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COMPLIANCE AUDIT PROGRAM

# EXCELSIOR QUARRY

Graymont (Excelsior) Pty Ltd



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# 1. Introduction

## 1.1. Background

Excelsior Quarry is an open cut limestone quarry located about 25 kilometres south of Kandos in central NSW. The quarry comprises four mining authorisations as summarised in Table 1.

*Table 1 Summary of mining titles comprising Excelsior Quarry*

Title	Grant	Expiry	Last renewal
Mining Lease 1517 (ML1517)	3 July 2002	2 July 2023	-
Private Lands Lease 1219 (PLL1219)	3 October 1968	3 October 2030	23 August 2011
Special Lease 664 (SL664)	27 March 1974	31 October 2034	4 July 2014
Mining Purposes Lease 318 (MPL318)	1 November 1993	31 October 2035	4 July 2014

All titles are held by Graymont (Excelsior) Pty Ltd, which acquired the quarry in August 2019 from Sibelco Australia Limited, which had owned the quarry since 2011. The conditions of title for PLL1219, SL664 and MPL318 were amended on transfer of the titles to Graymont. ML1519 has the original grant conditions.

Limestone deposits in the area have been mined since the late 1800s for a variety of uses including cement manufacture and metallurgical flux. Quarrying of limestone has been undertaken at Excelsior Quarry since 1980 and, the quarry has provided crushed and sized limestone for the Charbon Lime Works (also acquired by Graymont in 2019), since 2011. The previous operator put the quarry on a campaign mining basis in 2016 and little mining has been done on the site since that time.

Graymont intends to recommence operations at Excelsior Quarry in 2021 to supply crushed limestone to the Charbon lime plant.

As part of the compliance audit program undertaken by the NSW Resources Regulator, an audit of the mining operations associated with the Excelsior Quarry was undertaken on 25 August 2020. The audit

focussed on the mining and rehabilitation activities within ML1517, PLL1219 and SL664 and did not include any on-ground assessment of the mining purposes on MPL318.

## 1.2. Audit objectives

The objectives of the audit were to:

- undertake a compliance audit of the Excelsior Quarry, operated by Graymont (Excelsior) Pty Ltd, against the requirements of the *Mining Act 1992* and the conditions of the mining leases issued pursuant to that Act.
- assess the operational performance of the Excelsior Quarry mining operations and the ability of the title holder and/or operator to implement management systems and controls to provide for sustainable management of the operations.

## 1.3. Audit scope

The scope of the audit comprised of:

- the mining activities associated with the Excelsior Quarry including:
  - mine development within ML1517, PLL1219 and SL664
  - rehabilitation activities associated with mining and exploration activities.
- a review of documents and records pertaining to the mining and exploration activities
- the assessment of compliance for the period commencing 1 May 2019 to 25 August 2020.

## 1.4. Audit criteria

The audit criteria against which compliance was assessed included:

- *Mining Act 1992*, specifically Sections 5, 6, 163C to 163E, 163G, 378D
- Mining Regulation 2016, specifically clauses 59 to 68
- conditions attached to PLL1219 (granted 3 October 1968 with conditions modified on transfer dated 2 May 2019)
- conditions attached to SL664 (granted 27 March 1974 with conditions modified on transfer dated 2 May 2019)

- conditions attached to MPL318 (granted 1 November 1993 with conditions modified on transfer dated 2 May 2019)
- conditions attached to ML1517 (granted 3 July 2002)
- commitments made in Excelsior Limestone Quarry Mining Operations Plan dated June 2020 (approved 2 June 2020)
- commitments made in Excelsior Limestone Quarry Mining Operations Plan Amendment B dated September 2013 (approved 1 June 2016)
- *Exploration Reporting: A guide for reporting on exploration and prospecting in New South Wales* (Version 2, March 2016) published by the (then) NSW Department of Industry – Resources and Energy
- *Rehabilitation Cost Estimation Tool Handbook* (June 2017) published by NSW Department of Planning and Environment
- *ESG3: Mining Operations Plan (MOP) Guidelines*, September 2013 published by the (then) NSW Trade and Investment, Regional Infrastructure and Services – Division of Resources and Energy
- *Guidelines and Format for Preparation of an Annual Environmental Management Report* (January 2006) published by the (then) NSW Department of Primary Industries – Mineral Resources.

## 1.5. Publishing and disclosure of information

This audit report will be published on the Regulator’s website consistent with Section 365 of the *Mining Act 1992*.

This audit report may be publicly disclosed consistent with the *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 title holder and/or operator and a site inspection of the operations 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

The opening meeting was held onsite at Excelsior Quarry on 25 August 2020. 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 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 collected during the audit process were reviewed on site. 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/or site inspections 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 Excelsior Quarry including:

- access roads and haul roads
- storage shed – temporarily used for a contractor storage area and diesel storage
- mobile plant workshop
- dical emplacement area
- product storage area – including an exploration borehole



- open cut pit area.

## 2.3. Closing meeting

The closing meeting was held at the Graymont Charbon lime works office on 25 August 2020. 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 2.

Table 2 Audit assessment categories

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><b>NC1</b> – the absence of planning or implementation of a required operational element which has the potential to result in a significant risk.</p> <p><b>NC2</b> – 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><b>NC3</b> – 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>

ASSESSMENT	CRITERIA
<b>Suggestion for improvement</b>	Where changes in processes or activities inspected or evaluated at the time of the audit could deliver improvement in relation to risk minimisation, sustainable outcomes and management practices.
<b>Not determined</b>	<p>The necessary evidence has not been collected to enable an assessment of compliance to be made within the scope of the audit.</p> <p>Reasons why the audit team could not collect the required information include:</p> <ul style="list-style-type: none"> <li>■ insufficient information on the file relating to the period covered by the audit or insufficient evidence collected to reach a conclusion</li> <li>■ the wording on the criteria (approval condition) meant that no evidence could be gathered, or it was too difficult to gather the evidence.</li> </ul> <p>A 'not determined' assessment was also made where the condition was outside the scope of the audit.</p>
<b>Not applicable</b>	<p>The circumstances of the authorisation or title 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 site 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 mining operations and identify any non-compliances or observations of concern noted by the auditors during the site inspections and interviews.

The draft audit findings were forwarded to Graymont 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. Mining operations plan

Condition 2 of ML1517 and condition 3 of PLL1219, SL664 and MPL318 require the lease holder to comply with an approved Mining Operations Plan (MOP) in carrying out any significant surface disturbing activities, including mining operations, mining purposes and prospecting.

The previous title holder (Sibelco Australia Ltd) prepared and submitted the *Excelsior Limestone Quarry Mining Operations Plan Amendment B* in May 2016. This MOP was approved by the (then) Department of Industry – Resources and Energy in June 2016. The MOP was due to expire in July 2018, but approved extensions permitted operations, in accordance with the MOP, until 30 June 2020.

Graymont submitted a new *Mining Operations Plan for Excelsior Limestone Quarry* in May 2020. The MOP was approved on 2 June 2020.

Although the quarry was in care and maintenance mode at the time of the audit, evidence was generally available to confirm that relevant provisions of the MOP have been implemented. For example:

- Table 7 Risk assessment identified the controls to be implemented for key risk areas such as:
  - Infrastructure areas – scheduled annual weed survey is conducted as per the Weed Management Plan (also noted in section 3.2.8 Weeds) – records of the weed inspection completed 19 August 2020 were sighted during the audit. No significant weed infestations were observed during the site inspection.
  - Water management areas – diesel tank is double bunded and spill kits are kept on site (also noted in Section 3.2.22)– the self-bunded diesel tank and spill kits were observed in the plant area (Figure 1 and Figure 2).
  - Accumulated water in the pit is pumped to the wet quarry for use in dust suppression – a pump was observed in operation at open cut pit no. 1 (Figure 3).
- Section 3.2.5 – Geotechnical stability identified that monitoring of the geotechnical stability of the pit and surrounds will be undertaken annually by a qualified geologist or engineer. Records of inspections undertaken 17 December 2019 were sighted:
  - pit geotechnical inspection form
  - dump geotechnical inspection form.

Figure 1 Self-bunded diesel fuel storage tank



Figure 3 Pump operating to pump water from open cut pit 1 to the wet quarry



Figure 2 Spill kits in the mobile plant workshop



- Section 3.2.15 – Erosion and sediment control identified that routine inspection of site will be carried out to identify areas of erosion. The geotechnical inspections carried out in December 2019 were noted to include erosion issues.
- Section 3.2.16 – Soil management indicated that the existing six topsoil stockpiles would be signposted to indicate the nature of the material and minimise disturbance. An example of the topsoil stockpiles was sighted during the site inspection and was observed to be signposted.

- Section 3.2.17 – Surface water pollution identified that water monitoring of discharges from the sediment dams will be undertaken. Water quality monitoring results were sighted to confirm implementation of the monitoring program.

## 3.2. Rehabilitation

### 3.2.1. Risk assessment

Condition 2 of PLL1219, SL664 and MPL318, and condition 12 of ML1517, require that any disturbance resulting from the activities carried out under the mining leases must be rehabilitated to the satisfaction of the Minister. To achieve successful rehabilitation outcomes, the lease holder must be able to identify and manage any risks that could compromise rehabilitation outcomes.

An environmental risk assessment was included in section 3.2 of the approved MOP. This risk assessment considered a range of environmental impacts during operation of the quarry, some of which would be relevant for the rehabilitation of the quarry. A rehabilitation specific risk assessment was included in section 9.1 which identified weed infestation and vegetation failure as low risk. Localised erosion was rated as a medium risk, but the presence of the mine dam was identified as a control that would limit the risk of off-site impacts.

Section 9.2 and Table 16 of the MOP outline a trigger action response plan for the identified risks to rehabilitation.

### 3.2.2. Rehabilitation objectives

The post-mining land use and rehabilitation objectives were included in sections 4.2 and 4.3 of the MOP respectively. The long-term objective was to provide a low maintenance, stable and safe landform which is commensurate with the moderately dense woodland and/or nature conservation land use.

Rehabilitation objectives for each primary domain were detailed in Table 10 of the approved MOP. Section 5.3, 7.2, and Table 12 of the MOP identified that it is not anticipated that major rehabilitation works would be undertaken during the MOP term. Mining and emplacement areas at the end of the MOP term were to remain active.

### 3.2.3. Rehabilitation progress

There has been no significant progress in rehabilitation at the Excelsior Quarry site. It is acknowledged that the site is reasonably contained and Graymont only acquired the site in August 2019.

Section 5 of the MOP provides a basic discussion of rehabilitation planning and management, but it was noted by the auditor that there had been limited rehabilitation planning undertaken and no timeframes provided. This issue is raised as observation of concern no. 1. Issues which should be addressed as part of rehabilitation planning for the site include:

- There is likely to be a topsoil deficit on site and the topsoil that is available is generally of poor quality. An assessment of the likely volume of the topsoil deficit and options for mitigating this would be beneficial.
- Section 9 of the MOP briefly describes potential threats to rehabilitation and achievement of the closure objectives. It was noted that the risks identified did not include risks associated with a potential topsoil deficit which could impact growth to medium development.
- The MOP stated that the overburden emplacements and dical storage area were to be capped but there was no assessment of quantity and availability of suitable capping material on site to achieve this.
- Plans for restarting quarry operations should include the identification of a life-of-mine schedule including opportunities for progressive rehabilitation of the site, and indicative staging and timing of rehabilitation works.

### 3.3. Exploration

Section 2.3.1 of the MOP identifies that exploration infill drilling may be undertaken during the MOP term. Graymont considered the impact of drilling to be low risk with minimal disturbance of the land surface. All drill holes were to be plugged or backfilled on completion of geological investigations.

It was observed that a drilling program had been undertaken in April 2020. These sites have not yet been plugged or backfilled, but the drill collars had been capped. Sample bags were still on site at the drill holes inspected (Figure 4). The plastic sample bags will deteriorate over time when exposed to the weather, so it is recommended that Graymont collect the sample bags for storage or disposal. This is raised as suggestion for improvement no. 1.

Rehabilitation of the exploration drill holes is unlikely to be required. All the exploration drill holes observed were within the operational areas of the quarry.

Figure 4 Capped exploration borehole and sample bags



## 3.4. Reporting

### 3.4.1. Annual rehabilitation reporting

Condition 3(f) of PLL1219, SL664 and MPL318 requires the lease holder to prepare an annual rehabilitation report which provides a detailed review of the progress of rehabilitation against the performance measures and criteria established in the approved MOP. Condition 3 of ML1517 requires the lease holder to lodge an annual environmental management report (AEMR) that contains a review and forecast of performance of, amongst other things, the accepted mining operations plan, and where relevant, progress towards final rehabilitation objectives.

Graymont submitted the Excelsior Quarry 2019 Annual Environmental Management Report in September 2019. Section 5.4 of the AEMR states:

*No significant areas of rehabilitation have been commenced at Excelsior Quarry. No rehabilitation works were undertaken during the reporting period, as described in the current MOP. As a result, no rehabilitation monitoring against closure criteria were undertaken.*

### 3.4.2. Annual exploration reporting

Section 163C of the *Mining Act 1992* and clause 59 of the Mining Regulation 2016 require the preparation and submission of an annual report which provides full particulars of all exploration and other operations or activities conducted during the 12-month period.

Two exploration reports have been submitted during the audit scope period. The reports for 2019 and 2020 were reviewed by the auditor and were found to be generally in accordance with the relevant guidelines and templates:

- Sibelco Mining Services, Excelsior Combined Annual Report 03 July 2018 to 02 July 2019, submitted July 2019
- Graymont (Excelsior) Pty Ltd, Excelsior Combined Annual Report 03 July 2019 to 02 July 2020, submitted July 2020.

### 3.4.3. Compliance and environmental incident reporting

Condition 4 of PLL1219, SL664 and MPL318 requires the lease holder to notify the Department upon becoming aware of any breaches of the conditions of the lease, or breaches of the *Mining Act 1992* or Regulations. Similarly, Condition 5 of PLL1219, SL664 and MPL318 requires the lease holder to provide environmental incident notifications and reports no later than seven days after those reports are provided to relevant authorities under the *Protection of the Environment Operations Act 1997*.

A search of departmental databases did not find any notifications of breaches of the lease conditions or any notifications of environmental incidents. Graymont advised that there had been no breaches of the lease conditions nor had there been any environmental incidents in the last 12 months. There was nothing observed during the site inspection that would indicate any environmental incidents had occurred.

## 3.5. Other mining lease compliance requirements

### 3.5.1. Notice to landholders

Condition 1 of mining leases ML1517, PLL1219, SL664 and MPL318 requires the lease holder to provide a notice, in writing, to each landholder within the lease area, advising that the lease has been granted or renewed. Mining lease ML1517 was granted in 2002. Mining lease PLL1219 was last renewed in 2011 with conditions amended on transfer in 2019. Mining leases SL664 and MPL318 were last renewed in 2014 with conditions amended on transfer in 2019. Transfer of a lease is not subject to the notification requirements, therefore the notification requirements were not verified during the audit.



### 3.5.2. Security deposit

Under Condition 7 of PLL1219, SL664 and MPL318, and condition 23 of ML1517, the lease holder is required to provide and maintain a security deposit to secure funding for the fulfilment of obligations under the mining lease.

The security deposit required for PLL1219, SL664 and MPL318 is \$1,118,000 and is held as a group security across the three titles. The security deposit for ML1517 is \$438,000 and this amount is held by the Department. In total, \$1,556,000 is currently held for the rehabilitation liability across the Excelsior Quarry site.

A revised rehabilitation cost estimate was required to be submitted with the MOP in June 2020. This was not provided with the MOP but was submitted in September 2020 and was being assessed by the Regulator. This is raised as observation of concern no. 2. Graymont should ensure that rehabilitation cost estimates are provided at the required trigger points (i.e. submission of a revised MOP).

### 3.5.3. Co-operation agreement

Condition 8 of PLL1219, SL664 and MPL318 requires the lease holder to make reasonable attempts to enter into a co-operation agreement with the holders of any overlapping titles.

A review of published departmental mapping systems Commonground and Minview confirmed that there were no titles overlapping PLL1219, SL664 or MPL318. A co-operation agreement was not required.

### 3.5.4. Conditions on ML1517

ML1517 is an older lease that has a range of conditions that are no longer included as lease conditions on newer leases. These conditions and an assessment of compliance are provided below.

- Condition 10 Blasting – the quarry has been non-operational since 2016 and no blasting has been undertaken since that time.
- Condition 14 Prevention of soil erosion and pollution – no evidence of significant erosion was observed on site that had not previously been identified in the geotechnical inspection reports completed in December 2019. Given that there was no operational activity at the quarry at the time of the audit, no dust was observed from the quarry. The dical by-product, from the Charbon lime kilns, that is stored at the quarry is known to present a dust hazard. However, the dical storage at the number 2 overburden emplacement was observed to have been capped (Figure 5) in accordance with the storage guidelines in section 5.3 of the Graymont *Dical Management Plan* attached as an appendix to the approved MOP.

A large electrical transformer was observed in the product stockpile area. This had been banded and Graymont staff advised that the transformer had been drained of oil prior to being decommissioned. There was no evidence of leakage or contamination from the transformer observed during the site inspection (Figure 7).

- Condition 16 Fences and gates – Graymont own part of the land that comprises the Excelsior Quarry with the remaining land parcels being Crown Land which Graymont had a licence to use. Fences and gates within the quarry site are maintained by Graymont.
- Conditions 17 and 18 Roads – roads and tracks traversed during the site inspection were generally observed to be well maintained.
- Condition 19 Trees and timber – given that Graymont own part of the land and have a licence to use Crown land, no approvals to fell trees or cut timber on the lease were required.

*Figure 5 Capping on the dical storage area*



*Figure 6 Decommissioned transformer in the product storage area*



## 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 a mine can include:

- regulatory requirements (for example, environmental legislation)
- conditions imposed on the grant, renewal, or transfer of mining leases
- specific commitments made by the organisation (for example, MOP commitments).

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

Graymont advised that it has progressed implementation of a compliance action tracking system (ECATS) for the Excelsior Quarry. Copies of the mining leases, MOPs, departmental guidelines, and other compliance obligation documents were noted to be available on site and staff interviewed had a good understanding of the compliance requirements.

### 4.2. 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.

Graymont had established an inspection and monitoring regime for the quarry site. Geotechnical inspections, including any areas of erosion, are undertaken six-monthly by a geotechnical engineer. Water quality monitoring is undertaken six-monthly for a range of parameters.

The quarry manager undertakes a general site inspection monthly. The checklist for the monthly inspection primarily has a work health and safety focus. Some basic environmental checks were included. The checklist does not address all the commitments of the MOP. Suggestion for improvement no. 2 is that the monthly inspection checklist should be reviewed and revised to include a more comprehensive range of environmental checks in accordance with the MOP requirements.

### 4.3. Subcontractor management

Many mines use contractors to undertake specialist tasks. Whilst the responsibility for compliance or the implementation of environmental controls is often passed to the contractor, the lease holder will retain accountability for compliance with its lease conditions and other compliance obligations. It is important that the lease 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.

### 4.4. Record keeping

Sections 163D and 163E of the *Mining Act 1992* relate 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.

Generally, records were available to demonstrate compliance with most requirements, including MOP requirements. Records requested during the audit were made available for the audit team to review. Examples of records sighted during the audit included:

- monthly inspection records
- water sampling records
- geotechnical inspection records
- weed inspection records
- exploration reporting.

### 4.5. Title holder response to draft audit findings

Graymont was provided with a copy of the draft audit report and invited to submit a response to the draft audit findings. Generally, Graymont considered that the audit findings reflected the compliance

status of Excelsior Quarry. Minor corrections were made to the description of site facilities inspected, and clarification was provided on the submission of the rehabilitation cost estimate.

In relation to the observation of concern for rehabilitation planning, Graymont advised that it would continue to assess opportunities for progressive rehabilitation of the site and update these in future MOP submissions.

Graymont's response also indicated that:

- the sample bags would be collected for storage or disposal as recommended in suggestion for improvement no. 1
- amendments had been made to the site inspection checklists as recommended in suggestion for improvement no. 2 with this revised checklist also being rolled out to other Graymont sites to improve routine inspections.

## 5. Audit conclusions

From the evidence reviewed during the audit, and observations made on site during the audit site inspections, it was concluded that Graymont has generally achieved a high level of compliance with the requirements of the mining lease and MOP in relation to the operations of Excelsior Quarry. It was noted that there was a lack of rehabilitation progress on the site and further work in rehabilitation planning would be beneficial to improve rehabilitation performance.

Graymont has started implementing systems for compliance management. Further development of the inspection processes would be beneficial to promote a more robust approach to compliance management on site.

Two observations of concern and two suggestions for improvement were noted by the auditor as summarised in Table 3 and Table 4. Regulatory actions may be undertaken in relation to the observations of concern identified during the audit.

*Table 3 Summary of observations of concern*

OBSERVATION OF CONCERN NO.	DESCRIPTION OF ISSUE	RECOMMENDATION
1	Section 5 of the MOP provided a basic discussion of rehabilitation planning and management, but it was noted by the auditor that there had been limited rehabilitation planning undertaken and no timeframes provided. No rehabilitation activities have been undertaken on the site.	Further work in relation to the development of a life-of-mine plan including identifying opportunities for progressive rehabilitation. The outcomes will need to be updated into the Mining Operations Plan for approval by the Regulator.
2	A revised rehabilitation cost estimate was required to be submitted with the MOP in June 2020. This was not provided with the MOP but was submitted in September 2020 and was being assessed by the Regulator	Graymont should ensure that rehabilitation cost estimates are provided at the required trigger points (eg submission of a revised MOP).

Table 4 Summary of suggestions for improvement

SUGGESTIONS FOR IMPROVEMENT	DESCRIPTION OF ISSUE
1	Sample bags were still on site at the drill holes inspected (Figure 4). The plastic sample bags will deteriorate over time when exposed to the weather, so it is recommended that Graymont collect the sample bags for storage or disposal.
2	The checklist for the monthly inspection primarily has a work health and safety focus. Some basic environmental checks were included but the checklist does not address all the commitments of the MOP. As suggestion for improvement no.1, it is suggested that the monthly inspection checklist be reviewed and revised to include a more comprehensive range of environmental checks in accordance with the MOP requirements.