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Resources Regulator



Compliance audit program

EL8815 West Wyalong Gold Exploration Project

Weddarla Pty Ltd

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1. Introduction

1.1. Background

Exploration licence 8815 (1992) was granted to Weddarla Pty Ltd on 19 January 2019. Saturn Metals Ltd was a Joint Venture Agreement partner with Weddarla Pty Ltd and was the exploration operator of EL8815. The exploration area was about 3.58 km north of West Wyalong in central NSW.

As part of the compliance audit program, an audit of the exploration activities associated with the West Wyalong Gold exploration project within EL8815 was undertaken on 23 July 2025 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 Weddarla Pty Ltd and Saturn Metals Ltd 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 West Wyalong Gold exploration project including:
 - exploration activities within EL8815 including a selected sample of exploration drillholes
 - borehole sealing and rehabilitation activities for selected drilling activities undertaken since 01 July 2023.
- a review of documents and records pertaining to the exploration activities
- the assessment of compliance for the period commencing 23 July 2023 and ending 23 July 2025.

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 EL8815 (granted 14 January 2021)
- assessable prospecting operations application dated 15 November 2024 for 6 RC drill holes and 20 air core holes with access tracks, and associated approval dated 4 December 2024 (APO0001913)

- assessable prospecting operations application dated 16 June 2023 for 1 RC drill hole and 29 air core holes with access tracks, and associated approval dated 4 July 2023 (MAAG0016236)
- 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 [Public comment 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 23 July 2025. 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 EL8815:

- WWAC275 air core hole drilled November 2023 and rehabilitated; no issues were observed.
- WWAC274 air core hole drilled November 2023 and rehabilitated; no issues were observed.
- WWAC273 air core hole drilled November 2023 and rehabilitated; no issues were observed.
- WWAC301 air core hole drilled November 2023 and rehabilitated; no issues were observed
- WWAC300 air core hole drilled November 2023 and rehabilitated; no issues were observed
- WWAC272 air core hole drilled November 2023 and rehabilitated; no issues were observed
- WWAC276 air core hole drilled November 2023 and rehabilitated; no issues were observed
- WWAC277 air core hole drilled November 2023 and rehabilitated; no issues were observed
- WWAC305 air core hole drilled November 2023 and rehabilitated; no issues were observed

2.3. Closing meeting

A closing meeting was held on site on 23 July 2025. 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> <ul style="list-style-type: none"> insufficient information on the file relating to the period covered by the audit or insufficient evidence collected to reach a conclusion

Assessment	Criteria
	<ul style="list-style-type: none"> the wording on the criteria (approval condition) meant that no evidence could be gathered, or it was too difficult to gather the evidence. <p>A 'not determined' assessment was also made where the condition was outside the scope of the audit.</p>
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 Weddarla Pty Ltd and Saturn Metals Ltd 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 one of EL8815 required the licence holder to carry out the operations described in the approved work program. Work program WP-EL8815-2022-2028 was in force during the audit period.

Evidence was available to confirm that exploration activities were progressing. Annual reports for the 2024 and 2025 reporting periods were reviewed for EL8815. Exploration completed included:

- 4 geochemical samples collected
- drilling 48 air core holes totalling 2998 metres across the tenement.

Saturn Metals exploration staff said the annual review process was used to review and monitor the approved work program. Saturn Metals said records were kept of all drilling and other exploration activities to confirm work program activities. Exploration data was noted to be maintained by the Saturn Metals geologists (and/or their contractors) 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 EL8815. Saturn Metals said, in addition to the written land access agreement, verbal communication was used to confirm times and commencement of activities to keep landholders informed of all activities on their lands. As part of their exploration activity preparations Saturn Metals conducted searches of all owners and/or occupiers of land where activities were proposed.

3.3. Native title and exempted areas

Condition 2 of EL8815 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.

Saturn Metals staff said exploration activities were conducted in areas of both freehold and Crown Lands within EL8815. Mapping confirmed the 48 AC drill holes were drilled across both freehold land, Crown Lands, and land held by an Aboriginal group.

Records reviewed showed Minister's consent under section 30 of the Mining Act was obtained for exploration in exempted areas. Weddarla and Saturn Metals completed the right to negotiate process and the written consent of the Minister under Condition 2 of the licence was obtained.

Saturn Metals noted it had a good relationship with the Aboriginal Land Council with the council consulted during exploration activities planning.

3.4. Community consultation

Condition 3 of EL8815 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 one 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.

A risk assessment was undertaken by Saturn Metals Limited, on behalf of Weddarla Pty Ltd, for the West Wyalong programs. The risk assessment was documented in the titleholder's community consultation strategy, but there was no clear relationship between the risks and strategy objectives. As suggestion for improvement one, it was recommended the community consultation risk assessment be clearly identified within the risk assessment document with risks identified directly related to the community consultation strategy objectives.

3.4.2. Community consultation strategy

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

Saturn Metals Limited, on behalf of Weddarla Pty Ltd, prepared a community consultation strategy for the West Wyalong project. The level of detail within the prepared strategy was beyond what was recommended in the code of practice. The community consultation strategy was revised twice after creation. Once before exploration activities were planned, and again after activities were completed.

The strategy was noted to follow the guidance material in the code of practice and included:

- objectives for consultation
- a description and analysis of community stakeholders and impacts
- a description of how consultation would be undertaken
- a process for review and amendment of the strategy when required.

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 Saturn Metals was undertaking community consultation generally in accordance with the methods outlined in the community consultation strategy. Exploration activities were conducted on privately held land, and Crown Lands close to residential areas. Key consultation was conducted with landholders, including the Aboriginal Land Council.

It was noted records of consultation activities were maintained in a register. Community consultation was via phone calls and face-to-face meetings, with an initial community consultation meeting held in October 2020.

Community consultation reports were prepared for 2023, 2024, and 2025, neither Weddarla nor Saturn Metals received requests for the 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 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:

- assessable prospecting operations application dated 08 June 2023 for up to 6RC and 25AC holes, and associated approval granted 15 Jun 2023 (MAAG0015960). 24AC holes were drilled.
- assessable prospecting operations application dated 16 June 2023 for up to 1RC and 30AC holes, and associated approval granted 04 Jul 2023 (MAAG0016236). 24AC holes were drilled.

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 EL8815 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 one of the exploration activity approvals required the licence holder to carry out the activity in accordance with the Application.

No evidence of environmental harm was observed at the sites visited during the site inspection. The AC drilling programs were completed, and all plant and equipment were removed from site. The 48 holes were rehabilitated. An assessment against the Exploration code of practice: Environmental management was not completed but the following observations were made:

- The rehabilitated holes were said to be rehabilitated less than a week after drilling.
- No evidence of drilling was seen at the drill holes inspected.
- No waste was observed at any of the sites inspected. Drill cuttings were placed back down the drill holes. All other waste was disposed of at appropriately licenced facilities.
- Holes were drilled across a mix of native vegetated areas, and paddocks. No clearing was required for the drilling activities, with locations chosen specifically to avoid vegetation disturbance.

- No new tracks were required for activities, with existing tracks used during drilling activities.
- During wet weather drilling activities were stopped if tracks became too wet. Activities would recommence when tracks became accessible again, or an alternative route could be found.

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 change, implement revised environmental management controls.

Saturn Metals undertook an assessment of the impacts of its exploration operations as part of its application for assessable prospecting operations. Risk was reviewed before each new application for assessable prospecting operations. Identified risks and associated control measures were not clearly outlined in the risk assessment. Impact areas were broken down into categories that aligned with the assessable prospecting operations application and the review of environmental factors.

A review of the drilling risk assessment was conducted and it was not clear what the risks associated with the activity were, what the control measures to be used were, or what changes in controls may have been required. Clarity in identified risks was raised as observation of concern one. Lack of risk control measures was raised as observation of concern 2. Inclusion of record of any changes in controls was raised as suggestion for improvement 2.

It was recommended the risk assessment be updated to include the risks identified, control measures for all identified risks, and allow for transparency in any changes to control measures. It was suggested this be done by identifying risks and appropriate controls and relating them to the potential impacts of drilling activities.

3.7. Security deposit

Condition 5 of EL8815 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 EL8815 was \$10,000, which department records confirmed was held. It was noted the drilling program in 2023 on EL8815 did not trigger an increase in security.

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

3.8. Rehabilitation

Condition 6 of EL8815 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 one 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.

Saturn 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. Risks related to rehabilitation or rehabilitation objectives and completion criteria and associated controls were not clearly identified in the assessment. This was raised as observation of concern number 3.

It was recommended Saturn Metals review the rehabilitation risk assessment with reference to the rehabilitation objectives and completion criteria. Control measures to address identified risks should be documented 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, no 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 and submitted with the rehabilitation objectives and completion criteria.

The exploration activity approval applications lodged by Saturn Metals indicated the total surface disturbance area was less than 5 hectares. 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.

Evidence was not available in department records, or provided by Saturn Metals, to confirm ROCCs were submitted for the drilling program no later than 14 days before works began. Failure to comply with condition 6 – Rehabilitation was raised as non-compliance one. Rehabilitation was required to be carried out in accordance with the requirements of the Exploration code of practice: Rehabilitation. It was noted rehabilitation works completed were generally in line with the ROCCs in the template provided in Appendix 2 of the code of practice, though ROCCs were outstanding at the time of writing.

The Regulator determined there was sufficient evidence to sustain a breach of mandatory requirement 2(a) of the code of practice, as an offence under section 378D(1) of the *Mining Act 1992*. The Regulator determined to take no further enforcement action.

3.8.3. Rehabilitation program

Mandatory requirement 3 required the licence holder to develop, implement and complete a rehabilitation program (which included 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.

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

- site cleaned of all rubbish and drill samples
- all drill samples backfilled down the drillhole in the sequence in which they were drilled
- remediation and earthworks conducted if any sub-surface ground was disturbed
- photos taken before the site was distributed and after the site was rehabilitated.

Saturn Metals exploration staff said rehabilitation monitoring involved inspecting sites with collection of photographs. Further discussions noted rehabilitation activities were completed within a week after drilling, with data base records maintained.

Figure 1, Figure 2, Figure 3 and Figure 4 show examples of the rehabilitation of 4 drill holes inspected. The area surrounding the rehabilitated holes was returned to final land use.

Figure 1: AC hole WWAC272 – drilled and rehabilitated



Figure 2: AC hole WWAC276 - drilled and rehabilitated



Figure 3: AC hole WWAC301 – drilled and rehabilitated



Figure 4: AC hole WWAC305 – drilled and rehabilitated



3.9. Dwelling-houses, gardens and significant improvements

Section 31 of the *Mining Act 1992* required the holder of an exploration licence to obtain written consent for activities on lands within 200 metres of a principal place of residence of the person occupying it, within 50 metres of any garden, on which any significant improvement other than improvements used for ancillary mining activities.

During the audit, Saturn Metals confirmed there were no written consents obtained in accordance with section 31 of the *Mining Act 1992*. Upon completion of the site inspection, a review of drillhole mapping was conducted. From this review, it was noted that 5 drill holes were within 200 metres of 3 neighbouring houses that were used as the principal places of residence.

The Saturn Metals exploration manager confirmed no written consent was obtained in relation to the houses. It was noted the land access agreements did not contain a reference to drilling within 200 metres of the dwelling. Failure to comply with Section 31 of the *Mining Act 1992* was raised as non-compliance 2.

It was determined there was sufficient evidence to sustain a breach of section 31 of the Mining Act. Given there was no offence provision, the Regulator determined no further enforcement action was required.

3.10. Annual activity reporting

Section 163C of the *Mining Act 1992*, clause 59 of the Mining Regulation 2016 and condition 8 of EL8815 required the licence holder to submit an activity report annually within one calendar month after the 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, Weddarla submitted annual activity reports comprising an:

- annual geological report
- environmental rehabilitation and compliance report.

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

3.11. Core and sample storage

Clause 65 of the Mining Regulation 2016 required the holder of an authority to, so far as was reasonably practicable, to 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 Saturn Metals on EL8815 was AC drilling that resulted in generating chip samples. The chip sample storage was off-site on land leased from a landholder

outside of West Wyalong. This was inspected during the audit. It was observed samples were kept in an organised manner with photographs maintained on company servers.

Figure 5, Figure 6, Figure 7 show examples of the chip samples and core storage observed. All core and chip samples were kept in a manner generally in accordance with the guidelines.

Figure 5: Core sample storage example



Figure 6: Chip sample trays



Figure 7: Chip sample tray labelling



3.12. 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 Saturn Metals had generally maintained records as required by the licence conditions and the exploration codes of practice.

Examples of records reviewed included:

- Minister's consent approvals
- land access agreements
- review of environmental factors
- West Wyalong Project drilling risk assessment
- community consultation strategy
- community consultation records
- annual activity reporting.

It was noted Saturn Metals maintained a range of records electronically. Saturn Metals maintained a database that recorded all activity approvals but excluded a reference for when rehabilitation sign-off was achieved. As a suggestion for improvement 3, it was suggested that a rehabilitation sign-off reference be included in the data base to relate each drill hole to its sign-off.

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 Saturn Metals exploration staff generally had a good understanding of the compliance requirements for exploration. 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. A compliance officer was employed by Saturn Metals to ensure compliance requirements were met.

It was noted 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.

Saturn Metals used contract drillers to complete the exploration drilling program. Drilling was completed at the time of the audit, and a review of contractor management activities was not undertaken. During discussions it was noted Saturn Metals were on-site monitoring contractors during exploration activities.

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.

Saturn Metals exploration staff established a set of internal processes and official procedures suitable for the low impact nature of the exploration activities being conducted. These processes were noted to include inspecting drill sites and rehabilitation to confirm works are completed in accordance with the controls identified in the risk assessments.

The impact assessment prepared by Saturn Metals for the exploration drilling program was noted to include impacts related to environmental management and rehabilitation. Rankings of potential significance were identified. Observations made on site during the audit confirmed no evidence of erosion or environmental harm.

Exploration staff advised the monitoring, and inspections were documented and available to all field staff via the company server.

It was noted that systems were generally in place for inspections, monitoring and evaluation of risks.

5. Audit conclusions

From the evidence reviewed during the audit, it was concluded that the exploration operations undertaken by Saturn Metals were well managed. Evidence was available to demonstrate 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 records were being maintained as required to demonstrate compliance.

Saturn Metals was compliant with the requirements of the exploration licence, exploration activity approvals and the environmental management, and community consultation exploration codes of practice, for the elements reviewed during the audit.

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

Table 2: Summary of non-compliances

Non-compliance number	Description of issue	Recommendation
1	Rehabilitation objectives and completion criteria not submitted in accordance with mandatory requirement 2a of the Rehabilitation code of practice.	The Regulator determined sufficient evidence to sustain a breach of mandatory requirement 2(a) of the Rehabilitation code of practice under section 378D(1) of the <i>Mining Act 1992</i> . The Regulator determined to take no further enforcement action.
2	Written consent was not obtained for drilling within 200 m of a primary residence.	The Regulator determined sufficient evidence to sustain a breach of section 31 of the <i>Mining Act 1992</i> . The Regulator determined to take no further enforcement action.

Table 3: Summary of observations of concern

Observation of concern number	Description of issue	Recommendation
1	No clear risks identified for environmental management.	It was recommended the risk assessment be updated to include all identified risks.
2	Lack of clear control measures related to identified risks.	It was recommended the risk assessment be updated to include clear control measures for identified risks.

Observation of concern number	Description of issue	Recommendation
3	Risk related to rehabilitation or rehabilitation objectives and completion criteria not clearly identified.	It was recommended that Saturn Metals revise the risk assessment to include identified risks.

Table 4: Summary of suggestions for improvement

Suggestion for improvement number	Description of issue
1	It was recommended that the community consultation risk assessment should be clearly separated and identified within the risk assessment document with risks identified directly related to the community consultation strategy objectives. Currently elements of the risk assessment can be found across both the community consultation strategy and the drill risk assessment completed for the drill programs.
2	Environmental management risk assessment had no area for reviewing controls. It was recommended that Saturn Metals review control measures after activity, and any changes identified be documented with the risk assessment.
3	It was recommended Saturn Metals include rehabilitation sign-off reference against each drill hole as an addition to its records of activities and drill hole approvals. This will assist in a more robust record of approvals that were outstanding.