

Compliance audit program

ML 919 - Buckaroo Mine

R.K. Murdoch Pty Limited

March 2026

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1. Introduction

1.1. Background

Mining lease 919 (1973) was originally granted to Dolomite Limestone and Pipeclay on 18 February 1981. The title was transferred to Mudgee Dolomite and Lime Pty Limited in April 1997. R.K. Murdoch Pty Limited acquired the title on 1 December 2021, with its second renewal expiring on 18 February 2043. ML 919 forms the operations referred to as Buckaroo Limestone and Dolomite Mine (also known as Buckaroo Mine).

As part of the compliance audit program, an audit of the mining operations associated with the Buckaroo Mine was undertaken on 4 November 2025 by the Resources Regulator within the NSW Department of Primary Industries and Regional Development.

1.2. Audit objectives

The objectives of the audit were to:

- undertake a compliance audit of the R.K. Murdoch Pty Limited mining operations against the requirements of the *Mining Act 1992*, the conditions of the mining lease and the prescribed standard conditions outlined in Schedule 8A Part 2 of the Mining Regulation 2016
- assess the operational performance of the mining operations 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:

- a review of documents and records pertaining to mining operations associated with the Buckaroo Mine, as required by the standard conditions on mining leases and obligations under the *Mining Act 1992*
- the assessment of compliance for the period commencing 4 November 2023 and ending 4 November 2025.

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
- standard conditions for mining leases outlined in Schedule 8A Part 2 of the Mining Regulation 2016
- general conditions for mining leases
- Form and way: Annual rehabilitation report and forward program

- Form and way: Rehabilitation objectives, rehabilitation completion criteria.

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 4 November 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 mining operations including exploration activities under ML919.

2.3. Closing meeting

A closing meeting was held on site on 4 November 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 3 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 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 mining operations 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 R.K. Murdoch 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 lease conditions

3.1.1. Security deposit

Condition 2 of ML919 required the lease holder to provide and maintain a security deposit to secure funding for the fulfilment of obligations under the mining lease.

The security amount required for ML919 was \$162,000, which department records confirmed was held.

Observations made on site during the inspection confirmed the security held was adequate for the mining operations in progress.

3.1.2. Co-operation agreement

Condition 3 of ML919 required the lease holder to make reasonable attempts to enter into a co-operation agreement with the holders of any overlapping titles.

A search of the Minview database and department records confirmed that ML919 overlapped with EL8405. Bowden Silver Pty Limited was the titleholder for EL8405. A co-operation agreement was required. A cooperation agreement with Bowden Silver Pty Limited dated 17 September 2019 was electronically sighted. This agreement addressed the following:

- access arrangements
- operational interaction procedures
- dispute resolution
- information exchange
- rehabilitation issues
- planned activity locations
- compensation payable by Bowden Silver
- insurances
- other relevant information.

3.1.3. Assessable prospecting operations

Condition 4 of ML919 required the leaseholder to have development consent or the prior written approval of the Minister before carrying out any assessable prospecting operations on the lease area.

Buckaroo Mine received development consent under the *Environmental Planning and Assessment Act, 1979* on 6 August 1980. Development approval was granted by Mudgee Shire Council (now Mid-Western Regional Council) for the site (DA2.8/80) to coincide with the mining lease application. ML919 was granted in February 1981 within an area of 56.67ha. Buckaroo Mine did not carry out any assessable prospecting operations during 2024 or 2025. The requirements under condition 4 were not triggered and no applications for assessable prospecting operations were required.

3.2. Schedule 8A requirements

The Schedule 8A requirements commenced on 2 July 2021. Clause 31A (2) of the Mining Regulation 2016 included transitional arrangements for any mining lease that was in force on the commencement day of the Schedule 8A provisions. For a large mine, the new provisions would not apply until 12 months after the commencement day. For a small mine, the new provisions would not apply until 24 months after the commencement day of the Schedule 8A requirements.

Buckaroo Mine was considered a large mine, because an environment protection licence under the Environment Protection Authority was held for extractive, mineral processing and mining activities. The requirements of Schedule 8A applied to ML919 from July 2022. An assessment of compliance against the Schedule 8A requirements was undertaken for ML919, as documented in the following sections.

3.2.1. Multiple mining leases

Clause 3 of Schedule 8A allowed a leaseholder to make application to have multiple mining leases relating to the same mine treated as a single lease for the purposes of Part 2 of Schedule 8A. Though not required, as there was only one mining lease at Buckaroo Mine at the time of the audit, R.K. Murdoch made an application to treat ML919 as a single lease for the purposes of Part 2 of Schedule 8A. This application was approved by the Resources Regulator on 13 April 2023.

3.2.2. Environmental management

Clause 4 required a lease holder to prevent, or if that is not reasonably practicable, minimise any harm to the environment arising from activities carried out under the mining leases.

Extraction of materials and processing operations were carried out under ML919. The activities appeared to be well managed. The following observations were made:

- There were a number of sediment ponds onsite to capture water run-off for use in dust suppression (Figure 1, Figure 5 and Figure 10).
- The overburden areas were stockpiled and pulled by dozer to keep the land stable for reshaping into final landform (Figure 2 and Figure 11).
- There were 2 active open pits. The limestone pit with an exclusion fence was not planned to be expanded (Figure 3). The dolomite pit will minimally increase its footprint (Figure 4).
- Concrete by-products were arranged in stockpile areas with minimal dust observed (Figure 6).
- There was one self-bunded diesel storage tank with appropriate labels and the chemical storage containers were bunded (Figure 7, Figure 8 and Figure 9).
- Water sprayers were incorporated in all the crushing equipment.
- Water trucks were used for dust suppression.

As part of the environment protection licence (EPL), a pollution incident response management plan (PIRMP) was implemented onsite with copy of the PIRMP dated August 2023 sighted.

Figure 1: Kaiolan clean sediment pond



Figure 2: Overburden area



Figure 3: Limestone pit



Figure 4: Dolomite pit 2



Figure 5: Sediment pond near crusher pad



Figure 6: Concrete stockpiles



Figure 7: Self banded diesel storage



Figure 8: Labels on diesel storage

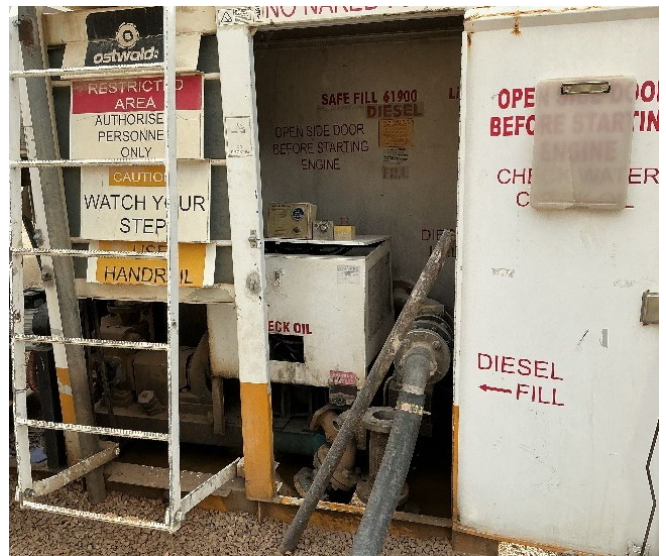


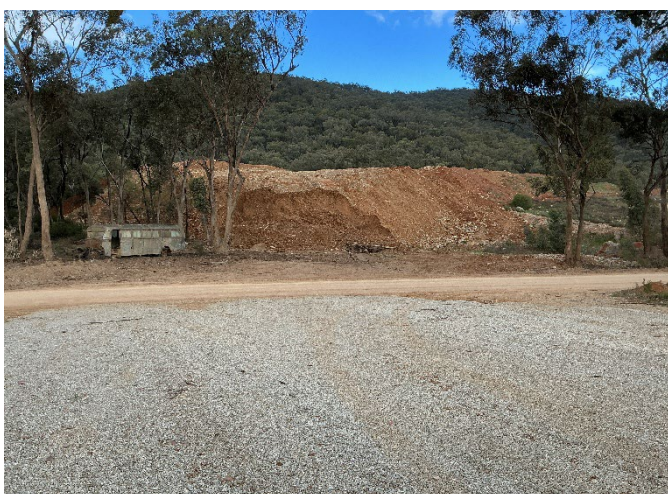
Figure 9 Bunded chemical storage



Figure 10 Sediment pond 3



Figure 11 Land pushed up by dozer



3.2.3. Rehabilitation

Clause 5 required rehabilitation to occur as soon as reasonably practicable after disturbance. It was observed there were rehabilitated areas within ML919 (Figure 12 and Figure 13). An exclusion fence was installed in the rehabilitated area located opposite the limestone pit to keep goats and kangaroos away. There were unwanted wood structures and other materials scattered in this area (Figure 12). As suggestion for improvement one, it was recommended R.K. Murdoch do some housekeeping of the area and dispose of unwanted materials. Other rehabilitation activities were also ongoing in other areas. These activities included refilling of topsoil, weeding and planting native grass seeds and trees.

Figure 12: Rehabilitated area with exclusion fence



Figure 13: Rehabilitated area



3.2.4. Final land use

Clause 6 required the lease holder to ensure that rehabilitation of the mining area achieves the final land use.

The final landform and rehabilitation plan (FLRP) application (FLRP0001298) was assessed and approved by the Resources Regulator on 15 May 2024. Most of the mine site was proposed to have a final land use of native ecosystem and agricultural sites for grazing.

The Buckaroo Mine representative said rehabilitation monitoring inspections were conducted. Electronic inspection records were sighted in growth medium development phase. These inspections noted the rehabilitation progressed well on areas one and 2.

3.2.5. Rehabilitation risk assessment

Clause 7 required the lease holder to conduct a rehabilitation risk assessment that identified, assessed and evaluated the risks that need to be addressed to achieve the rehabilitation objectives and completion criteria for the mine.

Section 3, table 6 of the rehabilitation management plan (RMP) showed a broad-brush risk assessment (BBDRA) was conducted in 2018 and reviewed in February 2020. A summary of the risk

assessment was included in the RMP. This included the risks associated with operational, environmental and rehabilitation phases at ML919. However, no actual record of the rehabilitation risk assessment was provided during the audit or when the record was requested via email. Clause 17 of Schedule 8a required the titleholder to create and maintain records that demonstrated compliance. While documenting the risk assessment in the RMP was a record, it would be better to have a separate record of the risk assessment conducted. This was raised as observation of concern one. R.K. Murdoch should aim to keep a separate record of the rehabilitation risk assessment in its internal system, and provide this to the Regulator in a timely manner when requested.

3.2.6. Rehabilitation documents

Under clause 8 of Schedule 8A, clauses 9 to 16 applied where the security deposit required under the mining leases was more than the minimum deposit prescribed by the Act. It was noted the security required for ML919 was \$162,000, more than the minimum security prescribed by the Act. As such, the provisions of clauses 9 to 16 of Schedule 8A apply to ML919 and rehabilitation documents were required.

Further assessment was undertaken against clauses 9 to 16 for the mining leases.

3.2.7. General requirements for documents

Under clause 9 of Schedule 8A, the lease holder was required to prepare documents in a form approved by the Secretary and include any matter required to be included in the form and if required to be given to the Secretary.

The RMP, FLRP, forward programs and annual rehabilitation reports for 2023 and 2024 were all submitted in the approved form and way forms.

3.2.8. Rehabilitation management plan

Clause 10(1) required the lease holder of a large mine to prepare a RMP for the mining leases that include the following:

- a) A description of how the holder proposed to manage all aspects of the rehabilitation of the mining area.
- b) A description of the steps and actions the holder proposed to take to comply with the conditions of the mining lease that relate to rehabilitation.
- c) A summary of rehabilitation risk assessments conducted by the holder.
- d) The risk control measures identified in the rehabilitation risk assessments.
- e) The rehabilitation outcome documents for the mining lease.
- f) A statement of the performance outcomes for the matters addressed by the rehabilitation outcome documents and the ways in which those outcomes are to be measured and monitored.

The RMP prepared by R.K. Murdoch contained all the elements required by Clause 10 (1)a to f.

Clause 11 required the lease holder to amend the RMP when given a written direction to do so by the Secretary, in accordance with the direction. There was no trigger for an amendment of the RMP.

3.2.9. Rehabilitation outcome documents

Clause 12 (1) required the lease holder to prepare the following rehabilitation outcome documents and give them to the Secretary for approval:

- a) The rehabilitation objectives statement, which set out the rehabilitation objectives (ROBJ) required to achieve the final land use for the mining area.
- b) The rehabilitation completion criteria statement, which set out criteria, the completion of which would demonstrate the achievement of the rehabilitation objectives.
- c) For a large mine, the final landform and rehabilitation plan, showing a spatial depiction of the final land use.

The ROBJ and FLRP were lodged and approved on 15 May 2024. The RMP stated the completion criteria would be prepared when the mine approaches closure.

3.2.10. Forward program and annual rehabilitation report

Clause 13 (1) required the lease holder to prepare a forward program that included the schedule of mining activities for the next 3 years, a summary of spatial progression of rehabilitation and the rehabilitation of disturbed areas as soon as reasonably practicable after the disturbance occurs.

R.K. Murdoch submitted forward programs for 2023, 2024, and 2025. The activities observed onsite reflected what was in the forward programs. However, the schedules of mining activities were identical across all 3 forward programs. This was noted as observation of concern 2. R.K. Murdoch must ensure future forward programs accurately reflect planned activities for the particular period rather than duplicating previous forward program schedules.

Clause 13(2) required the lease holder to prepare an annual rehabilitation report (ARR) which showed the description of the rehabilitation undertaken, the progress made through the phases of rehabilitation provided for in the forward program and a report demonstrating progress made towards achievement of the following:

- i. The objectives set out in the rehabilitation objectives statement.
- ii. The criteria set out in the rehabilitation completion criteria statement.
- iii. For large mines- the final land use as spatially depicted in the FLRP.

R.K. Murdoch submitted ARR for 2023, 2024, and 2025. However, none of the reports indicated relevant approvals issued by government agencies. The RMP identified development consent DA2.8/80 and ML919 as applicable regulatory requirements. As suggestion for improvement 2, it was recommended for ARR lodgements to explicitly note DA2.8/80 as an approval relevant to mining operations and rehabilitation activities.

3.2.11. Times of document preparation and submission

Clause 15 required the preparation and submission of the following documents in a timely manner as prescribed by the Secretary:

- RMP
- updated rehabilitation outcome documents

- forward program
- ARR
- rehabilitation completion criteria statement.

The ARR and forward program for Buckaroo Mine were due for submission annually by 19 April each year. A review of department records indicated the forward programs for 2023 and 2025 were submitted late. The late submission of the 2023 forward program resulted in issuing an official caution from the Regulator on 16 November 2023. The 2025 forward program was submitted on 8 May 2025, 19 days after the due date. The late submission of the 2025 forward program was raised as non-compliance one. A written direction notice to submit the next ARR and forward program by 19 April 2026 was issued by the Regulator to R.K. Murdoch. R.K. Murdoch must review the requirements of clause 15 for preparation and timely submission of all required documentation to ensure compliance.

3.2.12. Documents to be publicly available

Clause 16 required the lease holder to make the RMP, forward program and ARR publicly available by publishing it on the website and/or providing a copy upon written request without charge to a person within 14 days after the request was received.

R.K. Murdoch had a website at [MDL – Mudgee Dolomite & Lime](#) but the RMP, forward program and ARR were not published at the time of writing. This was raised as non-compliance 2 and was subjected to further investigation by the Regulator.

3.2.13. Records management

Sections 163D and 163E of the *Mining Act 1992* related to creating and maintaining 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. Clause 17 required the lease holder to create and maintain records to demonstrate compliance with the requirements of Schedule 8A, Part 2.

R.K. Murdoch was maintaining some records to demonstrate compliance with relevant requirements, but not all records requested were provided. Records reviewed during the audit included:

- forward programs
- RMP
- ARRs
- FLRP
- ROBJ 2024
- site inspection records
- cooperation agreement
- rehabilitation and monitoring summary report.

The record of risk assessment – rehabilitation was not available during the audit. As suggestion for improvement 3, it was recommended for R.K. Murdoch to keep all records in a legible form and provide these records to the Regulator in a timely manner when requested.

3.2.14. Reporting on non-compliance

Clause 18 required the lease holder to provide the Minister with a written report detailing any non-compliance with any conditions of the mining lease, or a requirement of the Act or Regulation, relating to the mining activities.

It was noted that non-compliances with Schedule 8A conditions were initiated by the Regulator. Following a desktop audit in April 2023, non-compliances were identified for not submitting the forward programs for 2022 and 2023 by the due date. An official caution was issued to R.K. Murdoch to comply with these requirements.

Further non-compliances were identified during the audit. These non-compliances were noted in section 3.2.11, section 3.2.12 and section 3.3.1 of this audit report. This indicates R.K. Murdoch did not have robust systems in place for managing compliance requirements or identifying non-compliance.

3.2.15. Nominated contact person

Clause 19 required the lease holder to nominate a contact person for the mining lease and provide contact details for that person.

R.K. Murdoch nominated a contact person for ML919 and was confirmed on 27 September 2023, but a written consent was not attached to the nominated contact person (NCP) records in the Regulator's portal. As suggestion for improvement 4, the NCP should lodge a new NCP application using the form provided in the Regulator portal, as the box which stated that 'the NCP take responsibility for receiving all email correspondences' for ML919 was not checked in the previous NCP lodgement.

3.2.16. Modification of development consent

Clause 20 required the lease holder to give written notice to the Secretary within 10 days after making an application for modification of a development consent except if the development was a state significant development.

No modification to development consent DA2.8/80 was submitted during the audit period.

3.3. Reporting

3.3.1. Annual exploration reporting

Section 163C of the *Mining Act 1992* and clause 59 of the Mining Regulation 2016 required preparing and submitting an annual report that provided full particulars of all exploration and other operations or activities conducted during the 12-month period.

An annual exploration report was due for submission annually by 18 March. A review of department systems failed to locate annual exploration reports for ML919 for the 2023 and 2024 periods. This

was raised as non-compliance 3. This matter was being further investigated by the Regulator. R.K. Murdoch must prepare and submit annual exploration reports even if no exploration has been completed or seek an exemption from reporting. All annual exploration reports must be submitted through the TMS portal.

3.3.2. Annual rehabilitation reporting

Clause 13 of Schedule 8A required the lease holder to prepare and submit a rehabilitation report annually.

Annual rehabilitation reports for 2023 and 2024 were submitted for ML919. There were 3 rehabilitation areas in medium growth development phase which were monitored. The activities undertaken included:

- weed control
- cleaning of drainage basin 4
- erosion control activities to improve water management onsite associated with dam inlets.

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).

R.K. Murdoch had some understanding of the compliance requirements for ML919. A consultancy firm was hired to manage the compliance submission requirements. However, non-compliances, observations of concern and suggestions for improvement were identified during the audit because R.K. Murdoch did not have clear systems and processes in place to manage their compliance obligations. This was raised as observation of concern 3. R.K. Murdoch should develop systems or processes to manage their compliance obligations.

4.2. Contractor management

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

The Buckaroo Mine representative advised contractors were used for drilling, mechanical and surveying activities and were all inducted via the mine's site induction process. Buckaroo Mine verified contractors safe work method statements which were uploaded to the 'rapid system' to ensure contractor's compliance with their obligations. A workplace inspection procedure and a copy of daily contractor's internal communication were sighted during the audit. Competencies and training completed by staff and contractors were recorded in the 'rapid system'.

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.

Copies of rehabilitation inspection checks and visual checks were sighted to confirm Buckaroo Mine had systems in place for inspection and monitoring of key risks controls. Annual rehabilitation and monitoring summary report for 2024-2025 period was sighted. Relevant staff were notified via email on non-compliances or issues identified during site inspections and these issues were discussed during pre-start meetings and required management reviews.

5. Audit conclusions

Based on the evidence reviewed and observations made during the site inspection, it was concluded environmental management of extraction and processing operations and rehabilitation activities carried out under ML919 were effective. However, R.K. Murdoch lacked sufficient systems and processes to manage compliance obligations as evidenced by the identified non-compliances, observations of concerns and suggestions for improvement.

Three non-compliances, 3 observations of concern, and 4 suggestions for improvement were identified as summarised in Table 2, Table 3 and Table 4.

Table 2 Summary of non-compliances

Non-compliance number	Description of issue	Recommendation
1	The ARR and forward program for Buckaroo Mine were due for submission annually by 19 April each year. A review of departmental records indicated the forward programs for 2023 and 2025 were submitted late. The late submission of the 2023 forward program resulted in the issuance of an official caution from the Regulator dated 16 November 2023. The 2025 forward program was submitted on 8 May 2025, 19 days after the due date. The late submission of the 2025 forward program was raised as non-compliance one.	A written direction notice to submit the next ARR and forward program by 19 April 2026 was being issued by the Regulator to R.K. Murdoch. R.K. Murdoch must review the requirements of clause 15 for preparation and timely submission of all required documentation to ensure compliance.
2	R.K. Murdoch has a website at MDL – Mudgee Dolomite & Lime but the RMP, forward program and ARR were not published.	This was subjected to further investigation by the Regulator.
3	An annual exploration report was due for submission annually by 18 March. A review of department systems failed to locate annual exploration reports for ML919 for the 2023 and 2024 periods.	This matter was being further investigated by the Regulator. R.K. Murdoch must prepare and submit annual exploration reports even if no exploration has been completed or seek an exemption from reporting. All annual exploration reports must be submitted through the TMS portal.

Table 3 Summary of observations of concern

Observation of concern number	Description of issue	Recommendation
1	Section 3, table 6 of the rehabilitation management plan (RMP) showed a broad-brush risk assessment (BBDR) was conducted in 2018 and reviewed in February 2020. A summary of the risk assessment was	R.K. Murdoch should aim to keep a separate record of the rehabilitation risk assessment in their internal system and provide this to the

Observation of concern number	Description of issue	Recommendation
	included in the RMP. This included the risks associated with operational, environmental and rehabilitation phases at ML919. However, no actual record of the rehabilitation risk assessment was provided during the audit or when the record was requested via email. Clause 17 of Schedule 8a requires the titleholder to create and maintain records that demonstrate compliance. Whilst documenting the risk assessment in the RMP is a record, it would be better to have a separate record of the risk assessment conducted.	Regulator in a timely manner when requested.
2	R.K. Murdoch submitted forward programs for 2023, 2024, and 2025. The activities observed onsite reflected what was in the forward programs. However, the schedules of mining activities were identical across all three forward programs. This was noted as observation of concern 2.	R.K. Murdoch must ensure future forward programs accurately reflect planned activities for the particular period rather than duplicating previous forward program schedules.
3	Non-compliances, observations of concern and suggestions for improvement were identified during the audit because R.K. Murdoch did not have clear systems and processes in place to manage their compliance obligations.	R.K. Murdoch should develop systems or processes to manage their compliance obligations.

Table 4 Summary of suggestions for improvement

Suggestion for improvement number	Description of issue
1	An exclusion fence was installed in the rehabilitated area located opposite the limestone pit to keep goats and kangaroos away. There were unwanted wood structures and other materials scattered in this area. It was recommended R.K. Murdoch do some housekeeping of the area and dispose of unwanted materials.
2	R.K. Murdoch submitted ARRs for 2023, 2024, and 2025. However, none of the reports indicated relevant approvals issued by government agencies. The RMP identified development consent DA2.8/80 and ML919 as applicable regulatory requirements. It was recommended for ARR lodgements to explicitly note DA2.8/80 as an approval relevant to mining operations and rehabilitation activities.
3	R.K. Murdoch was maintaining some records to demonstrate compliance with relevant requirements, but not all records requested were provided.

Suggestion for improvement number	Description of issue
	The record of risk assessment – rehabilitation was not available during the audit. It was recommended for R.K. Murdoch to keep all records in a legible form and provide these records to the Regulator in a timely manner when requested.
4	R.K. Murdoch nominated a contact person for ML919 and was confirmed on 27 September 2023, but a written consent was not attached to the nominated contact person (NCP) records in the Regulator’s portal. The NCP should lodge a new NCP application using the form provided in the Regulator portal, as the box which stated that ‘the NCP take responsibility for receiving all email correspondences’ for ML919 was not checked in the previous NCP lodgement.