

**Compliance audit program**  
EL8638 Barrow Exploration Project  
**Coolabah Metals Limited**

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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 .....	10
3.4. Community consultation .....	11
3.4.1. Risk assessment .....	11
3.4.2. Community consultation strategy .....	11
3.4.3. Implementation and reporting.....	12
3.5. Exploration activity approvals.....	12
3.6. Environmental management .....	12
3.6.1. Risk assessment .....	13
3.7. Security deposit .....	13
3.8. Rehabilitation .....	13
3.8.1. Risk assessment .....	14
3.8.2. Rehabilitation objectives and completion criteria.....	14
3.8.3. Rehabilitation program .....	14
3.9. Annual activity reporting .....	15

3.10. Core and sample storage ..... 16

3.11. Record keeping..... 16

4. Compliance management..... 18

4.1. Identifying compliance obligations..... 18

4.2. Contractor management ..... 18

4.3. Inspections, monitoring and evaluation ..... 18

5. Audit conclusions ..... 20

# 1. Introduction

## 1.1. Background

Exploration licence 8638 (1992) was granted to Bacchus Resources Pty Ltd on 31 August 2017. The licence was transferred to Coolabah Metals Limited on 7 October 2022. The exploration area was about 22 kilometres north-west of Tottenham in central NSW.

As part of the compliance audit program, an audit of the exploration activities associated with the Barrow exploration project within EL8638 was undertaken on 22 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 the Coolabah Metals 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 Barrow exploration project including:
  - exploration activities within EL8638 including a selected sample of exploration drillholes
  - borehole sealing and rehabilitation activities for selected drilling activities undertaken since October 2022.
- a review of documents and records pertaining to the exploration activities
- the assessment of compliance for the period commencing 1 October 2022 and ending 22 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 EL8638 (granted 31 August 2017 and renewed 13 November 2022)
- assessable prospecting operations application dated 31 August 2022 for up to 23 reverse circulation (RC) drill holes, and associated approval dated 15 September 2022 (APO0001276)

- 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).

## 1.5. Publishing and disclosure of information

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

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

## 2. Audit methods

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

### 2.1. Opening meeting

An opening meeting was held onsite on 22 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. Where documents were unable to be reviewed on the day, they were provided following the audit.

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

#### 2.2.2. Site inspections

A site inspection was undertaken of the following exploration activities on EL8638. All holes were drilled and rehabilitated in 2023:

- Hole CBRC004
- Holes CBRC003 and CBRC009 drilled from the same pad
- Hole CBRC002
- Hole CBRC001
- Hole CBRC012
- Hole CBRC005
- Hole CBRC006
- Hole CBRC008
- Hole CBRC007
- Hole CBRC014

- Hole CBRC013

## 2.3. Closing meeting

A closing meeting was held on site on 22 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
<b>Compliance</b>	Sufficient and appropriate evidence is available to demonstrate the particular requirement has been complied with.
<b>Non-compliance</b>	<p>Clear evidence has been collected to demonstrate the particular requirement has not been complied with. There are three subcategories of non-compliance reflecting the severity and level of risk associated with the non-compliance:</p> <p>NC1 – the absence of planning or implementation of a required operational element which has the potential to result in a significant risk.</p> <p>NC2 – an isolated lapse or absence of control in the implementation of an operational element which is unlikely to result in a significant risk.</p> <p>NC3 – an administrative or reporting non-compliance which does not have a direct environmental or safety significance.</p> <p>Note: The identification of a non-compliance in this audit may or may not constitute a breach of, or offence under, the <i>Mining Act 1992</i>. Non-compliances identified in this audit report may be further investigated by the Regulator and regulatory actions may be undertaken.</p>
<b>Observation of concern</b>	<p>Where an auditee may be compliant at the time of the audit but there are issues that exist that could result in the potential for future non-compliance if not addressed.</p> <p>Observation of concern was also used where an issue may not have particular compliance requirements, but which was not conducive to good management or best practice.</p>
<b>Suggestion for improvement</b>	Where changes in processes or activities inspected or evaluated at the time of the audit could deliver improvement in relation to risk minimisation, sustainable outcomes and management practices.
<b>Not determined</b>	<p>The necessary evidence has not been collected to enable an assessment of compliance to be made within the scope of the audit.</p> <p>Reasons why the audit team could not collect the required information include:</p> <ul style="list-style-type: none"> <li>• insufficient information on the file relating to the period covered by the audit or insufficient evidence collected to reach a conclusion</li> </ul>



Assessment	Criteria
	<ul style="list-style-type: none"> <li>the wording on the criteria (approval condition) meant that no evidence could be gathered, or it was too difficult to gather the evidence.</li> </ul> <p>A 'not determined' assessment was also made where the condition was outside the scope of the audit.</p>
<b>Not applicable</b>	<p>The circumstances of the authorisation or licence holder have changed and are no longer relevant ( e.g. no longer mining, mining equipment and plant has been removed).</p> <p>An invoking element in the criteria was not activated within the scope of the audit.</p>

## 2.5. Reporting

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

The draft audit findings were forwarded to Coolabah Metals 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 EL8638 required the licence holder to carry out the operations described in the approved work program. Work program WP-EL8638-2021-2027 was in force during the audit period:

Evidence was available to confirm that exploration activities were progressing. Annual reports for the 2022 and 2023 reporting periods were reviewed for EL8638. Exploration completed included:

- airborne gravity survey completed over 21 square kilometres
- airborne gravity processing and interpretation
- magnetic profile modelling
- rock chip sampling
- 17 RC drill holes totalling 2,718 metres across 5 prospect areas.

Coolabah Metals exploration staff said the annual reporting and budgeting process was used to review and monitor the approved work program. Coolabah Metals used UTM Global Pty Ltd (UTM) as a tenement manager. UTM provided monthly reports to Coolabah Metals on compliance with requirements including the work program.

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

### 3.2. Access arrangements

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

Evidence was provided to confirm that a written land access agreement was in place for the exploration activities undertaken on EL8638. The land access agreement was prepared using the standard 'Association of Mining and Exploration Companies' template. Clause 9 of the agreement included details of ground disturbance for drilling. Clause 10 of the agreement included details of rehabilitation to be completed by the explorer.

The land access agreement was a general agreement for exploration activities. Coolabah Metals provided a more detailed notification and maps to the land holder before starting the exploration drilling program.

### 3.3. Native title and exempted areas

Condition 2 of EL8638 required the licence holder to obtain the prior written consent of the Minister before carrying out any activities on land on which native title had not been extinguished. Similarly,

Section 30 of the *Mining Act 1992* required the consent of the Minister before a licence holder undertook any activities within an exempted area.

Coolabah Metals mapped exempted areas, and areas to which native title may apply, within the licence area. These were generally identified as no-go areas during drill hole planning.

Coolabah Metals staff said exploration activities were generally being conducted in areas of freehold land within EL8638. Mapping confirmed the 17 RC drill holes were drilled on freehold land. No further approvals under condition 2 of the licence or Section 30 of the *Mining Act* were required.

Although not a compliance requirement, confirmation of extinguishment of native title was not sought from NSW Resources.

## **3.4. Community consultation**

Condition 3 of EL8638 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.

Coolabah Metals undertook a community consultation risk assessment for the Barrow project, which was documented as part of the community consultation strategy. As suggestion for improvement 1, it was recommended that Coolabah Metals review the community consultation risk assessment against the objectives for consultation such that the risk assessment can focus on the risks and opportunities that need to be identified and managed to facilitate an inclusive and effective consultation program.

### **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.

Coolabah Metals prepared a community consultation strategy and plan for the Barrow project.

The strategy generally followed the guidance material in the code of practice and included:

- objectives for consultation (section 1)
- a description and analysis of community stakeholders and impacts (sections 4 and 5)
- a description of how consultation would be undertaken (section 7)
- a process for review and amendment of the strategy when required (section 3).

### 3.4.3. Implementation and reporting

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

Evidence was available to confirm Coolabah Metals was undertaking community consultation generally in accordance with the methods outlined in the community consultation strategy. Given the location of exploration activities remote from sensitive receptors, liaison with landholders was the key consultation undertaken.

Records of consultation activities were maintained in an excel spreadsheet consultation log. Details recorded included:

- stakeholder details (including date and time of consultation)
- matters discussed
- any outcomes from the consultation
- any actions required (or taken) because of the consultation.

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

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

## 3.5. Exploration activity approvals

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

Evidence was available to confirm that exploration activity approvals were sought and granted for exploration activities. Exploration activity approvals granted included assessable prospecting operations application dated 31 August 2022 for up to 23 reverse circulation (RC) drill holes, and associated approval dated 15 September 2022 (APO0001276).

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

## 3.6. Environmental management

Condition 4 of EL8638 required the licence holder to prevent or minimise so far as is reasonably practicable, any harm to the environment arising from the activities carried out under the licence. Condition 2 of the exploration activity approval required the licence holder to carry out the activity in compliance with Part B of the Exploration code of practice: Environmental management.

No evidence of environmental harm was observed at the sites visited during the site inspection. The RC drilling program was completed at the time of the audit and all plant and equipment had been

removed from site. All sites were rehabilitated. An assessment against the Exploration code of practice: Environmental management was not completed but the following observations were made:

- No tree clearing was observed during the site inspection. Minor clearance of ground vegetation was undertaken where necessary.
- Most holes were within cleared paddock areas.
- No waste was observed at any of the sites inspected. Coolabah Metals staff said RC sample bags were collected and sent to the local landfill for disposal.
- Generally, existing farm tracks were used wherever possible. Coolabah Metals exploration staff said all access points and tracks were agreed with the landowner before starting drilling. In most cases, the tracks were put in by the landowner and were to be used for fire trails once the exploration activities were completed.
- Drilling activities stopped during heavy rain and site access was restricted to minimise the risk of damage to farm roads and tracks.

### **3.6.1. Risk assessment**

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

Coolabah Metals undertook an assessment of the impacts of its exploration operations as part of its application for assessable prospecting operations. Some risk controls were included in the assessment and documented in the safety management plan. The assessment was not comprehensive. This was raised as observation of concern 1. It was recommended that Coolabah Metals undertake a comprehensive environmental risk assessment for its exploration operations to align with the mandatory requirements of the environmental management code of practice. This risk assessment should include the identification of suitable controls to manage the risks identified.

## **3.7. Security deposit**

Condition 5 of EL8638 required the licence holder to provide a security deposit to secure funding for the fulfilment of obligations under the licence.

The security amount required for EL8638 was \$10,000, which department records confirmed was held. Observations made on site during the site inspection confirmed the security held was adequate for the drilling programs completed.

## **3.8. Rehabilitation**

Condition 6 of EL8638 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.

Coolabah Metals undertook an assessment of the impacts of its exploration operations as part of its application for assessable prospecting operations, which included rehabilitation of the exploration activities. Risk controls were included in the assessment. It was noted that additional discussion of rehabilitation requirements was provided in the Coolabah Metals safety management plan. However, the assessment was broad and not comprehensive. This was raised as observation of concern 2.

It was recommended Coolabah Metals undertake a site-specific rehabilitation risk assessment for the exploration activities. As suggestion for improvement 3, it was suggested this be done by identifying and relating rehabilitation risks to the rehabilitation objectives and completion criteria to provide a more robust framework for managing rehabilitation risks.

### 3.8.2. Rehabilitation objectives and completion criteria

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

The exploration activity approval applications lodged by Coolabah Metals indicated the total surface disturbance area was less than 5 hectares. The drilling program did not fall within the definition of a higher risk activity under the code of practice and a rehabilitation management plan was not required to be developed.

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

### 3.8.3. Rehabilitation program

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

Coolabah Metals exploration staff said rehabilitation of drill sites generally included:

- site cleaned of all remaining rubbish and drill samples
- all drill samples were backfilled down the drillhole in the sequence in which they were drilled
- remaining samples were taken and disposed of at an offsite facility
- drill collars were removed, and topsoil was returned to drill collar accordingly

- photos were taken before the site is distributed and after the site was rehabilitated.

Coolabah Metals exploration staff said rehabilitation works were undertaken by the landholder. Monitoring of rehabilitation involved a site inspection and collection of photographs at about 6 monthly intervals.

Figure 1, Figure 2, Figure 3 and Figure 4 show examples of the rehabilitation completed on the holes inspected. No issues of concern were identified at any of the sites inspected. All holes were drilled and rehabilitated in 2023. Coolabah Metals had not sought rehabilitation sign-off from the Regulator but were progressing the application.

Figure 1: Rehabilitation of hole CBRC014



Figure 2: Rehabilitation of hole CBRC012



Figure 3: Rehabilitation of hole CBRC002



Figure 4: Rehabilitation of holes CBRC003 and CBRC009



### 3.9. Annual activity reporting

Section 163C of the *Mining Act 1992*, clause 59 of the *Mining Regulation 2016* and condition 8 of EL8638 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, Coolabah Metals submitted annual activity reports comprising:

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

Generally, reports were found to be in accordance with the NSW Resources and Resources Regulator templates and guidance material.

Coolabah Metals were using the services of a tenement manager who provided monthly reports which included reminders for upcoming reporting dates.

### 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.

The drilling program conducted by Coolabah Metals on EL8638 was RC drilling that resulted in the generation of chip samples. The chip sample storage was off-site at a facility in Orange and was not inspected during the audit. Coolabah Metals staff provided photos of the chip sample storage in metal racks within a shed. The storage appeared to be well organised.

### 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 4 years after the expiry or cancellation of the title. Specific requirements for the types of records to be maintained for exploration activities were detailed in the mandatory requirements of the exploration codes of practice as follows:

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

Records reviewed during the audit demonstrated that Coolabah Metals had generally maintained records as required by the licence conditions and the exploration codes of practice.

Examples of records reviewed included:

- land access agreements



- safety management plan
- worksite induction records
- rehabilitation objectives and completion criteria
- pre, during and post drilling photos
- photos of chip sample storage
- community consultation strategy
- community consultation records
- 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 Coolabah Metals exploration staff generally had a good understanding of the compliance requirements for exploration related to the exploration licence conditions and assessable prospecting operation approvals. Mandatory requirements of the exploration codes of practice were less understood, as reflected in the observations of concern.

Some basic systems and processes for managing compliance requirements were developed and implemented. However further development of these systems would be beneficial as noted in the suggestions for improvement documented in the audit report.

It was noted that records were generally being maintained to demonstrate compliance.

### 4.2. Contractor management

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

Coolabah Metals used contract drillers to complete the exploration drilling program. Drilling was completed at the time of the audit. Coolabah Metals exploration staff said the requirements of the APO approval were discussed with the driller during a site-specific induction. The drilling operations were supervised by a Coolabah Metals geologist, who was on site during the drilling program.

### 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.

Coolabah Metals exploration staff established an inspection and monitoring process that was suitable for the low impact nature of the exploration activities being conducted. These processes were noted to include inspection of drill sites and rehabilitation to confirm works were completed in accordance with the controls identified in the risk assessments.

Exploration staff advised that the process for checking the implementation and effectiveness of controls was informal and not documented. As suggestion for improvement 4, Coolabah Metals should consider the development of a documented process to evaluate the effectiveness of the risk controls implemented, with revised controls identified where those risks changed, or controls were identified as being ineffective.

## 5. Audit conclusions

From the evidence reviewed during the audit, it was concluded that the exploration operations undertaken by Coolabah Metals were generally well managed. Evidence was available to demonstrate that basic systems and processes were developed to identify and manage compliance requirements. Further development of these systems would be beneficial to ensure comprehensive and robust management systems were in place. It was observed that records were being maintained as required to demonstrate compliance.

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

Two observations of concern and 4 suggestions for improvement were noted during the audit, as summarised in Table 2 and Table 3.

Table 2 Summary of observations of concern

Observation of concern No.	Description of Issue	Recommendation
1	Coolabah Metals undertook an assessment of the environmental impacts of its exploration operations as part of its application for assessable prospecting operations. Some risk controls were included in the assessment and documented in the safety management plan. The assessment was not comprehensive.	It was recommended that Coolabah Metals undertake a comprehensive environmental risk assessment for its exploration operations to align with the mandatory requirements of the environmental management code of practice. This risk assessment should include the identification of suitable controls to manage the risks identified.
2	Coolabah Metals undertook an assessment of the impacts of its exploration operations as part of its application for assessable prospecting operations, which included rehabilitation of the exploration activities. Risk controls were included in the assessment. It was noted that additional discussion of rehabilitation requirements was provided in the Coolabah Metals safety management plan. However, the assessment was broad and not comprehensive.	It was recommended Coolabah Metals undertake a site-specific rehabilitation risk assessment for the exploration activities.

Table 3 Summary of suggestions for improvement

<b>Suggestion for Improvement No.</b>	<b>Description of issue</b>
1	Coolabah Metals should consider reviewing the community consultation risk assessment against the objectives for consultation such that the risk assessment can focus on the risks and opportunities that need to be identified and managed to facilitate an inclusive and effective consultation program.
2	Coolabah Metals should consider undertaking an analysis of any community consultation outcomes and complaints to identify any common issues, emerging trends or key outcomes, and document this in the annual reports.
3	Coolabah Metals should consider identifying and relating rehabilitation risks to the rehabilitation objectives and completion criteria to provide a more robust framework for managing rehabilitation risks.
4	Coolabah Metals should consider the development of a documented process to evaluate the effectiveness of the risk controls implemented, with revised controls identified where those risks changed, or controls were identified as being ineffective.