.
11.ii	review TSF seepage monitoring results and the appropriateness of the monitoring program.	4	Full Compliance	No reference to Independent Panel review of TSF seepage monitoring results in the Authorisation 05May2022 and 17May2023. The TSF Independent Panel Final TOR (Approved 12Dec22) has a requirement (Section 2 - Purpose, dot point 2.) ...TSF panel will undertake a review (every three years)on the ... seepage monitoring results and the appropriateness of the seepage system....	Would be undertaken by the yet to be established TSF Independent Panel required by Authorisation 05May22 and 17May2023 Condition 21 The Operator must provide funding and assist the Department to establish and operate an independent panel(s) of experts to advise on matters affecting the environmental performance of the NOEF, TSF and mine closure planning. Operator must provide quarterly report to the Ministers on TSF seepage and seepage management (Condition 80). Tree year TSF Independent Panel review is incorporated into Final TOR, approved 12Dec22.
11 continued	The panel shall provide a report every three years to the relevant regulator and the Independent Monitor and is made available to the Proponent, government agencies, the Community Reference Group and the public. The panel shall be formed:	4	Full Compliance	No reference to an Independent Panel TSF report every three years or making available to the Operator, government agencies, CRG or the public is contained in the Authorisation 05May2022 and 17May2023. The TSF Independent Panel TOR Final (approved 12Dec22) has a requirement (Section 6 - Reporting Obligations and Process) to report every three years to the relevant regulator, government agencies, CRG, Independent Monitor and publish on DITT website. Refer 11.i. and 11.ii. above.	In addition to the yet to be established TSF Independent Panel, Authorisation 05May22 Condition 21. The Operator must provide funding and assist the DITT to establish and operate an independent panel(s) of experts to advise on matters affecting the environmental performance of the NOEF, TSF and mine closure planning. Three year TSF Independent Panel review report is incorporated into Final TOR, approved 12Dec22.
11.iii	With an independent chair, appointed by the responsible Minister in consultation with the Minister for Environment and Natural Resources.	4	Full Compliance	Confirmed establishment and operation of an Independent panel(s) of experts in condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 21. Reference to an independent technical expert to chair the TSF panel appointed by the NT Minister for Mining and Industry in consultation with the NT Minister for Environment is included in TSF TOR Final (approved 12Dec22), Section 4 - Panel Membership Refer 11.i. and 11.ii. above.	TSF Independent Panel Final TOR, approved 12Dec22. In January 2024, Dr Alan Robertson was appointed by the Minister for Mining as the Independent Chairperson for the TSF Panel.

NT EPA recommendations compliance workbook - 2024 DITT

Audit period 1 May 2023 to 30 April 2024

NT EPA recommendation no.	NT EPA recommendation	Score	Compliance level	Evidence	Comments
11.iv	on the advice of the Department of Environment and Natural Resources, the Department of Primary Industry and Resources, and the Proponent.	4	Full Compliance	Confirmed establishment and operation of an Independent panel(s) of experts in condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 21. Refer 11.i. and 11.ii. above.	Draft Terms of Reference for NOEF were circulated for comment to DITT, DEPWS, NT EPA and the Operator in July 2021. TSF Independent Panel TOR Final Draft version August 2022.
11 continued	Terms of Reference for the panel shall set out the terms for roles and responsibilities, membership, timeframe for commencement and scope, reporting obligations and transparency and accountability. The Terms of Reference shall be finalised by the responsible Minister, in consultation with the Minister for Environment and Natural Resources acting on advice from the NT EPA, within six months of authorisation of the Proposal.	4	Full Compliance	TSF Independent panel TOR Final (approved 12Dec2022) includes reference to roles (section 5), responsibilities (Section 5, dot point 1), membership (Section 4), scope (Section 3), reporting (Section 6), transparency and accountability (Section 6, paragraph 4).	TSF Independent Panel Final TOR, approved 12Dec22.
11 continued	The structure of the panel and its Terms of Reference shall be reviewed by the Responsible Minister, in consultation with the Minister for Environment and Natural Resources every six years from the date the Terms of Reference are finalised.	4	Full Compliance	Confirmed establishment and operation of an Independent panel(s) of experts in condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 21. TSF independent panel TOR Final (Approved 12Dec2022), Section 7 - Period of Review states TOR shall be reviewed every six years in consultation with the NT Minister for Environment.	TSF Independent Panel Final TOR, approved 12Dec22.
12	As soon as practicable after cessation of mining, tailings and other contaminated earthen materials from the Tailings Storage Facility shall be deposited in the mine pit void using contemporary best-practice placement techniques, then protected with a water cover. Tailings shall preferably be reprocessed before in-pit disposal.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 24.	Condition 24. a) includes requirements for strategies for tailing reprocessing. Operator future requirement: to submit a strategy on long term disposal management of tailings into the mine pit void within 5 years of authorisation of OMP. (due 13Nov25).
12 continued	The intention of these measures is to protect the McArthur River water quality and aquatic ecosystems from surface or groundwater contamination consistent with the NT EPA's overarching environmental outcome in Recommendation 3. Any requirement to vary these measures will need approval from the relevant regulator and notification to the NT EPA in accordance with Recommendation 2. These measures should only be varied on the basis of further information to inform leading practice.	N/A	Not Applicable		Noted.
13	Approvals and decisions in relation to the Proposal shall include conditions that require the Proponent to conduct a review and synthesis of all water monitoring programs (groundwater and surface water) and implement a revised program that is capable of identifying and quantifying impacts of mining activities and their trends on the environmental values and beneficial uses of the McArthur River to measure performance against the NT EPA's overarching environmental outcome in Recommendation 3. The revised water monitoring program shall:	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 26. This condition is marked as completed in the Authorisation dated 17May2023.	Operator requirement: within 12 months of the authorisation of the OMP. DITT advised the operator submitted EMR 2021 S.6 p247 - Barney Creek Haul Bridge dust, not runoff, analysis identified sediment contaminates.
13.i	quantify loads of lead and zinc entering the McArthur River each year	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 27.b).i.	
13.ii	quantify impacts to water quality and trends in groundwater and surface water at appropriate points including upstream and downstream of the mine to determine that objectives and targets are being met, including the effectiveness of source control to reduce loads as low as is reasonably practicable	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 27.b).ii.	

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Audit period 1 May 2023 to 30 April 2024

NT EPA recommendation no.	NT EPA recommendation	Score	Compliance level	Evidence	Comments
13.iii	develop appropriate future trigger values for waterways on the mine site and the McArthur River in accordance with the ANZECC 2000 Guidelines. In the interim, the trigger values in the most current WDL shall be used.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 27.b).iii.	
13 continued	The review and revision of the water monitoring program shall be conducted to the satisfaction of the relevant regulator/s and the NT EPA as part of the broader monitoring review provided for in Recommendation 27 and incorporated into the authorised Adaptive Management Plan.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 27.a). Also Condition 27.c) requires consultation with the NT EPA.	The Amended AMP (version AMP- D version 01Oct21, submitted 13Nov21) approved by DITT 15Aug2022 was uploaded onto the NT Government website.
13 continued	The results of the monitoring program are to be reported by the Proponent to the relevant regulator and audited by the Independent Monitor every three years. The monitoring report together with the Independent Monitor's audit report shall be made available to government agencies, the Community Reference Group and publicly on the Proponent's and relevant regulators' websites.	3	Part Compliance (High)	Confirmed condition partly covered in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 27.g).i, ii and iii. Not identical wording and does require the Independent Monitoring report to be provided to the Department or published on the regulators website. The results of the water monitoring program are reported to DITT on 31 August 2023 and each future year in the EMR. DITT published the Independent Monitor Surface Water Audit Report on their website.	Authorisation Condition 27.g).iii. only requires publishing the results of the Water Monitoring Plan on the Operator's website, but not making the results or relevant reports available to others or on the regulator's website. The condition does not fully reflect the NT EPA recommendation wording. Independent Monitor conducted a site inspection including review of the Surface Water Management aspects of the Water Management Plan in May 2023. Currently the Water Management Plan from May 2022, has been submitted but is pending letter of approval from DITT. OFI: DITT to approve the Water Management Plan which triggers the requirement for the Operator to publish results of the program on Operator's website.
14	Approvals and decisions in relation to the Proposal shall include conditions that require the Proponent to prepare and implement a research and investigation program designed to determine the chronic and acute impacts to biota of mine-derived contaminants using recognised and accepted ecotoxicological testing. The program shall be designed to integrate with the monitoring program to be developed in accordance with Recommendation 15. Results of the program shall be used to inform trigger criteria in the Adaptive Management Plan.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 28. Operator submitted Ecotoxicology Research and Investigation Program (version September 2021) to DITT letter dated October 2021. Amended SSTVs approved by DITT March 2022 and WDL174 -13 was issued. Operator submitted an amended AMP incorporating the revised SSTVs to DITT for review on Nov2021. DITT approved AMP-D, Aug2022. SSTVs remain in current WDL. No specific reference to informing trigger criteria in the Adaptive Management Plan in the Authorisation, Condition 28.	Operator requirement: to submit ecotoxicological research and investigation program within 18 months of the approval of the OMP. DITT advised that a revised version of the AMP (version AMP-D 01Oct21 submitted 13Nov21) contained some ecotoxicological data. Condition 28. a) states "the results of this program must be integrated with other relevant programs, monitoring programs and management plans". This may include the AMP. Condition 44 requires within 18 months of the authorisation of the OMP the Operator must undertake a synthesis of all environmental monitoring and the revised monitoring programs must Condition 44. c) be incorporated in the AMP. This may include the ecotoxicological monitoring program. AMP-D incorporating revised SSTVs approved under MMA on 15Aug22.
14 continued	The program shall be prepared and implemented to the satisfaction of the Department of Environment and Natural Resources, and the Australian Government Department of the Environment and Energy.	3	Part Compliance (High)	Confirmed part condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 28.b).- the plan once approved by DITT must be implemented by the Operator. No mention of Department of Climate Change, Energy, the Environment and Water (DCCEEW) (previously Australian Government Department of the Environment and Energy).	Note: No OFI recorded as the Ecotoxicological Program findings and negotiation with regulators (DEPWS) to amend some local water quality trigger levels was completed in 2022.
15	Approvals and decisions in relation to the Proposal shall include conditions that require the Proponent to implement an aquatic ecosystem monitoring program based on improved understanding of aquatic ecosystems in the McArthur River including flow requirements and available Dry season habitat. The program shall be designed to assess impacts from the mine on:	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023- Condition 29.	The Operator has undertaken an aquatic ecosystem monitoring program for many years comprised of monitoring including: <ul style="list-style-type: none"> • Metals in Fluvial Sediments, Fish, Crustations and Molluscs (commenced 2005) • Aquatic Fauna Abundance and Diversity, Early Dry Season and Late Dry Season (commenced 2006) • Freshwater Aquatic Macroinvertebrate Monitoring (commenced 2008) • Freshwater Sawfish Acoustic Tagging Monitoring (commenced 2016) • Barramundi External Tagging Monitoring (commenced 2017)
15.i	water levels in refuge pools/waterholes, upstream and downstream of the mine, including in the McArthur River diversion channel	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 29.b). Condition 29.b refers to "relevant parameters at appropriate frequencies" but not the specific recommendation requirements.	Refer McArthur River Freshwater Aquatic monitoring programs listed in item 15 above.

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Audit period 1 May 2023 to 30 April 2024

NT EPA recommendation no.	NT EPA recommendation	Score	Compliance level	Evidence	Comments
15.ii	water quality in refuge pools/waterholes in the Dry season	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 29.b. Condition 29.b refers to "relevant parameters at appropriate frequencies" but not the specific recommendation requirements.	Refer McArthur River Freshwater Aquatic monitoring programs listed in item 15 above.
15.iii	the health of aquatic biota in the McArthur River using non-lethal sampling methods.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 29.b. Condition 29.b refers to "relevant parameters at appropriate frequencies" but not the specific recommendation requirements.	Refer McArthur River Freshwater Aquatic monitoring programs listed in item 15 above.
15 continued	The monitoring program shall be prepared and implemented to the satisfaction of the Department of Environment and Natural Resources, and the Australian Government Department of the Environment and Energy.	3	Part Compliance (High)	Confirmed part condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 29.c. - be implemented by the Operator. No reference in the Authorisation to DITT (formerly DENR) or the Australian Government DCCEEW (formerly Australian Government Department of the Environment and Energy).	Note: No OFI recorded as the Aquatic Ecology Monitoring Program is implemented with the results reported annually to NT DITT and DCCEEW.
15 continued	The monitoring program shall be designed to integrate with a revised monitoring program provided for in Recommendation 27 and incorporated into the Adaptive Management Plan, to be developed in accordance with Recommendation 28	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 45.a.vi.- monitoring in accordance with relevant Recommendations in NT EPA Assessment report 86.	
15 continued	The results of the monitoring program are to be reported by the Proponent and audited by the Independent Monitor every three years. The monitoring report together with the Independent Monitor's audit report shall be made available to government agencies and the community on the Proponent's and relevant regulators' websites.	4	Full Compliance	While part of these requirements may be broadly captured and reviewed every three years under the Adaptive Management Plan auditing conditions 45 and 46, a review by the Independent Monitor every three years and making the report publicly available is not specifically stated in the Authorisation conditions. The Operator reports annually specialist reviews relevant to aquatic ecosystems in the EMR. Independent Monitor Task 12 aquatic ecosystem audit conducted in 2022 and next audit planned for 2025.	Independent Monitor's aquatic ecosystem audit conducted in May 2022 with the audit report made publicly available on DITT website. Three year Aquatic Ecosystems review by the Independent Monitor is specifically included by DITT in the Independent Monitor's scope of work.
16	Approvals or decisions in relation to the Proposal, shall include conditions that require the Proponent to conduct all works in accordance with a valid Certificate issued in accordance with the <i>Northern Territory Aboriginal Sacred Sites Act</i> .	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 30. Condition in Authorisation 0059 dated 05May22 and 17May2023 - Condition 5 (broad requirement to meet all legislation).	Authorisation conditioned such that Operator must provide evidence of a valid AAPA certificate, as appropriate for proposed work. There are current AAPA certificates for current mining footprint but additional certificates will need to be obtained for additional disturbance. DITT had received no evidence of breaches.
17	Prior to any approvals for the Proposal, the Proponent and the responsible Minister shall consult with the Minister for Tourism and Culture on an alternative design of the NOEF that would preserve archaeological site MRM4. Any alternative design of the NOEF must achieve the same environmental outcomes as the currently proposed NOEF, taking into consideration the recommendations in this report.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 31 - "Operator must not disturb or encroach upon archaeological site MRM4, until a design of the NOEF is agreed..." DITT advised no NOEF design updates occurred during the audit period.	Works proposed in the 2020 MMP do not disturb or impact on MRM4. There is no development in or proposed in the MRM4 area. When appropriate DITT will facilitate consultation with the Minister for Arts, Culture and Heritage (also see NT EPA recommendation 18). Authorisation 0059 requires mining activities to avoid MRM4 whilst consultation occurs with the responsible NT agency (Minister for Arts, Culture and Heritage) to finalise an agreed NOEF design.
18	Approvals or decisions in relation to the Proposal, shall include conditions that require the Proponent to demonstrate to the responsible Minister, and the AAPA or the Minister for Tourism and Culture (where relevant), that it has undertaken a thorough process to identify, inform and consult with the appropriate custodians and traditional owners with an interest in lands that would be or may be affected by the Proposal.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 32. This condition. This condition is marked as completed in the Authorisation dated 17May2023. Cultural Heritage Management Stakeholder Engagement Report Feb2021.	

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NT EPA recommendation no.	NT EPA recommendation	Score	Compliance level	Evidence	Comments
19	Approvals and decisions in relation to the Proposal shall include conditions that require the Proponent to monitor sulphur dioxide within 1 km downwind of the NOEF, to the satisfaction of the NT EPA and relevant regulator. The objective of this monitoring program should be to identify any increase in sulphur dioxide emissions from the NOEF and any potential air quality risk to human health outside the MRM leases for all stages of the Proposal.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 33. This condition is marked as completed in the Authorisation dated 17May2023. Requirement to undertake monitoring is included in Condition Schedule D 6.a.ii. Note: the condition does not specify the location within 1km downwind of the NOEF but does require it at an appropriate location between NOEF and sensitive receptors determined in consultation with NT EPA.	AQMP submitted by the Operator in Nov21 and was assessed by DITT as meeting requirements of conditions 33, 34 and 35. SO ₂ monitoring was undertaken at the Mine at the SO2VAN01 and SOV2ILL01 monitoring sites. EMR 2023 - Appendix F - Ambient Air Monitoring Report data indicates that there were no exceedances of the National Environmental Protection Measure (NEPM) guideline for hourly SO ₂ concentrations during the audit period.
19 continued	The monitoring program shall be reviewed in accordance with Recommendation 27 and incorporated into the Adaptive Management Plan, to be developed in accordance with Recommendation 28.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 44, synthesis of all environmental monitoring programs (Recommendation 27) and Condition 93 - Adaptive Management Plan (Recommendation 28).	
19 continued	The results of the monitoring program are to be reported by the Proponent to the relevant regulator and audited by the Independent Monitor every three years. The monitoring report together with the Independent Monitor's audit report shall be made available to government agencies, the Community Reference Group and publicly on the Proponent's and regulator's websites.	3	Part Compliance (High)	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 35.a, monitoring program results made available on the Operator's website. No reference to requirement for the air quality report (sulphur dioxide) to be audited by the Independent Monitor. While part of these requirements may be broadly captured and reviewed every three years under the Adaptive Management Plan auditing conditions 45 and 46 making the report publicly available is not specifically stated in the Authorisation conditions. Operator reports annually specialist reviews relevant to air quality in the EMR. Sulphur dioxide monitoring is reported on the Operator's website. Independent Monitor's scope from DITT includes audit of specific monitoring programs including sulphur dioxide (air quality).	DITT advised condition met by AMP submitted by MRM in January 2020 and approved by the Minister November 2020. Air Quality Management Plan was reviewed by the Independent Monitor as part of the AMP review 15May2020. The AMP submission received by DITT 13Nov21 (including AMP-D version 01Oct21) was assessed as meeting the Air Quality Management Plan Authorisation Schedule A Conditions 33, 34 and 35. Air Quality monitoring program review and audit was undertaken by Independent Monitor in 2023. Note: No OFI recorded as three year Air Quality (sulphur dioxide) review by the Independent Monitor is specifically included by DITT in the Independent Monitor's scope of work.
20	Approvals and decisions in relation to the Proposal shall include conditions that require the Proponent to:		-		
20.i	continue a monitoring program, to the satisfaction of the NT EPA on advice of the Chief Health Officer, to determine if aquatic fauna obtained from any reach of the McArthur River is safe to eat during all stages of the Proposal	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 36.a. "...determine if aquatic fauna... is safe to eat".	The Aquatic Ecology Monitoring Program and Metals Lead in Fluvial Sediments and Aquatic Fauna is conducted and are reported annually in the EMR.

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Audit period 1 May 2023 to 30 April 2024

NT EPA recommendation no.	NT EPA recommendation	Score	Compliance level	Evidence	Comments
20.ii	publicly report the results of monitoring, including at appropriate locations in the region	3	Part Compliance (High)	<p>Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 36.c. "public reporting of aquatic fauna monitoring results"</p> <p>Currently Aquatic Ecology Monitoring Plan is verbally approved but not formally approved by DITT. The requirement for public reporting is not triggered in the Authorisation.</p>	<p>Conditions included in Authorisation 0059 address this NT EPA recommendation (Condition 36.c.), which require public reporting of the monitoring results, including at appropriate locations in the Borroloola region.</p> <p>Operator has a copy of 2022 EPBC Approval Compliance Report available on website, which refers to EPBC related aquatic ecology monitoring.</p> <p>DITT advised it will identify an appropriate medium for communicating the monitoring results. This may, for example, be achieved as part of addressing NT EPA recommendation 25, i.e. publishing via the DITT website and in hardcopy at various locations in the Borroloola community or engaging with the Community Reference Group.</p> <p>OFI: DITT should formally approve the Aquatic Ecology Monitoring Plan, to trigger the requirement for public reporting.</p> <p>OBS: It may be of benefit to make publicly available the results of monitoring in relation to aquatic fauna obtained from the McArthur River, including at appropriate locations in the region, to communicate river health.</p>
20.iii	maintain signage at waterways within the MRM site advising that fishing and harvesting of aquatic food species is prohibited, until the waterways recover and the risk of contamination from consumption of this aquatic fauna is negligible.	4	Full Compliance	<p>Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 36.d) and refers to condition 62.</p> <p>The wording on the signage differs from Conditions 62. b). wording requirement "fishing and harvesting of aquatic food species is prohibited", which is specific wording from the Chief Health Officer.</p> <p>Warning Signage Register 2019 provided by Operator showed photos of the "no unauthorised entry" wording on signage.</p>	<p>Letter from Operator (dated: 04Feb2015) to Chief Health Officer advising of the proposed wording to be used on signage. Not aware of any Chief Health Officer response.</p> <p>Operator to obtain agreement with NT EPA/Chief Health Officer that the alternative wording used on waterway signage "no unauthorised entry" at mining lease boundary is acceptable.</p> <p>Advised that signage erected at access point to mineral leases (refer Condition 62) is inspected annually by the Operator to ensure visibility and condition. Signs are replaced when they become damaged or no longer legible.</p>
21	Approvals and decisions in relation to the Proposal shall include conditions that require the Proponent to develop a non-lethal monitoring program for sawfish and from the results, define a specific (measurable and time-bound) threshold for a significant decline in sawfish movement (based on data) that would trigger investigation and implementation of management measures. This threshold is to be developed to the satisfaction of the Australian Government Department of the Environment and Energy and the Department of Environment and Natural Resources, within 12 months of authorisation of the Proposal.	3	Part Compliance (High)	<p>Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023- Condition 37 requires non-lethal monitoring, setting performance indicators to abate a significant decline and trigger levels for investigation and implementation of management measures, within 24 months of the approval of the OMP.</p> <p>Authorisation does not contain the requirement for development of the submission within 12 months of authorisation of the Proposal. It also does not reference the satisfaction of the Australian Government Department of the Environment and Energy.</p>	<p>Operator has actioned earlier than required by implementing sawfish transponder monitoring.</p> <p>Operator has established specific freshwater sawfish movement, navigating the McArthur River via acoustic receiver station, threshold trigger values in the 2022 AMP, Rev E, TARPs, Table 8.</p> <p>DITT advises 24 month timeframe is in recognition of adequate time to undertake a quality review including incorporating results from other relevant studies.</p> <p>Note: No OFI recorded as the development of non-lethal monitoring program for sawfish monitoring program, including trigger threshold for investigation and management measures was commenced in 2016 and is reported annually to regulators DEPWS and DCCEEW.</p>
22	Approvals and decisions in relation to the Proposal shall contain conditions that require environmental objectives to be established and achieved in case the mine site enters into care and maintenance. Environmental objectives should be reviewed by the relevant Independent Panel/s and approved by the relevant regulator/s after consultation with the Community Reference Group, custodians and traditional owners.	4	Full Compliance	<p>Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 38.a. - ...develop environmental objectives for a Care and Maintenance Plan...</p>	<p>Operator future requirement, triggered by and within 6 months of the establishment of the Independent Panel(s) of Experts (Condition 21) for NOEF, TSF and Mine Closure.</p> <p>DITT and the operator have established the Community Reference Group (NT EPA recommendation 26), to facilitate consultation with custodians and traditional owners to inform the development of the care and maintenance plan and independent panel (NT EPA recommendation 23). CRG inaugural meeting held on-site 27July23 for project familiarisation.</p> <p>OBS: The establishment of the Mine Closure Independent Panel and Community Reference Group has taken an unduly long time and consultation on environmental objectives for a Care and Maintenance Plan with CRG prior to regulator approval has been delayed.</p>

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Audit period 1 May 2023 to 30 April 2024

NT EPA recommendation no.	NT EPA recommendation	Score	Compliance level	Evidence	Comments
23	Approvals and decisions in relation to the proposal will include conditions requiring the Proponent to provide funding to establish and operate a panel of independent experts to:	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Condition 21.	Mine Closure Independent Expert Panel not yet established. Planning for Mine Closure Independent Expert Panel establishment underway. Draft Terms of Reference (Mine Closure Panel) were prepared in August 2022 and approved TOR dated June 2023 are published on DITT website.
23.i	review and advise on the development of closure and care and maintenance strategies for mine site domains, and the Proponent's trajectory towards achieving agreed closure objectives	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 and 17May2023 - Conditions 21, 38 and 39. Condition 38.a) requires Operator to develop environmental objectives for a Care and Maintenance Plan within 6 months of the establishment Independent Panel on closure. Condition 39.a) requires Operator to develop a Care and Maintenance Plan prior to 13 November 2025 (within 5 year of Authorisation of the OMP).	DITT, with support from the Operator, is managing the process to establish and operate an Independent Panels of experts, including developing Mine Closure Independent Expert Panel Terms of Reference (draft Mine Closure Independent Expert Panel TOR dated August 2022, approved Mine Closure Independent Expert Panel TOR dated June 2023) The Draft Mine Closure Independent Expert Panel TOR Section 2 - Purpose states: The purpose of the Mine Closure Panel is to conduct a rolling 3-5 year review of the mine closure plan to assess the trajectory of closure options for MRM site domains and provide a report to the relevant regulator and the Independent Monitor that is made available to the Proponent, government agencies, the Community Reference Group and the public. There is a specific approved TOR (dated June 2023) requirement for the Mine Closure Independent Expert Panel to conduct a rolling 3-5 year review of the mine closure plan to assess the trajectory of closure options and a report to the relevant regulators, Independent Monitor, CRG and the public. Future action: Confirm Operator submits an updated Mine Closure Plan with each MMP from the date of authorisation of the OMP (Condition 96 - Mine Closure), which may occur in 2024, potentially earlier than the establishment of the Mine Closure Independent Expert Panel.
23.ii	review the risk of potential catastrophic failure of the mine levee wall and the McArthur River diversion channel in view of future closure objectives.	3	Part Compliance (High)	No reference to catastrophic failure of mine levee wall and McArthur River diversion channel in the Authorisation under Care and Maintenance.	The Care and Maintenance Plan to be developed may consider the mine levee wall and the McArthur River diversion but there is no specific requirement in the Authorisation for this content. The Mine Closure Independent Expert Panel approved TOR dated June 2023 (published on DITT website) specifically mentions: provide advice regarding the risk of potential catastrophic failure of the mine levee wall and McArthur River Diversion Channel in view of future closure objectives (Scope - Section 3.i. and Appendix A: Matters for consideration by the Mine Closure Panel b.) Note: No OFI recorded as there is a specific requirement for the Mine Closure Independent Expert Panel to consider and provide advice regarding the potential catastrophic failure of the mine levee wall and the McArthur River Diversion Channel is in the approved ToR dated June 2023.
23 continued	The panel shall be formed:		-		
23.iii	with an independent chair, appointed by the responsible Minister in consultation with the Minister for Environment and Natural Resources	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 - Condition 21. The closure independent panel Draft TOR are dated August 2022 Reference to Independent Chair has been removed from Authorisation 13Nov2020 and 18Jun2021 and 05May2022.	Draft Terms of Reference for Mine Closure Independent Expert Panel were developed dated August 2022. Approved TOR (dated June 2023) Section 4 states the Mine Closure Independent Expert Panel will be chaired by an independent closure expert appointed by the NT Minister for Mining in consultation with the NT Minister for Environment. No fixed timeline for establishment of the Mine Closure Independent Expert Panel.
23.iv	on the advice of the relevant regulator/s and the Proponent.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 - Condition 21.	Draft Terms of Reference for Mine Closure Independent Expert Panel were developed dated August 2022 and circulated to relevant regulators. Future audit task to check that consultation responses on the formation of the panel have been received from DITT, DEPWS, DCCEEW and Operator.

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NT EPA recommendation no.	NT EPA recommendation	Score	Compliance level	Evidence	Comments
23 continued	The panel shall conduct a rolling 3-5 year review of the mine closure plan to assess the trajectory of closure options for MRM site domains and provide a report to the relevant regulator and the Independent Monitor that is made available to the Proponent, government agencies, the Community Reference Group and the public.	3	Part Compliance (High)	<p>Confirmed condition in Authorisation 0059 dated 05May2022 - Conditions 96 and 97.b.</p> <p>No reference to rolling 3 to 5 year review, however there is a requirement to update the Mine Closure Plan as closure concepts are developed.</p> <p>No reference to providing Mine Closure Plan to Independent Monitor, CRG and the public.</p> <p>Note: a review of the Mine Closure Plan is part of the Independent Monitor's scope of work.</p>	<p>Draft Terms of Reference for Mine Closure Independent Expert Panel were developed dated August 2022 and approved TOR dated June 2023 published on DITT website.</p> <p>The Mine Closure Independent Expert Panel TOR Section 2 - Purpose states: The purpose of the Mine Closure Panel is to conduct a rolling 3-5 year review of the mine closure plan to assess the trajectory of closure options for MRM site domains and provide a report to the relevant regulator and the Independent Monitor that is made available to the Proponent, government agencies, the Community Reference Group and the public.</p> <p>Note: No OFI recorded as there is a specific approved TOR dated June 2023 requirement for the Mine Closure Independent Expert Panel to conduct a rolling 3-5 year review of the mine closure plan to assess the trajectory of closure options and a report to the relevant regulators, Independent Monitor, CRG and the public.</p>
23 continued	Terms of Reference for the panel shall set out the terms for roles and responsibilities, membership, timeframe for commencement and scope, reporting obligations and transparency and accountability. The Terms of Reference shall be finalised by the responsible Minister, in consultation with the Minister for Environment and Natural Resources acting on advice from the NT EPA, within 12 months of authorisation of the Proposal.	4	Full Compliance	<p>Confirmed condition in Authorisation 0059 dated 05May2022 - Condition 21.</p> <p>Mine Closure Independent Panel Draft TOR dated August 2022.</p> <p>Reference to terms of reference requirements has been removed from Authorisation 13Nov2021 and 18June 2021 and 05May2022.</p> <p>No timeframe for finalisation of the terms of reference contained in the Authorisation.</p> <p>ToRs for Mine Closure Independent Panel includes references to roles, responsibilities, membership, scope, reporting, transparency and accountability.</p>	<p>Approved TOR for Mine Closure Independent Expert Panel dated June 2023 were not been finalised within 12 months of the approval of the OMP. However, Draft Mine Closure Independent Expert Panel TOR prepared August 2022 for consultation with NT EPA. Approved Mine Closure Independent Expert Panel TOR dated June 2023 is published on DITT website.</p>
23 continued	The structure of the panel and its Terms of Reference shall be reviewed by the Responsible Minister, in consultation with the Minister for Environment and Natural Resources every six years from the date the Terms of Reference are finalised.	4	Full Compliance	<p>Confirmed condition in Authorisation 0059 dated 05May2022 - Condition 21.</p> <p>Mine Closure Independent Panel approved TOR (dated June 2023) , Section 7 - Period of Review states: the structure of the panel and its TOR shall be reviewed every six years for the date the TOR are finalised, or sooner, if required.</p>	
24	An independent third-party assessment of the security that must be provided by the Proponent or Operator for rehabilitation of the Authorised activities at the McArthur River Mine site shall be conducted by a qualified person approved by the responsible Minister. The security amount shall be sufficient to secure the site in a manner that meets the NT EPA's overarching environmental outcome. The independently calculated amount and final amount of the security shall be published on the relevant regulator's website with any variation between the amounts explained.	4	Full Compliance	<p>Confirmed condition in Authorisation 0059 dated 05May2022 - Conditions 40 and 41.</p> <p>Note: the condition does not mention the security needing to be sufficient to secure the site in a manner that meets the NT EPA's overarching environmental outcome. DITT advises this is the role of DITT in administering the MMA and security amount is approved by the Minister.</p> <p>Independent Monitor sighted the security held as at 01August2023 published on the DITT website.</p>	<p>Operator nominated a third party assessor which has been approved by the Minister and accepted by the DITT. The third party review of the security was completed as part of the 2020 MMP approval and is required every three years thereafter.</p> <p>DITT advised the Independent Monitor that NT Government has committed to make mine security amounts publicly available. Currently the information published is the security amounts for major mines in the NT, including McArthur River Mine, with the individual mine's security amount held listed on the DITT's website.</p> <p>DITT advised it is not appropriate to provide the details of each security assessment on the Regulator's website or to explain any variation between the independently calculated and final security amount.</p>
24 continued	The security amount shall be reassessed every three years if an assessment of the security amount by the regulator has been undertaken during that time in accordance with the Authorisation for the McArthur River Mine.	4	Full Compliance	<p>Confirmed condition in Authorisation 0059 dated 05May2022 - Condition 40.</p> <p>DITT advised security assessment is currently provided annually as part of the Unplanned Closure Plan, supported by an independent report.</p>	<p>Operator future requirement for the security assessment to occur every three years if the security has been recalculated or adjusted.</p>

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NT EPA recommendation no.	NT EPA recommendation	Score	Compliance level	Evidence	Comments
25	The Mining Management Plan (overview and environmental management section) and the Authorisation for the McArthur River Mine Overburden Management Project shall be made available to the public on the relevant regulator's website and in hard copy at an appropriate location in Borroloola (e.g. Borroloola Public Library).	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 - Condition 42. A public copy of the 2020 MMP with commercially sensitive information removed is available on DITT website (sighted 22Aug2023). DITT advised an MMP hard copy was provided to Borroloola Library. Sighted copy of email 07Oct20 from DITT confirming Borroloola Community Library postal address to send MMP hardcopy.	Triggered by 2020 MMP approval. OFIs have been included for the Operator and DITT under the Authorisation related to ensuring that MMP amendments are also uploaded onto the regulator's website.
26	Approvals and decisions in relation to the Proposal shall include conditions that require a Community Reference Group to be established that has the following roles:	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 - Condition 43. Note: the subparts of this NT EPA recommendation are not stated in the 13Nov2020 and 18Jun2021 and 05May2022Conditions and no longer states "in accordance with the relevant NT EPA Recommendation" but have been captured in CRG draft terms of reference, refer to 26.i. to 26.v. and 26. continued below.	CRG held inaugural meeting 27July2023 at the Mine site. Primary purpose of first meeting was site familiarisation for CRG members. CRG meeting held 29Feb2024 in Mabunji Boardroom, Borroloola and Independent Monitor attended and presented 2023 Audit findings. MRM CRG Terms of Reference 04Oct2021, Version 1 and CRG meeting public Communiques are publicly available on the DITT website (checked 22Aug2023 and 24Oct2024). Draft terms of reference for the CRG (version 02 dated 28May2021) prepared by DITT were endorsed by the NT EPA (letter dated 06Jun21) Public advertising for CRG members nominations closed in 31Oct2021 and provided the opportunity for stakeholders to present nominations. Nominations were presented to the Minister for approval (members and chairperson) and decision reach to enable CRG establishment in mid 2023.
26.i	communicate the mine's performance to the local and broader NT community	4	Full Compliance	Confirmed in CRG Draft Terms of Reference, 04Oct2021, Version 1, Section 2 - Purpose, dot point No.1.	
26.ii	advise on the most appropriate method for the Proponent to report information that is required to be made publicly available	4	Full Compliance	Confirmed in CRG Draft Terms of Reference, 04Oct2021, Version 1, - Section 2. Purpose, dot point No.2.	
26.iii	provide a structured forum for review and discussion in setting environmental objectives for adaptive management, operation, care and maintenance, mine closure and the evaluation and costing of mine closure options	4	Full Compliance	Confirmed in CRG Draft Terms of Reference, 04Oct2021, Version 1, - Section 2. Purpose, dot point No.3.	
26.iv	provide a forum for discussing economic and social post-mining impacts	4	Full Compliance	Confirmed in CRG Draft Terms of Reference, 04Oct2021, Version 1, - Section 2. Purpose, dot point No.4.	
26.v	translate technical information into communication that is readily understood by the community, clear statements of outcomes to be achieved and progress in achieving them for both operational and closure matters.	4	Full Compliance	Confirmed in CRG Draft Terms of Reference, 04Oct2021, Version 1, - Section 2. Purpose, dot point No.5.	
26 continued	The Group shall be chaired by an independent person appointed by government, who is held in high regard in civic life and has expertise in taking the community interests into account and experience in the position of chair.	4	Full Compliance	Confirmed in CRG Draft Terms of Reference, 04Oct2021, Version 1, - Section 4. Membership, paragraph No.1.	
26 continued	The Group shall comprise members who represent the local community and broader Northern Territory community, as well as key stakeholders, particularly custodians and Traditional Owners.	4	Full Compliance	Confirmed in CRG Draft Terms of Reference, 04Oct2021, Version 1, - Section 4. Membership, paragraph No.2.	

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NT EPA recommendation no.	NT EPA recommendation	Score	Compliance level	Evidence	Comments
26 continued	A Terms of Reference for the Group shall be developed to the satisfaction of the NT EPA and agreed by the relevant regulator/s and the Department of the Chief Minister. Details regarding the establishment of the Community Reference Group, including roles and responsibilities, membership, timeframe for commencement and scope, reporting obligations and accountability should be decided within 12 months of all approvals being received for the Proposal.	4	Full Compliance	Draft terms of reference for the CRG (version 02 dated 28May2021) prepared by DITT were endorsed by the NT EPA 31May2021 (letter dated 06Jun2021). Final version of the TOR 04Oct2021, Version 1 is available on DITT website (checked 22Aug2023 and 24Oct2024). No reference to a timeframe for the establishment of the CRG in the Authorisation 13 Nov2020.	
26 continued	The structure of the Group and its Terms of Reference shall be reviewed every six years from the date the Terms of Reference are finalised.	4	Full Compliance	Confirmed in CRG Draft Terms of Reference, 04Oct2021, Version 1, - Section 9. Period of review, paragraph No.1.	
27	Approvals and decisions in relation to the Proposal shall include conditions that require the Proponent to conduct a complete review and synthesis of all monitoring programs that assess impacts of mining activities on the environmental values and beneficial uses of the McArthur River, in accordance with the NT EPA's overarching environmental outcome in Recommendation 3. The revised monitoring program shall be reviewed by the Independent Panel/s and Independent Monitor within nine months of authorisation of the Proposal, and then approved by the relevant regulator/s. The revised monitoring program shall be incorporated into the Adaptive Management Plan.	3	Part Compliance (High)	Confirmed condition in Authorisation 0059 dated 05May2022 - Condition 44. The Condition 44 does not require the review by the Independent Panel/s and Independent Monitor within nine months of authorisation of the Proposal, instead it states within 18 months of the authorisation. No reference to review by the Independent Panel or the Independent Monitor. However, revised monitoring program is required to be incorporated into the AMP which as per Condition 45.b). must be reviewed by the Independent Monitor and updated with inputs from the CRG. The 2022 EMR provides a more detailed Source-Path-Receptor model discussion considered against the annual monitoring results to provide a overall review and synthesis of monitoring programs. 2023 EMR Section 5 - Discussion contains a holistic review of the environmental performance at the Mine site over the reporting period and using a weight of evidence assessment considers any new drivers or trends in exceedance of monitoring program trigger values.	The 2021 EMR provides a high level synthesis of all environmental monitoring programs implemented at the Mine, including water monitoring programs. Trend analysis was undertaken, considering key elements of the source-pathway-receptor conceptual site model. Operator previously provided revised monitoring plan/s for surface water, groundwater, air quality and sediment as part of the 2020 MMP for assessment under the MMA. The Independent Monitor conducted a review of the Aquatic Ecology Program and Air and Water Quality Monitoring Programs (Task 12) and the AMP (Task 8) to which all monitoring programs contribute. The Independent Monitor's Task 12 and 8 related reviews are deemed to meet the requirement for independent review. DITT advised 18 month timeframe is in recognition of adequate time to undertake a quality review including incorporating results from other relevant studies. This condition is marked as complete in the Authorisation dated 17May2023. OFI: DITT to incorporate a mechanism for the revised monitoring program (assume Water Monitoring Program) to be reviewed by the Independent Panel(s) and Independent Monitor and then be approved by the relevant regulators, e.g. DITT.
28	Approvals and decisions in relation to the Proposal shall include conditions that require the Proponent to prepare an Adaptive Management Plan that includes the following key elements:	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 - Condition 45.	Operator future requirement to prepare AMP within 18 months of the authorisation of the MMP. Review of the AMP completed by Independent Monitor, report provided to the DITT, 15 May 2020. Independent Monitor review of AMP (Rev E May 2022), report provided July 2023. The Independent Monitor reviewed the AMP as its first task in 2021 and deemed the document passable. Summary of recent AMPs The AMP was updated prior to the audit period with minor changes. Amended AMP (AMP-D) was approved by DITT, letter dated 15 August 2022, outside the audit period.
28.i	clear, measurable environmental objectives for all significant environmental risks and potential impacts	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 - Condition 45.i.	
28.ii	measurable performance indicators to show that objectives are on target to be met	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 - Condition 45.ii.	
28.iii	pre-determined triggers to warn of potential for performance indicators to be exceeded, as informed by monitoring	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 - Condition 45.iii.	
28.iv	pre-determined, realistic and achievable contingency interventions to maintain performance indicators if triggers are consistently exceeded	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 - Condition 45.iv.	

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NT EPA recommendation no.	NT EPA recommendation	Score	Compliance level	Evidence	Comments
28.v	clearly defined management measures/actions that are capable of being implemented in a timely way to meet performance indicators and environmental objectives	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 - Condition 45.v.	
28.vi	monitoring in accordance with relevant Recommendations in this Report to determine whether management measures are effective and to inform the need for adjustments to management measures or need for alternatives	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 - Condition 45.vi.	
28.vii	a continual feedback system to ensure appropriate actions are initiated when triggered and environmental objectives are always being met	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 - 45.vii.	
28.viii	continual development of new management actions as required based on knowledge gained from experience at the site and elsewhere across industry.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 - Condition 45.viii.	
28 continued	All key elements should be auditable. Performance indicators, triggers and actions in the Adaptive Management Plan are aimed at ensuring the specified objectives are met.	4	Full Compliance	The AMP is required by Condition 45 in Authorisation 0059 dated 05May2022 and is therefore auditable.	Although the recommendations for audibility are not specifically stated in a Authorisation conditions the elements required in the AMP are listed in the Authorisation which is part of the Independent Monitor's scope to audit. AMP Table 1 summarises the key elements and references the section where these are addressed.
28 continued	Before approvals or decisions are given or made for the Proposal, the Adaptive Management Plan shall be reviewed by the Independent Monitor or an appropriately qualified, independent third party, and the review findings and plan provided to relevant regulator/s, the NT EPA, the Community Reference Group and be made available to the public.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 - Condition 45.b). Note: CRG not in existence at time of decision on proposal.	Operator prepared the AMP 31Jan2020. Independent Monitor's initial AMP review report was completed 15May2020 and submitted to DITT prior to approval or decision on the proposal on 13Nov2020. Independent Monitor AMP review publicly available on DITT website. (website checked 22Aug2022). Independent Monitor review of AMP (Rev E May 2022), report provided July 2023.
29	The Authorisation for the Proposal must provide for approval, implementation and review of the Adaptive Management Plan. To ensure clarity and enforceability, conditions of the Authorisation must:	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 - Condition 46.	Conditions included in the Authorisation to provide for approval, implementation and review of the Adaptive Management Plan. Compliance monitoring will be ongoing.
29.i	clearly set out the required management objectives and performance indicators	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 - Condition 46.a).	
29.ii	provide clarity on the triggers for changes to management actions, and responsibility and evidentiary basis for decision-making	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 - Condition 46.b).	
29.iii	establish the timeframe for initiation of certain actions if triggers are exceeded, including decisions to discontinue an activity and clarify responsibility and evidentiary basis for decision-making	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 - Condition 46.c).	
29.iv	establish a process for adjusting triggers that includes the regulator	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 - Condition 46.d).	
29.v	establish transparent monitoring, reporting and review requirements	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 - Condition 46.e).	
29.vi	establish processes to ensure transparency and stakeholder engagement in Adaptive Management Plan design and implementation	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 - Condition 46.f).	
29.vii	set out the mechanism for periodic review and approval of amendments to the plan.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 - 46.g) set out a mechanism for periodic review by the IM not exceeding a frequency of every three years. 46. h) Any amendments must be provided to DITT for re-approval.	

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NT EPA recommendation no.	NT EPA recommendation	Score	Compliance level	Evidence	Comments
29 continued	The Adaptive Management Plan and its implementation must be reviewed by the Independent Monitor every three years, with the outcomes of the review made available to the relevant regulator/s, the NT EPA, the Community Reference Group and the public.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 - 46.g). AMP review by Independent Monitor every three years. No reference to the NT EPA in this condition sub-part.	There is no reference to the NT EPA in the condition, however, DITT advised they would provide AMP review findings to the NT EPA and CRG. The Independent Monitors AMP review was uploaded to DITT website 15May2020. The Independent Monitor's scope includes a review of the Adaptive Management Plan (Rev E, May 2022) and implementation outcomes which was conducted in late 2022, report provided July 2023.
30	Where trends indicate that performance indicators and environmental objectives will not or are unlikely to be met by implementing the adaptive management plan, the NT EPA must be notified of any resultant changes to the Proposal required under clause 14A of the Environmental Assessment Administrative Procedures.	4	Full Compliance	Confirmed condition in Authorisation 0059 dated 05May2022 -Condition 47.	Operator ongoing requirement for monitoring and reporting trends and performance against the AMP. EMR 2024 Section 4.3 provides an overview of the environmental performance of each monitoring program as a summary of relevant TARPS (level 1, 2 and 3 triggers) and no indication or discussion of trends, since trends are within expected ranges. Advised this condition is included in the Authorisation, as a second order line of compliance. The action is a requirement under NT legislation as the Environmental Assessment Act applies.



Appendix E. River health review

Table E-1: Monitoring program outcomes for protection of the McArthur River beneficial uses and community values from mining impacts

Monitoring Program	2023-2024	Key Conclusions
Freshwater Macroinvertebrate Monitoring	This monitoring program has been developed and refined since 2008 to allow for a quantifiable and site-specific assessment to detect statistically significant differences in freshwater aquatic macroinvertebrate communities resulting from Mine activities.	The Independent Monitor agrees with the conclusions of the Operator's external expert's assessment that it indicates no statistically significant differences in macroinvertebrate assemblages in sites upstream and downstream of the Mine's operations for the monitoring period encompassing 2023 - 2024.
Diversity and Abundance of Freshwater Aquatic Fauna	This monitoring program has been developed and refined since 2006 to allow for a quantifiable and site-specific assessment to detect statistically significant differences in freshwater aquatic fauna resulting from Mine activities.	The monitoring program appears to have been implemented in accordance with the approved MMP. The Independent Monitor agrees with the conclusions of the Operator's external expert's assessment that there has been no observable change in species diversity and abundance outside the range of natural variance (largely driven by inter-year seasonal flow variation).
Metals in Freshwater Aquatic Fauna	This monitoring program has been developed and refined since 2005. Significant improvements to the monitoring program were made in 2009 to allow species specific comparisons between sites. In 2014, larger species (more likely to be consumed by people) were included in the monitoring program. These and other improvements have increased the appropriateness and robustness of the program.	The Independent Monitor agrees with the conclusions of the Operator's external expert's assessment that the data suggests little measurable effect on tissue metal concentrations in the McArthur River and downstream environments. The program is suitably designed to detect any potential metal tissue concentration elevations in the future. Past detection of elevated metal tissue concentrations has informed management actions.

Table E-2: Monitoring program outcomes for facilitation of development of the ecosystems and their functions along the McArthur River diversion channel for terrestrial and aquatic flora and fauna

Monitoring Program	2023-2024	Key Conclusions
Freshwater Macroinvertebrate Monitoring	This monitoring program has been developed and refined since 2008 to monitor the development of instream habitats in the McArthur River and Barney Creek diversion channels. The level of sampling and sampling sites selected were appropriate for meeting the monitoring objective to assess development of macroinvertebrate assemblages within the diversion channels.	The monitoring program appears to have been implemented in accordance with the approved MMP. The Independent Monitor agrees with the conclusions of the Operator’s external expert’s assessment, that the results suggest that macroinvertebrate assemblages riffle sites along the McArthur River diversion channel appeared to have resembled those in reference sites within two years of channel operation, and that edge habitats were becoming more similar over time.
Diversity and Abundance of Freshwater Aquatic Fauna	Components of this monitoring program have been developed and refined since 2008 to monitor changes in aquatic fauna in the diversion channels, monitor fish passage success through the McArthur River diversion channel, and assess the effectiveness of adding woody debris to the McArthur River diversion channel as a key rehabilitation strategy.	The monitoring program appears to have been implemented in accordance with the approved MMP. The Independent Monitor agrees with the conclusions of the Operator’s external expert’s assessment that there has been no observable change in species assemblages related to mining activities. Fish assemblages in complex habitat (i.e., where woody debris has been introduced) were comparable with naturally complex habitat upstream and downstream of the diversion channel.
Freshwater Sawfish and Barramundi Acoustic Monitoring	Since 2011, tagging has focused on migratory species, notably Barramundi and Freshwater Sawfish. This included dart tags, and for specimens captured at locations whose future movements were likely to inform the objectives of the acoustic monitoring program, the specimens were fitted with acoustic tags.	Three sawfish were recorded either within or upstream of the McArthur River diversion channel. This again supports the assertion that fish passage for this species is not impaired and exceeds the minimum requirement of demonstrating passage of sawfish through the diversion channel once every five years.
Metals in Freshwater Aquatic Fauna	This monitoring program has been developed and refined since 2005. Significant improvements to the monitoring program were made in 2009 to allow species specific comparisons between sites. In 2014, larger species (more likely to be consumed by people) were included in the monitoring program. These and other improvements have increased the appropriateness and robustness of the program.	The Independent Monitor agrees with the conclusions of the Operator’s external expert’s assessment that the data suggests little measurable effect on tissue metal concentrations in the McArthur River and downstream environments. The program is suitably designed to detect any potential metal tissue concentration elevations in the future. Past detection of elevated metal tissue concentrations has informed management actions.