

---

## Resources Regulator

Department of Primary Industries  
and Regional Development



## Compliance audit program

### EL9449 Tumbarumba Exploration Project

#### Right Resources Pty Ltd

July 2026

Published by the Department of Primary Industries and Regional Development

Title: EL9449 Tumbarumba Exploration Project  
Subtitle: Right Resources Pty Ltd  
First published: July 2026  
Department reference number: D26/99952

| Amendment schedule |         |                 |
|--------------------|---------|-----------------|
| Date               | Version | Amendment       |
| July 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. Community engagement contact.....                       | 11 |
| 3.4.2. Community consultation plan.....                        | 11 |
| 3.4.3. Implementation, record keeping and reporting.....       | 12 |
| 3.5. Exploration activity approvals.....                       | 12 |
| 3.6. Environmental management.....                             | 13 |
| 3.7. Security deposit.....                                     | 15 |
| 3.8. Rehabilitation.....                                       | 15 |
| 3.8.1. Risk assessment .....                                   | 15 |
| 3.8.2. Rehabilitation objectives and completion criteria ..... | 16 |
| 3.8.3. Rehabilitation program.....                             | 16 |
| 3.9. Annual activity reporting .....                           | 16 |
| 3.10. Core and sample storage.....                             | 16 |

3.11. Record keeping ..... 17

4. Compliance management ..... 19

4.1. Identifying compliance obligations ..... 19

4.2. Contractor management ..... 19

4.3. Inspections, monitoring and evaluation ..... 20

5. Audit conclusions ..... 21

# 1. Introduction

## 1.1. Background

Exploration licence 9449 (1992) was granted to Right Resources Pty Ltd on 10 August 2022. The exploration area was about 26 kilometres south-east of Tumbarumba in southern NSW.

As part of the compliance audit program, an audit of the exploration activities associated with the Halls Peak exploration project within EL9449 was undertaken on 14 April 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 Right Resources 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 titleholder 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 EL9449 - Pilot Project (APO0002030), EL 9449 Hazardous Tree Removal (APO0002133) and EL 9449 Water Management (APO0002195) exploration projects including:
  - exploration activities within EL9449 including a selected sample of exploration drillholes
  - borehole sealing and rehabilitation activities for selected drilling activities undertaken since April 2024 (if any).
- A review of documents and records pertaining to the exploration operations for the period commencing 14 April 2024 and ending 14 April 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 EL9449 (granted 10 August 2022, last renewed 4 September 2025)
- assessable prospecting operations application dated 23 April 2025 for 14 diamond drill holes with access tracks, and associated approval dated 9 May 2025 (APO0002030)

- assessable prospecting operations application dated 8 September 2025 for removal of trees within 50m of particular drilling activities approved under APO0002030, and associated approval dated 10 September 2025 (APO0002133)
- assessable prospecting operations application dated 25 October 2025 for temporary water management structures, including tanks and a pipeline to aid drilling activities approved under APO0002030, and associated approval dated 12 November 2025 (APO0002195)
- assessable prospecting operations application dated 18 February 2026 for 6 diamond drill holes with drill pad area (APO0002315)
- 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 14 April 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 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. Several documents were unable to be reviewed on the day and were provided following the remote 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 operations in EL9449:

- compound drilling site including:
  - core cutting and storage facilities
  - water management infrastructure
  - diesel refuelling infrastructure
  - waste management facilities
  - offices and amenities
  - drill sites pegged for future drilling.
- Pilot drilling site including:
  - access track and drill pad
  - water management facilities
  - 4 diamond drill holes drilled from the same pad.

## 2.3. Closing meeting

A closing meeting was held on site on 14 April 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                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Compliance</b>                 | Sufficient and appropriate evidence is available to demonstrate the particular requirement has been complied with.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Non-compliance</b>             | <p>Clear evidence has been collected to demonstrate the particular requirement has not been complied with. There are 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> |
| <b>Observation of concern</b>     | <p>Where an auditee may be compliant at the time of the audit but there are issues that exist that could result in the potential for future non-compliance if not addressed.</p> <p>Observation of concern was also used where an issue may not have particular compliance requirements, but which was not conducive to good management or best practice.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Suggestion for improvement</b> | Where changes in processes or activities inspected or evaluated at the time of the audit could deliver improvement in relation to risk minimisation, sustainable outcomes and management practices.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Not determined</b>             | <p>The necessary evidence has not been collected to enable an assessment of compliance to be made within the scope of the audit.</p> <p>Reasons why the audit team could not collect the required information include:</p> <ul style="list-style-type: none"> <li>insufficient information on the file relating to the period covered by the audit or insufficient evidence collected to reach a conclusion</li> <li>the wording on the criteria (approval condition) meant that no evidence could be gathered, or it was too difficult to gather the evidence.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                     |



| Assessment            | Criteria                                                                                                                                                                                                                                                                   |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                       | A 'not determined' assessment was also made where the condition was outside the scope of the audit.                                                                                                                                                                        |
| <b>Not applicable</b> | <p>The circumstances of the authorisation or licence holder have changed and are no longer relevant ( e.g. no longer mining, mining equipment and plant has been removed).</p> <p>An invoking element in the criteria was not activated within the scope of the audit.</p> |

## 2.5. Reporting

Following completion of the audit, the audit checklists were completed, and audit notes were reviewed to compile a list of outstanding matters to be noted in the audit report. This report was prepared to provide an overview of the operational performance of the site in relation to the exploration activities and identify any non-compliances or observations of concern noted by the auditors during the documentation review and interviews.

The draft audit findings were forwarded to Right Resources 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 EL9449 required the licence holder to carry out the operations described in the approved work programs. Work programs WP-EL9449-2022-2025 and WP-EL9449-2025-2031 were in force during the audit period. Exploration activities were planned to target stages one to 5 of exploration across the tenement over the 2 terms of the licence.

The licence was initially granted as a low impact licence for the first term to 2025. It was renewed as a full licence in 2025 for a six-year term. Annual reports for the 2024 and 2025 reporting periods were reviewed for EL9449. Evidence was available to confirm exploration activities were progressing. Exploration completed included:

- review and compilation of historic data sets
- geophysical surveys and remote sensing activities, including LiDAR, magnetic and radiometric and gravity surveys
- geological mapping
- soil and rock sampling and geochemical analysis
- a diamond drilling campaign was conducted in 2026.

Right Resources used the annual reporting processes to set the work program for the year across the tenement. Tracking systems and spreadsheets were used to track progress of the exploration activities against the approved work programs.

Exploration data was noted to be maintained by the Right Resources geologists (and/or their contractors) and submitted to NSW Resources with the annual activity reports as required.

### 3.2. Access arrangements

Section 140 of the *Mining Act 1992* stated, ‘the holder of a prospecting title must not carry out prospecting operations on any particular area of land except in accordance with an access arrangement or arrangements applying to that area of land’. The access arrangement was required to be agreed in writing between the holder of the prospecting title and each landholder of that area of land.

Exploration activities were conducted within areas of the Maragle State Forest. Evidence was provided to confirm Right Resources had permits and access arrangements in place with Forestry Corporation. Liaison with Forestry was maintained throughout the exploration operations.

### 3.3. Native title and exempted areas

Condition 2 of EL9449 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.

Right Resources commenced the right to negotiate process for EL9449 in September 2024. Consent under condition 2 was granted in April 2025. No further approvals were required.

There were no state conservation areas within the exploration licence areas. No approvals under section 30 of the *Mining Act 1992* were required. Right Resources had a land access arrangement in place with Forestry Corporation for exploration activities within Maragle State Forest.

### 3.4. Community consultation

Condition 3 of EL9449 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 was undertaken as documented in the following sections.

#### 3.4.1. Community engagement contact

Mandatory requirement one of the code 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 change to the contact details.

Contact details for Right Resources were included on the Right Resources website. The contact email address was a company general email that was actively monitored by Right Resources staff. Any enquiries or complaints received were documented and actioned. The website did not specifically identify the contact details were for community engagement purposes, nor did it provide a contact phone number. This was raised as non-compliance one. Right Resources took immediate steps to address the issue with a new community page developed on its website. The new page provided the contact email, phone number and address for community engagement and enquiries. It also identified the community consultation plan was available upon request. The Regulator resolved to take no further action.

#### 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.

Right Resources prepared a community consultation plan for its tenements in the Tumbarumba area including EL9449. 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 2.
- A description of the project and the proposed exploration activities was included in section 4.
- Stakeholder identification and analysis was described in section 5 with details and analysis of stakeholders contained in a separate spreadsheet for privacy reasons.
- Risk management for consultation and engagement was documented in section 6.

- Engagement methods were described in section 7 – consultation mechanisms were typically tailored to each stakeholder type.
- Methods for collecting and resolving feedback and complaints were documented in section 9.

Mandatory requirement 5 required the licence holder to provide a copy of the consultation plan to any person who requests it in writing. Right Resources exploration staff said no requests to provide the consultation plan were received. The separation of stakeholder details into a spreadsheet separate from the consultation plan meant personal information was kept confidential should the consultation plan be requested. This was generally considered a good practice.

### 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 confirm implementation of the consultation plan. Right Resources maintained a detailed log of consultation activities. Given the low impact nature of the exploration activities, and a location reasonably remote from nearby communities, liaison with landholders was the key consultation undertaken. Evidence was available to confirm ongoing consultation with Forestry as documented in the consultation strategy. Evaluation of the consultation outcomes showed community consultation was mostly positive.

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. Reports for EL9449 under the 2026 code of practice were not due but evidence was available to confirm Right Resources prepared annual community consultation reports for earlier years, generally in accordance with the reporting guidance in Appendix 2 of the previous code of practice. The reports were available upon request, but Right Resources 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 approvals were sought and granted for exploration activities. Exploration activity approvals granted included:

- assessable prospecting operations application dated 23 April 2025 for 14 diamond drill holes with access tracks, and associated approval dated 9 May 2025 (APO0002030)
- assessable prospecting operations application dated 8 September 2025 for removal of trees within 50m of particular drilling activities approved under APO0002030, and associated approval dated 10 September 2025 (APO0002133)

- assessable prospecting operations application dated 25 October 2025 for temporary water management structures, including tanks and a pipeline to aid drilling activities approved under APO0002030, and associated approval dated 12 November 2025 (APO0002195)
- assessable prospecting operations application dated 18 February 2026 for 6 diamond drill holes with drill pad area (APO0002315).

Generally, evidence was provided to indicate that 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 EL9449 required the licence holder to prevent or minimise so far as was reasonably practicable, any harm to the environment arising from the activities carried out under the licence. Condition 2 of the exploration activity approvals required the licence holder to carry out the activity in compliance with Part B of the Exploration code of practice: Environmental management.

The first phase of the diamond drilling program on EL9449 was completed, and all plant and equipment were removed from site. A full assessment against the Exploration code of practice: Environmental management was not completed but the following observations were made:

- No evidence of environmental harm was observed at the sites visited during the site inspection. Right Resources prepared and implemented an environmental management plan for the exploration activities.
- There was a small amount of spilled material (suspected hydrocarbon, grease or cutting fluid) observed at the pilot drill site (Figure 1). This was raised as observation of concern one. Right Resources should clean up the material during rehabilitation of the site.
- Diesel fuel was stored on site at the compound area. This storage was confirmed to be a double skinned tank (Figure 2).
- A diesel generator was next to the diesel storage tank. Fuelling lines and electrical cabling were on the ground. As observation of concern 2, Right Resources should review housekeeping at the compound site to better manage risks associated with the diesel storage and generator.
- A spill kit was observed on site, but it was not near the diesel storage. As suggestion for improvement one, Right Resources should review the need for additional spill kits at the compound site to ensure adequate spill response materials were in place.
- Clearing of vegetation for drill pads and the establishment of access tracks was generally consistent with the APO approvals (Figure 3), including removing dangerous trees in consultation with Forestry.
- Wastes were generally well managed (Figure 4). Drill cuttings from the diamond drilling were dried and bagged and temporarily stored in a covered skip bin at the compound site (Figure 5). Other wastes were collected in a separate covered skip bin for disposal at the local waste management facility.
- A waste classification for the dried drill cuttings was sighted, and Right Resources confirmed the waste was suitable for disposal at the local waste management facility.



- The need for cleaning vehicles before being on site was included in the site induction as part of biosecurity controls.
- A fire trailer was observed on site as a management measure for preventing the spread of fire during exploration operations (Figure 6).

An environmental risk assessment was undertaken for the Tumbarumba project. The risk assessment was documented and generally aligned with the mandatory elements of the code of practice. Controls were documented to mitigate the risks identified. The risk assessment linked to the environmental management plan prepared for the exploration activities. On-site inspections were carried out by Right Resources personnel to confirm implementation and effectiveness of the controls. Right Resources engaged a consultant to undertake independent audits of the activities to confirm compliance with regulatory requirements.

Figure 1: Pilot drill pad - 4 holes drilled



Figure 2: Diesel storage and generator at compound



Figure 3: Drill pad and tracks at Pilot drill site



Figure 4: Covered waste management bins at compound





Figure 5: Dried drill cuttings in covered waste bin



Figure 6: Fire trailer at compound site



### 3.7. Security deposit

Condition 5 of EL9449 required the licence holder to provide a security deposit to secure funding for the fulfilment of obligations under the licence.

The security amount required for EL9449 was \$10,000, which department records confirmed was held. The diamond drilling program on EL9449 did not trigger an increase in security from the minimum required.

### 3.8. Rehabilitation

Condition 6 of EL9449 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.

Right Resources prepared a rehabilitation risk assessment for the Tumbarumba project. The risk assessment included a range of risks associated with rehabilitation of exploration activities. Controls were documented for the risks identified. Examples of risks identified included:

- adopting inadequate topsoil management processes
- weed infestation associated with introduction of weed species
- contamination resulting from exploration activities
- damage to rehabilitation from fauna (e.g. kangaroos, pest animals or livestock).

### 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 Right Resources indicated the surface disturbance area was less than the 5-hectare threshold for a higher risk prospecting operation. Excavations were below the 60 cubic metre threshold. The drilling program did not fall within the definition of a higher risk prospecting operation under the code of practice, and a rehabilitation management plan was not required to be developed.

ROCCs were documented as part of the application for assessable prospecting operations. It was noted that the ROCCs 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 included a monitoring program) to rehabilitate disturbed areas to a condition that could support the intended final land use. Mandatory requirement 4 required the licence holder to commence rehabilitation of a site as soon as reasonably practicable following the completion of activities on that site.

Drilling of 4 holes was completed in late March 2026 with 2 holes grouted as part of initial decommissioning and rehabilitation. Grouting records were available to confirm the grouting process. Right Resources staff said rehabilitation would progress once final testing was completed.

## 3.9. Annual activity reporting

Section 163C of the *Mining Act 1992*, clause 59 of the Mining Regulation 2016 and condition 8 of EL9449 required the licence holder to submit an activity report annually within one calendar month following the grant anniversary date. Annual activity reports were required to be prepared in accordance with the Exploration guideline: Annual activity reporting for prospecting titles.

During the audit scope period, Right Resources submitted annual activity reports comprising:

- annual geological report
- environmental rehabilitation and compliance report.

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

## 3.10. Core and sample storage

Clause 65 of the Mining Regulation 2016 required the holder of an authority to, so far as is 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.

Core was temporarily stored at the Right Resources compound on EL9449 where core processing was in progress (Figure 7). Core trays were well labelled (Figure 8) and stacked on pallets by hole number (Figure 9).

Figure 7: Core processing facilities at compound site



Figure 8: Core tray labelling



Figure 9: Core trays stacked by hole number



### 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 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 Right Resources generally maintained records as required by the licence conditions and the exploration codes of practice. It was noted that relevant documents and records were readily retrievable upon request from the company's Sharepoint system.

Examples of records reviewed included:

- level 1 and level 2 Forestry permits
- environmental and rehabilitation risk assessments
- assessable prospecting operations approval and associated documentation
- environmental management plan
- pre, during and post drilling photos
- exploration field inspection reports from consultants
- examples of daily prestart meeting minutes
- examples of completed pre-mobilisation reconnaissance checklists
- waste management records including waste classification and confirmation of acceptance to waste management facility
- rehabilitation objectives and completion criteria
- hole grouting records
- community consultation plan
- community consultation records
- community consultation reports
- annual activity reporting.

## 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 Right Resources exploration staff generally had a good understanding of the compliance requirements for exploration. Systems and processes for managing compliance requirements were generally developed and implemented. Examples of systems and processes reviewed during the audit included:

- risk register – drilling
- tenement registers recording exploration activities
- pre-mobilisation and inspection checklists.

It was noted records were generally maintained to demonstrate compliance using a Sharepoint system.

### 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.

Drilling was completed at the time of the audit. Right Resources used contract drillers for the diamond drilling program, and a review of contractor management activities was undertaken. Contractor management activities undertaken by Right Resources included:

- The driller was required to send a copy of its HSEC system to Right Resources as part of a pre-qualification check.
- Right Resources gave the driller a copy of the environmental management plan for the works.
- The driller's personnel were included in risk assessment sessions with Right Resources staff.

- Morning meetings were held on site during drilling to discuss any issues raised. These daily pre-start meetings were documented.
- A Right Resources exploration geologist was on site during the drilling operations to supervise the drilling contractor.

### 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.

Right Resources exploration staff established an inspection and monitoring process that was suitable for the nature of the exploration operations being conducted. These processes were noted to include inspection of drill sites to confirm works were completed in accordance with the controls identified in the risk assessments.

Right Resources engaged a consultant to assist with implementation and monitoring of environmental controls. Inspection reports were provided which outlined the results of the inspections and any issues arising.

As suggestion for improvement 2, Right Resources should consider developing a documented process to evaluate the effectiveness of the risk controls implemented, with revised controls identified where those risks changed, or controls were identified as being ineffective.

## 5. Audit conclusions

From the evidence reviewed during the audit and observations made on site during the site inspection, it was concluded the exploration operations undertaken by Right Resources were well managed. Evidence was available to demonstrate systems and processes were developed to identify and manage compliance requirements. It was observed records were being maintained as required to demonstrate compliance.

Right Resources were generally compliant with the requirements of the exploration licence, exploration activity approvals and the exploration codes of practice, for the elements reviewed during the audit. One non-compliance was identified during the audit as summarised in Table 2. Two observations of concern and 2 suggestions for improvement were identified as summarised in Table 3 and Table 4.

Table 2: Summary of non-compliances

| Non-compliance number | Description of issue                                                                                                                                                                                                                                                                                                                           | Recommendation                                                                                                                                                                                                                                                            |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                     | Contact details for Right Resources were included on the Right Resources website. The contact email address was a company general email that was actively monitored by Right Resources staff. The website did not specifically identify the contact details were for community engagement purposes, nor did it provide a contact phone number. | Right Resources took immediate steps to address the issue with a new community page developed on its website. The new page provided the contact email, phone number and address for community engagement and enquiries. The Regulator resolved to take no further action. |

Table 3: Summary of observations of concern

| Observation of concern number | Description of issue                                                                                                                       | Recommendation                                                                                                                           |
|-------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|
| 1                             | There was a small amount of spilled material (suspected hydrocarbon, grease or cutting fluid) observed at the pilot drill site (Figure 1). | Right Resources should clean up the material during rehabilitation of the site.                                                          |
| 2                             | A diesel generator was next to the diesel storage tank. Fuelling lines and electrical cabling were on the ground.                          | Right Resources should review housekeeping at the compound site to better manage risks associated with the diesel storage and generator. |

Right Resources took immediate steps to rectify the non-compliance and the observations of concern. Photos and records were provided to confirm corrective actions.



Table 4: Summary of suggestions for improvement

| Suggestion for improvement number | Description of issue                                                                                                                                                                                                                          |
|-----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                                 | Right Resources should review the need for additional spill kits at the compound site to ensure adequate spill response materials were in place.                                                                                              |
| 2                                 | Right Resources should consider developing a documented process to evaluate the effectiveness of the risk controls implemented, with revised controls identified where those risks changed, or controls were identified as being ineffective. |