

Compliance audit program

EL8084 and EL8987 Constellation Exploration Project

Tritton Resources Pty Ltd

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Table of Contents

1. Introduction.....	5
1.1. Background.....	5
1.2. Audit objectives.....	5
1.3. Audit scope.....	5
1.4. Audit criteria	5
1.5. Publishing and disclosure of information.....	6
2. Audit methods.....	7
2.1. Opening meeting.....	7
2.2. Site interviews and inspections.....	7
2.2.1. Data collection and verification	7
2.2.2. Site inspections	7
2.3. Closing meeting.....	8
2.4. Compliance assessment definitions	8
2.5. Reporting.....	9
3. Audit findings	10
3.1. Work program	10
3.2. Access arrangements.....	10
3.3. Native title and exempted areas	11
3.4. Community consultation	11
3.4.1. Risk assessment	11
3.4.2. Community consultation strategy	12
3.4.3. Implementation and reporting.....	12
3.5. Exploration activity approvals.....	12
3.6. Environmental management	13
3.6.1. Use of chemicals, fuels and lubricants	13
3.6.2. Water management.....	15
3.6.3. Noise and vibration	15
3.6.4. Air quality	15
3.6.5. Waste management	16
3.6.6. Vegetation clearance and surface disturbance.....	16
3.6.7. Roads and tracks	17

3.6.8. Weeds, pest animals and disease.....	17
3.6.9. Livestock protection	17
3.6.10. Cultural heritage.....	17
3.6.11. Fire prevention.....	18
3.6.12. Risk assessment.....	18
3.7. Security deposit.....	19
3.8. Rehabilitation	19
3.8.1. Risk assessment	19
3.8.2. Rehabilitation objectives and completion criteria.....	19
3.8.3. Rehabilitation program	20
3.9. Annual activity reporting	20
3.10. Core and sample storage.....	21
3.11. Record keeping.....	22
4. Compliance management.....	24
4.1. Identifying compliance obligations.....	24
4.2. Contractor management	24
4.3. Inspections, monitoring and evaluation	25
5. Audit conclusions	26

1. Introduction

1.1. Background

Exploration licence 8084 (1992) was granted to Tritton Resources Pty Ltd on 10 May 2013. The exploration area was about 45 kilometres north-west of Nyngan in central NSW.

Exploration licence 8987 (1992) was granted to Tritton Resources Pty Ltd on 5 June 2020. The exploration area was about 64 kilometres north-west of Nyngan in central NSW.

As part of the compliance audit program, an audit of the exploration activities associated with the exploration projects within EL8084 and EL8987 was undertaken on 24 October 2024 by the Resources Regulator within the Department of Primary Industries and Regional Development.

1.2. Audit objectives

The objectives of the audit were to:

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

1.3. Audit scope

The scope of the audit included:

- the exploration activities associated with the Constellation exploration project including:
 - exploration activities within EL8084 and EL8987 including a selected sample of exploration drillholes
 - borehole sealing and rehabilitation activities for selected drilling activities undertaken since January 2022.
- a review of documents and records pertaining to the exploration operations for the period commencing 24 October 2021 and ending 24 October 2024.

1.4. Audit criteria

The audit criteria against which compliance was assessed included:

- *Mining Act 1992*, specifically, Sections 5, 30, 140, 163C to 163E, 163G, 378D
- Mining Regulation 2016, specifically clauses 59 to 68
- conditions attached to EL8084 (granted 10 May 2013 and last renewed 14 July 2023)

- assessable prospecting operations application dated 14 September 2023 for up to 10 diamond drill holes, and associated approval dated 25 September 2023 (APO0001545)
- assessable prospecting operations application dated 7 October 2022 for up to 15 diamond drill holes, and associated approval dated 2 November 2023 (APO0001569)
- conditions attached to EL8987 (granted 5 June 2020 and last renewed 17 August 2022)
- assessable prospecting operations application dated 20 September 2023 for up to 15 diamond drill holes, and associated approval dated 10 October 2023 (APO0001549)
- assessable prospecting operations application dated 23 May 2024 for up to 15 diamond drill holes, and associated approval dated 20 June 2024 (APO0001761)
- Exploration code of practice: Environmental management (Version 4, June 2021 and Version 5, March 2022)
- Exploration code of practice: Rehabilitation (Version 4, June 2021 and Version 5, March 2022)
- Exploration code of practice: Community consultation (Version 2.0, October 2022 and Version 2.1, May 2023)
- Exploration code of practice: Produced water management, storage and transfer (Version 3, September 2017, Version 4, June 2021 and Version 5, March 2022)
- Exploration Reporting: A guide for reporting on exploration and prospecting in New South Wales (Version 3, October 2021 and Version 4, January 2022)
- Exploration Guideline: Annual activity reporting for prospecting titles (Version 3.0, December 2020 and Version 4, October 2022) published by Department of Regional NSW.

1.5. Publishing and disclosure of information

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

- Section 365 of the *Mining Act 1992*
- Resource Regulator's [Compliance Publication Policy](#)
- *Government Information (Public Access) Act 2009*

2. Audit methods

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

2.1. Opening meeting

An opening meeting was held onsite on 24 October 2024. The audit team was introduced, and the scope of their responsibilities was conveyed to the auditees. The objectives and scope of the audit were outlined. The methods to be used by the team to conduct the audit were explained, including the interview of personnel, review of documentation, examination of records and a site inspection to assess specific compliance requirements.

2.2. Site interviews and inspections

2.2.1. Data collection and verification

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

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

2.2.2. Site inspections

A site inspection was undertaken of the following exploration operations in EL8084 and EL8987:

EL8084

- TAKD141 drilling in progress
- TAKD142 drilling in progress
- TAKD131 drilled but not yet rehabilitated.

EL8987

- TAKD105 drilled but not yet rehabilitated
- TAKRC027 drilled and rehabilitated
- Core and sample storage at the Tritton Mine.

2.3. Closing meeting

A closing meeting was held on site on 24 October 2024. The objectives of this meeting were to discuss any outstanding matters, present preliminary findings and outline the process for finalising the audit report.

2.4. Compliance assessment definitions

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

Table 1 Compliance assessment definitions

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

Assessment	Criteria
	A 'not determined' assessment was also made where the condition was outside the scope of the audit.
Not applicable	<p>The circumstances of the authorisation or licence holder have changed and are no longer relevant (e.g. no longer mining, mining equipment and plant has been removed).</p> <p>An invoking element in the criteria was not activated within the scope of the audit.</p>

2.5. Reporting

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

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

3. Audit findings

3.1. Work program

Condition 1 of EL8084 and EL8987 required the licence holder to carry out the operations described in the approved work programs. Work programs WP-EL8084-2023-2028, WP-EL8084-2018-2023, and WP-EL8987-2022-2028 were in force during the audit period.

Evidence was available to confirm that exploration activities were progressing. Extensive work was completed on the Constellation project to progress the project to resource definition stage. Annual reports for the 2023 and 2024 reporting periods were reviewed for EL8084 and EL8987.

Exploration completed included:

EL8084

- diamond drilling of 10 holes
- drill core analysis
- petrological analysis.

EL8987

- diamond drilling of 5 holes
- drill core analysis
- helicopter versatile time domain electromagnetic (VTEM) survey
- moving loop transient electromagnetic (MLTEM) ground surveys
- regional geological mapping
- mineral potential mapping.

Tritton adopted a philosophy of designing the work program to be achievable over the renewal period. Monthly reporting and the annual activity reporting cycle were used to monitor progress on the work programs.

Exploration data was noted to be maintained by the Tritton geologists and submitted to NSW Resources with the annual activity reports as required.

3.2. Access arrangements

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

Evidence was provided to confirm written land access agreements were in place for the exploration activities undertaken on EL8084 and EL8987. The land access agreements reviewed during the audit were generally noted to be prepared using the standard Association of Mining and Exploration Companies' template.

One access agreement included a description of specific areas where access was permitted which was restricted to a road corridor and a drilling area. Special conditions were included in the agreement which was supplemented by a deed of entry.

Tritton mapped where land access agreements were in place or were in negotiation. Drill programs were restricted to those properties where access agreements were in place. Any specific landholder requirements were included in the drill hole plans given to the drillers.

3.3. Native title and exempted areas

Condition 2 of EL8084 and EL8987 required the licence holder to obtain the prior written consent of the Minister before carrying out any activities on land on which native title had not been extinguished. Similarly, Section 30 of the *Mining Act 1992* required the consent of the Minister before a licence holder undertook any activities within a State Conservation Area.

Tritton exploration staff advised exploration activities were being conducted in areas of freehold land within EL8084 and EL8987. A review of mapping data showed no holes were drilled in any exempted areas within EL8084 or EL8987. No further approvals under section 30 of the *Mining Act 1992* were required.

Tritton staff said a large portion of the licence areas was under freehold title where native title was extinguished. Mapping confirmed drilling was in freehold areas and no further approvals under condition 2 were required.

It was noted Tritton was maintaining a Crown Lands layer in its geographic information system (GIS) to identify where further approvals may be required. Drill hole planning aimed to avoid areas where native title may exist. Tritton staff were aware native title was held by the Ngemba, Ngiyampaa, Wangaaypuwan and Wayilwan people (NCD2024/002).

3.4. Community consultation

Condition 3 of EL8084 and EL8987 required the licence holder to carry out community consultation in relation to the planning and conduct of exploration activities. Community consultation was required to be carried out in accordance with the requirements of Exploration code of practice: Community consultation.

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

3.4.1. Risk assessment

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

Tritton prepared a comprehensive risk assessment for its exploration operations that was documented as part of the workplace risk assessment and control process adopted by Tritton. The risk assessment included a range of risks associated with consultation and engagement.

Tritton undertook the activity impact level assessment, following the guidance in Appendix 1 of the code of practice, for its exploration operations and concluded the activities were low risk. The auditor concurred with this assessment.

3.4.2. Community consultation strategy

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

Tritton implemented a community consultative committee for its Tritton mining operations and prepared a community and stakeholder engagement plan. . This was supplemented by a specific community consultation strategy for the exploration operations.

The elements of mandatory requirement 3 of the code of practice were included across both the stakeholder engagement plan and the exploration community consultation strategy. Community engagement tools and methods were generally contained in the corporate plan. Detailed stakeholder analysis for the exploration licences was generally contained in the exploration community consultation strategy.

3.4.3. Implementation and reporting

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

Records were available to confirm implementation of the consultation strategy. Exploration was included in the Tritton Mine community consultation committee (CCC) meetings. Given the location of the Constellation drilling program remote from residences and other sensitive receptors, one on one face to face meetings with landholders was the primary consultation undertaken.

Tritton was using the Consultation Manager software package to collate and maintain community consultation records. Minutes were maintained for all CCC meetings.

Up until the change to the code of practice in October 2022, annual community consultation reports were prepared and submitted by Tritton, generally in accordance with the reporting guidance in Appendix 2 of the code of practice. Since October 2022, annual community consultation reports were prepared and were available, however, Tritton did not receive any requests for community consultation reports to be provided.

3.5. Exploration activity approvals

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

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

EL8084

- Assessable prospecting operations application dated 14 September 2023 for up to 10 diamond drill holes, and associated approval dated 25 September 2023 (APO0001545).

- Assessable prospecting operations application dated 7 October 2022 for up to 15 diamond drill holes, and associated approval dated 2 November 2023 (APO0001569).

EL8987

- Assessable prospecting operations application dated 20 September 2023 for up to 15 diamond drill holes, and associated approval dated 10 October 2023 (APO0001549).
- Assessable prospecting operations application dated 23 May 2024 for up to 15 diamond drill holes, and associated approval dated 20 June 2024 (APO0001761).

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

3.6. Environmental management

Condition 4 of EL8084 and EL8987 required the licence holder to prevent or minimise so far as was reasonably practicable, any harm to the environment arising from the activities carried out under the licence. Condition 2 of the exploration activity approval required the licence holder to carry out the activity in compliance with Part B of the Exploration code of practice: Environmental management.

An assessment against the Exploration code of practice: Environmental management was completed for the exploration activities in progress as documented in the following sections. Two diamond drill rigs were operating on EL8084 (Figure 1 and Figure 2). Drilling was not in progress on EL8987, but a drilling program was recently completed.

Figure 1: Drill rig on site at TAKD141

Figure 2: Drill rig on site at TAKD142



3.6.1. Use of chemicals, fuels and lubricants

Mandatory requirements 1.1 to 1.4 identified the requirements for the management of chemicals, fuels and lubricants used during exploration activities.

Oils, greases and other chemicals were stored on plastic sheeting banded around the edges (Figure 3). A rig nappy was in place under each drill rig (Figure 4), with spill and leak protection also

observed under the generator and lighting plant. Safety data sheets were available in hard copy and electronically and drilling staff were familiar with their locations.

A fully stocked spill kit was located next to each drill rig (Figure 5). The driller said all drilling staff were trained in the use of the spill kits. No spills were observed at the drill site and appropriate controls were in place to manage chemicals, fuels and lubricants associated with the drilling program.

Figure 3: Oil and chemical storage at TAKD142



Figure 4: Rig nappy under rig at TAKD142



Figure 5: Spill kit onsite at TAKD141



3.6.2. Water management

Mandatory requirements 2.1 and 2.2 required the licence holder to implement all measures to prevent, so far as reasonably practicable, causing adverse impacts on water quality and quantity, including groundwater levels and pressure.

Diamond drilling required the use of water and drilling muds as part of the drilling process. These fluids need to be managed during drilling operations to minimise the risk of environmental impacts. Tritton assessed the risks to surface and groundwater for the drilling program and documented this as part of its environmental risk assessment.

Tritton was using contract drillers for the drilling program. The drillers established a fluid management system involving the use of 5,000 litre plastic tanks as aboveground sumps to capture and recirculate the fluids (Figure 6) at each drill rig. The tanks were pumped out at regular intervals using a liquid waste vacuum truck (Figure 7) for disposal at the Tritton Mine tailings management facility. Records from the mine were available to confirm disposal.

Figure 6: Above ground sumps at TAKD141



Figure 7: Liquid waste vacuum truck at TAKD142



3.6.3. Noise and vibration

Mandatory requirement 3.1 required the licence holder to implement all practicable noise management measures to ensure that noise levels meet acceptable noise criteria for sensitive receivers.

It was noted the drilling was being conducted in broadscale agricultural areas. Noise was assessed by Tritton as part of the environmental risk assessment and the risk of adverse impacts was assessed as low with controls in place.

3.6.4. Air quality

Mandatory requirement 4.1 required the licence holder to implement all measures to prevent, so far as practicable, pollution caused by dust and other air pollutants.

It was noted that the drilling was being conducted in broadscale agricultural areas. Air quality impacts were assessed by Tritton as part of the environmental risk assessment and the risk of adverse impacts was assessed as low with controls in place.

Observations made by the audit team on site confirmed that minimal dust was generated from the diamond drilling process and no further controls were required.

3.6.5. Waste management

Mandatory requirement 5.1 required the licence holder to manage all waste in a manner which did not, as far as practicable, cause harm to the environment.

The key waste streams from the Tritton exploration operations included:

- drilling fluids from the diamond drilling process
- drill cuttings
- domestic waste from the drilling crew.

Tritton developed a waste management procedure to address the risks associated with wastes from the exploration programs. Drilling fluids were managed using the aboveground sump system with pump out of the tanks on a regular basis by a liquid waste vacuum truck. Drill cuttings and fluids from the tanks were disposed of at the Tritton Mine tailings management facility.

Domestic waste was collected in appropriate receptacles at the drill site and removed to the local waste management facility at regular intervals.

Records were reviewed to confirm the waste management practices, for example, the daily drillers plods, and the sign-in records from the mine for access to the tailings facility. No wastes were observed at any of the drill sites inspected by the audit team.

3.6.6. Vegetation clearance and surface disturbance

Mandatory requirements 6.1 to 6.4 required the licence holder to:

- minimise the extent of any vegetation clearing and surface disturbance to as low as practicable
- implement all measures to prevent, so far as practicable:
 - adverse impacts to fauna caused by vegetation clearing or surface disturbance
 - causing any land degradation or pollution of land and water
 - harm to the environment when disturbing land in areas of potential or actual acid sulfate soils.

The Tritton environmental risk assessment identified the key control for vegetation clearance and ground disturbance to be drill site planning to minimise disturbance.

Due to the flat nature of the terrain, formed drill pads were not required, with drive-up access for the drill rig across the paddocks. No significant vegetation clearance other than some minor ground cover disturbance (mostly grass) was observed at any of the holes inspected during the site inspection. Tritton used a smaller tracked rig to access the drill sites close to the wooded area. This rig had a smaller footprint and minimised the need for vegetation clearance.

The terrain in which drilling was conducted was reasonably flat. The Tritton environmental risk assessment concluded erosion was low risk and specific controls for erosion and sedimentation were not required. No evidence of erosion or sedimentation from drilling activities was observed at any of the drill sites inspected by the audit team.

3.6.7. Roads and tracks

Mandatory requirements 7.1 to 7.5 required the licence holder to:

- consult with relevant landholders prior to establishing any new roads or tracks
- plan, design, construct and use roads and tracks in a manner which minimises the area and duration of disturbance
- construct any crossing of rivers, permanent and intermittent water lands and wetlands to prevent impacts on fish habitats
- refrain from using any unsealed road or track during wet conditions to prevent damage to that road or track
- repair all damage to existing roads and tracks resulting from exploration activities.

Risks associated with ground disturbance from vehicular movements were included in the Tritton environmental risk assessment and were assessed as low risk with suitable controls in place.

Tracks used to access the drill sites inspected during the audit were existing property roads and tracks. At sites TAKD141 and TAKD142, the audit team observed the drill rig had driven the short distance across the paddock from the existing station track to the drill site – no formed track or vegetation clearance was required.

3.6.8. Weeds, pest animals and disease

Mandatory requirement 8.1 required the licence holder to implement all practicable measures to prevent the introduction and spread of weeds, pest animals and animal and plant diseases.

Vehicle hygiene procedures were the primary control identified in the Tritton environmental risk assessment to avoid the introduction of weeds and diseases into the site. The need for vehicle cleaning was included in the site induction given to all personnel and contractors. The rigs were inspected before coming on to site and this was documented in the drill rig audit checklist.

3.6.9. Livestock protection

Mandatory requirement 9.1 required the licence holder to implement all measures to prevent, as far as practicable, causing adverse impacts to livestock.

There were no livestock in the paddock during the site inspection at TAKD141 and TAKD142 where drilling was in progress. Tritton exploration staff said landholders were typically requested to move livestock from the paddocks required for drilling.

3.6.10. Cultural heritage

Mandatory requirement 10.1 required the licence holder to implement all measures to prevent, so far as practicable, harm to Aboriginal cultural heritage and non-indigenous cultural heritage.

Searches of the aboriginal heritage information system (AHIMS) were conducted as part of the preparation of applications for assessable prospecting operations. The results of these searches are communicated through the site induction process (for example, the scarred tree within the Constellation project area which was observed to be included in the Constellation site induction). Sites were also included in the activity risk assessments.

Observations made during the site inspection confirmed drilling was conducted in open and cleared paddocks, highly modified by agricultural practices. The potential for artefacts was likely to be very low.

3.6.11. Fire prevention

Mandatory requirement 11.1 required the licence holder to implement all measures to prevent, as far as practicable, the ignition and spread of fire.

Fire extinguishers were maintained on the drill rigs and in all light vehicles. Fire control measures were noted to be included in the Tritton site induction so all personnel on site were familiar with the requirements, controls, and what actions needed to be taken. A water tank and fire pump on a trailer were on site at TAKD141 (Figure 8).

Figure 8: Fire suppression equipment at TAKD141



3.6.12. Risk assessment

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

Tritton prepared a comprehensive environmental risk assessment for its exploration programs. Where required, environmental controls were identified to mitigate any high and medium risks. The environmental risk assessment was noted to address the mandatory requirements of the code of practice. For example, the risk assessment addressed:

- the use of roads and tracks
- vegetation clearance and surface disturbance

- drill collars washing out
- rehabilitation not in accordance with requirements

Evidence was available to demonstrate implementation of the required controls.

3.7. Security deposit

Condition 5 of EL8084 and EL8987 required the licence holder to provide a security deposit to secure funding for the fulfilment of obligations under the licence.

The applications for assessable prospecting operations triggered increases in security. The security amount required for EL8084 was \$88,000, which department records confirmed was held. The security amount required for EL8987 was \$61,000 which department records confirmed was held.

Observations made on site during the site inspection confirmed that the security held was adequate for the drilling programs in progress.

3.8. Rehabilitation

Condition 6 of EL8084 and EL8987 required the licence holder to carry out rehabilitation of all disturbance caused by activities carried out under the licence in accordance with the requirements of the Exploration code of practice: Rehabilitation.

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

3.8.1. Risk assessment

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

Tritton prepared a comprehensive environmental risk assessment for its exploration programs that included risks associated with rehabilitation of the sites. Where required, controls were identified to mitigate any high and medium risks.

Evidence was available to confirm implementation of required risk controls. Drill holes inspected were in agricultural areas. Given the reasonably small disturbance footprint, rehabilitation typically involved scarifying or ripping of the area with natural regeneration of vegetation.

3.8.2. Rehabilitation objectives and completion criteria

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

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

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

3.8.3. Rehabilitation program

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

The 2024 drilling programs were not rehabilitated at the time of the audit. Earlier programs conducted in 2022 and 2023 were rehabilitated. Rehabilitation typically included:

- removal of all plant, equipment and wastes
- cutting drill collars below ground level and permanently plugging each hole
- backfilling the hole to surface
- scarifying or ripping of the area
- natural revegetation of the sites.

Rehabilitation monitoring was generally done using a photographic record with details recorded on the rehabilitation checklist. Photographs before, during, and after drilling were maintained electronically for each site. Tritton conducted an annual rehabilitation review for each work program.

Drilling records were collated and maintained using a geological data management software package. This system was used to track each hole drilled against its approval and identify when each hole was rehabilitated.

3.9. Annual activity reporting

Section 163C of the *Mining Act 1992*, clause 59 of the Mining Regulation 2016 and condition 8 of EL8084 and EL8987 required the licence holder to submit an activity report annually within one calendar month following grant anniversary date. Annual activity reports were required to be prepared in accordance with the Exploration guideline: Annual activity reporting for prospecting titles.

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

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

Generally, reports were in accordance with the NSW Resources and/or Resources Regulator templates and guidance material.

3.10. Core and sample storage

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

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

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

Tritton staff advised that core and sample storage was maintained in a core yard at the company’s Tritton Mine which was inspected as part of the audit (Figure 9).

Core was stored in plastic core trays, labelled, numbered and palletised by hole (Figure 10). Chip samples from the earlier RC drilling programs were stored in labelled plastic chip trays, stacked by hole number on shelving within storage containers (Figure 11 and Figure 12).

Figure 9: Core storage in the Tritton core yard



Figure 10: Core trays stacked and labelled at TAKD141



Figure 11: Chip sample storage in a storage container



Figure 12: Details of chip sample tray labelling



3.11. Record keeping

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

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

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

Examples of records reviewed included:

- land access agreements
- GIS system
- drill hole plans
- drilling records, including a spreadsheet which related drilled holes to relevant activity approval and rehabilitation signoff
- environmental risk assessment
- pre, during and post drilling photos
- waste management records
- drill hole checklists

- drill rig audits
- rehabilitation objectives and completion criteria
- rehabilitation risk assessment
- community consultation risk assessment
- community consultation strategy
- community consultation records
- community consultation reports
- annual activity reporting.

4. Compliance management

4.1. Identifying compliance obligations

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

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

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

The Tritton exploration staff had a good understanding of the compliance requirements for exploration. Comprehensive and robust systems and processes for managing compliance requirements were developed and implemented. A surface drilling sign-off plan was prepared for each program that included a pre-drilling checklist to check all requirements were in place before drilling started.

The Constellation exploration project was located across 3 exploration licence boundaries including both EL8084 and EL8987. Tritton mapped the tenement boundaries for each licence area and surveyed the drill collar locations to ensure approved holes were in the right tenement.

Records were generally maintained to demonstrate compliance.

4.2. Contractor management

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

Tritton was using contract drillers to complete the exploration drilling programs. Any specific requirements (e.g. landholder requirements or specific controls required for the APO) were included on a drill hole plan which was provided to the drillers for each hole. All personnel were required to complete a site-specific induction which included a discussion of environmental requirements.

The driller at each rig provided a copy of the drill hole plan for the hole in progress. The drill hole plan included:

- requirements for core labelling
- environmental controls

- access requirements.

The driller at each rig and the drilling supervisor had a good understanding of the environmental management controls required for drilling operations. Relevant environmental controls associated with the drill rig were implemented; for example, bunding and spill control around plant and equipment, water management controls, and waste management measures.

Tritton undertook a review of the drilling contractor performance during and after the contracts and, as a result, had established an informal preferred supplier list.

4.3. Inspections, monitoring and evaluation

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

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

Tritton exploration staff established an inspection and monitoring process that was suitable for the nature of the exploration activities being conducted. These processes included monitoring of contract drilling works, inspection of drill sites and rehabilitation to confirm works were completed in accordance with the controls identified in the risk assessments.

The environmental and rehabilitation risk assessments prepared by Tritton were noted to include risks related to exploration activities and environmental management controls were in place. However, as suggestion for improvement 1, Tritton should consider expanding its risk assessment process to include a post drilling review to assess the performance of the control measures and make any recommendations for future drilling programs, where those controls were shown to be not effective in addressing the risk.

5. Audit conclusions

From the evidence reviewed during the audit, it was concluded the exploration operations undertaken by Tritton were well managed. Evidence was available to demonstrate comprehensive and robust systems and processes were developed to identify and manage compliance requirements. Records were maintained as required to demonstrate compliance.

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

One suggestion for improvement was identified as summarised in Table 2.

Table 2 Summary of suggestions for improvement

Suggestion for Improvement No.	Description of issue
1	Tritton should consider expanding its risk assessment process to include a post drilling review to assess the performance of the control measures and make any recommendations for future drilling programs, where those controls were shown to be not effective in addressing the risk.