Compliance audit program

EL9527 Junior Exploration Project

Great Dirt Pty Ltd

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1. Introduction

1.1. Background

Exploration licence 9527 (1992) was granted to Great Dirt Pty Ltd on 8 February 2023. The exploration area was about 21.8 kilometres north-east of Barraba in northern NSW.

As part of the compliance audit program, an audit of the exploration activities associated with the Junior exploration project, part of the Doherty prospect within EL9527 was undertaken on 6 May 2026 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 Great Dirt Pty Ltd exploration activities against the requirements of the *Mining Act 1992* and the conditions of the exploration licence 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 Junior exploration project including:
  - exploration activities within EL9527 including a selected sample of exploration drillholes
  - borehole sealing and rehabilitation activities for selected drilling activities undertaken since May 2024.
- a review of documents and records pertaining to the exploration activities
- the assessment of compliance for the period commencing 6 May 2024 and ending 6 May 2026.

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 EL9527 (granted 8 February 2023)
- Assessable prospecting operations application dated 18 September 2024 for 19 reverse circulation drill holes, and associated approval dated 1 October 2024 (APO0001778)
- Exploration code of practice: Environmental management (Version 5, March 2022)

- Exploration code of practice: Rehabilitation (version 5, March 2022)
- Exploration code of practice: Community consultation (version 2.1, May 2023 and/or version 3.0 November 2025)
- Exploration code of practice: Produced water management, storage and transfer (version 5, March 2022)
- Exploration reporting: A guide for reporting on exploration and prospecting in New South Wales (version 5, March 2024)
- Exploration guideline: Annual activity reporting for prospecting titles (version 4, October 2022).

1.5. Publishing and disclosure of information

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

- Section 365 of the *Mining Act 1992*
- Resources Regulator's *Compliance publication policy*
- *Government Information (Public Access) Act 2009*.

2. Audit methods

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

2.1. Opening meeting

An opening meeting was held onsite on 6 May 2026. 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 interviewing personnel, reviewing documentation, examining 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 in hard copies on the day. Where documents were unable to be reviewed on the day, they were provided electronically following the audit.

All information obtained during the audit process was verified by the audit team where possible. For example, statements made by site representatives 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 EL9527:

- RC drill hole GRCD007 – hole drilled November 2024 and rehabilitated, no issues observed.
- RC drill hole GRCD014 – hole drilled November 2024 and rehabilitated, no issues observed.
- RC drill hole GRCD014a – hole drilled November 2024 and rehabilitated, no issues observed.
- RC drill hole GRCD15 – hole drilled November 2024 and rehabilitated, no issues observed.
- RC drill hole GRCD15a – hole drilled November 2024 and rehabilitated, no issues observed.
- RC drill hole GRCD012 – hole drilled November 2024 and rehabilitated, no issues observed.
- RC drill hole GRCD011 – hole drilled November 2024 and rehabilitated, no issues observed.
- RC drill hole GRCD010 – hole drilled November 2024 and rehabilitated, with prickly pear weeds near drill hole.
- RC drill hole GRCD017 – hole drilled November 2024 and rehabilitated, no issues observed.
- RC drill hole GRCD018– hole drilled November 2024 and rehabilitated, no issues observed.

2.3. Closing meeting

A closing meeting was held on 6 May 2026. 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.
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

Assessment	Criteria
	• 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 checklist was 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 Great Dirt Pty 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 EL9527 required the licence holder to carry out the operations described in the approved work program. Work program WP-EL9527-2026-2028 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 EL9527. Exploration completed included:

- rock chip sampling
- geochemical and geophysical surveys
- design of an eleven-hole reverse circulation drilling program at Doherty Mine prospect (currently under assessment by the Regulator)
- petrographic analyses of samples
- RC drilling program
- Appointment of a consultant who undertook research and development geoscience program to define targets
- geological mapping and sampling.

The Great Dirt representative said the annual reporting process was used to review and monitor the approved work program. Exploration data was noted to be maintained by Great Dirt in a database with a server based in Perth Western Australia 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 written land access agreements were in place for the exploration activities undertaken on EL9527. The agreements include specific conditions of access that were relayed to on-ground staff and contractors before any exploration activity commenced. In addition to the written land access agreements, regular phone calls with the landowners were conducted during the program to keep the landowners updated with current exploration activities.

3.3. Native title and exempted areas

Condition 2 of EL9527 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 a state conservation area.

The Great Dirt representative said exploration activities were generally conducted in areas of freehold land within EL9527. Mapping confirmed the inspected RC drill holes were drilled on freehold land. No further approvals under section 30 of the Mining Act were required.

The Great Dirt representative said most of the licence area was under freehold title and no native title claims were recorded. Exploration targets were generally prioritised to avoid exempted areas where possible. No further approvals under condition 2 of the licence were required for EL9527.

3.4. Community consultation

Condition 3 of EL9527 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. Community engagement contact

Mandatory requirement one of the code of practice required the licence holder to publish on its website the contact details of its designated community engagement contact. Mandatory requirement 2 required the licence holder to update the contact details within 7 days of any changes to the contact details.

The Great Dirt engagement contact for EL9527 was published on its website at Contact Us – Great Dirt. The engagement contact served as the primary point of contact for community stakeholders seeking further information about the exploration project. No changes were made to the engagement contact details for the audit reporting period.

3.4.2. Community consultation plan

Mandatory requirement 3 required the preparation of a community consultation plan to describe how the licence holder would engage with the community. Mandatory requirement 4 set out the requirements for preparation of the community consultation plan.

Great Dirt prepared a community consultation plan particularly for EL9527. A review of the community consultation plan for exploration activities confirmed it generally addressed the mandatory requirements of the code of practice, as outlined below:

- Objectives for the strategy were documented in section 1.2.
- A description of the project and the proposed exploration activities was included in section 2.
- Stakeholder identification and analysis were described in section 3.
- Engagement methods were described in section 3.3 – consultation mechanisms were typically tailored to each stakeholder type.
- Methods for collecting and resolving feedback and complaints were documented in section 4.

Mandatory requirement 5 required the licence holder to provide a copy of the consultation plan to any person who requested it in writing. A community consultation plan provided to any person under mandatory requirement 5 must not include any personal information or commercially sensitive information for any community stakeholder. It was indicated in the document control section of the community consultation plan the plan will be provided, in de-identified format, to any person who requested it in writing, within 28 days and at no charge, in accordance with Part B 8.2(5) of the code. All personal and commercially sensitive information would be removed before release.

The Great Dirt representative said no requests to provide the consultation plan were received.

3.4.3. Implementation, record keeping and reporting

Mandatory requirement 6 required the licence holder to keep and maintain records to demonstrate compliance with the requirements of the code. Mandatory requirement 7 required the licence holder to implement the consultation plan, monitor the results of consultation, keep records of consultation activities and evaluate the effectiveness of consultation.

Records were available to demonstrate implementation of the consultation plan. Great Dirt maintained a detailed register of consultation activities. Key consultation activities included:

- landholder meetings and introductory engagement
- land access negotiations and agreement discussions
- consultation regarding proposed geological mapping, geochemical sampling, geophysical surveys and drilling activities
- stakeholder correspondence relating to proposed drilling activities
- ongoing communication regarding exploration planning and access arrangements.

No complaints relating to exploration activities within EL9527 were recorded during the audit reporting period.

Mandatory requirement 8 required the licence holder prepare an annual community consultation report that details the consultation activities completed for the previous year. Mandatory requirement 10 set out the requirements for the community consultation report. Evidence was available to confirm Great Dirt prepared annual community consultation reports for 2024 and 2025, generally in accordance with the reporting guidance in Appendix 2 of the previous code of practice. However, the community consultation reports presented were still in draft and there was no evidence to confirm the dates the reports were produced. As suggestion for improvement one, it was recommended Great Dirt finalise the community consultation reports and indicate the dates when the reports were produced.

The reports were available upon request, but Great Dirt did not receive any requests for community consultation reports to be provided.

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 approval was sought and granted for exploration activities. Exploration activity approval granted included, assessable prospecting operations application dated 18 September 2024 for 19 RC drill holes, and associated approval dated 1 October 2024 (APO0001778).

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

3.6. Environmental management

Condition 4 of EL9527 required the licence holder to prevent or minimise so far as is reasonably practicable, any harm to the environment arising from the activities carried out under the licence. Condition 2 of the exploration activity approval required the licence holder to carry out the activity in compliance with Part B of the Exploration code of practice: Environmental management.

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

- All the holes inspected and drill pads were completely rehabilitated and blended well with the existing environment. It was noted prickly pear weeds existed near RC drillhole GRCD010. During the audit, the Regulator recommended removing existing weeds in this location (Figure 1). Site inspection records submitted after the audit indicated the prickly pear was eradicated and removed from site.
- No evidence of drill cuttings was observed on the surfaces of the sites inspected.
- No waste caused by the exploration activities was observed at any of the sites inspected. Great Dirt said all rubbish generated on-site was placed in heavy gauge large plastic bags and securely stored above ground in a work vehicle. The rubbish was transported to the exploration office in Barraba, which was rented from a rate payer and was eligible for municipal waste collected by the Tamworth Regional Council.
- Waste was observed along the historical junior adit opposite RC drillholes GRCD014 and GRCD014a (Figure 2). According to Great Dirt, the area became a dumping location by the landholders. It was noted Great Dirt was not responsible for the cleanliness of an area outside the location of the drill holes where exploration activities were not conducted.
- All holes were within cleared areas and/or existing private access tracks that kept ground disturbance and vegetation clearing at a minimum.
- The existing property tracks (historic mining tracks) were considered adequate, and no new tracks were created.
- Drilling activities stopped during heavy rain and site access was restricted to minimise the risk of damage to agricultural grazing land and tracks.
- Two homesteads namely Neranghi and North Neranghi were near the project site. The Neranghi homestead was the nearest to the drill sites, 330 metres to the nearest drill hole. According to Great Dirt, the Neranghi homestead was already uninhabited. No complaints due to exploration activities were received from these sensitive receivers.

Great Dirt prepared an environmental risk assessment addressing the impacts of its exploration operations as part of its assessable prospecting operations application. The assessment included identified risk controls. Great Dirt advised that the environmental risk assessment would be reviewed and updated before the commencement of any new assessable prospecting operations.

Figure 1: Prickly pear weeds along drill hole GRCD010

Figure 2: Waste dumped on junior adit

3.7. Security deposit

Condition 5 of EL9527 required the licence holder to provide a security deposit to secure funding to fulfil obligations under the licence.

The security amount required for EL9527 was $10,000 that department records confirmed was held. The last security review was conducted during March 2025.

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 EL9527 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.

Great Dirt undertook an assessment of the impacts of its exploration operations as part of its application for each assessable prospecting operations, which included rehabilitation of the exploration activities. Risk controls were included in the assessment. Examples of risks identified included:

- failure of borehole seals/ inadequate decommissioning of boreholes
- inadequate topsoil management leading to failed rehabilitation
- soil compaction at drill sites, sumps and overland access routes
- contamination of soil or water by hydrocarbon, lubricants or chemicals
- release of drilling fluid or sump failure
- failed or inadequate revegetation
- introduction or spread of weeds
- erosion of disturbed areas
- damage to rehabilitation by fauna and livestock
- insufficient skills or experience of rehabilitation personnel
- bushfire impacting operations or rehabilitation areas.

3.8.2. Rehabilitation objectives and completion criteria

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

The exploration activity approval application lodged by Great Dirt for the junior exploration project indicated the total surface disturbance area was less than 5 hectares. The drilling program did not fall within the definition of a higher risk activity under the code of practice, and a rehabilitation management plan (RMP) was not required to be developed. However, Great Dirt prepared a RMP for EL9527. Section 6 of the RMP contained the rehabilitation objectives and completion criteria (ROCC). It was noted the final land use goal was not included in the ROCC but discussed separately in section 5 of the RMP.

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.

Great Dirt said rehabilitation of drill sites generally included:

- site cleaned of all remaining rubbish and drill samples
- drill holes were backfilled and completely rehabilitated
- remaining samples were taken and disposed of at an offsite facility

- remediation and earthworks were conducted if any sub-surface ground was disturbed
- drill collars were removed, and topsoil was returned to drill collar accordingly
- photos were taken before the site is disturbed and after the site was rehabilitated.

Great Dirt representative advised that rehabilitation monitoring comprised site inspections supported by photographic records for each inspection. Site inspection records were made available after the site audit upon request by the Regulator via email within a specified due date.

Figure 3, Figure 4, Figure 5, Figure 6, Figure 7, Figure 8, Figure 9 and Figure 10 show examples of the rehabilitation of the eight drill holes inspected within EL9527.

Figure 3: RC drillhole GRCD007 – drilled and rehabilitated

Figure 4: RC drillhole GRCD015 – drilled and rehabilitated

Figure 5: RC drillhole GRCD015a- drilled and rehabilitated

Figure 6 RC drillhole GRCD012- drilled and rehabilitated

Figure 3: RC drillhole GRCD007 – drilled and rehabilitated

Figure 4: RC drillhole GRCD015 – drilled and rehabilitated

Figure 7: RC drillhole GRCD011- drilled and rehabilitated

Figure 8: RC drillhole GRCD010- drilled and rehabilitated

Figure 3: RC drillhole GRCD007 – drilled and rehabilitated

Figure 4: RC drillhole GRCD015 – drilled and rehabilitated

Figure 9: RC drillhole GRCD017- drilled and rehabilitated

Figure 10: RC drillhole GRCD018- 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 EL9527 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, Great Dirt submitted annual activity reports comprising:

- annual exploration 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.

3.10. 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 Great Dirt on EL9527 generated chip samples. According to Great Dirt the chip samples generated, and the relevant technical data were donated to the Geological Survey of NSW, W. B. Clarke Geoscience Centre, at Londonderry.

3.11. Record keeping

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 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 Great Dirt had generally maintained records as required by the licence conditions and the exploration codes of practice.

Examples of records reviewed included:

- signed land access agreements
- risk assessments
- work program
- rehabilitation objectives and completion criteria
- community consultation plan
- environmental and rehabilitation compliance reports
- annual activity reporting
- photos of baseline conditions and after completion of rehabilitation

- site inspection records
- staff training records
- rehabilitation management plan
- operation and environmental management plan.

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).

Great Dirt generally had a good understanding of the compliance requirements for exploration. Great Dirt used consultants to help them manage timely submission of reporting requirements. Systems and processes for managing compliance requirements were developed and implemented.

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.

Great Dirt 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.

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.

Great Dirt established an inspection and monitoring process 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 were completed in accordance with the controls identified in the risk assessments. Documented records of rehabilitation site inspections were provided to the Regulator on request after the site audit within a specified due date.

The impact assessment prepared by Great Dirt for the exploration drilling program was 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.

Great Dirt advised it maintained an incident notebook for recording any non-compliances or defects during operation. There was no adequate process for reviewing actions taken to verify controls or mitigation measures applied were effective or evaluate trends for incidents or issues. As suggestion for improvement 2, it is recommended that Great Dirt establishes a process for reviewing and evaluating incidents or issues as they occur to verify the effectiveness of controls and/or identify trends in particular issues.

5. Audit conclusions

From the evidence reviewed during the audit, it was concluded that the exploration operations undertaken by Great Dirt were well managed. Evidence was available to demonstrate that basic systems and processes were developed to identify and manage compliance requirements. It was observed that records were being maintained as required to demonstrate compliance.

Great Dirt was compliant with the requirements of the exploration licence, exploration activity approvals and the environmental management and rehabilitation exploration codes of practice, for the elements reviewed during the audit.

Two suggestions for improvement were noted during the audit, as summarised in Table 2. No non-compliances and observations of concern were recorded.

Table 2: Summary of suggestions for improvement

Suggestion for improvement number	Description of issue
1	Evidence was available to confirm Great Dirt prepared annual community consultation reports for 2024 and 2025, generally in accordance with the reporting guidance in Appendix 2 of the previous code of practice. However, the community consultation reports presented were in draft and there was no evidence to confirm the dates the reports were produced. As suggestion for improvement one, it is recommended Great Dirt finalise the community consultation reports and indicate the dates when the reports were produced.
2	Great Dirt advised it maintained an incident notebook for recording any non-compliances or defects during operation. There was no adequate process for reviewing actions taken to verify controls or mitigation measures applied were effective or evaluate trends for incidents or issues. As suggestion for improvement 2, it is recommended that Great Dirt establishes a process for reviewing and evaluating incidents or issues as they occur to verify the effectiveness of controls and/or identify trends in particular issues.