



SOUTH MIDDLEBACK RANGE MINING AREA

2018 Compliance Report

simec.com



Document Control

PUBLICATION DATE: 30 April 2019

REVIEW DATE:

AUTHOR: Stephen Packer, Russell Hodges

VERSION NUMBER: Rev 0

COMMENTS: Review: Peter Woods, Chris Smyth

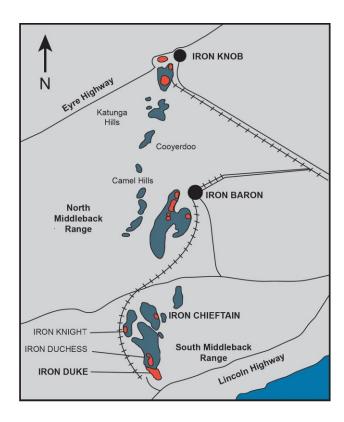
Executive Summary

This annual compliance report covers the reporting period 1 January 2018 to 31 December 2018 for operations approved under PEPR 2014/109 for the South Middleback Range (SMR). Operations within the SMR included hematite and magnetite mining and the associated activities of crushing, screening, production of magnetite concentrate and low-grade ore beneficiation.

In June 2018 DPC approved the new PEPR for SMR Operations as MPEPR2016/069 (SIMEC Mining reference WPC-108 Rev 5).

SIMEC continues to convert the TSF to a full perimeter discharge central decant (PDCD) configuration for more efficient recovery of supernatant water and to reduce water seepage into the ground. The PDCD conversion is a fiveyear programme, scheduled for completion in 2019, and monthly reports and annual briefings were provided to DEM and DEW (Native Vegetation) as part of the management plan, referred to within the Environmental Direction pertaining to the issue. Extraction of groundwater from within the mounding area is an ongoing process.

Dust management remains a high priority and subject to continuous improvement.





Ministerial Declaration 009 Checklist

Sect	ion		Included or N/A
1.	Pub	lic liability insurance	Section 1
2.	Ider	ntification	
	a.	Tenement number(s)	Section 2
	b.	Name of the mine operation	Section 2
	C.	General location details	Section 2
	d.	Name(s) of the mine owner and mine operator(s)	Section 2
	e.	Site Contact	Section 2
	f.	Registered Mine Manager, Mines Works Inspection Act, 1920	Section 2
	g.	Reference and approved date of relevant PEPR being reported against	Section 2
	h.	Dates of the reporting period for the report	Section 2
	i.	Date of preparation of the report.	Section 2
3.	Ten	ements	
	a.	Summary list and the status of currency of all tenements covered by the approved PEPR;	Section 3
	b.	A plan(s) of the mining operation showing all tenement boundaries covered by the approved PEPR.	Figures 1 - 4
4.	4. Other approvals		
	aut en	wide a summary list and the status of currency of any other approvals obtained to thorize the mining operation, that are relevant to the achievement of vironmental outcomes within the approved PEPR and or compliance with the ement conditions.	Section 4
5.	Ore	reserves and mineral resources. Provide:	
	a.	A statement of the current ore reserves and mineral resource estimates in the tenement area and a brief description of the basis of this estimate; include Australasian Joint Ore Reserve Committee (JORC) compliant ore reserve and mineral resource estimates and categories, if available.	Section 5.1
	b.	A statement of any change in the mineral resource and ore reserves from those that form the basis for the mining operation in the approved PEPR.	Section 5.1
	or		
	C.	An estimate of the resource to be mined, the basis of the estimate, and demonstrate that the resource continues to be mined at current commodity prices.	N/A
	an	d	
	d. e.	A summary of any new delineation or exploration drilling activities on the tenement, or any other potential sources of ore (e.g. from nearby mines) that may have a significant effect on the future of production levels and mine life. A statement of the estimated mine life.	N/A
6.		ing, processing and waste storage activities. Provide:	



6	a. A summary of the quantity of ore mined and processed in the reporting period, and the expected quantity to be mined and processed in the next reporting period.	Section 6.1, 6.2, 6.3
k	o. A summary of the ore currently stockpiled on the tenement, the amount of concentrate or other products exported from the tenement in the reporting period, and the amount expected to be exported in the next reporting period.	Section 6.1, 6.3
C	A summary of the amount of overburden/waste mined during the reporting period, the amount of overburden/waste to be mined during the next reporting period and the amount of overburden/waste mined since the commencement of mining operations.	Section 6.4
7. c	ompliance with environmental outcomes and leading indicator criteria. Provide:	
6	a. A statement that operations were, or were not, compliant with each environmental outcome (including mine completion outcomes) specified in the tenement conditions or approved PEPR. The statement must be supported by a summary of measured criteria data that clearly demonstrates the conclusion that the environmental outcome was (or was not) fully achieved.	Section 7.1
k	Summarise data relating to any leading indicator criteria in the approved PEPR. If any leading indicator have been or will become relevant to the operation of any control strategy, the report must state the actions that were taken and if the relevant controls strategies continue to be effective.	Section 7.2
8. C	ompliance with non-outcome based tenement conditions. Provide:	
6	a. Provide a statement on the compliance status of any tenement conditions of the lease or licence that do not relate to an environmental outcome in the approved PEPR.	Section 8
k	o. Evidence to support the statement of compliance.	Section 8
9. R	ectification of non-compliances.	
6	a. Where instances of non-compliance with either the relevant environmental outcomes in the approved PEPR or tenement conditions have occurred during the current reporting period, provide the following information for each non-compliance:	Section 9
	i. the date of the incident	
	 ii. what environmental outcome or tenement condition was breached iii. the date the incident was reported under Regulation 87 of the Mining Regulations, or other reporting protocol endorsed by the Government of SA (including the South Australian Uranium Incident Reporting Protocol) iv. the cause of the non-compliance 	
	v. any actions taken or yet to be taken to rectify the non-compliance and to prevent the reoccurrence of any such non-compliance	
k	No. Where any non-compliances under Regulation 86 or initial incident reports under Regulation 87 of the Mining Regulations have previously been reported in compliance reports and not fully rectified at the time of reporting, a progress report must be included to assess the effectiveness of rectification.	Sections 9.2
	isturbance and rehabilitation activities. Provide a summary of the disturbance and chabilitation activities, including:	
ć	a. The amount of land disturbed and activity that created the disturbance in the reporting period	Section 10



b.	The amount of land disturbed and activity that created the disturbance in the reporting period	Section 10
C.	Strategies implemented to avoid or minimize disturbance	Section 10
d.	Rehabilitation works carried out in the reporting period	Section 10
е.	The amount of land where rehabilitation works are completed	Section 10
f.	An estimated amount of land to be rehabilitated in the next reporting period	Section 10
g.	Any potential improvements learned from previous rehabilitation activities	Section 10
	onciliation of native vegetation clearance. Where native vegetation has been roved for clearance, include:	
a.	the approved maximum clearance (as described in the PEPR) in hectares	Section 11
b.	the amount cleared in the reporting period (in hectares and shown on a plan)	Section 11
C.	the total amount cleared to date, and	Section 11
d.	an estimated amount to be cleared in the next reporting period.	Section 11
12. Env	ronment Protection and Biodiversity Conservation Act 1999 reporting	
a.	If the tenement was the subject of an approval under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act), include a summary report demonstrating compliance with all EPBC Act approval conditions.	Section 12
13. Exe	mpt land. Provide:	
a.	a statement that all waivers for land relevant to the mining operation are in place and compliant with exempt land provisions in accordance with Section 9 of the Mining Act	Section 13
	the status of any exempt land, including i. name of person entitled to exemption ii. certificate of title or crown land details iii. reason for exemption iv. area of exemption (hectares) v. date waiver registered vi. any relevant conditions	Not applicable
C.	a plan showing all exempt land relevant to the mining operations. The plan must detail the extent of mining operations at the end of the reporting period.	Not applicable
	applaints. Provide a summary of any complaints raised by third parties for the parting period. For each complaint specify:	Section 14
a.	the date of the complaint	
b.	the nature of the complaint	
C.	whether or not it related to a non-compliance	
d.	what action was taken to address the complaint (or yet to be taken), and	
e.	the date the complaint was received	
und tene	nagement system reviews. Provide a summary of any management system reviews ertaken during the reporting period in order to ensure compliance with relevant ement conditions and environmental outcomes (including mine completion comes), including:	



a.	when an audit or review was undertaken	Section 15	
b.	who undertook the audit or review	Section 15	
C.	what aspect(s) of the management system was audited or reviewed	Section 15	
d.	what issues, or recommendations for improvement were noted	Section 15	
e.	an assessment of any issues identified in the audit or review with the potential to lead to a non-conformance with approved environmental outcomes, and	Section 15	
f.	what corrective has been, or will be taken, to address any issues identified	Section 15	
16. Ver	fication of uncertainty. Provide:		
a.	a description of and status of works undertaken during the reporting period or proposed to be undertaken to address any identified uncertainties or assumptions made in the approved PEPR; and	Section 16	
b.	a description and status of works undertaken during the reporting period or proposed to be to be undertaken to address any additional uncertainties or assumptions identified since the PEPR was approved.	Section 16	
17. Cha	17. Change to mining operations and emerging environmental hazards. Provide:		
a.	a summary list of any change(s) to mining operations endorsed under the approved PEPR for the reporting period.	Section 17.1	
b.	a description of any new or emerging environmental hazards that apply, or appear to be arising, in relation to mining operations.	Section 17.2	
18. Tec	nnical reports.		
a.	Provide a summary list of all technical data, studies and reports generated during the reporting period that support the achievement of tenement conditions and environmental outcomes in the approved PEPR.	Section 18	
19. Vol			
a.	Community or wider environment support activities		
b.	Community engagement activities		



Declaration of Accuracy

This document has been prepared to fulfil the requirement under Regulation 86 (1) of the Mining Regulations 2011 (Mining Regulations), determining the minimum information required to be provided in a Compliance Report for a holder of a mineral lease and any associated miscellaneous purposes licence under Regulation 86(1), (3), (4), (5) and (7) of the Mining Regulations.

I, Chris Smyth, OneSteel Manufacturing Pty Limited's Group Manager - Environment, Regulatory & Stakeholder have taken the following steps to review the information in this Mining Proposal to ensure its accuracy:

- Internal peer reviews by suitably qualified and experienced personnel
- Internal process of review by responsible managers.

Name	Position or Agent	Signature	Date
Chris Smyth	Group Manager - Environment, Regulatory & Stakeholder		30 th April 2019

Document Status

Rev No	Authors	Responsible Manager
0	Russell Hodges Principal Environment & Approval Scientist	Chris Smyth – Group Manager Environment, Regulatory and Stakeholder
	Stephen Packer Regulatory Approvals Coordinator	Peter Woods – Environment Assurance Manager – Mining Areas



Contents

1	Public liability insurance	14
2	Identification	15
3	Tenements	16
4	Other approvals	23
5	Ore reserves and mineral resources	24
5.1	Ore reserves and mine life	24
	5.1.1 Iron Chieftain resource	24
	5.1.2 Iron Knight (South)	24
	5.1.3 Iron Duchess	25
	5.1.4 Iron Duke / Magnet	25
6	Mining, processing and waste storage	26
6.1	Ore mining	26
6.2	2018 Ore processing	26
6.3	Concentrate	27
6.4	Overburden / Waste	27
7	Compliance with environmental outcomes and leading indicator criteria	28
7.1	Compliance summary	28
7.2	Compliance with outcomes	28
8	Compliance with non-outcome based tenement conditions	39
9	Rectification of non-compliances	53
9.1	2018 non-compliances	53
9.2	Outstanding items from previous reports	53
10	Disturbance and rehabilitation activities	54
11	Reconciliation of native vegetation clearance	58
12	Environment Protection and Biodiversity Conservation Act 1999 Reporting	61
13	Exempt land	62
14	Complaints	63
15	Management system reviews	64
15.1	ISO AS/NZS 14001 Audit	64
15.2	2 Internal reviews & audits	64
16	Verification of uncertainty	65
17	Change to mining operations and emerging environmental hazards	66
17.1	Changes to mining operations	66
17.2		66
18	Technical reports	67
19	Voluntary information	68
19.1	-	68
	19.1.1 Community sponsorship and support	68



20	Reference	s	70
	19.2.3	The Middleback Alliance	69
	19.2.2	Indigenous consultation	69
	19.2.1	Community consultation	68
19.2	Commu	nity engagement activities	68
	19.1.3	Local employment opportunities	68
	19.1.2	Helping break the cycle of disadvantage	68

Table 1	SMR mining tenements	16
Table 2	Agreement and licences – SMR	23
Table 3	Iron Chieftain total resource and reserve (Fe>47%)	24
Table 4	Iron Knight North total resource and reserve (Fe >47%)	24
Table 5	Iron Duchess – North total resource and reserve	25
Table 6	Iron Duke / Magnet total resource and reserve	25
Table 7	Ore mined in the SMR – 2018	26
Table 8	Iron Duke / Knight / Magnet stockpiles as at 31 December 2018	26
Table 9	Ore crushed for the SMR	26
Table 10	Concentrate exports from the SMR in 2018	27
Table 11	Overburden mined in the SMR – 2018	27
Table 12	Compliance summary – SMR (1 January to 31 December 2018)	28
Table 13	Compliance with Environmental Outcomes	29
Table 14	Compliance against non-outcome based tenement lease conditions for SMR – 2018	40
Table 15	Rectification of non-compliances SMR	53
Table 16	Outstanding items from previous reports	53
Table 17	Disturbance and rehabilitation SMR (2018)	57
Table 18	Maximum approved native vegetation clearance areas	58
Table 19	SIMEC Mining's SEB Register	59
Table 20	Complaints register – SMR (1 January to 31 December 2018)	63
Table 21	SIMEC Mining internal audits & reviews	64
Table 22	Uncertainties in relation to compliance for SMR in 2018	65
Table 23	SMR technical data, studies and reports – 2018	67
Table 24	SIMEC Mining internal audits & reviews	67
Figure 1	SMR mining area domains	10
Figure 2	SMR - Iron Chieftain tenements and cadastre boundaries	
Figure 3	SMR - Iron Knight tenements and cadastre boundaries	
Figure 4	SMR – Iron Duke & Iron Duchess (South SMR) tenements and cadastre boundaries	
Figure 5	2018 Vegetation Clearances Iron Duchess	
Figure 6	2018 Vegetation Clearance Iron Duchess South	
Figure 7	2018 Vegetation Clearance Fixed Plant North	
Figure 8	2018 vegetation clearance Fixed Plant south	
Figure 9	2018 vegetation clearance Fixed Plant South	
rigule 3	2010 AERECATION CIEGIANCE NON DAKE SOUCH	50



Abbreviations and Definitions

Abbreviation	Definition
AOC	area of concern
DEM	Department for Energy and Mining
DEW	Department for Environment and Water
DEWNR	Department of Environment, Water and Natural Resources
DMITRE	Department for Manufacturing, Innovation, Trade, Resources and Energy
DPC	Department of the Premier & Cabinet
DSD	Department of State Development
GIS	Geographic Information System
IBMA	Iron Baron Mining Area
ILUA	Indigenous Land Use Agreement
IPTSF	in-pit tailings storage facility
LFA	Landscape Function Analysis
LGO	Low Grade Ore
LOM	life of mine
MARP	Mining and Rehabilitation Program
MBR	Middleback Range
OBP	ore beneficiation plant
OMC	outcome measurement criteria
PEPR	Program for Environmental Protection and Rehabilitation
ROM	run of mine
SEB	significant environmental benefit
SMR	Southern Middleback Range
TARP	Trigger Action Response Plan
TSF	tailings storage facility
WRD	waste rock dump
WBO	Whyalla Blend Ore

Measurements and Symbols

Unit	Definition
BCM	bank cubic metres
BGM	below ground level
CY	calendar year
ha	hectares
m²	square metres
Mt	million tonnes



Glossary

bank cubic metre	A measure of volume representing a cubic metre of in-situ rock or material before it is drilled and blasted
orthorectified	Spatially corrected to remove error as a result of the earth's curvature



1 Public liability insurance

SIMEC Mining holds insurance to cover legal liability in respect of property damage or personal injury arising out of an occurrence in connection with the Insured's business or products. The limits of liability are \$50,000,000 for any one occurrence, limited in respect of Products Liability to \$50,000,000 in the aggregate for all occurrences for the period of insurance.

The Certificate of Currency is shown in Appendix A.



2 Identification

Mine name	Southern Middleb Iron Chieftain, Iron Iron Magnet and I	n Knight, Iron Duchess,	PEPR#	2016/069 27 June 2018	
Lease holder	OneSteel Manufacturin				
Operator	_	: SIMEC Mining is a busing SIMEC Mining (or SIME ring Pty Limited.			
Mining Lease approval dates	See Section 3 for det	ails			
Associated tenements	ML2648-2654, ML2656-2660, ML2662, ML2663, ML2668, ML2669, ML2677, ML2682, ML2683, ML2701, ML2704-2712, ML4714-2720, ML2729, ML2730, ML4714-4747, ML4761, ML4770-ML4775, ML6055, ML6167, ML6361, ML6362, ML 6441, ML6055, MPL32-34, MPL51-55, MPL67, MPL69, MPL70-74, MPL123 and MPL135				
Approval documents	PEPR 2016/069				
Ministerial Determination	Ministerial Determination (MD 009) under Regulation 86(1), (3), (4) and (7) of the <i>Mining Regulations 2011</i> (effective from 6 September 2012) determining the reporting periods and minimum information required to be provided in a Compliance Report for a Mineral Lease (ML) and any associated Miscellaneous Purposes Licence (MPL) for metallic and industrial minerals				
Site contact	Peter Woods - Enviro	onment Assurance Mana	ger, Whyalla Mines		
	Email:	peter.woods@simecgfg.	com		
	Phone number	(08) 8640 4149			
Registered Mine Managers	Roger Pengelly – Mine Manager				
Site location details	Middleback Ranges				
Reporting period	From	1 January 2018	Го	31 December 2018	
Report preparation date	April 2019				



3 Tenements

Details of existing tenements in the SMR are provided in Table 1. Figure 1 shows the general location of the SMR pits and mining tenements. Figure 2 and Figure 3 show the Mineral Leases (MLs) and Miscellaneous Purpose Licences (MPLs) for Iron Chieftain and Iron Knight. Figure 4 shows the Mineral Leases (MLs) and Miscellaneous Purpose Licences (MPLs) for Iron Duchess, Iron Magnet and Iron Duke.

Table 1 SMR mining tenements

Tenement	Tenement Number	Approval Date	Expiry Date	Forward work plan
Miscellaneous	Purposes Licence	es (MPL) – Iron Knight		
MPL	51	15 October 2012	14 October 2033	
MPL	52	15 October 2012	14 October 2033	
MPL	55	15 October 2012	14 October 2033	
MPL	123	12 October 2010	11 October 2025	
Mineral Leases	(ML) – Iron Knig	ht		
ML	2657	1 January 1935	30 November 2029	
ML	2663	1 January 1935	30 November 2029	
ML	2704	1 October 1937	30 November 2029	
ML	2717	1 October 1937	30 November 2029	
ML	2718	1 October 1937	30 November 2029	
ML	2719	1 October 1937	30 November 2029	Mining and progressive rehabilitation wil
ML	4735	12 July 1979	11 July 2029	continue throughout 2019 in accordance with PEPR 2016/069
ML	4736	12 July 1979	11 July 2029	With Et it 2010/003
ML	4737	12 July 1979	11 July 2029	SIMEC Mining will retain all tenements for the SMR Life of Mine (LOM)
ML	4738	12 July 1979	11 July 2029	
ML	4739	12 July 1979	11 July 2029	Mining and ancillary operations including
ML	4740	12 July 1979	11 July 2029	crushing, screening, rail loading, ore
ML	4741	12 July 1979	11 July 2029	stockpiling and tailings deposition will
ML	4742	12 July 1979	11 July 2029	continue until ore deposits are fully
ML	4743	12 July 1979	11 July 2029	utilised.
ML	4770	12 July 1979	11 July 2029	Progressive rehabilitation and closure
ML	4771	12 July 1979	11 July 2029	activities will be undertaken as described in approved PEPR2011/019
ML	4772	12 July 1979	11 July 2029	A Mine Completion Report will be
ML	4773	12 July 1979	11 July 2029	submitted at least three months prior to
ML	4774	12 July 1979	11 July 2029	Licence relinquishment or expiry
ML	4775	12 July 1979	11 July 2029	
Mineral Leases	(ML) – Iron Chie	ftain		
ML	2662	1 January 1935	30 November 2029	
ML	2706	1 October 1937	30 November 2029	
ML	4745	12 July 1979	11 July 2029	
ML	4746	12 July 1979	11 July 2029	
ML	4747	12 July 1979	11 July 2029	
ML	6361	12 October 2010	11 October 2025	
ML	6362	12 October 2010	11 October 2025	

Tenement	Tenement Number	Approval Date	Expiry Date	Forward work plan
ML	6441	8 December 2014	11 October 2025	
Miscellaneous	Purposes Licence	es (MPL) – Iron Duchess/N	/lagnet/Duke	
MPL	32	15 July 2009	14 July 2030	
MPL	33	15 July 2009	14 July 2030	
MPL	34	15 July 2009	14 July 2030	
MPL	53	15 October 2012	14 October 2033	
MPL	54	15 October 2012	14 October 2033	
MPL	67	22 December 2010	21 December 2031	
MPL	69	23 November 2011	22 November 2032	
MPL	70	23 November 2011	22 November 2032	
MPL	71	23 November 2011	22 November 2032	
MPL	72	23 November 2011	22 November 2032	
MPL	73	23 November 2011	22 November 2032	
MPL	74	23 November 2011	22 November 2032	
MPL	135	1 September 2011	11 July 2029	
Mineral Leases	(ML) – Iron Ducl	ness/Magnet/Duke		
ML	2648	1 October 1934	30 November 2029	
ML	2649	1 October 1934	30 November 2029	
ML	2650	1 October 1934	30 November 2029	
ML	2651	1 October 1934	30 November 2029	
ML	2652	1 October 1934	30 November 2029	
ML	2653	1 October 1934	30 November 2029	
ML	2654	1 October 1934	30 November 2029	
ML	2656	1 January 1935	30 November 2029	
ML	2658	1 January 1935	30 November 2029	
ML	2659	1 January 1935	30 November 2029	
ML	2668	1 January 1936	30 November 2029	
ML	2669	1 January 1936	30 November 2029	
ML	2677	1 October 1937	30 November 2029	
ML	2682	1 October 1937	30 November 2029	
ML	2683	1 October 1937	30 November 2029	
ML	2701	1 October 1937	30 November 2029	
ML	2705	1 October 1937	30 November 2029	
ML	2707	1 October 1937	30 November 2029	
ML	2708	1 October 1937	30 November 2029	
ML	2709	1 October 1937	30 November 2029	
ML	2710	1 October 1937	30 November 2029	
ML	2711	1 October 1937	30 November 2029	
ML	2712	1 October 1937	30 November 2029	
ML	2714	1 October 1937	30 November 2029	
ML	2715	1 October 1937	30 November 2029	
ML	2716	1 October 1937	30 November 2029	
ML	2720	1 October 1937	30 November 2029	
ML	4714	12 July 1979	11 July 2029	
ML	4715	12 July 1979	11 July 2029	



Tenement	Tenement Number	Approval Date	Expiry Date
ML	4716	12 July 1979	11 July 2029
ML	4717	12 July 1979	11 July 2029
ML	4718	12 July 1979	11 July 2029
ML	4719	12 July 1979	11 July 2029
ML	4720	12 July 1979	11 July 2029
ML	4721	12 July 1979	11 July 2029
ML	4722	12 July 1979	11 July 2029
ML	4723	12 July 1979	11 July 2029
ML	4724	12 July 1979	11 July 2029
ML	4725	12 July 1979	11 July 2029
ML	4726	12 July 1979	11 July 2029
ML	4727	12 July 1979	11 July 2029
ML	4728	12 July 1979	11 July 2029
ML	4729	12 July 1979	11 July 2029
ML	4730	12 July 1979	11 July 2029
ML	4731	12 July 1979	11 July 2029
ML	4732	12 July 1979	11 July 2029
ML	4733	12 July 1979	11 July 2029
ML	4734	12 July 1979	11 July 2029
ML	4744	12 July 1979	11 July 2029
ML	4761	12 July 1979	11 July 2029
ML	6055	8 September 2013	7 September 2034
ML	6167	23 November 2011	22 November 2032

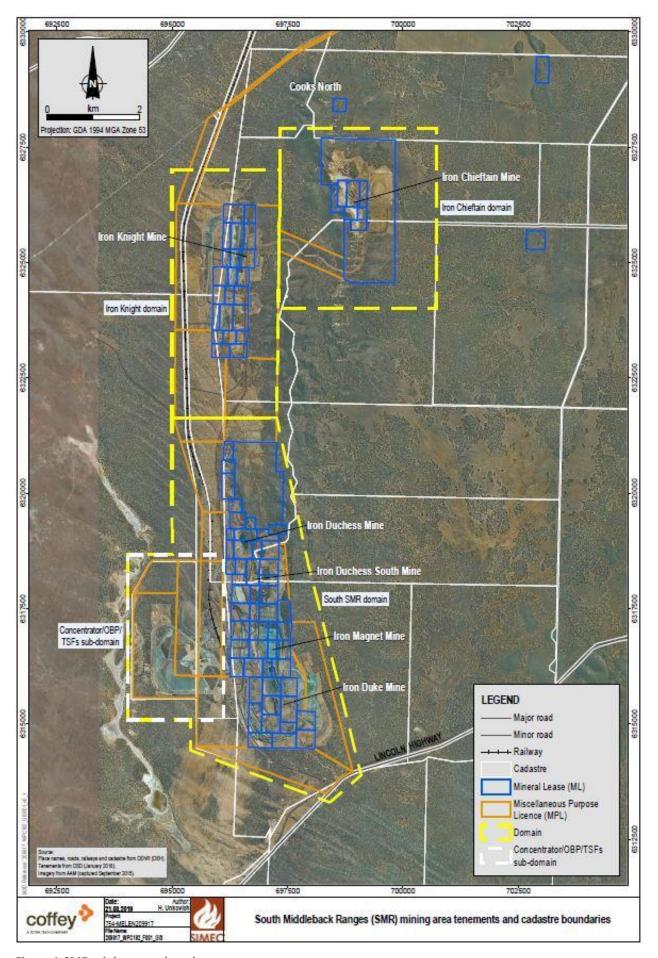


Figure 1 SMR mining area domains

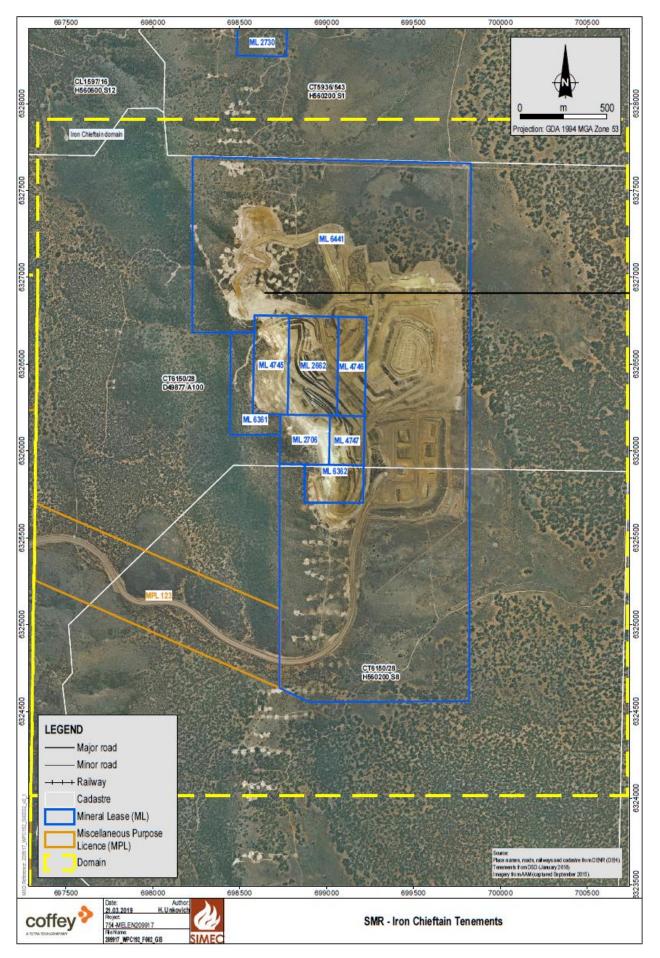


Figure 2 SMR - Iron Chieftain tenements and cadastre boundaries

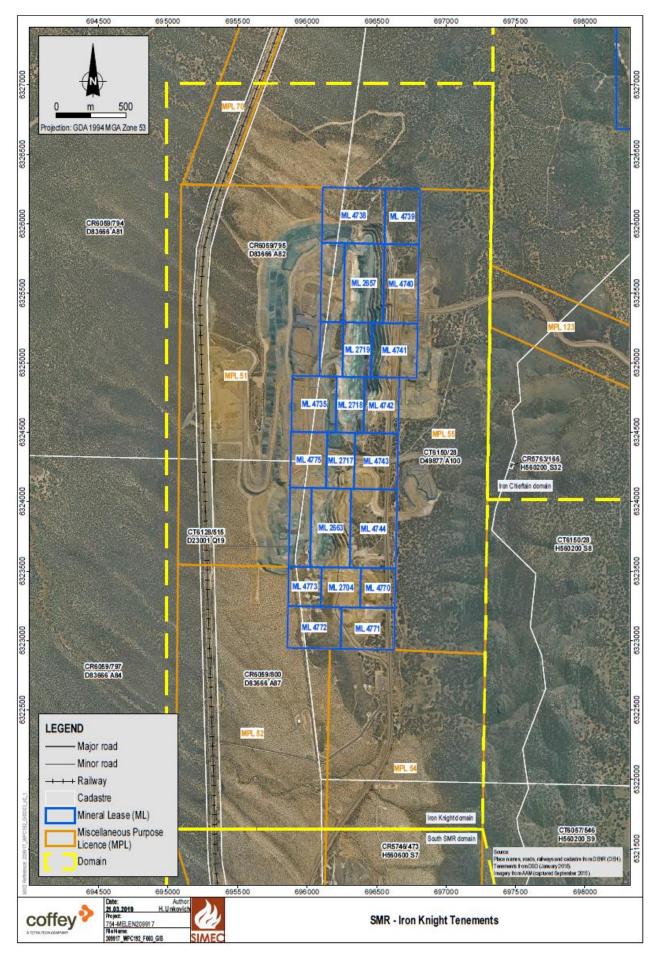


Figure 3 SMR - Iron Knight tenements and cadastre boundaries

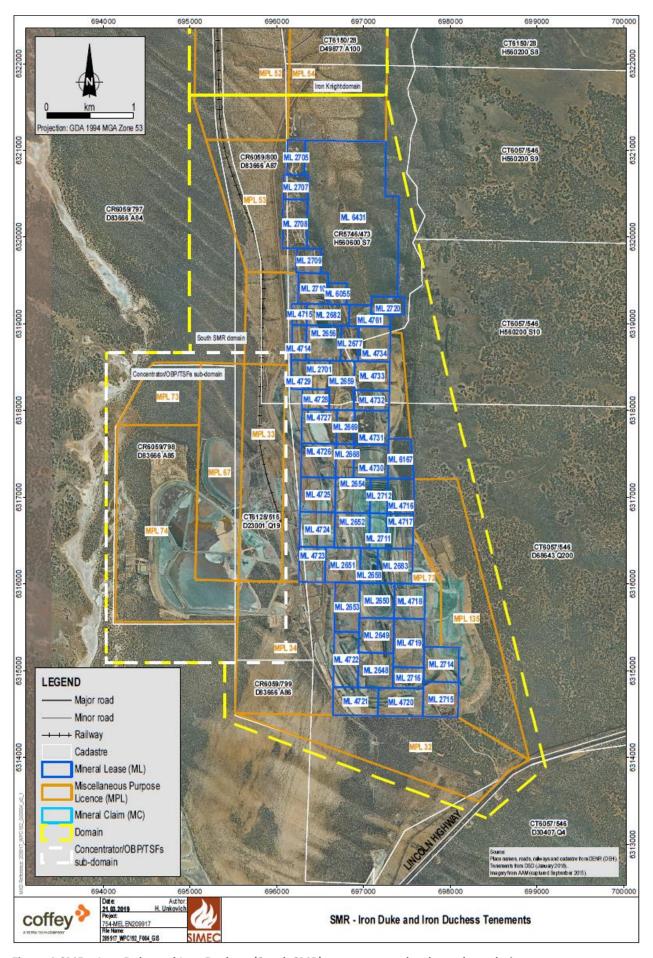


Figure 4 SMR – Iron Duke and Iron Duchess (South SMR) tenements and cadastre boundaries

4 Other approvals

Table 2 provides details of agreements and licences held for the SMR.

Table 2 Agreement and licences – SMR

Licence, permit or agreement	Regulatory authority or other	Supporting documents	Associated ML, MPL, ML lease condition or outcome measurement criteria
Middleback Ranges SA ILUA: SI2013/002	National Native Title Tribunal	Extract from Register of Indigenous Land Use Agreements	Aboriginal heritage
EPA Licence 17122 (Mineral works)	Environment Protection Authority	Licence held at Environment Assurance and copies at work sites	Unauthorised damage under the Environment Protection Act 1993 (EP Act)
EPA Licence 13109 (Railway Operations)	Environment Protection Authority	Licence held at Environment Assurance and copies at work sites	Air quality
DEWNR Water Affecting Activity Permit SAAL00005	South Australian Arid Lands Natural Resources Management Board	Permit held at Environment Assurance	Stormwater

5 Ore reserves and mineral resources

5.1 Ore reserves and mine life

Details of ore reserves and estimated mine life as at the end of December 2018 are provided below for the various pits that comprise the SMR Mining Area.

5.1.1 Iron Chieftain resource

Table 3 shows the current known reserve) and resource (sourced from the JORC 2012 reporting process) in the Iron Chieftain area, and the changes in both compared with the reserves and resources shown in PEPR2016/069.

Table 3 Iron Chieftain total resource and reserve (Fe>47%)

Ore reserves	Mass (Mt)	Mineral Resources	Mass (Mt)	Estimated mine life (Years)
Proved	-	Measured		
Probable	4.5	Indicated	13.5	
		Inferred	9	2
Total	4.5		22.5	2
PEPR	9.5		34.36	
Change	-5.0		-11.86	

5.1.2 Iron Knight (South)

Table 4 shows the current known reserve and resource (sourced from the JORC 2012 reporting process) in the Iron Knight area, and the changes in both compared with the reserves and resources shown in PEPR2016/069.

Table 4 Iron Knight North total resource and reserve (Fe >47%)

Ore reserves	Mass (Mt)	Mineral resources	Mass (Mt)	Estimated mine life (Years)
Proved	-	Measured		
Probable	0.2	Indicated	2.1	
		Inferred	3.2	1.5
Total			5.3	1.5
PEPR	1.41		6.24	
Change	-1.21		-0.94	

5.1.3 Iron Duchess

Table 5 shows the current known reserve (updated in 2016 to the JORC 2012 code) and resource in the Iron Duchess area, and the changes in both compared with the reserves and resources shown in PEPR2016/069.

Table 5 Iron Duchess – North total resource and reserve

Ore reserves	Mass (Mt)	Mineral resources	Mass (Mt)	Estimated mine life (Years)
Iron Duchess North				
Proved	-	Measured	3.5	
Probable	-	Indicated	17.7	
		Inferred	13.4	-
Total	-		34.6	5
PEPR	-		34.94	
Change	-		+0.34	
Iron Duchess South				
Proved	-	Measured	-	
Probable	1.32	Indicated	1.94	
		Inferred	0.73	
Total	1.32		2.67	
PEPR	1.32		2.67	
Change	-		-	

5.1.4 Iron Duke / Magnet

Table 6 shows the current known reserve (updated in 2016 to the JORC 2012 code) and resource in the Iron Duke/Magnet area, and the changes in both compared with the reserves and resources shown in PEPR2016/069.

Table 6 Iron Magnet total resource and reserve

Ore reserves	Mass (Mt)	Mineral resources	Mass (Mt)	Estimated mine life (Years)
Proved	33.6	Measured	38.2	8 (until 2027)
Probable	22.4	Indicated	70.6	
		Inferred	65	
Total	56.0		173.8	
PEPR	62.36		182.9	
Change	-6.36		-9.1	

6 Mining, processing and waste storage

6.1 Ore mining

Table 7 shows the volumes of ore mined, and ore to be mined at the SMR. Table 8 shows ore stockpile volumes as at December 2018.

Table 7 Ore mined in the SMR – 2018

Ore mined Mine life (2011-2017) (BCM)	Reporting period Ore mined (BCM)	Next reporting period Ore to be mined (BCM)	End of reporting period Current ore stockpile (Mt)
14,393,008	2,598,122	1,870,000	See Table 8
Reason(s) for variations from previous reports			

Table 8 Iron Duke / Knight / Magnet stockpiles as at 31 December 2018

Whyalla blend ore	OBP	Magnetite
(t)	(t)	(t)
248,713	411,668	3,885,087

6.2 2018 Ore processing

Table 9 shows volumes associated with ore processing.

Table 9 Ore crushed for the SMR

Ore processed Mine life (t)	Domain	Reporting period Ore processed (t)
Not available due to constraints related to obtaining accurate data from commencement of mining	Iron Duke	6,711,280
Not available due to constraints related to obtaining accurate data from commencement of mining	Iron Knight	1,271,876
Total		7,983,156

6.3 Concentrate

Volumes of concentrate associated with the SMR are provided in Table 10.

Table 10 Concentrate exports from the SMR in 2018

Concentrate exported Mine life (t)	Reportin Concentrat (1	e exported	Next reporting period Concentrate to be exported (t)
(2011- December 2018) 12,426,056	Concentrator	2,022,178	3,100,000
	OBP	975,896	
Total		2,998,074	
Reason(s) for variations from previous reports			

6.4 Overburden / Waste

Table 11 shows the volumes of overburden for the reporting period and total 2018.

Table 11 Overburden mined in the SMR – 2018

Overburden mined Mine life (2011-2018) (BCM)	Reporting period Overburden mined (BCM)	Next reporting period Overburden to be mined (BCM)
59,337,342	4,522,258	7,950,000
Reason(s) for variations from previous reports		

7 Compliance with environmental outcomes and leading indicator criteria

7.1 Compliance summary

A summary of compliance items is provided in Table 12.

Table 12 Compliance summary – SMR (1 January to 31 December 2018)

Licence/Permit/Tenement Type of non- compliance	Brief description	Status	Section of report for further detail
--	-------------------	--------	--

There were no non-compliances recorded during the reporting period

7.2 Compliance with outcomes

An overview of compliance against outcomes and associated measurement criteria for the SMR is provided in Table 13.



Table 13 Compliance with Environmental Outcomes

Outcome	Outcome measurement criteria (OMC)	OMC compliance status	Outcome achievement	Outcome achievement status	Outcome achievement actions summary	Evidence	Forward work plan
Flora							
No permanent loss of abundance or diversity to native vegetation through clearance, dust/contaminant deposition, fire or other damage caused by mining operations on or off the tenements, unless prior approval under legislation is obtained	Annual aerial and/or ground surveys of operational areas demonstrate that the total area cleared does not exceed the approved area as per PEPR 2016/069 Table 31 (see PEPR Section 4.3) when compared to the September 2013 aerial image (see Figure 82, PEPR 2016/069) Mine records demonstrate that SIMEC Mining dust management strategies were in place and applied in accordance with the Mines FDR Procedure QP50-68.	Compliant	Vegetation clearance is not to exceed the approved area as per PEPR2016/069 Table 31 Iron Chieftain domain – 114.6ha Iron Knight domain – 61.16ha South SMR domain – 108ha Concentrator and OBP domain – 58.4ha	Compliant	NA	Ground Survey plus vegetation clearance permit data to the 31 December 2018 (see Section 10 and Section 11 Table 17), this document.	NA
No vegetation health impacts to neighbouring properties from dust generated by mining activities	Quarterly internal assessment and annual vegetation dust impact assessment by external consultant at the vegetation monitoring quadrats on neighbouring properties (see PEPR 2016/069 Appendix A-9), demonstrate that impact assessment scores do not exceed an impact score of 2 (see Table 45, PEPR 2016/069), from mine derived dust, factoring in regional rangelands floristic health as measured at the control sites (see PEPR 2016/069, Appendix A-9)	Compliant	Vegetation impact assessment scores do not exceed an impact score of 2 (see PEPR2016/069 Table 45), from mine derived dust, factoring in regional rangelands floristic health as measured at the control sites (see PEPR 20198/069, Appendix A-9).	Compliant	NA	In the 2018 annual vegetation survey (EBS, 2018), none of the five SMR control sites scored higher than 2. At control site ICPP10 the vegetation scores = 2. At the remaining four control sites EBS described the vegetation as "good to very good", with only a single vegetation impact score exceeding zero. EBS found it difficult to distinguish "impacts on indicator species difficult from fugitive dust, unfavourable climatic conditions (water stress), overgrazing, or natural	Continuous observation assessment and improvement opportunities identified and implemented. Continue mustering and removing goats across SMR.
	Mine records demonstrate that SIMEC Mining dust management strategies are					senescing and life cycles." (p.10) There were no IRMS incident reports.	

Outcome	Outcome measurement criteria (OMC)	OMC compliance status	Outcome achievement	Outcome achievement status	Outcome achievement actions summary	Evidence	Forward work plan
	applied in accordance with the Mines FDR Procedure QP50-68.						
Fauna							
That there is no permanent loss of native fauna abundance caused by mining operations	Records demonstrate that incidents of drill collars not being capped immediately following exploration activities are logged and investigated and all corrective actions are closed out within 24 hours of receiving notification of the incident	Compliant	Incidents of drill collars not being capped immediately following exploration activities are logged and investigated and all corrective actions are closed out within 24 hours of receiving notification of the incident	Compliant	NA	No incidents of uncapped drill collars recorded within the reporting period.	
	Annual aerial and/or ground surveys at operational areas demonstrates that the total area cleared does not exceed the approved area as listed in PEPR2016/069 Table 32 when compared to the September 2013 aerial image.	Compliant	Vegetation clearance is not to exceed the approved area as per Table 32 (PEPR2016/069)	Compliant	NA	Vegetation clearance to-date has not exceeded the approved area as per Table 32 (PEPR2016/069), (see section 10 and Section 11 Table 17), this document	NA
Weeds, pests and	pathogens						
No introduction of new species of weeds, nor a sustained increase in abundance of existing weed species in the Licence area, compared to adjoining land	Biannual weed inspection reports and continuous weed mapping demonstrate that new weeds and existing weeds are managed by control measures as per the SIMEC Mining Pest Plant and Animal Control Strategy QP50_62 within six months of documenting the presence of new weed incursions or increase in abundance of existing weeds in the licence area compared to baseline flora and fauna surveys (Bebbington 2009 and 2014)	Compliant	New weeds and existing weeds are managed by control measures as per the SIMEC Mining Pest Plant and Animal Control Strategy QP50_62 within six months of documenting the presence of new weed incursions or increase in abundance of existing weeds in the licence area compared to baseline flora and fauna surveys.	Compliant	NA	No new weed incursions or increase in abundance of existing weed were recorded by weed inspections. Continue managing weeds and pests in accordance with SIMEC's Pest Plant and Animal Control Strategy QP50_62	Continue to monitor compliance with the Pest Plant and Animal Control Strategy QP50_62
Soils							
Topsoil quality and quantity is maintained	Six-monthly inspection audits demonstrate that topsoil has been stripped, stockpiled (see Figure 56 of PEPR 2016/069) and maintained in accordance with SIMEC Mining's Soil	Compliant	Topsoil has been stripped, stockpiled and maintained in accordance with SIMEC Mining's Soil Management Plan (QP50_66) and that all	Compliant	NA	Audits confirmed that top soil had been maintained in accordance with QP50.66.	NA



Outcome	Outcome measurement criteria (OMC)	OMC compliance status	Outcome achievement	Outcome achievement status	Outcome achievement actions summary	Evidence	Forward work plan
	Management Plan (QP50_66) and that all corrective actions from audits logged and closed out within 60 days or as otherwise agreed with the Regulator		corrective actions from audits logged and closed out within 60 days or as otherwise agreed with the Regulator			No evidence of unauthorised disturbance, all stockpiles are the correct height, free from erosion and signage in place. Recent recovery of topsoil from Iron Duke east stockpile for main south dump rehabilitation work.	
Stormwater							
No water contaminated as a result of mining operations leaves the tenement areas or results in loss of, or contamination of, soil on, or off, the tenement/s	Records demonstrate that inspection audits of drainage silt traps (see location plan PEPR 2016/069, Appendix A-10) are carried out within five days of rainfall events that result in flows of stormwater, or every three months, whichever is the lesser, to determine that culverts are not blocked and that >500 mm of freeboard remains in silt traps and that spillways are not eroded or otherwise damaged, and that all corrective actions from inspections are logged and closed out within 30 days or as otherwise agreed with the Regulator	Compliant	Inspection audits of drainage silt traps are carried out within five days of rainfall events that result in flows of stormwater, or every three months, whichever is the lesser, to determine that culverts are not blocked and that >500 mm of freeboard remains in silt traps and that spillways are not eroded or otherwise damaged, and that all corrective actions from inspections are logged and closed out within 30 days or as otherwise agreed with the Regulator	Compliant	NA	Storm water inspection audits completed. No areas of concern identified. All silt traps have adequate freeboard. Good evidence of sediment capture and no major erosion. Maintenance of silt traps was observed and noted to be adequate	NA
Groundwater							
No changes to groundwater levels that adversely impact vegetation due to Magnetite TSF operations	Records and reports demonstrate that SIMEC Mining is compliant with the Magnetite TSF Management Plan, and that the ground water extraction wells are functioning (refer to PEPR2016/069 Section 3.9.6) and that monthly groundwater level monitoring at location plan (see PEPR2016/069 Figure 23), demonstrates a falling trend in groundwater levels to below the vegetation root zone, averaged over a twelve month period and taking into	Uncertain	SIMEC Mining is compliant with the Magnetite TSF Management Plan, and that the ground water extraction wells are functioning (refer to PEPR2016/069 Section 3.9.6) and that monthly groundwater level monitoring at location plan (see PEPR Figure 23), demonstrates a falling	Uncertain (regarding demonstrated falling trend in groundwater levels)	Continue to implement and monitor the Magnetite TSF Management Plan	SIMEC Mining remains compliant to the Magnetite TSF Management Plan as reported monthly to DEM. Groundwater levels in the west bores predominately rose over the first half of 2018 with the exception of WEST2 where the groundwater level exhibited more dynamic fluctuations. Groundwater levels across the area were then generally stable	



Outcome	Outcome measurement criteria (OMC)	OMC compliance status	Outcome achievement	Outcome achievement status	Outcome achievement actions summary	Evidence	Forward work plan
	account rainfall events that may naturally raise groundwater levels temporarily. Biannual aerial and ground surveys demonstrate that the TSF vegetation impact area has not increased.		trend in groundwater levels to below the vegetation root zone, averaged over a twelve month period and taking into account rainfall events that may naturally raise groundwater levels temporarily.		summary	from July to November with minor fluctuations. Since this time groundwater levels in all west bores have been on a declining trend. WEST1 reached an all-time recording history low of 2.02 mbgl at the end of 2018. The BHMB series bores, located closer to the TSF have had less significant groundwater level fluctuations during the past year, compared to previous years (specifically during deposition in the void areas). BHMB3, BHMB4 and BHMB5 have generally exhibited a declining trend throughout 2018 except during October and November when significant rainfall occurred. BHMB2's groundwater level has been more dynamic potentially due to a closer proximity to the supernatant pond on the TSF throughout the year. BHMB1 has a history of fluctuations in groundwater level connected to rainfall events, due to 2018 being a relatively dry year with drought conditions emerging throughout the period, no major fluctuations were observed in BHMB1's groundwater level. In September 2013 the TSF vegetation impact area covered 59 ha. The April 2018 internal	
						vegetation impact area covered 59 ha. The April 2018 internal TSF vegetation impact area assessment measured 52.4 ha, an overall reduction of 6.6 ha since the initial calculations in 2013.	



Outcome	Outcome measurement criteria (OMC)	OMC compliance status	Outcome achievement	Outcome achievement status	Outcome achievement actions summary	Evidence	Forward work plan
No changes to groundwater levels that adversely impact vegetation due to Iron Duchess water storage operations	Monthly groundwater monitoring records demonstrate that the groundwater level does not exceed 160m AHD at DMW03 (see Figure 24, PEPR2016/069) Annual aerial and/or ground surveys demonstrate that the total area of vegetation cleared does not exceed the approved area as per PEPR 2016/069, Table 31 (see Section 4.3) when compared to the September 2013 aerial image (see Figure 72; PEPR2016/069)	Compliant	Groundwater level does not exceed 160m AHD at DMW03 (see PEPR2016/069 Figure 24) Annual aerial and/or ground surveys demonstrate that the total area of vegetation cleared does not exceed the approved area as per Table 31 (PEPR2016/069) (see Section 4.3) when compared to the September 2013 aerial image (see Figure 72). (PEPR2016/069)	Compliant	NA	Monthly ground water levels at DMW3 demonstrate that the groundwater level has remained stable near 140 m AHD (actual level dropping slightly in 2018 to 140.8 m AHD) since the well was installed in May 2015. There has been no impact to vegetation or changed groundwater levels due to Duchess water storage. Ground survey mapping has demonstrated that vegetation cleared does not exceed the approved area as per (PEPR2014/109) Table 31.	NA
Air quality							
No nuisance impacts to local residents and the general public from air emissions, dust and odour generated from mining operations	Records demonstrate that complaints of emissions, dust or odour are responded to within 24 hours, are logged and investigated and all corrective actions are closed out within 30 days of receiving a complaint, or as otherwise agreed with the affected party or the Regulator	Compliant	Records demonstrate that complaints of emissions, dust or odour are responded to within 24 hours, are logged and investigated and all corrective actions are closed out within 30 days of receiving a complaint, or as otherwise agreed with the affected party or the Regulator	Compliant	NA	No complaints of dust emissions were received in 2018.	Continued focus on improved dust control Dust TARP finalised April 2019



Outcome	Outcome measurement criteria (OMC)	OMC compliance status	Outcome achievement	Outcome achievement status	Outcome achievement actions summary	Evidence	Forward work plan
The contrasting and reflective aspects of WRDs and infrastructure are visually softened to blend in with the surrounding landscape	Annual audits against the staged rehabilitation strategy, with the use of annual aerial and ground surveys of the landform development and biennial flora monitoring surveys demonstrate progressive rehabilitation undertaken in accordance with staged rehabilitation strategy for the SMR Mining Area (see PEPR Section 8)	Compliant	Progressive rehabilitation undertaken in accordance with staged rehabilitation strategy for the SMR Mining Area (see Section 8) (PEPR2016/069)	Compliant	Continue to progressively rehabilitate in accordance with PEPR2016/069	Lack of rain (drought) and impact of goat grazing is hampering rehabilitation efforts. Over 350 goats have been removed from SMR since December 2018.	Continue to progressively rehabilitate in accordance with PEPR2016/069
Blasting and vibra	tion						
No public health, safety and nuisance impacts from air blast overpressure, vibrations, fumes, dust or fly rock caused by blasting undertaken on site	Records show that an independent investigation of recorded incidents related to blasting activities on site, demonstrates that an incident could not have been prevented through implementation and use of reasonable preventative measures and that all incidents as a result of blasting, including fly rock occurrences outside of the blast management zone, or complaints related to blasting are investigated and corrective actions closed out within 30 days or as otherwise agreed with the Regulator	Compliant	Independent investigation of recorded incidents related to blasting activities on site, demonstrates that an incident could not have been prevented through implementation and use of reasonable preventative measures and that all incidents as a result of blasting, including fly rock occurrences outside of the blast management zone, or complaints related to blasting are investigated and corrective actions closed out within 30 days or as otherwise agreed with the Regulator	Compliant	NA	No incidents were recorded. No complaints of damage were received	NA
Public safety							
No accidents involving the public as a result of exploration and mining activities that could have been reasonably prevented by SIMEC Mining	Records show that an independent investigation of recorded injuries from unauthorised access to the site, demonstrates that an incident could not have been prevented through implementation of reasonable preventative measures and that 100% of incidences of unauthorised access are investigated and corrective actions	Compliant	Independent investigation of recorded injuries from unauthorised access to the site, demonstrates that an incident could not have been prevented through implementation of reasonable preventative measures and that 100% of incidences of unauthorised	Compliant	NA	No incidents of unauthorised access or injury from unauthorised access were recorded during the reporting period	NA



Outcome	Outcome measurement criteria (OMC)	OMC compliance status	Outcome achievement	Outcome achievement status	Outcome achievement actions summary	Evidence	Forward work plan
	closed out within 30 days or as otherwise agreed with the Regulator		access are investigated and corrective actions closed out within 30 days or as otherwise agreed with the Regulator				
Adjacent land use	and third party property						
No unauthorised damage to adjacent property or infrastructure from mining operations	Records demonstrate that complaints of unauthorised damage are responded to within 24 hours, are logged and investigated and all corrective actions are closed out within 30 days of receiving a complaint, or as otherwise agreed with the affected party or the Regulator	Compliant	Complaints of unauthorised damage are responded to within 24 hours, are logged and investigated and all corrective actions are closed out within 30 days of receiving a complaint, or as otherwise agreed with the affected party or the Regulator	Compliant	NA	No complaints were received in 2018.	Continuous observation, assessment and improvement of dust control systems and procedures. The confidential cropping investigation commenced in 2017 was finalised in April 2018 and provided to the complainant.
Heritage							
No disturbance to Aboriginal artefacts, sites of significance or European heritage unless prior approval under the relevant legislation is obtained	Records demonstrate that discoveries of suspected Aboriginal or European artefacts or remains were left without further disturbance, reported to the authorities and investigated and that work recommenced only after being authorised by the appropriate authority	Compliant	Discoveries of suspected Aboriginal or European artefacts or remains were left without further disturbance, reported to the authorities and investigated and that work recommenced only after being authorised by the appropriate authority	Compliant	NA	No incidents of discoveries of suspected Aboriginal or European artefacts or remains were recorded during the reporting period	NA
Traffic							
No incidents or accidents resulting from road accidents associated with the SMR operational or	Records of independent investigation of all recorded incidents and accidents involving SMR operational traffic, or SMR access road/public road interface traffic demonstrates that the incident could not	Compliant	Independent investigation of all recorded incidents and accidents involving SMR operational traffic, or SMR access road/public	Compliant	NA	No road incidents or accidents associated with SMR reported.	NA



Outcome	Outcome measurement criteria (OMC)	OMC compliance status	Outcome achievement	Outcome achievement status	Outcome achievement actions summary	Evidence	Forward work plan
access traffic that could have been reasonably prevented	have been prevented through implementation of reasonable preventative measures and that 100% of incidences of unauthorised access are investigated and corrective actions closed out within 30 days or as otherwise agreed with the Regulator		road interface traffic demonstrates that the incident could not have been prevented through implementation of reasonable preventative measures and that 100% of incidences of unauthorised access are investigated and corrective actions closed out within 30 days or as otherwise agreed with the Regulator				
Post-closure							
Integrate and harmonise final landforms and vegetation with surrounding landscape	Annual Progressive Rehabilitation Compliance Audit and final landform profile and revegetation audit demonstrates WRDs are constructed and remediated to integrate and harmonise the final landform and vegetation with the surrounding landscape as each lift is completed in accordance with the design, closure and rehabilitation strategy described in Section 8 (PEPR2016/069)	Compliant	WRDs are constructed and remediated to integrate and harmonise the final landform and vegetation with the surrounding landscape as each lift is completed in accordance with the design, closure and rehabilitation strategy described in Section 8 (PEPR2016/069)	Compliant	Continue to progressively rehabilitate in accordance with PEPR2016/069		Continue to progressively rehabilitate in accordance with PEPR2016/069
	Final landform profile and revegetation audit via ground and flora survey demonstrates that all constructed haul roads and open areas are remediated in accordance the design, closure and rehabilitation strategy described in Section 8 (PEPR2016/069)	Not applicable until mine closure	All constructed haul roads and open areas are remediated in accordance the design, closure and rehabilitation strategy described in Section 8 (PEPR2016/069)	Not applicable until mine closure			
Re-establishment of mine site ecosystem and landscape function	Annual assessment by internal specialist or external consultant and a final report from a suitably qualified person confirms that Landscape Function Analysis (LFA) indicates that LFA curve has moved above, or is likely to move above the critical threshold of sustainability, which, depending on specific site variables are	Compliant	Landscape Function Analysis (LFA) indicates that LFA curve has moved above, or is likely to move above the critical threshold of sustainability, which, depending on specific site variables is within the	Compliant		Baseline LFA data was collected in December 2013 subsequent rounds of LFA data collection is undertaken annually.	Continue to collect LFA data annually



Outcome	Outcome measurement criteria (OMC)	OMC compliance status	Outcome achievement	Outcome achievement status	Outcome achievement actions summary	Evidence	Forward work plan
	within the following ranges (stability index; 45-55%, Infiltration index; 30-33%, Nutrient cycling index, 23-28%), on remediated WRDs, haul roads and operational and fixed plant areas. This criterion to remain open until the target is met		following ranges (stability index; 45-55%, Infiltration index; 30-33%, Nutrient cycling index, 23-28%), on remediated WRDs, haul roads and operational and fixed plant areas.				
Risk to health and safety of the public and fauna are as low as reasonably practical	The completion safety audit demonstrates that WRDs, quarry pit and operational areas are constructed and remediated and that the safety bunds are 10 m outside of the potentially unstable pit edge zone (see Figures 85, 88, 93 and 94), and that, fencing and signage are in place in accordance with the design, closure and rehabilitation strategy described in Section 8. Fencing and signage will be maintained by SIMEC Mining until such time that it is agreed between SIMEC Mining and DSD that SIMEC Mining is no longer responsible for the maintenance	Not applicable until mine closure		Not applicable until mine closure			
The site is physically stable	Annual and final landform profile compliance audits demonstrates WRDs, pits, and infrastructure areas are constructed and remediated in accordance with design, closure and rehabilitation strategy set out in Section 8 (PEPR2016/069)	Compliant	WRDs, pits, and infrastructure areas are constructed and remediated in accordance with design, closure and rehabilitation strategy set out in Section 8 (PEPR2016/069)	Compliant	Continue to construct and remediate in accordance with design, closure and rehabilitation strategy	Internal compliance and EMS audits.	Continue to construct and remediate in accordance with design, closure and rehabilitation strategy
The site will be rehabilitated to a stable condition that supports a resilient, self-sustaining natural ecosystem suitable for the postmining land use that will be determined in	Site audit at mine closure by an independent professional to demonstrate that the site is rehabilitated as per the closure domain objectives (see Section 8 (PEPR2016/069)	Not applicable until mine closure		Not applicable until mine closure			



Outcome	Outcome measurement criteria (OMC)	OMC compliance status	Outcome achievement	Outcome achievement status	Outcome achievement actions summary	Evidence	Forward work plan
consultation with relevant stakeholders							
All infrastructure is removed from the site prior to mine completion	Final closure and divestment audit report demonstrates that all fixed mine infrastructure is demolished disposed of or removed from site within two years of mine closure	Not applicable until mine closure		Not applicable until mine closure			
All equipment is removed from site prior to mine closure	Final closure and divestment audit report demonstrates that all mobile machinery and equipment is removed from site within 12 months (or as otherwise agreed with DSD) of completion of rehabilitation of all WRDs, haul roads and impacted areas	Not applicable until mine closure		Not applicable until mine closure			
All mine waste materials left on site are chemically and physically stable	At mine closure records demonstrate all industrial and domestic wastes are disposed of in accordance with the Environment Protection Act 1993, and that all waste mine materials left on site are chemically and physically stable as determined by a site contamination audit conducted by an independent and qualified auditor	Not applicable until mine closure		Not applicable until mine closure			



8 Compliance with non-outcome based tenement conditions

A review of compliance against non-outcome based lease conditions for SMR is provided in Table 14.



Table 14 Compliance against non-outcome based tenement lease conditions for SMR – 2018

Condition	Compliance status	Evidence	Forward work plan			
ML2662, ML2706, ML4745, ML4746, ML4747, ML2704, ML2663, ML2717, ML2718, ML2719, ML2657, ML4740, ML4741, ML4742, ML4743, ML4744, ML4770, ML4771, ML4772, ML4773, ML4774, ML4775, ML4735, ML4736, ML4737, ML4738, ML4739, ML6361, ML6362, ML 6441, MPL51, MPL52, MPL54, MPL55, MPL70, MPL123						
Mining operations authorised by this Lease must only be for the recovery of Iron Ore	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions			
The Lessee must not commence or undertake any mining operations on the land until a Mining and Rehabilitation Program (MARP) has been approved by the Minister and a bond has been paid in accordance with Section 62 of the Mining Act 1971	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions			
The Lessee must prepare a MARP that complied with the requirements of guidelines approved by the Director of Mines and include environmental outcomes and criteria that are developed in consultation with relevant stakeholders	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions			
The criteria included in the MARP must demonstrate clear and unambiguous achievement of the environmental and mine closure outcomes specified in the Second Schedule by:	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions			
• Including the specific parameters to be measure and monitored by the Lessee						
 Specifying the locations that the parameters will be measured or how these locations will be determined 						
 Clearly stating the acceptable values for demonstrating achievement of the outcome, with consideration of any inherent errors of measurement 						
 Specifying the frequency of monitoring by the Lessee 						
 Identifying what background or control data are to be used of specify how it will be acquired (if necessary) 						
The Lessee must review the Mining and Rehabilitation Program (MARP) on request of the Director of Mines within a time specified in the request and submit the revised MARP for approval to the Director of Mines	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions			
The Lessee agrees to the approved MARP being made available for public inspection	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions			
The Lessee must provide information as requested by and to the satisfaction of the Director of Mines, on the Lessee's capability and competence to comply with the requirements of the Mining Act 1971, the conditions of this Lease, and the MARP in accordance with approved guidelines or as otherwise specified by the Director of Mines	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions			
The Lessee must provide to the Director of Mines a Mining and Rehabilitation Compliance Report (MARCR) on operations carried out on the Lease and compliance with the approved MARP. The MARCR must be submitted every year,	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions			

Condition	Compliance status	Evidence	Forward work plan
within 2 months after the anniversary of the date the Lease was granted, or at some other time agreed with the Director of Mines in accordance with guidelines approved by the Director of Mines. The Lessee agrees to the MARCR being made available for public inspection			
The Lessee must if requested by the Director of Mines, undertake an independent audit of achievement of the environmental outcomes in the MARP, by an independent expert approved by the Director of Mines and submit the audit to the Director of Mines. The lessee agrees to the audit being made available for public inspection	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
At least 3 months prior to Lease relinquishment or expiry, the Lessee must provide to the Minister a Mine Completion Report prepared in consultation with the landowner and in accordance with guidelines approved by the Director of Mines, which demonstrates achievement of the closure criteria as specified in the current MARP	Compliant	Actionable as mine closure approaches	Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
The Lessee must prior to commencing operations under this Lease and for the duration of the lease maintain public liability insurance to cover all operations under the Lease (including sudden and accidental pollution) in the name of the Lessee for a sum not less than \$20 million or such greater sum as specified by the Director of Mines, and make such amendments to the terms and conditions of the insurance as the Director of Mines may require	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
A copy of the cover note of certificate of currency for the insurance must be provided to the Director of Mines upon request	Compliant	Attachment A to this report	Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
If requested by the Director of Mines, the Lessee must engage an independent and reputable risk assessor to prepare a risk assessment report detailing the public liability risks arising out of the conduct of operations on the Lease, and recommending the level of amount of public liability cover (in respect of any one occurrence) that should be effected and maintained by the Lessee. In preparing the risk assessment report, the assessor must consult with the landowner and the Director of Mines	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
In specifying the level of insurance required, the Director of Mines accepts no liability for the completeness, adequacy of the sum insured, the limit of liability, the scoped coverage, the conditions or exclusions of the insurance in respect of how the Lessee may or may not respond to any loss, damage or liability	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
The Lessee must report any non-compliance with these conditions and approved MARP to the Director of Mines. A verbal notification must be provided within 24 hours, after the Lessee becomes aware of the non-compliance. A written report must be provided within 3 calendar days or such time period as approved by the Director of Mines	Compliant	Complaints register data	Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
In requesting a review of the bond required under the Mining Act 1971 the Minister may request that written quotes from an independent third party approved by the	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions



Condition	Compliance status	Evidence	Forward work plan
Minister are obtained by the Lessee for the cost of rehabilitating the site to the requirements specified in the approved MARP			
The Lessee must meet all the charges and costs in obtaining and maintaining the Bond	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
ML 2652, ML2648 – ML2651, ML 2668 – ML2669, ML2677, ML2682	– ML2683, ML2701	I, ML2712, ML2714 – ML2716, ML272	0
1. The lessee will during the said term pay or cause to be paid to the Minister of Mines (hereinafter referred to as "the Minister") at the office of the Department of Mines in the City of Adelaide on behalf of the Governor the rent and other sum hereby reserved at the times and in the manner hereinbefore appointed for payment thereof free and clear of all rates taxes impositions outgoings and deductions whatsoever	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
2. That the lessee will pay and discharge all rates taxes assessments impositions and outgoings which during the said term shall become payable in respect of the said land and premises	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
3. That the lessee will maintain in position during the said term the posts and trenches or piles of stone required by the said regulations to be erected or put on the said land when the same was pegged out as a claim and in addition thereto will paint legibly on such posts the number of this lease	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
4. That the lessee will during the said term make construct and work all mines and so and perform all things authorised by this lease in a fair orderly, skilful and workmanlike manner	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
5. That the lessee will during the said term employ and keep constantly employed not less than one man for every ten acres of portion of ten acres except as provided by Regulation No. 125 in mining or prospecting for all metals and mineral except gold in or upon the said land and will whenever thereunto requires by the Minister furnish him with satisfactory evidence that such number of men have been and are so employed due allowance being made by the Minister for machinery or horses employed at the rate of two men for each horse or horsepower of machinery	No longer relevant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
6. The lessee will make such provision for the disposal of silt sludge dirt waste or refuse which may be brought out by the said mines and premises so that the same will not flow or find its way into any stream brook river or water channel or so as to injure or interfere with any land set apart for water supply purposes	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
7. That the lessee will build and keep in proper repair a sufficient and substantial stone wall or other fence around all the pits and shafts which may at any time during the said term be open in any part of the said land and premises for the purpose of this lease so as effectually to prevent all access thereto by all kinds of cattle	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions



Condition	Compliance status	Evidence	Forward work plan
8. That the lessee will whenever lawfully required do to for at the lessee's own cost and in manner required by any regulations for the time being in force in that behalf cause to be made a survey of the said land and cause to be forwarded to the said Department of Mines a map or plan of such survey	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
9. That the lessee will at all times during the said term keep and preserve the said mines and premises in good order repair and condition and in such good order repair and condition at the end or other sooner determination of the said term deliver peaceable possession thereof and of all and singular the premises hereby leased unto the Governor or the Minister or to some officer authorised by him or them to receive possession thereof	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
10. (a) That the lessee will half-yearly in the months of January and July furnish to the Warden of the mining district in which the said land is situated a full and true return showing in respect of the preceding half-year the quantity of stone or ore treated the quantity of metals and mineral taken from the said land and the working expenses incurred in and the gross proceeds and net profits received from the occupation and working of the said land and the sale of all metals and minerals	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
11. That the lessee will permit the pastoral lessee (if any) of the said land at all times to have free access and user for domestic purposes and for the purposes of watering stock to and of any surface water on the said land which shall not have been provided or stored by artificial means by the lessee	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
12. That the lessee will report to a Warden when payable gold is struck or metals precious stones minerals coal shale oil salt or gypsum are found in payable quantities in or upon the said land	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
13. The lessee will not during the continuance of the said term without the written consent of the Minister first had and obtained use or occupy or permit to be used or occupied the said land and premises other than for the purpose of exercising the rights and liberties hereinbefore granted	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
14. The lessee will not prevent any person who holds a right privilege or authority under the said Acts and regulations or any amendment thereof from exercising the same	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
15. The lessee will not during the said term transfer assign sublet or otherwise dispose of or part with the possession of or mortgage charge or encumber the said land and premises or any part thereof or do not permit to suffer to be done any act matter or thing whereby the said land and premises or any part thereof shall or may be transferred assigned sublet or otherwise disposed of or the possession thereof parted with or mortgaged charged or encumbered to any person or persons for the whole or any part of the said term without the consent in writing of the Minister first hand and obtained for every such purpose	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions

Provided always and it is hereby agreed and declared in manner following:-



Condition	Compliance status	Evidence	Forward work plan
16. It shall be lawful for the Governor or the Minister or any person authorised by him or them at all proper and reasonable times during the said term without any interruption from the lessee or the lessee's agents servants or workmen to enter into and upon the said land and premises and into and upon any mines or works that may be found therein to view and examine the condition thereof and whether the same be worked in a proper skilful and workmanlike manner and for such purpose to make use of any of the railroad or other roads or ways machinery and work belonging to the said mines and premises and to examine and take extracts from all books accounts vouchers and documents relating thereto:	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
17. That so far as applicable the provisions of the said Acts and all regulations made thereunder or any amendment of the said Acts are embodied and incorporated herein and the lessee hereby covenants to observe fulfil and perform the same	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
18. The lessee shall on due performance and observance of the covenants conditions and provisos herein contained be entitled to a renewal from time to time of this lease for any period at each renewal not exceeding twenty one years from the expiration of this lease or any renewal thereof at the rent for the time being chargeable by law in respect of leases of the same class as this lease and shall be subject to the covenants conditions and provisions prescribed by any Act or regulations for the time being in force relating to leases of the same class as this lease	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
19. If the said rent be not paid on or before the day hereinbefore appointed for payment thereof a penalty of five pounds per centum shall be added to the said rent and if the said rent and penalty not be paid within one calendar month after the said day a further penalty of ten pounds per centum shall be added and if the said rent and penalties be not paid within one calendar month after the said first month the same shall be recoverable by the Minister by action in any court or competent jurisdiction	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
20. If the lessee shall during the said term commit any breach of or shall fail to comply with any covenant condition or proviso herein contained this lease shall be liable to forfeiture in manner hereinafter provided	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
21. If the said rent shall be in arrear and unpaid for more than three calendar months after the day at which the same is payable under this lease it shall be lawful for the Governor to cancel this lease and the Minister may thereupon insert a notice in the Government Gazette declaring this lease to be forfeited	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
22. If the Minister has reason to believe that there has been a breach of or non-compliance with any of the covenants conditions or provisos herein contained other than a breach of the covenant for payment of the said rent or non-compliance with the labour conditions of this lease, the Minister shall give written notice to the lessee specifying the covenants conditions or provisos which he has reason to believe are not being complied with and notifying the lessee that this lease will be liable to forfeiture at the expiration of one month from the date of such notice	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions



Condition	Compliance status	Evidence	Forward work plan
unless in the meantime such covenants condition or provisos are duly complies with and if at the expiration of such notice such covenants conditions or provisos are still not being complied with by the lessee the Governor may cancel this lease notwithstanding that the rent payable under this lease for the period during which such breach is committed may have been paid and notwithstanding any implied waiver of such breach by the Governor and the Minister shall thereupon insert a notice in the Government Gazette declaring this lease to be forfeited. In case of a breach of the covenant for payment of the said rent or the non-compliance with the said labour conditions the Governor may exercise the power of cancellation without giving the written notice hereinbefore mentioned			
23. A notice of forfeiture as herein before mentioned in the last two preceding provisos so published in the Government Gazette shall be taken to be conclusive evidence that this lease has been legally cancelled and for	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
24. In case this lease shall become liable to forfeiture the Minister may (except as to any case coming under the operation of section 70 of the said Acts) extend the period during which the lessee may perform the covenants conditions and provisos of this lease for such time and subject to such terms and conditions as the Minister may think fit and the terms and conditions so imposed by the Minister shall bind the lessee and all transferees mortgagees assignees and other persons claiming through or under him and this lease shall thereafter be constructed as if the said terms and conditions were inserted therein	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
25. The lessee shall be at liberty to surrender this lease by giving to the Minister three calendar months' notice in writing of the lessee's desire or intention so to do and upon payment of all arrears or rent up to the date or surrender	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
26. The lessee shall be at liberty to remove from the said land at any time within: (a) three months of the date of forfeiture or surrender of this lease any plant machinery engines or tools (b) six months from the date of forfeiture or surrender of this lease any ore or other substance mined by virtue of this lease and stacked upon the said land But shall not remove or interfere with any timber in any mine upon said land	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
ML4714 – ML4720, ML4722 – ML4734, ML4761			
1. The Lessee will during the said term pay or cause to be paid to the Minister of Mines (hereinafter referred to as 'the Minister") at the office of the Department of Mines in the City of Adelaide on behalf of the Governor the rent and further sums hereby reserved at the times and in the manner hereinbefore appointed for payment thereof free and clear of all rates taxes impositions outgoings and deductions whatsoever	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
2. That the Lessee will pay and discharge all rates taxes assessments impositions and outgoings which during the said term shall become payable in respect of the said land	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions



Condition	Compliance status	Evidence	Forward work plan
3. That the lessee will maintain in position during the said term the posts and trenches or piles of stone required by the said regulations to be erected or cut on the said land when the same was pegged out as a claim and in addition thereto will paint legibly on such posts the number of this lease	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
4. That the lessee will during the said term make construct and work all mines and do and perform all things authorised by this lease in a fair orderly, skilful and workmanlike manner	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
5. The lessee will during the said term employ and keep constantly employed not less than one man for every ten acres in mining or prospecting for all metals and minerals except gold in or upon the said land and will whenever thereunto required by the Minister furnish him with satisfactory evidence that such number of men have been and are so employed, due allowance being made by the Minister for machinery or horses employed at the rate of two men for each horse or horsepower of machinery and provided that if the number of men horsepower and horses employed by the lessee on any one or more of the mineral leases held by the lessee is not less than the total number of men horsepower and horses required to be employed by the lessee on all the mineral leases held by the lessee shall be deemed to have complied with this covenant	No longer relevant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
6. The Lessee will make such provision for the disposal of silt sludge dirt waste or refuse which may be brought out by the said mines and premises so that the same will not flow or find its way into any stream brook river or water channel or so as to injure or interfere with any land set apart for water supply purposes	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
7. That the lessee will build and keep in proper repair a sufficient and substantial stone wall or other fence around all the pits and shafts which may at any time during the said term be open in any part of the said land and premises for the purpose of this lease so as effectually to prevent all access thereto by all kinds of cattle.	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
8. That the lessee will whenever lawfully required do to so at the lessee's own cost and in manner required by any regulations for the time being in force in that behalf cause to be made a survey of the said land and cause to be forwarded to the said Department of Mines a map or plan of such survey.	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
9. That the lessee will at all times during the said term keep and preserve the said mines in good order repair and condition and in such good order repair and condition at the end or other sooner determination of the said term deliver peaceable possession thereof and of the land hereby leased unto the Governor or the Minister or to some officer authorised by him or them to receive possession thereof.	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
10. That the lessee will permit the pastoral lessee (if any) of the said land at all times to have free access and user for domestic purposes and for the purposes of	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions



Condition	Compliance status	Evidence	Forward work plan
watering stock to and of any surface water on the said land which shall not have been provided or stored by artificial means by the lessee.			
11. That the lessee will report to a Warden when gold precious stones coals shale oil gypsum or other minerals other than iron ore or iron bearing substances are found in payable quantities in or upon the said land.	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
12. The lessee will not during the continuance of the said term without the written consent of the Minister first had and obtained use or occupy or permit to be used or occupied the said land and premises other than for the purpose of exercising the rights and liberties hereinbefore granted.	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
13. The lessee will not prevent any person who holds a right privilege or authority under the said Acts and regulations or any amendment thereof from exercising the same.	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
14. It shall be lawful for the Governor or the Minister or any person authorised by him or them at all proper and reasonable times during the said term without any interruption from the lessee or the lessee's agents servants or workmen to enter into and upon the said land and into and upon any mines or works that may be found therein to view and examine the condition thereof and whether the same be worked in a proper skilful and workmanlike manner and for such purpose to make use of any of the railroad or other roads or ways machinery and work belonging to the said mines and premises and to examine and take extracts from all books accounts vouchers and documents relating thereto	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
15. If the said rent be not paid on or before the day hereinbefore appointed for payment thereof a penalty of five pounds per centum shall be added to the said rent and if the said rent and penalty not be paid within one calendar month after the said day a further penalty of ten pounds per centum shall be added and if the said rent and penalties be not paid within one calendar month after the said first month the same shall be recoverable by the Minister by action in any court or competent jurisdiction.	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
16. If the lessee shall during the said term commit any breach of or shall fail to comply with any covenant condition or proviso herein contained this lease shall be liable to forfeiture in manner hereinafter provided	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
17. If the Minister has reason to believe that there has been a breach of or non-compliance with any of the covenants conditions or provisos herein contained the Minister shall give written notice to the lessee specifying the covenants conditions or provisos which he has reason to believe are not being complied with and notifying the lessee that this lease will be liable to forfeiture at the expiration of one month from the date of such notice unless in the meantime such covenants condition or provisos are duly complied with and if at the expiration of such notice such covenants conditions or provisos are still not being complied with by the lessee the Governor may cancel this lease notwithstanding that the rent payable under this lease for the period during which such breach is committed may have	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions



Condition	Compliance status	Evidence	Forward work plan
been paid and notwithstanding any implied waiver of such breach by the Governor and the Minister shall thereupon insert a notice in the Government Gazette declaring this lease to be forfeited			
18. A notice of forfeiture so published in the Government Gazette shall be taken to be conclusive evidence that this lease has been legally cancelled and forfeited	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
19. In case this lease shall become liable to forfeiture the Minister may extend the period during which the lessee may perform the covenants conditions and provisos of this lease for such time and subject during such period of extension to such terms and conditions as the Minister may think fit	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
ML6055			
First Schedule			
1. Quarrying operations may be conducted for the recovery of iron ore from the area of the lease	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
2. The lessee must ensure that quarrying operations on the land are carried out in an orderly and skilful manner in accordance with a program for mining and rehabilitation of the land approved, from time to time, by the minister	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
3. The lessee must submit to the Director, from time to time, at the Director's request, a current plan or survey of the land in the form requested by the director	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
4. The lessee shall ensure that land disturbed by quarrying operations is rehabilitated to achieve a regular landform, to minimise erosion, to establish native vegetation indigenous to the area, and return the land to a grazing after use	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
Second Schedule			
1. The lessee shall ensure that as operations progress to appropriate stages, land disturbed by mining is progressively rehabilitated to facilitate regeneration of native vegetation	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
2. The lessee shall ensure that rare or endangered species of native flora and fauna are identified and a program implemented to ensure their survival and return to the area after operations are complete	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
3. The lessee shall ensure that an Environmental Management Plan is prepared, generally, in accordance with the recommendations of the University of South Australia's Centre for Environmental and Recreational Management report "A Biological Study of BHP Mining Leases in the South Middleback Ranges, SA" June 1997, Clark I. The Environmental Management Plan is to be implemented to the satisfaction of the Chief inspector of Mines	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
4. The lessee shall ensure that all employees and contractors are made aware of the requirements to operate in a manner that will minimise environmental impact	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions



Condition	Compliance status	Evidence	Forward work plan
5. The lessee shall consult with the landowner and shall ensure the provision of grazing rights and the protection of stock by appropriate fencing or provide other compensation as may be agreed or determined in accordance with section 61 of the Mining Act, 1971	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
6. The lessee shall ensure that waste dumps are contoured in harmony with the local topography and are constructed in a manner to prevent erosion and retain soil moisture in order to facilitate revegetation	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
7. The lessee shall ensure that upon completion of quarrying operations, all plan, equipment, materials and structures are removed from the site and the land is rehabilitated to the satisfaction of the Chief Inspector of Mines	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
MPL70			
1. The development and operation of a service corridor to contain a power line and buried pipelines to transport concentrate and return water are operations ancillary to mining and may be carried out on the area of the licence	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
2. The licencee must ensure that activities ancillary to mining operations are carried out in an orderly and skilful manner in accordance with a program for mining and rehabilitation of the land approved, from time to time, by the minister	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
3. The licencee must ensure that land disturbed by activity ancillary to mining is rehabilitated to achieve a safe and stable landform consistent with the surrounding environment, to minimise erosion and to re-establish native vegetation, indigenous to the area	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
Second Schedule			
1. The licencee must ensure that as operations progress to appropriate stages, land disturbed by operations ancillary to mining is progressively rehabilitated to facilitate regeneration of native vegetation	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
2. At least two weeks prior to the commencement of operations ancillary to mining, the licencee must submit to the Minister a report detailing compliance with all the relevant regulatory approvals that apply to the proposed operations	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
3. The licencee must ensure that all available topsoil is progressively stripped ahead of land disturbance and appropriately managed for use in the rehabilitation of land disturbed by operations ancillary to mining	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
4. The licencee must ensure that all employees and contractors on-site are fully aware of the requirement to operate in a manner that will minimise environmental impact	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
5. The licencee must abide by the provisions of the Aboriginal Heritage Act, 1988	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions



Condition	Compliance status	Evidence	Forward work plan
MPL72			
The construction and operation of a waste rock dump are operations ancillary to mining and may be carried out on the area of the licence	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
The licencee must ensure that activities ancillary to mining operations are carried out in an orderly and skilful manner in accordance with a program for mining and rehabilitation of the land approved, from time to time, by the Minister	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
The licencee must ensure that land disturbed by activity ancillary to mining is rehabilitated to achieve a safe and stable landform consistent with the surrounding environment, to minimise erosion and to establish native vegetation, indigenous to the area	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
Second Schedule			
1. The lessee must ensure that as operations progress to appropriate stages, land disturbed by mining is progressively rehabilitated to facilitate regeneration of native vegetation	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
2. At least two weeks prior to the commencement of construction or mining the lessee must submit to the Minister a report detailing compliance with all the relevant regulatory approvals that apply to the proposed operations	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
3. The licencee mist ensure that all available topsoil is progressively stripped ahead of land disturbance and must be temporarily stockpiled, for use in the rehabilitation of land disturbed by operations ancillary to mining	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
The licencee must ensure that rare or endangered species of native flora and fauna are identified and a program implemented to ensure their survival and return to the area after operations are complete	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
5. The lessee must ensure that all employees and contractors on-site are fully aware of the requirement to operate in a manner that will minimise environmental impact	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
5. The licencee must abide by the provisions of the Aboriginal Heritage Act, 1988	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
MPL73			
First Schedule			
The construction and operation of a tailings storage facility are operations ancillary to mining and may be carried out on the area of the licence	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
2. The licencee must ensure that activities ancillary to mining operations are carried out in an orderly and skilful manner in accordance with a program for mining and rehabilitation of the land approved, from time to time, by the Minister	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions



Condition	Compliance status	Evidence	Forward work plan
3. The licencee must ensure that land disturbed by activity ancillary to mining is rehabilitated to achieve a safe and stable landform consistent with the surrounding environment, to minimise erosion and to establish native vegetation, indigenous to the area	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
Second Schedule			
1. The licencee must ensure that as operations progress to appropriate stages, land disturbed by operations ancillary to mining is progressively rehabilitated to facilitate regeneration of native vegetation	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
2. At least two weeks prior to the commencement of operations ancillary to mining, the licencee must submit to the Minister a report detailing compliance with all the relevant regulatory approvals that apply to the proposed operations	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
3. The licencee must ensure that all available topsoil is progressively stripped ahead of land disturbance and must be temporarily stockpiled, for use in the rehabilitation of land disturbed by operations ancillary to mining	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
4. The licencee must ensure that rare or endangered species of native flora and fauna are identified and a program implemented to ensure their survival and return to the area after operations are complete	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
5. The licencee must ensure that all employees and contractors on-site are fully aware of the requirement to operate in a manner that will minimise environmental impact	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
MPL 74			
First Schedule			
The construction and operation of a tailings storage facility are operations ancillary to mining and may be carried out on the area of the licence	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
2. The licencee must ensure that activities ancillary to mining operations are carried out in an orderly and skilful manner in accordance with a program for mining and rehabilitation of the land approved, from time to time, by the Minister	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
3. The licencee must ensure that land disturbed by activity ancillary to mining is rehabilitated to achieve a safe and stable landform consistent with the surrounding environment, to minimise erosion and to establish native vegetation, indigenous to the area	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
Second Schedule			
1. The licencee must ensure that as operations progress to appropriate stages, land disturbed by operations ancillary to mining is progressively rehabilitated to facilitate regeneration of native vegetation	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions



Condition	Compliance status	Evidence	Forward work plan
2. At least two weeks prior to the commencement of operations ancillary to mining, the licencee must submit to the Minister a report detailing compliance with all the relevant regulatory approvals that apply to the proposed operations	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
3. The licencee must ensure that all available topsoil is progressively stripped ahead of land disturbance and must be temporarily stockpiled, for use in the rehabilitation of land disturbed by operations ancillary to mining	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
4. The licencee must ensure that rare or endangered species of native flora and fauna are identified and a program implemented to ensure their survival and return to the area after operations are complete	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
5. The licencee must ensure that all employees and contractors on-site are fully aware of the requirement to operate in a manner that will minimise environmental impact	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions
6. The licencee must abide by the provisions of the Aboriginal Heritage Act, 1988	Compliant		Implement and comply with PEPR2016/069, applicable Legislation, Regulations and Licence Conditions



9 Rectification of non-compliances

9.1 2018 non-compliances

There were no non-compliances in 2018 (Table 15).

Table 15 Rectification of non-compliances SMR

Tenement	Date of incident	Detected by operator	Reportable under Regulation 87?	Date initially reported to Minister	Date written report to Minister	Non- compliance	Status	Further work plan
	None							

9.2 Outstanding items from previous reports

There are no outstanding items from previous reports (Table 16).

Table 16 Outstanding items from previous reports

Year	Date of incident	Detected by operator	Reportable under Regulation 87?	Date initially reported to Minister	Date written report to Minister	Non- compliance	Status	Further work plan
2015	None							
2016	None							
2017	None							

10 Disturbance and rehabilitation activities

Areas of disturbance and areas that have been rehabilitated in the SMR (as at 31 December 2018) and areas anticipated to be disturbed in calendar year (CY) 2018 are summarised in Table 17. Figure 5, Figure 6 and Figure 7 show areas of vegetation clearing in 2018.

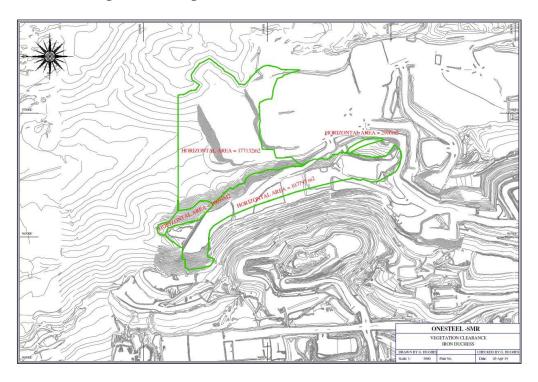


Figure 5 2018 Vegetation Clearances Iron Duchess

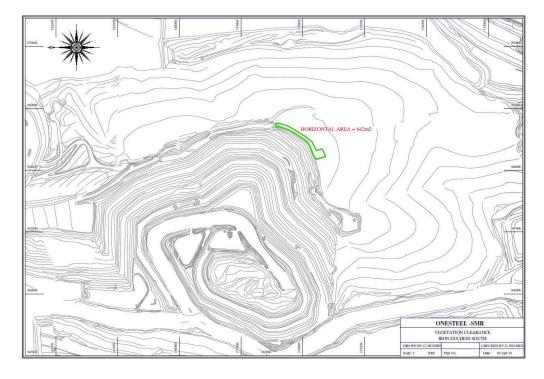


Figure 6 2018 Vegetation Clearance Iron Duchess South

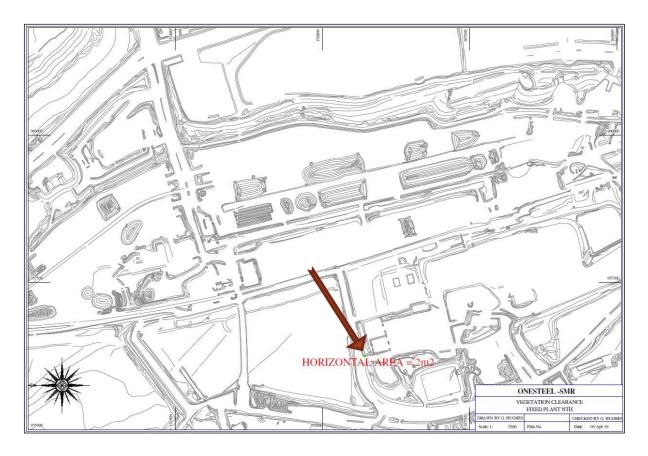


Figure 7 2018 Vegetation Clearance Fixed Plant North

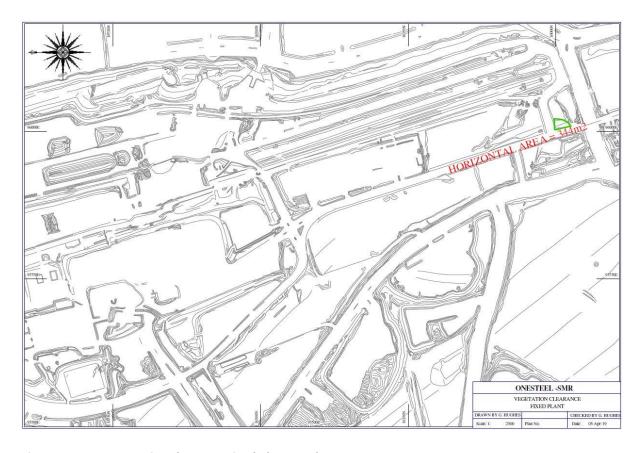


Figure 8 2018 vegetation clearance Fixed Plant south

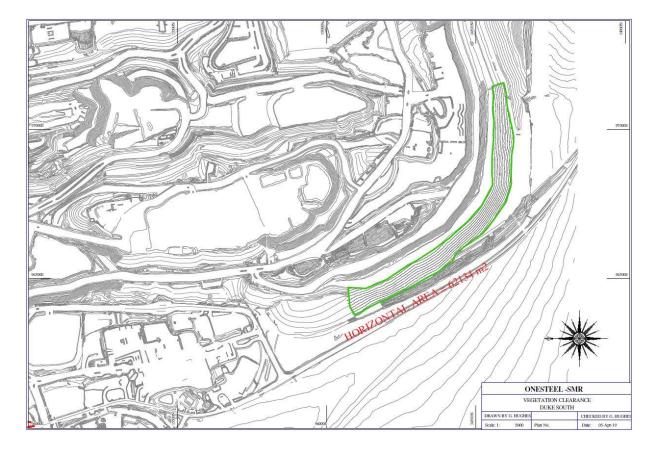


Figure 9 2018 vegetation clearance Iron Duke South

Table 17 Disturbance and rehabilitation SMR (2018)

Date Sub-Domain		Activity du	uring 2018	Proposed no	ext 12 months
		Disturbed (ha)	Rehabilitated (ha)	Disturbed (ha)	Rehabilitated (ha)
Chieftain					
Total this	period				
Previousl	y reported	80.2	29.71		
Total to-	date	80.2	29.71		
Knight					
Total this	period				
Previousl	y reported	11.1	33.11		
Total to-	date	11.1	33.11		
South-SN	1R				
2018	Iron Duchess	29.85		1	
2018	Iron Duchess South	0.06			
2018	Iron Duke	6.21			
Total this	period	29.85			
Previousl	y reported	0.77	45.11		
Total to-date		30.62	45.11		
Concentrator & OBP					
2018	Fixed Plant	0.03			
Total this period		0.03			
Previousl	y reported	5.77			
Total to-	date	5.8			

¹ Some clearing is expected to be required for the deepening of Duchess North and an expanded Waste Rock Dump, subject to acceptance of a Minor Change Notification or PEPR update. The timing of this is uncertain, and some might be commenced in 2019, if approved before the end of 2019.

11 Reconciliation of native vegetation clearance

SIMEC Mining have provided 20,872 Ha of Significant Environmental Benefit (SEB) offset through the purchase and donation of the Whyalla Conservation Park and Shirrocoe Pastoral Lease, a pristine area of high biodiversity, to the National Parks and Wildlife Service (NPWS) as Shirrocoe Reserve. In 2010 Shirrocoe was proclaimed as the Ironstone Hill Conservation Park under the National Parks and Wildlife Act 1972.

Under the current PEPRs, all SIMEC Mining native vegetation clearing activities in the Middleback Ranges (MBR) have been assigned an SEB offset ratio. These ratios are recommended by Native Vegetation Council accredited vegetation consultants based on assessment of the vegetation and the biodiversity and conservation value of the vegetation to be cleared. In accordance with PEPR2016/069 (and other SIMEC Mining Middleback Ranges PEPRs), SIMEC Mining offsets cleared native vegetation through the use of these SEB credits.

Under PEPR2016/069, SIMEC Mining is approved to clear up to 342.16 Ha of native vegetation (Table 18).

Table 18 Maximum approved native vegetation clearance areas

SMR Domain	Area to be Cleared (Ha)	Area cleared to-date (as of December 2018)
Iron Chieftain	114.6	80.2
Iron Knight	61.16	11.1
South SMR	108	30.06
Concentrator & OBP	58.4	5.8
Total	342.16	127.16

As part of SIMEC Mining's environmental management system, SIMEC maintains an SEB credit ledger covering all Company native vegetation clearance in the MBR. SIMEC's Significant Environmental Benefit (SEB) credit ledger is provided in Table 19.



Table 19 SIMEC Mining's SEB Register

Description	Reference:	Area disturbed (ha)	Date	Offset Ratio	SEB area (ha)	Credit (ha)
Whyalla Conservation Park			2003			972
Ironstone Hill Conservation Park (Shirrocoe)			2007			19900
Total SEB Credit						20872
SMR Project Magnet	SMR MARP 2007	356.65	2007	various	3188.64	17683.36
Transhipment Pad & Spurline	NVC2007/3063/010 07WLB06139	0.9	2007	10:1	9	17674.36
BOS slag dumps	NVC 07WLB07865	10	2007	4:1	40	17634.36
Rail passing loops	NVC2008/3164/850	1.275	2008	various	5.95	17628.41
N-SMR (Chieftain-Knight)	N-SMR MARP 2010	335.7	2010	various	2641.08	14987.33
Iron Baron OBP	Iron Baron Construction MARP (Jan) 2011	17	2011	8:1	136	14851.33
NE WRD Ext	SMR MARP 2007 Addendum 2011	56	2011	10:1	560	14291.33
SE WRD Ext	SMR MARP 2007 Addendum 2011	132	2011	10:1	1320	12971.33
Iron Baron OBP (Update)	Iron Baron Construction MARP 2011 (update)	8.48	2011	various	32.12	12939.21
Iron Baron OBP surplus (credit)	WPC-056 approved 30ha for construction, (17+ 8.48 = 25.48 used = 4.52 remaining)	4.52	2011	8:1	36.16	12903.05
SMR Access Road realignment	PIRSA Notification 2011	6	2011	10:1	60	12843.05
SMR Workshop Extension	Letter to PIRSA re MPL 34 activity 16/7/10	5	2011	10:1	50	12793.05
N-SMR (Chieftain-Knight) update	WPC-081 SMR minor mine adjustments_PIRSA_7-10-11	35.29	2011	various	286.52	12506.53
IBMA WRDs	IBMA PEPR WPC-059 (Eucalyptus oleosa)	36	2011	8:1	288	12218.53
IBMA WRDs	IBMA PEPR WPC-059 (Casuarina pauper)	1.4	2011	6:1	8.4	12210.13
IBMA Ext to Little Baron pit	IBMA PEPR WPC-059	0.2	2011	4:1	0.08	12210.05
IBMA LGO temp out of spec	IBMA PEPR WPC-059	2.3	2011	2:1	4.6	12205.45
IBMA surplus (credit)	IBMA PEPR WPC-059	10.9	2011	8:1	87.2	12118.25
Iron Chieftain Go-Line adjustment	MI134_Iron Chieftain Go-Line_VCCA	0.28	2011	2:1	0.56	12117.69



IBMA surplus (credit)	IBMA PEPR WPC-083 (credit reduced from 059)	-0.9	2012	8:1	-7.2	12124.89
IBMA Out of spec LGO stockpile	IBMA PEPR WPC-083	6.4	2012	2:1	12.8	12112.09
Reclamation of LGO dumps PC and IBDU07	IBMA PEPR WPC-083	6	2012	2:1	12	12100.09
IBMA boundary fence	IBMA PEPR WPC-083	2.4	2012	8:1	19.2	12080.89
IBMA WRDs	IBMA PEPR WPC-083 (<i>Eucalyptus oleosa</i>) Increase to WPC-059 line 19; 36+13.9=49.9	13.9	2012	8:1	111.2	11969.69
Whyalla Steelworks Ports project rail construction	NVC 12NRM0198	2.2	2012	4:1	8.8	11960.89
Whyalla Steelworks Ports project rail construction	NVC 12NRM0298	8.8	2012	4:1	35.2	11925.69
Iron Baron OBP surplus (credit)	Ref; line 15, (4.52ha credit minus 1.74, Lucas workshops ref MI165 = 2.78 ha remaining)	0	2012	8:1	0	11925.69
Iron Princess ground water monitoring wells	IKMA PEPR WPC-084	1	2012	8:1	8	11917.69
Whyalla Steelworks Ports project rail construction	NVC 12NRMO875	7.2	2012	4:1	28.8	11888.89
Iron Knob Phase 1	IKMA PEPR WPC-088	75.1	2013	various	515.5	11373.39
Iron Knob Phase 2 tenements proposal	IKMA Proposal WPC-102	258.67	2013	various	1969.66	9403.73
NE WRD reconciled credit	SMR MARP 2007 Addendum 2011	-2.2	2014	10:1	-22	9425.73
SE WRD reconciled credit	SMR MARP 2007 Addendum 2011	-18.4	2014	10:1	-184	9609.73
SMR Project Magnet	SMR MARP 2007	-5.29	2014	Various	-47.3	9657.03
N-SMR (Chieftain-Knight) reconciled credit	N-SMR MARP 2010	-32.36	2014	Various	-254.6	9911.63
SMR PEPR 2014	WPC-108; Iron Chieftain Domain	128	2014	various	1039.4	8872.23
SMR PEPR 2014	WPC-108; Iron Knight Domain	61.8	2014	10:1	618	8254.23
SMR PEPR 2014	WPC-108; SMR Domain	28	2014	10:1	280	7974.23
SMR PEPR 2014	WPC-108; TSFs Sub Domain	58.4	2014	10:1	584	7390.23
IBMA Ph2 PEPR 2015	WPC-106; IBMA PEPR Ph2	77.5	2015	Various	467	6923.23
IBMA Ph3 PEPR 2017 (Sul, War, Qn, Cav, Bar, Emp)	WPC-180; IBMA MPEPR 2017/033	486	2017	various	3962.7	2960.53
IBMA-Warrior-Knight access and haul roads	NVC 2018-3021-010	4.88	2018	various	19	2941.53
Ironstone Hill TSF impact area	NVC	0	2018	not offset	27	2914.53
Totals		2186.995			17957.47	2914.53



12 Environment Protection and Biodiversity Conservation Act 1999 Reporting

SIMEC has no requirement to demonstrate compliance with the Commonwealth *Environment Protection and Biodiversity Conservation (EPBC) Act 1999*, as none of the Company's tenements in the SMR mining area are subject to a controlled action under the Act.



13 Exempt land

SIMEC Mining's SMR operation does not impact any land Exempt under Section 9 of the Mining Act.



14 Complaints

There were no new complaints received in relation to SMR operations during the reporting period. When complaints are received, SIMEC actively works with the complainants to address their concerns.

Table 20 Complaints register – SMR (1 January to 31 December 2018)

Complaint reference	Date Complaint Received	Complaint type	Was the complaint a result of a PEPR non-compliance?	Resolution date	Forward work plan
	Nil				

15 Management system reviews

15.1 ISO AS/NZS 14001 Audit

In September 2018, SAI Global completed an audit of SIMEC Mining and Liberty Primary Steel Whyalla Steelworks as part of its ISO AS/NZS 14001 certification program (certificate number C10317).

The purpose of the audit was to determine implementation of the businesses' management system in ensuring continual compliance with customer, statutory and regulatory requirements, and in meeting its specified objectives; and the conformity of the management system to stated criteria.

The audit found that the Environmental Management Systems at the Liberty Primary Steel Whyalla Steelworks and SIMEC Mining remain effective. The audit found that "...the commitment that the organisation has made to integrate its Environmental Management System within its normal business operations has been impressive with operational controls being maintained effectively. This was confirmed with the site inspections at various locations that found site issues such as containment of chemicals/oils and general housekeeping was very well managed. Systems maintenance continues at a high standard." (SAI Global p. 4)

The results of the audit were positive with a reduction in the number of minor non-conformances raised from four to two. These minor non-conformances were assigned corrective actions and entered in the companies' issues management system for tracking and close-out. No major non-conformances were identified or findings that identified a threat to SIMEC Mining's ability to meet the approved environmental outcomes.

15.2 Internal reviews & audits

In 2018, SIMEC Mining completed 10 internal inspections and audits at SMR (Table 21).

Table 21 SIMEC Mining internal audits & reviews

Date	Audit Type	Classification
29/01/2018	Bunding Audit	Internal Site
20/03/2018	Stormwater Infrastructure Inspection	Internal Site
15/05/2018	Topsoil Stockpile Inspection	Internal Site
15/05/2018	Waste Management	Internal Site
15/05/2018	Weed Audit	Internal Site
20/06/2018	Stormwater Infrastructure Inspection	Internal Site
31/07/2018	Bunding Audit	Internal Site
18/09/2018	Stormwater Infrastructure Inspection	Internal Site
23/11/2018	Topsoil Stockpile Inspection	Internal Independent
23/11/2018	Weed Audit	Internal Site

16 Verification of uncertainty

Assumptions of uncertainties related to SMR operations in 2018 are provided in Table 22.

Table 22 Uncertainties in relation to compliance for SMR in 2018

Description of assumption of uncertainty	Estimated date to resolve	Progress in reporting period	Confirmed	Forward work plan
Complaints of dust impacts to a neighbouring property	Ongoing	Further improvements made to the fixed plant dust suppression systems and improvement to system control, monitoring, reporting and maintenance. Confidential cropping investigation completed by independent specialist in April 2018 and provided to complainant.	No evidence of impact to neighbouring properties found to date.	Continuous observation, assessment and improvement of dust control systems and procedures.
Seepage from TSF	Ongoing	Perimeter discharge/central decant design changes operational.	Monthly updates to DEM. 2018 Annual Update presented to DEM and DEW in June 2018	Continue to implement five year TSF management plan

17 Change to mining operations and emerging environmental hazards

17.1 Changes to mining operations

Mining in Knight South was completed in September 2018. Mining in Duchess North recommenced July 2018.

17.2 Emerging environmental hazards

No emerging environmental hazards were identified in 2018.



18 Technical reports

A summary of technical data, studies and reports relevant to the SMR that were generated during the reporting period 1 January – 31 December 2018 are listed in Table 23 and Table 24.

Table 23 SMR technical data, studies and reports – 2018

Report	Author
MI297 - Iron Duke Tailings Storage Facility Groundwater and Surface Water Chemistry Review	Jacobs Group
MI301 - MBR Annual Flora Monitoring June 2018	EBS
MI304 – Ironstone Hill CP SEB RAM assessment	EBS
MI310 - Uplands SEB RAM assessment	EBS
MI313 - Goat home range and habitat use in the Middleback Ranges	Ecological Horizons

Table 24 SIMEC Mining internal audits and reviews

Date	Audit Type	Classification
29/01/2018	Bunding Audit	Internal Site
20/03/2018	Stormwater Infrastructure Inspection	Internal Site
15/05/2018	Topsoil Stockpile Inspection	Internal Site
15/05/2018	Waste Management	Internal Site
15/05/2018	Weed Audit	Internal Site
20/06/2018	Stormwater Infrastructure Inspection	Internal Site
31/07/2018	Bunding Audit	Internal Site
18/09/2018	Stormwater Infrastructure Inspection	Internal Site
23/11/2018	Topsoil Stockpile Inspection	Internal Independent
23/11/2018	Weed Audit	Internal Site

19 Voluntary information

19.1 Community or wider environment support activities

19.1.1 Community sponsorship and support

SIMEC Mining's Community Support Program continues to assist its nearby communities by supporting ongoing and sustainable initiatives that provide:

- welfare help for the less advantaged
- local youth with a range of opportunities to assist in their development for the future
- significant benefit to local communities usually in the way of major events or new or improved community facilities

Some of the ongoing programs of which SIMEC Mining is a major supporter include:

- The Smith Family's Learning For Life and Let's Read programs
- Foodbank Whyalla branch (including the Schools in Breakfast program)
- Whyalla Road Safety Centre
- Whyalla Hockey Association's Hockey in Schools program
- Whyalla Christmas pageant and carols
- Junk to Funk Youth Scholarship

19.1.2 Helping break the cycle of disadvantage

SIMEC Mining is the major supporter of Foodbank's School Breakfast Program.

The program assists local students who are attending school without having accessed a healthy breakfast – ensuring they have enough nourishment to start their school day.

These students are going to school without breakfast for a variety of reasons, and are at a disadvantage from the outset as studies have shown that students concentrate better after eating a healthy breakfast. This lack of concentration can often result in them falling behind in their studies, ultimately increasing the chances of the cycle of disadvantage continuing. By ensuring they have a decent meal to start each day, it helps set them up for success and provides them with a better chance of success at school.

Nineteen Whyalla schools and child care centres are now on board with the program, which is serving over 1000 children every week in Whyalla alone. The Whyalla Foodbank branch also covers the Upper Spencer Gulf and lower West Coast, where the program assists a further 19 schools and child care centres, and serves close to a further 1000 children per week.

19.1.3 Local employment opportunities

SIMEC Mining is supportive of employing local people, including supporting the employment of Barngarla Community members through the Walga Mining Services contract at Iron Knob.

19.2 Community engagement activities

19.2.1 Community consultation

SIMEC Mining has regular contact with key community representatives who provide feedback on mining operations and how these are seen from a community perspective. Regular contact is through:

- face-to-face meetings, telephone and email exchanges
- regular Environment Consultation Group (ECG) meetings, attended by a cross-section of the Whyalla community, chaired by state member for Giles and includes EPA representatives
- regular meetings with landholders located near SIMEC's mining operations



- regular community forums and open days in Iron Knob which include information on the IKMA operations as well as other SIMEC mining areas
- other forums, as required, on specific topics of interest with residents in Whyalla.

19.2.2 Indigenous consultation

SIMEC Mining meets regularly with the Board of the Barngarla Determination Aboriginal Corporation to discuss mining within the Middleback Ranges and any matters relating to the Indigenous Land Use Agreement (ILUA) area.

The ILUA between OneSteel Manufacturing Pty Ltd (SIMEC Mining) and the Barngarla Native Title Claimants sets out clear heritage clearance protocols for both parties and includes protocols for notifications concerning proposed changes and developments within the ILUA area.

19.2.3 The Middleback Alliance

The Middleback Alliance (the Alliance) is a cooperative framework for sustainable land management across the Middleback Ranges and surrounding areas. The Alliance includes three major landholders in the region (SIMEC Mining, Natural Resources Eyre Peninsula (DEW) and Ecological Horizons).

By sharing resources and cooperatively delivering a works program across land boundaries, the Alliance delivers improved and sustainable land management outcomes.



20 References

- Bebbington, L., 2009a. *Caladenia tensa* Micro-site Surveys of North SMR Development Project Magnet Phase 2, Iron Chieftain ML4745 Proposed Extension for OneSteel Whyalla, August 2009, unpublished report prepared for OneSteel Whyalla, 21 August, 2009.
- Bebbington, L., 2009b. Vegetation Assessment of Project Connolly: Iron Chieftain MLs, Iron Knight Rom Pad and Associated Haul Road for OneSteel Whyalla, unpublished report prepared for OneSteel Whyalla, March 2009
- Bebbington, L., 2014. Flora Assessment of Proposed Extensions Iron Chieftain Tenements South Middleback Range for Arrium Mining Whyalla, March 2014, unpublished report.
- Department for Premier and Cabinet, 2018. Ministerial Determination (MD) 009; Reporting periods and minimum information required to be provided in a compliance report for a holder of a mineral lease and any associated miscellaneous purpose licence or associated extractive mineral lease. Notice in accordance with regulation 86(1), (3), (4) (5) and (7) of the Mining Regulations 2011.
- EBS, 2018. MBR Annual Flora Monitoring June 2018, Unpublished report prepared for SIMEC Mining
- SAI Global Pty Limited, 2018. Surveillance audit for OneSteel Manufacturing Pty Ltd Trading as Liberty OneSteel, SIMEC Mining. Commercial in Confidence Report to OneSteel manufacturing Pty Ltd.
- SIMEC Mining, 2018. SMR, Program for Environment Protection and Rehabilitation (PEPR2016/069), May 2018 (Doc. Ref: WPC-108, Revision 5), South Australia



APPENDIX A: CERTIFICATE OF CURRENCY





Lloyd Pearson Senior Account Executive

Marsh Pty Ltd ABN 86 004 651 512 One International Towers Sydney 100 Barangaroo Avenue SYDNEY NSW 2000 PO Box H176 AUSTRALIA SQUARE NSW 1215 PH +61 2 8864 8322 lloyd.pearson@marsh.com marsh.com.au

2 November 2018

CERTIFICATE OF CURRENCY COMBINED GENERAL LIABILITY & UMBRELLA LIABILITY INSURANCE

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE HOLDER. IT DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICY. IT IS PROVIDED AS A SUMMARY ONLY OF THE COVER PROVIDED AND IS CURRENT ONLY AT THE DATE OF ISSUE. FOR FULL PARTICULARS, REFERENCE MUST BE MADE TO THE CURRENT POLICY WORDING

INSURED

GFG Alliance Australia (comprising of Liberty ONESTEEL & SIMEC Mining) and all companies under their effective management control and all subsidiary corporations and related body corporates as defined in the Corporations Act 2001 (including those acquired or incorporated during the Period of Insurance) for their respective rights and interests

PERIOD OF INSURANCE

From 31 October 2018 at 4:00pm local standard time to 31 October 2019 at 4:00pm local standard time

INSURER

LIMIT OF LIABILITY / LAYER	INSURER / POLICY NUMBER	
Primary	Zurich Australian Insurance Limited	
\$10,000,000	Policy No: 72 2232551 GLR	
Primary Umbrella	Zurich Australian Insurance Limited	
\$40,000,000	Policy No: 72 2232552 GLR	

INTEREST INSURED

Insured's legal liability in respect of property damage or personal injury arising out of an occurrence in connection with the Insured's business or products

LIMITS OF LIABILITY

\$50,000,000 any one occurrence, limited in respect of Products Liability to \$50,000,000 in the aggregate for all occurrences for the Period of Insurance

TERRITORIAL LIMITS

Anywhere in the world

SOLUTIONS...DEFINED, DESIGNED, AND DELIVERED.





OTHER INTERESTS

This policy extends to cover South Middleback Ranges Mining Area and the interests of the Minister for Energy and Mining has been noted

In accordance with the ongoing commitment by Marsh to quality management philosophies, this certificate has been verified for accuracy of content by:

Yours faithfully,

Lloyd Pearson

Senior Account Executive

2 | MARSH