NSW Resources
Resources Regulator

Compliance audit program

AUTH346 Maules Creek Exploration Project

Aston Coal 2 Pty Ltd, ICRA MC Pty Ltd, J-Power Australia Pty Ltd

June 2026

Published by the Department of Primary Industries and Regional Development

Title: AUTH346 Maules Creek Exploration Project

Subtitle: Aston Coal 2 Pty Ltd, ICRA MC Pty Ltd, J-Power Australia Pty Ltd

First published: June 2026

Department reference number: D26/81917

Amendment schedule		
Date	Version	Amendment
June 2026	1.0	First published

© State of New South Wales through the Department of Primary Industries and Regional Development 2026. You may copy, distribute, display, download and otherwise freely deal with this publication for any purpose, provided that you attribute the Department of Primary Industries and Regional Development as the owner. However, you must obtain permission if you wish to charge others for access to the publication (other than at cost); include the publication in advertising or a product for sale; modify the publication; or republish the publication on a website. You may freely link to the publication on a departmental website.

Disclaimer: The information contained in this publication is based on knowledge and understanding at the time of writing (June 2026) and may not be accurate, current or complete. The State of New South Wales (including Department of Primary Industries and Regional Development), the author and the publisher take no responsibility, and will accept no liability, for the accuracy, currency, reliability or correctness of any information included in the document (including material provided by third parties). Readers should make their own inquiries and rely on their own advice when making decisions related to material contained in this publication.

Table of Contents

1. Introduction 5
1.1. Background 5
1.2. Audit objectives 5
1.3. Audit scope 5
1.4. Audit criteria 5
1.5. Publishing and disclosure of information 6
2. Audit methods 7
2.1. Opening meeting 7
2.2. Site interviews and inspections 7
2.2.1. Data collection and verification 7
2.2.2. Site inspections 7
2.3. Closing meeting 8
2.4. Compliance assessment definitions 8
2.5. Reporting 9
3. Audit findings 10
3.1. Work program 10
3.2. Access arrangements 10
3.3. Native title and exempted areas 10
3.4. Community consultation 11
3.4.1. Risk assessment 11
3.4.2. Community consultation strategy 11
3.4.3. Implementation and reporting 11
3.5. Exploration activity approvals 12
3.6. Environmental management 12
3.6.1. Risk assessment 13
3.7. Security deposit 13
3.8. Rehabilitation 13
3.8.1. Risk assessment 14
3.8.2. Rehabilitation objectives and completion criteria 14
3.8.3. Rehabilitation program 14
3.9. Annual activity reporting 16

3.10. Core and sample storage 16
3.11. Record keeping 16
4. Compliance management 18
4.1. Identifying compliance obligations 18
4.2. Contractor management 18
4.3. Inspections, monitoring and evaluation 18
4.4. Training and competency 19
5. Audit conclusions 20

1. Introduction

1.1. Background

Authorisation 346 (1973) (AUTH346) was granted to Coalcliff Collieries Pty Limited on 28 February 1984. On 13 July 2012 AUTH346 was transferred to Aston Coal 2 Pty Ltd, ICRA MC Pty Ltd, and J-Power Australia Pty Ltd. Whitehaven Coal Limited was the ultimate holding company of Aston Coal 2 Pty Ltd and was the operator of the activities conducted on AUTH346. The exploration area was about 21 kilometres north-north-east of Boggabri in northern NSW.

As part of the compliance audit program, an audit of the exploration activities associated with the Maules Creek exploration project within AUTH346 was undertaken on 11 November 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 Aston Coal 2 Pty 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 Maules Creek exploration project including:
  - exploration activities within AUTH346 including a selected sample of exploration drillholes
  - borehole sealing and rehabilitation activities for selected drilling activities undertaken since January 2019.
- a review of documents and records pertaining to the exploration activities
- the assessment of compliance for the period commencing 11 November 2023 and ending 11 November 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 AUTH346 (granted 28 February 1984, last renewed 30 March 2022)

- Assessable prospecting operations application dated 14 February 2024 for 3 RC and 15 DD with access tracks, and associated approval dated 26 February 2024 (APO0001410)
- Minor change application dated 17 March 2025 for a time extension to APO0001410, and associated approval dated 17 March 2025 (MAAG0017878)
- 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 11 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 following exploration activities on AUTH346:

- Diamond drill (DD) hole MAC3302C – hole drilled between May and September 2024 and was rehabilitated. A heritage area located near to site was fenced off. Weeds and vegetation were consistent with greater area. No issues were observed.
- DD hole MAC3303C – hole drilled between May and September 2024 and was rehabilitated. Weeds and vegetation were consistent with greater area. No issues were observed.
- DD hole MAC3305C – hole drilled between May and September 2024 and was converted to a piezometer. No issues were observed.
- Reverse circulation (RC) hole MAC3306 – hole drilled between May and September 2024 and was rehabilitated. No issues were observed
- RC hole MAC3304 – hole drilled between May and September 2024 and was rehabilitated. No issues were observed

- DD hole MAC3308C – hole drilled between May and September 2024 and was converted to a piezometer. No issues were observed with the standpipe protected from cattle and machinery with a fence.
- RC hole MAC3307 – hole drilled between May and September 2024 and was converted to a piezometer. No issues were observed

2.3. Closing meeting

A closing meeting was held on site on 11 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	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: NC1 – the absence of planning or implementation of a required operational element which has the potential to result in a significant risk. NC2 – an isolated lapse or absence of control in the implementation of an operational element which is unlikely to result in a significant risk. NC3 – an administrative or reporting non-compliance which does not have a direct environmental or safety significance. Note: The identification of a non-compliance in this audit may or may not constitute a breach of, or offence under, the *Mining Act 1992*. Non-compliances identified in this audit report may be further investigated by the Regulator and regulatory actions may be undertaken.
Observation of concern	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. 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.
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.

Assessment	Criteria
Not determined	The necessary evidence has not been collected to enable an assessment of compliance to be made within the scope of the audit. Reasons why the audit team could not collect the required information include: • 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. A 'not determined' assessment was also made where the condition was outside the scope of the audit.
Not applicable	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). An invoking element in the criteria was not activated within the scope of the audit.

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 Whitehaven Coal Limited 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 AUTH346 required the licence holder to carry out the operations described in the approved work program. Work program WP-AUTH346-2022-2027 was in force during the audit period:

Evidence was available to confirm exploration activities were progressing. Annual reports for the 2024 and 2025 reporting periods were reviewed for AUTH346. Exploration completed included:

- Drilling – 4 cored holes, and 4 open holes totalling 2484m.
- Three drillholes were converted to piezometer holes.

Whitehaven exploration staff said the annual reporting process was used to review and monitor the approved work program. All works were proceeding in line with the work program. No amendments or variations were sought for the work program.

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.

Activities were conducted on land owned by Whitehaven Coal. Landowners and leaseholders were identified during planning and informed of activities. Agreements between Whitehaven Coal and the parties leasing the land include access for exploration activities.

3.3. Native title and exempted areas

Condition 2 of AUTH346 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.

Whitehaven Coal staff advised research of areas where native title may exist was undertaken as part of preparation for the application for assessable prospecting operations (APO). It was noted during research there were no areas within the boundaries of AUTH346 where native title may exist.

It was noted as part of the research for APO applications, exempted areas were identified across the tenement. No exploration activities were conducted within exempted areas or State conservation areas.

Ministers consent under Condition 2 of AUTH346 or section 30 of the *Mining Act 1992* was not required.

3.4. Community consultation

Condition 3 of AUTH347 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.

Whitehaven Coal staff advised a community consultation team was responsible for the risk assessment required under the code. It was noted the community consultation risk assessment included risks, which were linked to the consultation objectives. A review was conducted at the end of exploration activities. A copy of the project risk assessment was provided upon request. Risks for community consultation were noted to be included.

A specific community consultation risk assessment was included in the community consultation strategy.

3.4.2. Community consultation strategy

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

The community consultation strategy was prepared and provided for review. Whitehaven Coal advised the strategy was reviewed annually. Stakeholder interactions were detailed in the strategy, with records maintained in a stakeholder management software system. It was understood analysis of community consultation was conducted with results not available on day of audit.

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

- objectives for consultation
- risk assessment
- 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 Whitehaven Coal was undertaking community consultation generally in accordance with the methods outlined in the community consultation strategy. The website for Maules Creek Mine had a page for community consultation where details were available to contact the Community Consultative Committee.

Records maintained for community consultation and feedback included complaint registers dated from 2014, committee meeting minutes, funding opportunities, newsletters and fact sheets.

A community consultation report was prepared annually and was available upon request. The 2024 and 2025 community consultations reports were available on day of audit which were noted to meet the annual report requirements.

3.5. Exploration activity approvals

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

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

- assessable prospecting operations application dated 14 February 2024 for up to 11 access tracks, 3 reverse circulation and 15 diamond drill holes as part of the Maules Creek Area B Exploration Program, and associated approval dated 26 February 2024 (APO0001410)
- variation of assessable prospecting operations approval application dated 25 February 2025 to extend the time to complete the activities, approved 17 March 2025. Approval of variation cancelled APO0001410 replaced with approval MAAG0017878.

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 AUTH346 required the licence holder to prevent or minimise so far as is reasonably practicable, any harm to the environment arising from the activities carried out under the licence. Condition 2 of the exploration activity approval required the licence holder to carry out the activity in compliance with Part B of the Exploration code of practice: Environmental management.

No evidence of environmental harm was observed at the sites visited during the site inspection. The sites visited were completed at the time of the audit and all plant and equipment had been removed from site. Five holes were rehabilitated. The remaining 3 holes were converted to piezometers. An assessment against the Exploration code of practice: Environmental management was not completed but the following observations were made:

- All holes rehabilitated had vegetation regenerating in a manner consistent with the surrounding vegetation.
- Whitehaven staff advised rehabilitation of drill holes included capping straight away and grouting. All alluvial soils were cased off to prevent adverse impacts on groundwater.
- Drilling activities were stopped if dust generation was unmanageable.

- No waste was observed at any of the sites inspected. Whitehaven staff said drilling muds were disposed of at licenced facilities.
- All holes were within cleared areas or paddocks. Whitehaven staff said vegetation was managed, with most drill holes located next to the access track to minimise vegetation disturbance.
- Generally, existing tracks were used wherever possible.
- Drilling activities and travelling across sites was stopped during rain to minimise impact.
- Vehicles were washed down at end of each day upon return to the mine site.
- All cultural or heritage sites were fenced off and clearly identified. Fencing labels were sighted on day of audit.

3.6.1. Risk assessment

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

Whitehaven Coal undertook an assessment of impacts of its exploration operations as part of its environmental management plan. While the whole of project risk assessment included risks for environmental management, it was very difficult to find the relevant risks identified. As suggestion for improvement number one, it was recommended separating the environmental management risk assessment out into a new worksheet to clearly identify the relevant risk controls.

A review of the project risk assessment noted there was an allocated space for a review of controls and gaps that may have been identified. It appeared the controls were not reviewed after the drilling activity was completed and documented. As suggestion for improvement number 2, it was recommended controls should be reviewed on completion of each program, and records maintained to confirm the review was completed, with ineffective controls clearly identified.

3.7. Security deposit

Condition 5 of AUTH346 required the licence holder to provide a security deposit to secure funding to fulfil obligations under the licence.

The security amount required for AUTH346 was $105,000, which department records confirmed was held. The security deposit was assessed on 26 February 2024 triggered by the submission of APO0001410.

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

3.8. Rehabilitation

Condition 6 of AUTH346 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 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.

Whitehaven Coal undertook a risk assessment of impacts to rehabilitation as part of its rehabilitation management plan. A review of the plan was conducted where it was noted the document was heavily skewed to the mining operations on neighbouring mining leases and did not clearly demonstrate risks that would prevent the exploration rehabilitation objectives and completion criteria (ROCC) being met during rehabilitation. This was raised a suggestion for improvement number 3.

It was recommended the exploration risk assessment be included with the exploration program risk assessment with clear separation of risk assessment categories, and to ensure it addressed the risks that would prevent the exploration ROCC from being met.

3.8.2. Rehabilitation objectives and completion criteria

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

The exploration activity approval applications lodged by Whitehaven Coal indicated the total excavations were greater than 60 cubic metres. The drilling programs fell within the definition of a higher risk activity under the code of practice, and a rehabilitation management plan was required.

Evidence was made available to confirm the plan was submitted to the department in accordance with the code's mandatory requirements. Additionally, evidence was available in department records to confirm that ROCCs were submitted for the drilling program as part of the application for assessable prospecting operations. It was noted the ROCCs submitted were generally based on the template provided in Appendix 2 of the code of practice.

3.8.3. Rehabilitation program

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

Whitehaven Coal exploration staff said rehabilitation of drill sites generally included:

- site cleaned of all remaining rubbish and drill samples
- all core and chip samples moved to core storage

- photographs taken and kept of sites
- holes not converted to piezometers were grouted to depth
- rehabilitation began as soon as practicable, with the intention of completing as soon as drilling activities end
- erosion and sediment controls, if required, remained in place until risk of erosion was negligible.

Whitehaven Coal exploration staff said rehabilitation monitoring involved a site inspection and collection of photographs from fixed points at about three-monthly intervals. Monitoring was documented in a spreadsheet which was sighted on day of audit.

Figures 1, 2, 3 and 4 show examples of the rehabilitation or conversion to a piezometer of 4 of the holes completed under the activity approval. Seven drill holes were inspected on the day of the audit. Three were converted to piezometers to assist in monitoring groundwater as part of the water management plan. The remaining 4 were rehabilitated.

Figure 1: DD hole MAC3303C – hole drilled and rehabilitated

Figure 2: DD hole MAC3308C - drilled and converted to piezometer.

Figure 3: RC hole MAC3307 – drilled and converted to piezometer

Figure 4: DD hole MAC3304 – hole drilled and rehabilitated.

3.9. Annual activity reporting

Section 163C of the *Mining Act 1992*, clause 59 of the Mining Regulation 2016 and condition 8 of AUTH346 required the licence holder to submit an activity report annually within one calendar month following grant anniversary date. Annual activity reports were required to be prepared in accordance with the Exploration guideline: Annual activity reporting for prospecting titles.

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

- annual exploration (geoscientific) report part A and part B
- 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.

3.10. Core and sample storage

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

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

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

The drilling program conducted by Whitehaven Coal on AUTH346 was a combination of both DD and RC drilling that resulted in the generation of core and chip samples. The core and chip sample storage was off-site in the town of Boggabri and was inspected during the audit.

No samples from AUTH346 have been disposed of to date, and Whitehaven Coal was aware of the requirements for disposal. Chip trays were stored within containers outside the core sample shed. Core sample trays were noted to be labelled in a manner that easily identified contents. Whitehaven Coal staff advised a database was maintained to easily locate samples, which references bay number and shelf letter.

3.11. Record keeping

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

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

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

Examples of records reviewed included:

- stakeholder management communications
- rehabilitation objectives and completion criteria
- rehabilitation management plan
- community consultation strategy
- community consultation records
- annual community consultation reports
- annual activity reporting
- compliance obligation management database
- monitoring photographs and documentation
- waste disposal invoices
- piezometer data records
- fuel usage
- risk assessments.

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 Whitehaven Coal exploration staff generally had a good understanding of the compliance requirements for exploration. Systems and processes for managing compliance requirements were developed and implemented. Several communication methods were utilised to notify relevant employees of changes.

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

4.2. Contractor management

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

Whitehaven Coal used contractors for waste removal, water management plan, drilling, geophysical logging and general field staff. All contractors were required to complete the induction process with a Whitehaven Coal staff on site daily for supervision purposes. Drilling was completed at the time of the audit, and a review of contractor management activities was not undertaken.

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.

Whitehaven Coal exploration staff established an inspection and monitoring process that was suitable for the nature of the exploration activities being conducted. These processes were noted to include inspection and photographs of drill sites and rehabilitation to confirm works were completed in accordance with the controls identified in the risk assessments. All monitoring inspections were documented and recorded.

The risk assessments prepared by Whitehaven Coal were noted to include risks related to environmental management and rehabilitation. Controls were identified and implemented to manage the risks. Observations made on site during the audit confirmed no evidence of erosion or environmental harm.

4.4. Training and competency

Suitably trained, skilled and experienced staff are essential for any organisation. Systems and processes are necessary that allow the identification of training needs to address operational, environmental and safety requirements. Such systems and processes will allow for identification of skills gaps and will enable the development of a training or induction program that identifies the risks associated with poorly trained or inexperienced staff.

Processes and systems were in place to ensure all staff, employees and contractors, were suitably trained, skilled and experienced. Whitehaven Coal advised inductions were required for all staff, with records maintained on qualifications, and training records. A separate system was used to manage contractors, which manages and monitors expiry dates for qualifications.

5. Audit conclusions

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

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

Three suggestions for improvement were noted during the audit, as summarised in Table 2.

Table 2: Summary of suggestions for improvement

Suggestion for Improvement No.	Description of Issue
1	Whitehaven Coal should consider separating the environmental management risk assessment out into a new worksheet to enable clear identification of relevant risk controls.
2	It was recommended controls are reviewed upon completion of program, and record maintained that review was completed, with ineffective controls clearly identified.
3	It was recommended the exploration risk assessment be included with the exploration program risk assessment with clear separation of risk assessment categories, and to ensure it addresses the risks that would prevent the exploration ROCC from being met.