Tarcoola Gold Mine
2021 Annual Compliance Report

Barton Gold Holdings Ltd

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DOCUMENT TRACKING

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Template 2.8.1

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Abbreviations and definitions

Abbreviation	Description
ACR	Annual Compliance Report
AMYAC	Antakirinja Matu-Yankunytjatjara Aboriginal Corporation
ARD	Acid rock drainage
ARTC	Australian Rail Track Corporation
Au	Gold
BOM	Bureau of meteorology
DEM	Department for energy and mining
DEW	Department for environment and water
DSD	Department for State Development
EC	Electrical conductivity
EPA	Environment Protection Authority
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999*
EL	Exploration Licence
ELA	Eco Logical Australia
EPP (WQ)	Environment protection policy – water quality
JORC	Joint Ore Reserves Committee
km	Kilometres
LoM	Life of Mine
MCN	Minor change notification

Abbreviation	Description
MCR	Mining Compliance Report
ML	Mining Lease
MLP	Mining lease proposal
MD 009	Ministerial Determination 009
NAF	Non-acid forming
NTMA	Native title mining agreement
NVF	Native vegetation fund
NVMP	Native vegetation management plan
OMC	Outcome measurement criteria
Oz	Ounce
PAF	Potentially acid forming
PEPR	Program for Environment Protection and Rehabilitation
ROM	Run of mine
SEB	Significant Environmental Benefit
SWL	Standing water level
TDS	Total dissolved solids
tpa	tons per annum
TRH	Total recoverable hydrocarbons
WPG	WPG Resources Limited
WRF	Waste rock facility

Executive summary

This report is the third Annual Compliance Report (ACR) submitted for the Tarcoola Gold Project (the Project) since the Project's commencement in 2016, and applies to the period 1 July 2020 to 30 June 2021.

The Project is located approximately 600 km north-west of Adelaide, 360 km north-west of Port Augusta, and 3 km west of Tarcoola in South Australia and owned and operated by Barton Gold Holdings Limited (Barton Gold) via its wholly owned subsidiary Tarcoola 2 Pty Ltd (Tarcoola 2). Mining Lease (ML) 6455 was originally granted to Tarcoola Gold Pty Ltd (Tarcoola Gold, a subsidiary of WPG Resources Ltd (WPG)) on 8 March 2016 for the term of 10 years. The most recent Program for Environment Protection and Rehabilitation (PEPR) for the Project was submitted on 23 March 2018 and approved on 10 July 2018 (PEPR459424) .

Since the Project was acquired by Barton Gold in 2019, it has remained in a period of care and maintenance. The Project is subject to the conditions outlined within the ML documents and approved PEPR (PEPR459424), with the most recent regulatory ACR for the site submitted in October 2020, covering the period between 4 November 2017 to 30 June 2020. This document presents a review of compliance for the subsequent year, with a reporting period of July 1 2020 to 30 June 2021, for Tarcoola.

This ACR reports the evidence available to demonstrate compliance of the Project against requirements of the current approved PEPR document's Outcome Measurement Criteria (OMC). This document has been prepared in accordance with the Department of Energy and Mining's (DEM) *Determination: Terms of reference 009 – Mining compliance reports (Notice under Regulation 77 of the mining Regulations 2020)*, dated 11 December 2020.

In relation to some environmental outcomes, OMC, and lease conditions, there was insufficient data or records available to demonstrate achievement compliance with the criteria. This has occurred due to less resources available for care and maintenance compliance related tasks and/ or less detailed records. Proposed corrective actions and timeframes to address outstanding compliance matters are further detailed in this report.Prior to and since acquisition of Tarcoola, Barton Gold and its consultants have established and maintained an active dialogue with the Department for Energy and Mining of South Australia (DEM) to jointly determine and agree a pathway to returning the project to compliance, including in relation to formulating a new PEPR, OMC, environmental outcomes suitable to an expected prolonged state of care and maintenance. This dialogue and joint effort remains ongoing, with the intention of establishing these outcomes during the 1 July 2021 – 30 June 2022 year.

Ministerial determination checklist

the *Terms of reference 009* and associated *MG3 Preparing a mining and rehabilitation compliance report* template is summarised in Table 1.

Table 1 Compliance with the *Terms of reference 009* and associated template

Section (as per MD 009 / MCR Template)	Section in this ACR
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1. Declaration of accuracy

This report is prepared for the Department for Energy and Mining (DEM) to fulfil the Annual Compliance Report (ACR) requirements for the tenements listed herein. A signed declaration of accuracy stating that the information contained in this report is to the best of Barton Gold's knowledge a true and accurate record of the mining activities and compliance status for the reporting period can be found in Table 2.

Table 2 Declaration of accuracy

Name	Andrew Goode
Position	Principal Geologist
Company / Agent	Barton Gold
Signature	
Date	7th October 2021
Summary of steps undertaken to review the compliance report to ensure its accuracy	I, Mr Andrew Goode, holding the position of Principal Geologist, for the tenement holder Barton Gold, have taken the following steps to review the information in this compliance report to ensure its accuracy: • implemented an audit process against the Ministerial Determination MD009 to ensure the minimum requirements have been addressed; • obtained a third-party review of annual compliance data; and • undertaken an internal process for review, endorsement and sign off by senior management of Barton Gold.

2. Public liability insurance

Details of the relevant public liability insurances are outlined below in Table 3. Certificates demonstrating currency and showing further detail are provided in Appendix A.

Table 3 Public liability insurances

Insurer	Policy Number	Insurance period (begin/end)
DUAL Australia Pty Ltd	PRL/0/252452/19/K5	31 October 2020 / 31 October 2021
CGU Insurance	10M 8272185	31 October 2020 / 31 October 2021

These insurance policies are maintained and renewed on an annual basis, and will be renewed prior to the end of the current insurance period (31 October 2021).

3. Introduction

3.1 Background

The Tarcoola Gold Project (the Project) is located approximately 600 km north-west of Adelaide, 360 km north-west of Port Augusta, and 3 km west of Tarcoola in South Australia. Access to the Project site is via the Stuart Highway to Glendambo, and then 120 km along the un-sealed Glendambo to Tarcoola road (see Figure 1).

Mining Lease (ML) 6455 was granted to Tarcoola Gold Pty Ltd (Tarcoola Gold, a subsidiary of WPG Resources Ltd (WPG)) on 8 March 2016. Project components within the ML include an open pit, waste rock storage and other minor infrastructure, as shown in Figure 1. It should be noted that some of the infrastructure shown in Figure 1 including the office and fuel storage have subsequently been removed from the site. The scope of the operations were revised following the submission of a Mining Lease Proposal (MLP) document (August 2015); ore has been trucked approximately 170 km north-west to the Challenger Gold Mine (Challenger) for processing off-site during the operational phase. Tenement boundaries are shown in Figure 2.

In August 2018, the previous project owners, WPG Resources, went into receivership and mining operations ceased shortly thereafter. The open pit was designed to reach 110m below ground surface, however WPG failed to complete operations and some ore remained at the base of the designed pit.

Following initial approval of the operation's Program for Environment Protection and Rehabilitation (PEPR) PEPR 2016/062 (rev 3) in November 2016, site works commenced in the fourth quarter of 2016, followed by mining activity soon thereafter. The most recent Program for Environment Protection and Rehabilitation (PEPR) for the Project was submitted on 23 March 2018 and approved on 10 July 2018 (PEPR459424) .

Since the Project was acquired by Barton Gold in 2019, no mining operations have been undertaken and it has remained in a period of care and maintenance. It is anticipated that the project will remain in a period of care and maintenance for an extended period of time. The Project is subject to the conditions outlined within the ML documents and approved PEPR (PEPR459424). The most recent regulatory ACR for the site was submitted in October 2020, covering the period between 4 November 2017 to 30 June 2020. This document presents a review of compliance for the subsequent year, with a reporting period of July 1 2020 to 30 June 2021, for Tarcoola.

Barton Gold is submitting this ACR as required by the *Mining Act 1971* (Mining Act) and associated *Mining Regulations 2020*, as well as the conditions of the ML for the Tarcoola Gold Mine (ML 6455).

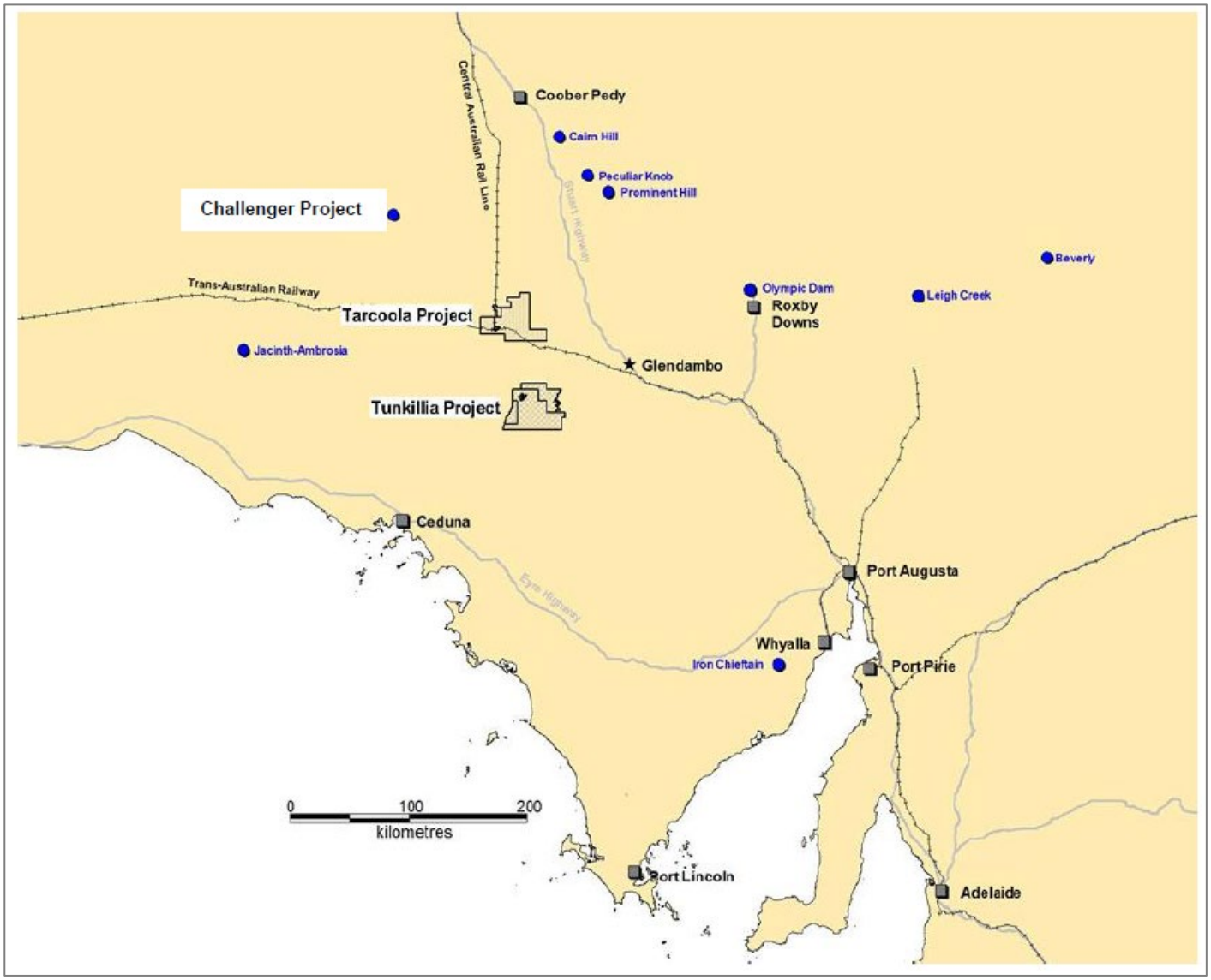

Figure 1 Tarcoola Gold project location

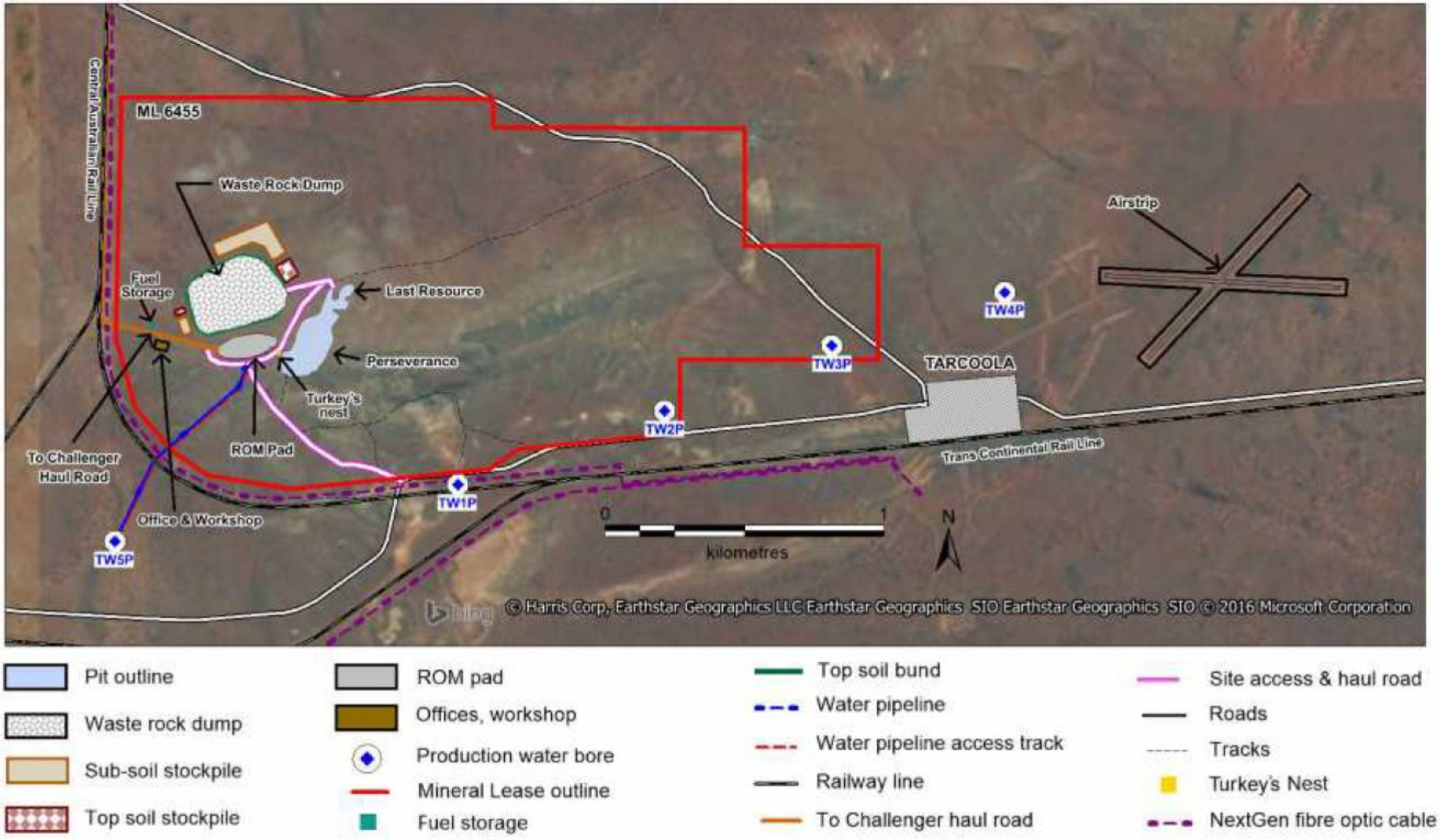

Figure 2 Location of mining lease and project layout

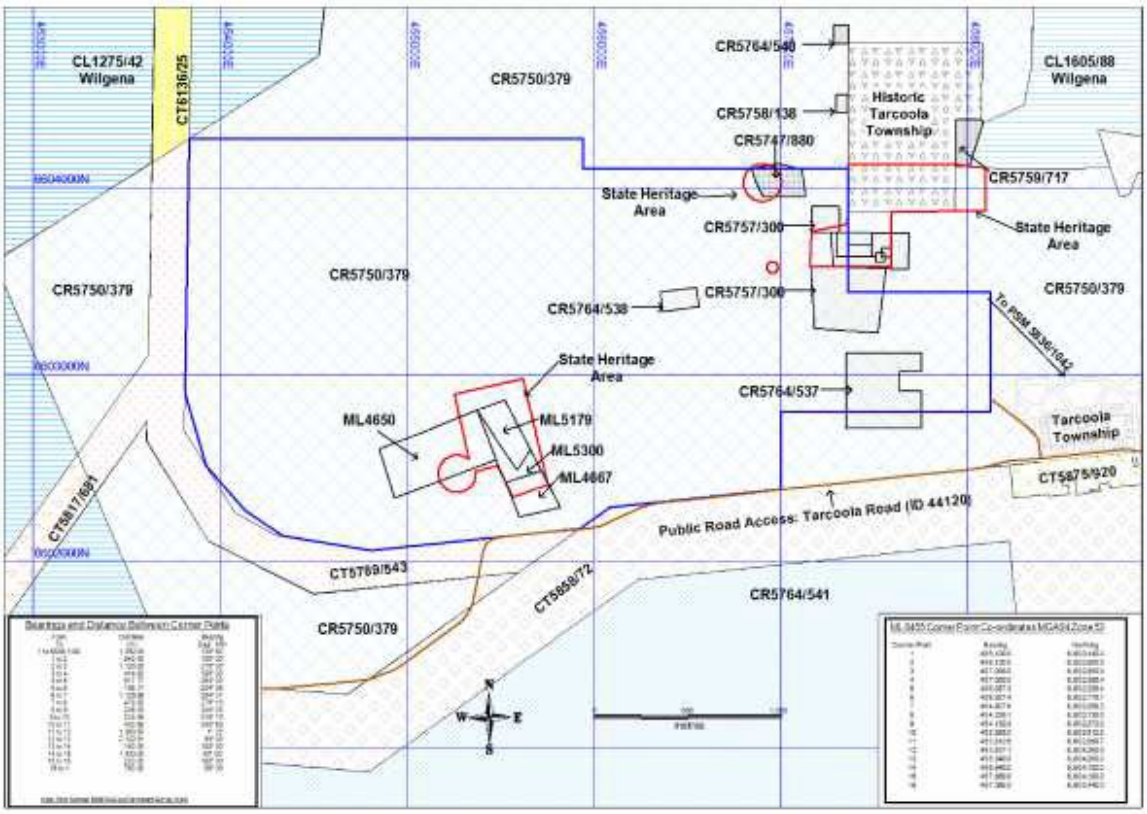

Figure 3 Location of mineral leases

3.2 Identification

Site details are provided below in Table 4.

Table 4 Project and site details

Mine name(s)	Tarcoola Gold		
Tenement holder(s)	Barton Gold Suite 5, 62 Ord Street, West Perth, WA 6005		
Operating company(s)	Barton Gold Suite 5 62 Ord Street, West Perth, WA 6005		
Tenement number(s)	ML 6455		
PEPR(s) document	PEPR459424	PEPR No.(s)	4
		PEPR(s) approval date	10 July 2018
Site contact	Name	Andrew Goode	
	Email	andrew.goode@miningplus.com.au	
	Phone	08 9213 2600	
Location details	Located approximately 600km north-west of Adelaide, 360 km north-west of Port Augusta, and 3 km west of Tarcoola in South Australia. Access to the project site is via the Stuart Highway to Glendambo, and then 120 m along the un-sealed Glendambo-Tarcoola road (see Figure 1).		
Reporting period	1 July 2020	30 June 2021	
Compliance report submission date	September 2021		

3.3 Tenements

Tenement details for the Project are provided in Table 5. The tenement boundaries covered by the approved PEPR(s) are shown in Figure 2. ML 6455 encompasses the historic tenements ML 4650, ML 4667, ML 5179 and ML 5300 (see Figure 3). It is noted that the historic leases were surrendered in November 2018.

Table 5 Tenement summary

Tenement	Tenement Number	Tenement Grant Date	Approval Date	Expiry Date	Surrender date	Reporting Period Activity
Tarcoola Gold Project	ML 6455	8 Mar 2016	8 Mar 2016	7 Mar 2026	NA	The Project was in care and maintenance for the entire reporting period
Tarcoola Gold Project	ML 5179	11 Jan 1984	11 Jan 1984	10 Jan 2031	27 Nov 2018	Nil
Tarcoola Gold Project	ML 4650	30 Oct 1978	30 Oct 1978	10 Jan 2031	27 Nov 2018	Nil
Tarcoola Gold Project	ML 4667	15 Jan 1979	15 Jan 1979	10 Jan 2031	27 Nov 2018	Nil
Tarcoola Gold Project	ML 5300	3 Sep 1985	3 Sep 1985	10 Jan 2031	27 Nov 2018	Nil

The tenement boundaries covered by the approved PEPR are shown in Figure 2 and Figure 3.

3.4 Other approvals, licences, permits, waivers and Native Title Agreements

Native title for the project area is held by the Antakirinja Matu-Yankunytjatjara people represented by the Antakirinja Matu-Yankunytjatjara Aboriginal Corporation (AMYAC). A Native Title Mining Agreement (NTMA) was negotiated and executed with AMYAC, and registered by the then mining Regulator, Department for State Development (DSD, and now DEM) before the ML was granted (see Table 6). The NTMA was assigned to Tarcoola 2 Pty Ltd (a wholly owned Barton Gold subsidiary) on 14 June 2019 by Deed of Covenant.

Two waivers were required and obtained for an existing optic fibre cable. All waivers for exempt land are in place in accordance with the Mining Act. These are summarised in Table 7.

Table 6 Approval summary

Approval document	Regulatory authority or other	Supporting documents	Relevant environmental outcome or tenement condition	State of currency
Part 9B – AMYAC Native Title Mining Agreement NTMA	Native Title Claimants: Antakirinja Matu-Yankunytjatjara Aboriginal Corporation	Confidential	In accordance with Part 9B of the Mining Act	–Current - ongoing

Table 7 Waivers required under the Mining Act (Extract of Table 4 from the PEPR)

Structure/feature	Distance from mining activity	Waiver required under the Mining Act	Comments
Optic fibre cable	Installation of above ground water pipeline is <150 m from infrastructure	Yes	Waiver obtained from NextGen
Rail track	Upgrade to haul road is <150 m from infrastructure	Yes	Waiver obtained from the Australian Rail Track Corporation (ARTC)

4. Mining operations

4.1 Mineral Resources

In November 2020, Barton Gold commissioned an updated Mineral Resource estimate for the Tarcoola Project using all available drilling information. The total Indicated and Inferred Mineral Resource comprises 370,000 tonens at 1.3g/t for a total of 15,800 ounces of gold. A Mineral Resource summary has been provided in Table 8.

Table 8 Mineral endowment estimate

Mineral Resource Estimate for the Tarcoola Deposit – November 2020							
Domain	Cut-Off	Indicated			Inferred		
	g/t Au	Tonnes (kt)	Au (g/t)	Au (koz)	Tonnes (kt)	Au (g/t)	Au (koz)
Perseverance Pit	0.4	70	1.7	3.8	70	1.1	2.4
Low grade stockpile - Oxide	-	-	-	-	170	1.2	6.9
Low grade stockpile - Primary	-	-	-	-	60	1.4	2.8
Total	0.4	70	1.7	3.8	300	1.2	12.0

4.2 Mining, processing and waste storage activities

Mining activity commenced in December 2016 at Tarcoola and stopped mid-late 2018 when WPG went into administration. Table 9 provides a summary of the previous ore mined, ore transported to Challenger, and the waste/ overburden mined during the life of mine. No mining activities were undertaken by Barton Gold during the current reporting period. At the end of the reporting period there was 230,000 tonnes of broken ore stocks stockpiled on ML6455. The remaining capacity of the waste rock facility (WRF) during the reporting period has not been verified.

Table 9 The mining activities undertaken during the life of mine

Activity	Quantity
Ore mined	496,599 tonnes
Ore hauled	294,324 tonnes
Overburden/waste mined	2,991,093 BCM

4.3 Care and maintenance phase activities

During the care and maintenance phase, all mining operation activities e.g. ore extraction, waste rock haulage, ceased. A Care and Maintenance Plan was developed for the Project as described in Section 8.9.8 of the PEPR and outlines a number of activities to be conducted. The status against those activities is described below in Table 10.

In 2019, during the care and maintenance phase, ownership transferred from WPG to Barton Gold. Care and maintenance inspection records were kept and have been viewed in the preparation of this ACR. Some records are limited in detail and there is some uncertainty whether sufficient information is available for the entire ACR period to conclude that criteria have been met. It should be noted however that a reduction in the intensity of mining activities at the Project site during the care and maintenance period may have reduced the risk of non-achievement of the overall outcomes. Where applicable, comments on this have been included in Section 5 of this ACR.

Table 10 Care and maintenance strategies and activities

Care and Maintenance strategies and activities (PEPR)	Status
The site will be made safe and site access restricted	Implemented and ongoing
Safety bunds will be constructed as necessary to prevent public access to the open pits	Implemented and ongoing
Portable buildings will be taken off-site	Completed. Contractor facilities have been removed
All commercial wastes will be taken off-site	Completed
Any ore on the run of mine (ROM) pad will be transported off-site for processing	Some low-grade ore remains on the ROM
Progressive rehabilitation will be completed up to the point in time when care and maintenance begins	Further clean-up of legacy infrastructure occurred throughout the care and maintenance period
Any exposed PAF in the WRF will be covered (5 m)	Completed
Topsoil stockpiles will remain *in situ*	Topsoil stockpiles have remained at site but volumes require to be verified.
Fuel infrastructure will be removed from site	No fuel infrastructure onsite. All have been removed.
Water supply infrastructure will remain on site	Water supply infrastructure retained

Care and Maintenance strategies and activities (PEPR)	Status
• water infrastructure will remain on-site in preparation for the re-commencement of mining operations; • maintenance activities will continue; • environmental monitoring (surface water, groundwater and flora) activities will continue and be reviewed regularly, particularly with regards to surface water runoff and groundwater in the WRF area; • compliance reporting activities will continue; • all ore on the ROM pad will be removed to Challenger; • pit dewatering will discontinue once the pit bund has been constructed and ore has been removed from the ROM pad; • closure bund around the pit will be completed (currently scheduled for completion at the end of year)the WRF topsoil bund will remain in-situ during care and maintenance and be inspected regularly and maintained as required; • the timing of rehabilitation activities for PAF will be accelerated to commence within three months of early closure; • encapsulation of PAF cell with NAF, where practicable, to prevent ARD formation whilst site is in temporary closure; • rock armouring (1 metre) will be placed on the NAF material of the outer slopes to reduce potential erosion; • rock type to be used for the rock armouring will be dependent on the type of rock available at that stage of mining when care and maintenance commences; • PAF will not be located within the WRF batters during care and maintenance; • monitoring and maintenance of rehabilitation works to ensure stabilisation of the WRF and encapsulation of PAF materials; • development of contingency plans should PAF acidification occur; • removal of all general wastes, tyres, hydrocarbons and septic systems from site in accordance with EPA requirements; • draining and modification (as required) of the Turkey's nest to prevent fauna entrapment; • installation of drainage, where required, to prevent ponding in sections of the WRF not yet rehabilitated; • installation of a bund at access ramps into the pit and onto the WRF to prevent access; • an assessment of pit stability will be undertaken and any remediation activities required to ensure a safe working environment will be undertaken; and • security gates to prevent vehicular access to the lease will be in place (installed as part of mine start up).	All activities are understood to have been undertaken with the following exceptions: • groundwater and flora monitoring was not conducted; and • some low grade ore remains at Tarcoola. • Access to the WRF remains to enable WRF monitoring. Levelling and safety bunding in place.

It is noted that DEM were notified by the appointed receivers of the following activities to be undertaken in relation to care and maintenance (RSM, 10 October 2018):

- inspections of the mine which will include:
  - confirming the site is secure and identifying any signs of unauthorised entry including into the township hospital and houses, lease boundary, access roads and pits;
  - assessing the water levels of the pits and turkey nest;
  - assess signs of erosion including at the identified risk areas of the WRF, turkey nest, pits and ROM bunding;
- monthly inspection of the mine which will include:
  - inspecting and monitoring of data from piezometers;
  - inspecting ensuring the integrity of the abandonment bunds and access gates;
  - inspecting the WRF including for signs of erosion;
  - assessing the turkey's nest water levels and signs of non-containment of water flows around the ROM;
- the engaged contractors for the care and maintenance regime will also have carriage of Challenger and conduct inspections of Tarcoola after all and any heavy rain events;
- the contractors will be appropriately skilled, ticketed and experienced to undertake the tasks associated with this care and maintenance regime;
- observations and recommendations will be documented and reported to the Receivers and Managers;
- a Water Management Plan will be implemented and enforced during the care and maintenance regime;
- there will be adherence to current site safety systems and reporting requirements; and
- The tasks for the site supervisors will also include activities associated with the Tarcoola Gold Mine's PEPR (specifically an appended list of selected PEPR requirements, prioritised on the basis of risk).

A review of care and maintenance inspection records indicates that these tasks were generally undertaken throughtout the period. Tresspassing was noted to be occurring on several occasions, deterrent bunds and gates were maintained as required.

5. Compliance

5.1 Compliance with environmental outcomes and leading indicator criteria

Tables and appendices referenced within the Outcome Measurement and Leading Indicator Criteria columns in this section, refer to the PEPR document approved 10 July 2018. Compliance with OMC has been assessed, as well as leading indicator criteria to the extent of being relevant to the operation of any control strategy.

Table 11 to Table 25 summarise outcomes per environmental aspect, as per the PEPR:

- land use;
- Aboriginal and European Heritage;
- native fauna;
- native vegetation;
- weeds and pests (and feral animals);
- soil;
- groundwater and hydrology;
- waste disposal and hazardous substances, and
- air quality, odour and noise.

Table 11 Vegetation environmental outcomes and compliance status

Aspect:	Vegetation	**Tenement:**	ML 6455	**Impact ID:**	T1, T2	**Compliance status:**	**Unable to determine**

Environmental outcome:	No permanent loss of abundance or diversity of native vegetation on or off the ML through: • clearance; • dust/contamination deposition; • fire; or • other damage. unless prior approval under the relevant legislation is obtained.			
Outcome measurement criteria	**What will be measured and form (method) of measurement**	**Locations**	**Outcome achievement**	**Frequency**
	Abundance and diversity of vegetation during annual vegetation survey. Extent of vegetation clearance by surveys.	Impact monitoring sites (Figure 49 in PEPR). ML area. Additional control monitoring sites may be established during first monitoring event (5 km from operational areas). Clearance areas (Figure 47 in PEPR).	No significant difference in abundance and diversity of vegetation compared to baseline. No unauthorised clearance on mining lease.	Annual spring vegetation surveys. Weekly clearance surveys (during construction).
Outcome measurement criteria summary	The last completed annual vegetation survey for the Project was conducted in 2017 (Fyfe, 2017) and no significant reduction in species abundance and diversity was recorded. The 9 July 2018 Minor Change Notification (WPG, 2018) includes a summary of surveyed disturbed areas at that point (73.38 ha) and planned disturbance associated with the Wondergraph pit works (1.1 ha). This total fell within the approved disturbance extent, with an Significant Environmental Benefit (SEB) offset provision of at least 38.55 ha remaining. While no other records could be viewed, it is understood that no other disturbance works were conducted, and none were reported (or expected) within the care and maintenance period. It seems reasonable to conclude that no unauthorised clearance has occurred during the reporting period. Compliance with the OMC and achievement of the Outcome cannot be demonstrated. It should be noted that the risk of non-achievement of the Outcome has been reduced due to the care and maintenance status of the Project.			
Leading indicator criteria	Records demonstrate vegetation if the clearance approvals/inspection process is being implemented.			
Leading indicator criteria summary	The 9 July 2018 Minor Change Notification (WPG, 2018) includes a summary of surveyed disturbed areas at that point (73.38 ha) and planned disturbance associated with the Wondergraph pit works (1.1 ha). This total fell within the approved disturbance extent, with an SEB offset provision of at least 38.55 ha remaining. While no other records could be viewed, it is understood that no other disturbance works were conducted, and none were reported (or expected) within the care and maintenance period. It seems reasonable to conclude that no unauthorised clearance has occurred during the reporting period.			
Effectiveness of existing controls.	There is insufficient detail in care and maintenance inspection records to determine the effectiveness of the listed control and management strategies (as outlined in the PEPR dated February 2018).Since the Project was placed into care and maintenance in late 2018 and changing ownership in 2019, control and management strategies have been implemented on a reduced basis to reflect reduced site activities. It is the intention of the current ownership to restore control and management strategies (as outlined in the PEPR) to meet compliance requirements moving forward.			
Supporting report reference	9 July 2018 Minor Change Notification (WPG, 2018). Care and maintenance inspection records (not appended).			
Forward work plan	Undertake vegetation surveys to demonstrate the abundance and diversity of vegetation. Care and maintenance records to include a register of land clearance.			

Aspect:	**Vegetation**	**Tenement:**	**ML 6455**	**Impact ID:**	**T3, T4, T5**	**Compliance status:**	**Unable to determine**

Environmental outcome:	No permanent loss of abundance or diversity of native vegetation on or off the ML through: - clearance; - dust/contamination deposition; - fire; or - other damage. unless prior approval under the relevant legislation is obtained.			
Outcome measurement criteria	**What will be measured and form (method) of measurement**	**Locations**	**Outcome achievement**	**Frequency**
	Abundance and diversity of vegetation during annual vegetation survey.	Impact monitoring sites (Figure 49 in PEPR). ML area. Additional control monitoring sites may be established during first monitoring event (5 km from operational areas).	No significant difference in abundance and diversity of vegetation compared to baseline.	Annual spring vegetation surveys. Weekly clearance surveys (during construction).

Outcome measurement criteria summary	The last completed annual vegetation survey for the Project was conducted in 2017 (Fyfe, 2017) and no significant reduction in species abundance and diversity was recorded. Compliance with the OMC and achievement of the Outcome cannot be demonstrated. It should be noted that the risk of non-achievement of the Outcome has been reduced due to the care and maintenance status of the Project.
Leading indicator criteria	None specified.
Leading indicator criteria summary	Not required.
Effectiveness of existing controls.	There is insufficient detail in care and maintenance inspection records to determine the effectiveness of the listed control and management strategies (as outlined in the PEPR dated February 2018).Since the Project was placed into care and maintenance in late 2018 and changing ownership in 2019, control and management strategies have been implemented on a reduced basis to reflect reduced site activities. It is the intention of the current ownership to restore control and management strategies (as outlined in the PEPR) to meet compliance requirements moving forward.
Supporting report reference	Care and maintenance inspection records (not appended).
Forward work plan	Undertake vegetation surveys to demonstrate the abundance and diversity of vegetation.

Table 12 Fauna environmental outcomes and compliance status

Aspect:	Fauna	**Tenement:**	ML 6455	**Impact ID:**	T10, T11	**Compliance status:**	**Unable to determine**
Environmental outcome:	No native fauna injuries or death caused by mining operations (including fire) that could have been reasonably prevented.						
Outcome measurement criteria	**What will be measured and form (method) of measurement**		**Locations**		**Outcome achievement**		**Frequency**
	Incidence of fauna injuries and death caused by vehicle collisions. Incidence of fauna injuries and death caused by fires (that are caused by mining operations).		ML area.		No preventable injuries and death due to vehicle collisions. No preventable injuries and death to native fauna due to fires (that are caused by mining operations).		Annual
Outcome measurement criteria summary	There is no specific reference to the occurrence or otherwise of fauna injuries/deaths or fires within the Care and Maintenance reports evidence. There is insufficient detail in Care and maintenance inspection records to determine compliance with the outcome measurement criteria. It should be noted that the risk of non-achievement of the Outcome has been reduced due to the care and maintenance status of the Project.						
Leading indicator criteria	None specified.						
Leading indicator criteria summary	Not required.						
Effectiveness of existing controls.	There is insufficient detail in care and maintenance inspection records to determine the effectiveness of the listed control and management strategies (as outlined in the PEPR dated February 2018).Since the Project was placed into care and maintenance in late 2018 and changing ownership in 2019, control and management strategies have been implemented on a reduced basis to reflect reduced site activities. It is the intention of the current ownership to restore control and management strategies (as outlined in the PEPR) to meet compliance requirements moving forward.						
Supporting report reference	Care and maintenance inspection records (not appended).						
Forward work plan	Care and maintenance records to include a register of native fauna injuries or deaths and fires on the ML.						

Table 13 Weeds, Pests and pathogens environmental outcomes and compliance status

Aspect:	Weeds, Pests and Pathogens	**Tenement:**	ML 6455	**Impact ID:**	T16, T17, T18, T19	**Compliance status:**	**Unable to determine**
Environmental outcome:	No increased abundance or introduction of new or sustained increase in abundance of existing weed or pest and/or pathogen species on the ML or adjoining property.						
Outcome measurement criteria	**What will be measured and form (method) of measurement**		**Locations**		**Outcome achievement**		**Frequency**
	Abundance or introduction of new weeds or sustained increase of weeds, pests or pathogen species.		Impact monitoring sites (Figure 49 in PEPR) within the ML area. Additional control monitoring sites may be established during first monitoring event (5 km from operational areas).		No statistical increase in density or distribution of weeds, pests or pathogens compared to baseline (Appendix H, of the PEPR).		Annual
Outcome measurement criteria summary	The last completed annual vegetation survey for the Project was conducted in 2017 (Fyfe, 2017) and no significant increase in weed, pest or pathogen species abundance or diversity was recorded. Care and maintenance inspection records do not discuss management of weeds, pest and pathogens. As annual vegetation surveys have not been conducted, compliance with the OMC and achievement of the Outcome cannot be demonstrated. It should be noted that the risk of non-achievement of the Outcome has been reduced due to the care and maintenance status of the Project.						

Aspect:	Weeds, Pests and Pathogens	**Tenement:**	ML 6455	**Impact ID:**	T16, T17, T18, T19	**Compliance status:**	Unable to determine
Leading indicator criteria	Inspection records for vehicles and machinery demonstrate that all vehicles and machinery have been certified as clean before operating on site.						
Leading indicator criteria summary	There are no records and as such it is unknown if vehicles and machinery were assessed as clean before operation on site.						
Effectiveness of existing controls.	There is insufficient detail in care and maintenance inspection records to determine the effectiveness of the listed control and management strategies (as outlined in the PEPR dated February 2018).Since the Project was placed into care and maintenance in late 2018 and changing ownership in 2019, control and management strategies have been implemented on a reduced basis to reflect reduced site activities. It is the intention of the current ownership to restore control and management strategies (as outlined in the PEPR) to meet compliance requirements moving forward.						
Supporting report reference	Care and maintenance inspection records (not appended).						
Forward work plan	Undertake vegetation surveys to demonstrate the abundance and diversity of vegetation. Care and maintenance records to include observations and management of weeds on the ML.						

Table 14 Groundwater environmental outcomes and compliance status

Aspect:	Groundwater	**Tenement:**	ML 6455	**Impact ID:**	T20	**Compliance status:**	Unable to determine
Environmental outcome:	No adverse impact to the quality and quantity of groundwater to existing users and groundwater environmental value caused by mining operations.						
Outcome measurement criteria	**What will be measured and form (method) of measurement**		**Locations**		**Outcome achievement**		**Frequency**
	Groundwater levels (SWL) and drawdown to validate the modelled radius of drawdown and confirm that the pastoral bores and production wells are outside of the predicted radius of influence from pit dewatering (Figure 27 in PEPR).		Trigger monitoring bores (TTW1 and TTW2 – see Figure 1 Appendix D, of the PEPR) near lease boundary in north- eastern corner (located between the pit and pastoral bores - South and Campbell's bore) and northern boundary (between the pit and pastoral bore – Konkaby bore), (see Figure 6.2 Appendix A, of the PEPR).		Groundwater levels in installed boundary trigger wells (TTW1, TTW2) are within 2 m of modelled drawdown (predicted) levels at that location and time.		Quarterly
Outcome measurement criteria summary	No groundwater monitoring events were undertaken during the reporting period. No water was extracted for mining operations during the care and maintenance period and as such it's reasonable to assume that any experienced drawdown would likely recede or at worst stabilise during this period of abstraction inactivity. While the criteria cannot be confirmed on the basis of an absence of results, the risk of exceeding the criteria is considered low. It should be noted that the risk of non-achievement of the Outcome has been reduced due to the care and maintenance status of the Project.						
Leading indicator criteria	Quarterly monitoring of groundwater levels in monitoring bores within the ML (TMB1, TMB2, MB3) indicates SWLs are within 30% of modelled levels at those locations and times.						
Leading indicator criteria summary	No groundwater monitoring events were undertaken during the reporting period and as such it is unknown whether SWLs are within 30% of modelled levels at those locations and times.						
Effectiveness of existing controls.	There is insufficient detail in care and maintenance inspection records to determine the effectiveness of the listed control and management strategies (as outlined in the PEPR dated February 2018).Since the Project was placed into care and maintenance in late 2018 and changing ownership in 2019, control and management strategies have been implemented on a reduced basis to reflect reduced site activities. It is the intention of the current ownership to restore control and management strategies (as outlined in the PEPR) to meet compliance requirements moving forward.						
Supporting report reference	Care and maintenance inspection records (not appended).						
Forward work plan	Undertake groundwater monitoring to demonstrate compliance to OMC.						
Aspect:	Groundwater	**Tenement:**	ML 6455	**Impact ID:**	T21	**Compliance status:**	Unable to determine
Environmental outcome:	No adverse impact to the quality and quantity of groundwater to existing users and groundwater environmental value caused by mining operations.						
Outcome measurement criteria	**What will be measured and form (method) of measurement**		**Locations**		**Outcome achievement**		**Frequency**
	Field and laboratory measurement of pH, EC and TDS, and laboratory analysed for metals.		Trigger monitoring bores (TTW1 and TTW2 – see Figure 1 Appendix D, of the PEPR) near lease boundary in north- eastern corner (located between the pit and pastoral bores - South and Campbell's bore) and northern boundary (between the pit and pastoral bore		Average concentration for each data set (operational and trigger wells) for each sampling round demonstrates rate of increase in operational wells (average concentrations) is not more than 20% of average concentrations in trigger wells for EC, TDS and metals. pH in each operational well has not reduced by more than 1 pH unit compared to average pH for the trigger wells.		Quarterly field measurements of pH, EC and TDS Six monthly analysis of metals and laboratory measurement of pH, EC and TDS.

							– Konkaby bore), (see Figure 6.2 Appendix A, of the PEPR).	
Outcome measurement criteria summary	No groundwater monitoring events were undertaken during the reporting period. As a result, compliance with the OMC and achievement of the Outcome cannot be demonstrated. It should be noted that the risk of non-achievement of the Outcome has been reduced due to the care and maintenance status of the Project.							
Leading indicator criteria	Quarterly field measurements of pH, EC and TDS in monitoring bores within the ML (TMB1, TMB2, TMB3) are within 20% of baseline levels (Figure 47). Baseline levels: TMB 1 pH – 6.16, EC -128.5 mS/cm, TDS – 86296 mg/L, TMB 2 pH – 6.84, EC – 36.2 mS/cm, TDS – 24254 mg/L, TMB 3 pH – 6.77, EC – 68.3 mS/cm, TDS – 45761 mg/L.							
Leading indicator criteria summary	No groundwater monitoring events were undertaken during the reporting period.							
Effectiveness of existing controls.	There is insufficient detail in care and maintenance inspection records to determine the effectiveness of the listed control and management strategies (as outlined in the PEPR dated February 2018).Since the Project was placed into care and maintenance in late 2018 and changing ownership in 2019, control and management strategies have been implemented on a reduced basis to reflect reduced site activities. It is the intention of the current ownership to restore control and management strategies (as outlined in the PEPR) to meet compliance requirements moving forward.							
Supporting report reference	Care and maintenance inspection records (not appended).							
Forward work plan	Undertake groundwater monitoring to demonstrate compliance to OMC.							
Aspect:	Groundwater	**Tenement:**	ML 6455	**Impact ID:**	T22	**Compliance status:**	**Unable to determine**	
Environmental outcome:	No adverse impact to the quality and quantity of groundwater to existing users and groundwater environmental value caused by mining operations							
Outcome measurement criteria	**What will be measured and form (method) of measurement**					**Locations**	**Outcome achievement**	**Frequency**
	Laboratory analysis for TRH. Water quality parameters (pH, EC, TDS)					Monitoring bores TMB1, TMB2, TMB3 (Figure 50). Monitoring bores TMB1, TMB2, TMB3.	TRH concentrations within 10% of baseline if detected in baseline samples. TRH concentrations are below the laboratory limits of detection. Six monthly sampling of operational groundwater monitoring wells demonstrates no reduction in groundwater environmental value based on TDS when compared to groundwater environmental values of operational monitoring wells prior to commencement of mining.	Six monthly analysis for TRH and metals. Quarterly field measurements for pH, EC and TDS and six monthly laboratory measurement for pH, EC and TDS.
Outcome measurement criteria summary	No groundwater monitoring events were undertaken during the reporting period. It should be noted that the risk of non-achievement of the Outcome has been reduced due to the care and maintenance status of the Project. Due to a lack of monitoring data, it is not possible to demonstrate there is no reduction in environmental value and beneficial used based on TDS.							
Leading indicator criteria	Results of soil validation sampling undertaken after soil removal from oil and fuel spill or leak sites demonstrates no residual TRH concentrations in soil. Quarterly field measurements of pH, EC, TDS in monitoring bores within the ML are within 20% of baseline levels. Baseline levels: TMB 1 pH – 6.16, EC – 128.5 mS/cm, TDS – 86296 mg/L, TMB 2 pH – 6.84, EC – 36.2 S/cm, TDS – 24254 mg/L, TMB 3 pH – 6.77, EC – 68.3 mS/cm, TDS – 45761 mg/L.							
Leading indicator criteria summary	No oil or fuel spills were recorded within care and maintenance reports during the reporting period. No groundwater monitoring events were undertaken during the reporting period.							
Effectiveness of existing controls.	There is insufficient detail in care and maintenance inspection records to determine the effectiveness of the listed control and management strategies (as outlined in the PEPR dated February 2018).Since the Project was placed into care and maintenance in late 2018 and changing ownership in 2019, control and management strategies have been implemented on a reduced basis to reflect reduced site activities. It is the intention of the current ownership to restore control and management strategies (as outlined in the PEPR) to meet compliance requirements moving forward.							
Supporting report reference	Care and maintenance inspection records (not appended).							
Forward work plan	Undertake groundwater monitoring to demonstrate compliance to OMC. Care and maintenance records to include records (or absence) of spills and management to address on the ML.							

Table 15 Surface water environmental outcomes and compliance status

Aspect:	Surface Water	**Tenement:**	ML 6455	**Impact ID:**	T25	**Compliance status:**	Unable to determine		
Environmental outcome:		No long-term impact on local environmental values as a result of changes to flows or surface water quality characteristics.							
Outcome measurement criteria		**What will be measured and form (method) of measurement**					**Locations**	**Outcome achievement**	**Frequency**
		See outcome measurement criteria for T27.							
Aspect:	Surface Water	**Tenement:**	ML 6455	**Impact ID:**	T26	**Compliance status:**	Unable to determine		
Environmental outcome:		Mining operations do not cause inundation of third-party property and infrastructure by water (to a greater extent than would be expected to occur prior to mining operations commencing).							
Outcome measurement criteria		**What will be measured and form (method) of measurement**					**Locations**	**Outcome achievement**	**Frequency**
		Operation and maintenance of drainage containment systems through inspections and third party assessments. Adverse impacts to ARTC's rail infrastructure as measured by photographic records (see PEPR Appendix N). Extent and severity of observed surface water flows in the area of third party infrastructure during rainfall events.					ML area (Figure 51 in PEPR). Rail infrastructure adjacent to ML. Areas of water pooling at and beyond lease boundary. Rail infrastructure adjacent to ML.	Design specifications met and surface water controls are operating effectively. No adverse impacts to ARTC's rail infrastructure. Extent of water pooling following intense rainfall events, at and beyond ML boundary, is within 20% of the predicted model (Appendix B in PEPR) for a rainfall event of that depth and duration, and no off-site inundation of ARTC's rail infrastructure occurs due to mining activities (or is no different to the pre-mining scenario).	Annual Following rainfall events that generate runoff.
Outcome measurement criteria summary		There are no annual inspection or audit reports and as such it is unknown whether any surface water flows resulted in inundation of third party property and whether it could not reasonably be prevented during the reporting period. There are no records and as such it is unknown if surface water control infrastructure was monitored or maintained and whether any corrective actions were implemented for incidents. It is noted no complaints from third parties were recorded during the reporting period in relation to the rail infrastructure. There are no observation records or inspection reports confirming the surface water flows observed during/ following rainfall events. As such it is unknown whether water pooled following intense rain events or if visual assessments of this pooling show that pooling are within 20% of the predicted model for a rainfall event of appropriate depth and duration, or if any off site inundation of ARTC rain infrastructure occurred. As a result, compliance with the OMC and achievement of the Outcome cannot be demonstrated.							
Leading indicator criteria		Any incident of stormwater control infrastructure not being maintained or having failed.							
Leading indicator criteria summary		There are no observation records or inspection reports confirming the surface water flows observed during/ following rainfall events. As such it is unknown whether there were any incidents of stormwater control infrastructure not being maintained adequately or having failed in function during the reporting period.							
Effectiveness of existing controls.		There is insufficient detail in care and maintenance inspection records to determine the effectiveness of the listed control and management strategies (as outlined in the PEPR dated February 2018).Since the Project was placed into care and maintenance in late 2018 and changing ownership in 2019, control and management strategies have been implemented on a reduced basis to reflect reduced site activities. It is the intention of the current ownership to restore control and management strategies (as outlined in the PEPR) to meet compliance requirements moving forward.							
Supporting report reference		Care and maintenance inspection records (not appended).							
Forward work plan		Conduct an inspection of drainage and containment systems specific to the rail infrastructure (at surface water monitoring locations) to assess potential for surface water impacts to ARTC infrastructure. Ensure observation/ photographic records monitoring in relation to inundation of third party property (ARTC rail infrastructure) are retained. Care and maintenance records to include records demonstrating evidence of monitoring and maintenance of surface water infrastructure.							
Aspect:	Surface Water	**Tenement:**	ML 6455	**Impact ID:**	T27	**Compliance status:**	Unable to determine		
Environmental outcome:		No surface water contaminated as a result of mining operations leaves the mining lease area or results in increased sediment load off the lease area.							
Outcome measurement criteria		**What will be measured and form (method) of measurement**					**Locations**	**Outcome achievement**	**Frequency**
		Abundance and diversity of vegetation during annual vegetation survey.					Impact monitoring sites (Figure 49 in PEPR). ML area.	No significant difference in abundance and diversity of vegetation compared to baseline.	Annual spring surveys.
Outcome measurement criteria summary		The last completed annual vegetation survey for the Project was conducted in 2017 (Fyfe, 2017) and no significant reduction in species abundance and diversity was recorded. There has been no vegetation survey conducted during the reporting period and as such, compliance with the OMC and achievement of the Outcome cannot be demonstrated.							
Leading indicator criteria		Post rainfall events (that generate surface water flows), inspection indicates surface water management infrastructure performing as designed and corrective actions closed out within 14 days. Observations as part of operational inspection protocols do not identify potential issue with surface water quality (sediment load) or controls implemented.							
Leading indicator criteria summary		Care and maintenance records do not include exhaustive observations of surface water impacts. The September 2020 report indicated erosion impacts to the pit ramp and the July 2021 report indicated maintenance had occurred. It cannot be concluded that that surface water management infrastructure was not performing as designed.							

Effectiveness of existing controls.	There is insufficient detail in care and maintenance inspection records to determine the effectiveness of the listed control and management strategies (as outlined in the PEPR dated February 2018).Since the Project was placed into care and maintenance in late 2018 and changing ownership in 2019, control and management strategies have been implemented on a reduced basis to reflect reduced site activities. It is the intention of the current ownership to restore control and management strategies (as outlined in the PEPR) to meet compliance requirements moving forward.								
Supporting report reference	Care and maintenance inspection records (not appended).								
Forward work plan	Undertake vegetation surveys to demonstrate the abundance and diversity of vegetation. Care and maintenance records to include observations and management of surface water impacts on the ML.								
Aspect:	Surface Water	**Tenement:**	ML 6455	**Impact ID:**	T28	**Compliance status:**	Unable to determine		
Environmental outcome:	No surface water contaminated as a result of mining operations leaves the mining lease area or results in contamination of soil on or off the lease area.								
Outcome measurement criteria	**What will be measured and form (method) of measurement**				**Locations**		**Outcome achievement**		**Frequency**
	See outcome measurement criteria for soil (T43)								

Table 16 Acid rock drainage environmental outcomes and compliance status

Aspect:	Acid Rock Drainage	**Tenement:**	ML 6455	**Impact ID:**	T34	**Compliance status:**	Yet to be determined		
Environmental outcome:	No impacts to groundwater, surface water, soil and land use from PAF material within the waste rock facility and open pit.								
Outcome measurement criteria	**What will be measured and form (method) of measurement**				**Locations**		**Outcome achievement**		**Frequency**
	See Surface Water T87, T88 OMC, Measurement Criteria and Leading indicator criteria. See Groundwater T77, T78 OMC, Measurement Criteria and Leading indicator criteria.								
Outcome measurement criteria summary	The OMC for T77, T78, T87, T88 are all relevant to the Completion phase of the operation, therefore the evidence available to demonstrate compliance to the OMC for this outcome is discussed in Section 5.3 against T77, T78, T87 and T88.								
Leading indicator criteria	Field pH measurements of surface water collected in the WRF toe drain, following every rainfall event that produces a monitorable surface water flow, demonstrate that runoff pH from the WRF is > 6 . Decreasing pH measurements during a monitoring period; or any event pH measurements of any water ponding in the WRF bund are <7. Quarterly monitoring of saturation levels within the NAF base layer of the PAF cell measured by installed piezometers, will indicate that seepage has been mitigated. Monthly reconciliations completed by site personnel as part of operational controls for classification and placement QA/ QC protocols for PAF/ NAF demonstrates PAF is contained in accordance with design specifications (Appendix J in PEPR). Permeability tests (hydraulic conductivity) of the constructed NAF base prior to PAF placement indicate permeability is less than 10-1 m/ day, demonstrating minimised possibility of seepage through the NAF base. Implementation and compliance with ARD Management Plan (Appendix L in PEPR).								
Leading indicator criteria summary	Care and maintenance records do not report monitorable surface water flows or ponded water in the WRF bund area, and this is consistent with the previous ACR where no surface water runoff from the WRF or in the toe drain has been observed during the reporting period. No piezometer recordings were undertaken during the reporting period. It's unclear if PAF material was disposed during this period as records were unavailable. No NAF bases for PAF cells were constructed in the reporting period.								
Effectiveness of existing controls.	There is insufficient detail in care and maintenance inspection records to determine the effectiveness of the listed control and management strategies (as outlined in the PEPR dated February 2018).Since the Project was placed into care and maintenance in late 2018 and changing ownership in 2019, control and management strategies have been implemented on a reduced basis to reflect reduced site activities. It is the intention of the current ownership to restore control and management strategies (as outlined in the PEPR) to meet compliance requirements moving forward.								
Supporting report reference	Care and maintenance inspection records (not appended).								
Forward work plan	Undertake saturation monitoring of PAF cell. Care and maintenance records to include observations and management of surface water impacts on the ML, including within the toe drain.								
Aspect:	Acid Rock Drainage	**Tenement:**	ML 6455	**Impact ID:**	T36	**Compliance status:**	Yet to be determined		
Environmental outcome:	No impacts to groundwater, surface water, soil and land use from PAF material within the waste rock facility and open pit.								
Outcome measurement criteria	**What will be measured and form (method) of measurement**				**Locations**		**Outcome achievement**		**Frequency**

	Field pH measurements. See Surface Water T87, T88 OMC, Measurement Criteria and Leading indicator criteria. See Groundwater T77, T78 OMC, Measurement Criteria and Leading indicator criteria.	Locations within the toe drain of the WRF.	Toe drain of pH of surface water the WRF for is greater than 6 surface water pH.	Opportunistic, following rainfall events which provide adequate sample.
Outcome measurement criteria summary	For surface water pH measurements summary see the Leading indicator summary for Impact ID T34, above. The OMC for T77, T78, T87, T88 are all relevant to the Completion phase of the operation, therefore the evidence available to demonstrate compliance to the OMC for this outcome is discussed in Section 3.3 against T77, T78, T87 and T88.			
Leading indicator criteria	Quarterly monitoring of saturation levels within the NAF base layer of the PAF cell measured by installed piezometers, will indicate that seepage has been mitigated. Monthly reconciliations completed by site personnel as part of operational controls for classification and placement QA/ QC protocols for PAF/ NAF demonstrates PAF is contained in accordance with design specifications (Appendix J in PEPR). Permeability tests (hydraulic conductivity) of the constructed NAF base prior to PAF placement indicate permeability is at a maximum of 10 - 1 m/ day, demonstrating minimised possibility of seepage through the NAF base. Implementation and compliance with ARD Management Plan (Appendix L of the PEPR).			
Leading indicator criteria summary	See the Leading indicator summary for Impact ID T34, above.			
Effectiveness of existing controls.	There is insufficient detail in care and maintenance inspection records to determine the effectiveness of the listed control and management strategies (as outlined in the PEPR dated February 2018).Since the Project was placed into care and maintenance in late 2018 and changing ownership in 2019, control and management strategies have been implemented on a reduced basis to reflect reduced site activities. It is the intention of the current ownership to restore control and management strategies (as outlined in the PEPR) to meet compliance requirements moving forward.			
Supporting report reference	Care and maintenance inspection records (not appended).			
Forward work plan	Undertake saturation monitoring of PAF cell. Care and maintenance records to include observations and management of surface water impacts on the ML, including within the toe drain. Collect surface water samples following significant rain events, if safe to do so, to demonstrate compliance, and/or consider revising stormwater sampling (during a future PEPR revision) to sediment testing as an indicator of surface water impacts.			

Table 17 Air quality environmental outcome and compliance criteria

Aspect:	Air Quality	**Tenement:**	ML 6455	**Impact ID:**	T38	**Compliance status:**	Compliant
Environmental outcome:	No public health and/ or public nuisance impacts from air emissions and/or dust generated by mining operations.						
Outcome measurement criteria	Investigation of all dust related complaints were acknowledged within 48 hours and closed out with the complainant within 7 days to the satisfaction of the complainant (or as agreed with DSD, now DEM) and demonstrates that the mine operator did not cause or could not reasonably have prevented the incident from occurring. If a complaint is not resolved, the tenement holder will undertake monitoring of air emissions (using methodologies and instrumentation acceptable to DSD, now DEM), to demonstrate that dust emissions are within applicable regulatory levels.						
Outcome measurement criteria	**What will be measured and form (method) of measurement**		**Locations**		**Outcome achievement**		**Frequency**
	Type and management of complaints regarding dust from mining operations. How dust from mining operations is prevented, monitored and managed.		Residential areas in Tarcoola when residents are present.		Mine operator did not cause or could not reasonably have prevented the incident occurring. All complaints acknowledged within 48 hours and closed out within 7 days.		As required.
Outcome measurement criteria summary	Records reviewed for the operational and care and maintenance periods do not contain dust related complaints and it's assessed that none were received. As a result, achievement of the Outcome during the ACR period is considered to have been met.						
Leading indicator criteria	None specified.						
Leading indicator criteria summary	Not required.						
Effectiveness of existing controls.	There is insufficient detail in care and maintenance inspection records to determine the effectiveness of the listed control and management strategies (as outlined in the PEPR dated February 2018).Since the Project was placed into care and maintenance in late 2018 and changing ownership in 2019, control and management strategies have been implemented on a reduced basis to reflect reduced site activities. It is the intention of the current ownership to restore control and management strategies (as outlined in the PEPR) to meet compliance requirements moving forward.						
Supporting report reference	Care and maintenance inspection records (not appended).						
Forward work plan	Care and maintenance records to include details and management of complaints, including dust impacts.						

Table 18 Soil and disturbance environmental outcome and compliance criteria

Aspect:	Soil and disturbance	**Tenement:**	ML 6455	**Impact ID:**	T43	**Compliance status:**	Compliant
Environmental outcome:	Existing (pre-mining) soil quantity and quality is maintained.						
Outcome measurement criteria	Results of annual audits of survey, inspection, as-construct reports, maintenance, incident and corrective action records demonstrate that all available topsoil is/ was stripped, stockpiled, managed and reused, and that any losses of topsoil could not have reasonably prevented. Prior to mine completion results of soil sampling results and analysis concludes that the quality of soils on the lease (as determined by pH, salinity and the presence of metals and TRH) is consistent with or within 10% of the baseline site assessment (to be completed).						
Outcome measurement criteria	**What will be measured and form (method) of measurement**		**Locations**		**Outcome achievement**		**Frequency**
	Correct removal and storage of topsoil and subsoil. Soil quality parameters (pH, salinity, metals, TRH).		Topsoil and subsoil storage areas. ML		All topsoil and subsoil stockpiled in designated areas. Any loss of topsoil could not have been reasonably prevented Soil sampling results (pH, salinity, metals, TRH) taken prior to mine completion are consistent with or within 10% of the baseline site assessment		As required inspections; annual audit. During closure, prior to mine completion.
Outcome measurement criteria summary	No mining was undertaken during this reporting period and therefore topsoil/subsoil stripping did also not occur. As a result, achievement of the Outcome during the ACR period is considered to have been met.						
Leading indicator criteria	Records maintained on site demonstrate that topsoil and subsoil have been stripped, stockpiled in delineated and labelled stockpile locations, in accordance with the Soil Management Plan. Sampling of surface water pooling in higher risk areas - WRF and ROM pad demonstrates that metals, pH and TRH are within baseline limits or EPP (Water Quality, 2015). Annual audit reports of bunding and fuel, oil and chemical storage management, and of inspection, maintenance, incident and corrective action records, demonstrate that facilities are designed and constructed in accordance with relevant EPA Guidelines (EPA 080/07) and industry standards, and operated to best practice.						
Leading indicator criteria summary	No mining was undertaken during this reporting period and therefore topsoil/subsoil stripping did also not occur. Carea and maintenance records do not indicate presence or absence of surface water pooling sufficient for collection of samples. There are no records of an audit of bunding and fuel, oil and chemical storage management against relevant EPA Guidelines (EPA 080/07) and industry standards having occurred within the reporting period, however inspection, maintenance, incident and corrective action records (operational and care and maintenance), indicate that facilities remain as previously reported and are likely to be being operated as appropriate.						
Effectiveness of existing controls.	There is insufficient detail in care and maintenance inspection records to determine the effectiveness of the listed control and management strategies (as outlined in the PEPR dated February 2018).Since the Project was placed into care and maintenance in late 2018 and changing ownership in 2019, control and management strategies have been implemented on a reduced basis to reflect reduced site activities. It is the intention of the current ownership to restore control and management strategies (as outlined in the PEPR) to meet compliance requirements moving forward.						
Supporting report reference	Care and maintenance inspection records (not appended).						
Forward work plan	Care and maintenance records to include records of topsoil movements. Barton Gold to initiate an audit to survey/ quantify current volumes and reasonably prevent topsoil losses and completed soil sampling and analysis prior to mine completion. Care and maintenance records to include records of surface water pooling and samples collected when sufficient surface water volume present in the WRF and ROM pad areas (or turkeys nest where runoff collects) and analysed for metals, pH and TRH are within baseline limits or EPP (Water Quality, 2015). Barton Gold to initiate an audit of bunding and fuel, oil and chemical storage management areas to provide further evidence Leading Indicator Trigger has been investigated and any corrective actions identified from the audit are in effect.						

Table 19 Traffic environmental outcome and compliance criteria

Aspect:	Traffic	**Tenement:**	ML 6455	**Impact ID:**	T48	**Compliance status:**	Compliant
Environmental outcome:	No traffic accidents involving the public at mine access points or along the haul route that could have been reasonably prevented by the tenement holder.						
Outcome measurement criteria	Independent investigations undertaken within 14 days (or other time period as agreed with DSD, now DEM) of all recorded traffic accidents at mine access points or along the haul route conclude that they could not have been reasonably prevented through implementation of precautionary measures or not due to traffic related to the mining operation.						
Outcome measurement criteria	**What will be measured and form (method) of measurement**		**Locations**		**Outcome achievement**		**Frequency**
	Traffic accidents by independent investigation.		Mine site access points. Haul route.		No traffic accidents involving the public at mine access point or along haul route that could have been reasonably prevented.		As required and independent investigations within 14 days (or as agreed with DSD, now DEM).

Aspect:	Traffic	Tenement:	ML 6455	Impact ID:	T48	Compliance status:	Compliant
Outcome measurement criteria summary	A review of care and maintenance records indicates no incidents have been recorded at mine access points or along the haul road occurred and as such no investigations were required during the reporting period. As a result, achievement of the Outcome during the ACR period is considered to have been met.						
Leading indicator criteria	None specified.						
Leading indicator criteria summary	Not required.						
Effectiveness of existing controls.	There is insufficient detail in care and maintenance inspection records to determine the effectiveness of the listed control and management strategies (as outlined in the PEPR dated February 2018).Since the Project was placed into care and maintenance in late 2018 and changing ownership in 2019, control and management strategies have been implemented on a reduced basis to reflect reduced site activities. It is the intention of the current ownership to restore control and management strategies (as outlined in the PEPR) to meet compliance requirements moving forward.						
Supporting report reference	Care and maintenance inspection records (not appended).						
Forward work plan	Care and maintence records to include records of traffic accidents and continue to monitor, record and undertake independent investigations as required for all traffic accidents.						

Table 20 Aboriginal and non-Aboriginal heritage environmental outcomes and compliance status

Aspect:	Aboriginal and Non-Aboriginal heritage	Tenement:	ML 6455	Impact ID:	T49	Compliance status:	Compliant
Environmental outcome:	No disturbance to Aboriginal heritage sites, objects or artefacts unless prior approval under the relevant legislation has been obtained.						
Outcome measurement criteria	Mine records demonstrate that upon discoveries of suspected Aboriginal heritage sites, objects or artefacts work ceased until appropriate authorisation under the relevant legislation was obtained.						
Outcome measurement criteria	**What will be measured and form (method) of measurement**		**Locations**		**Outcome achievement**		**Frequency**
	Disturbance to Aboriginal heritage sites, objects or artefacts.		ML		Mine records show no unauthorised disturbance to Aboriginal heritage site, objects or artefacts and where suspected Aboriginal heritage sites, objects or artefacts have been identified, works were ceased until appropriate authorisation under the relevant legislation was obtained.		Annual
Outcome measurement criteria summary	A review of care and maintenance records do not indicate suspected heritage sites have been uncovered during the reporting period. As a result, achievement of the Outcome during the ACR period is considered to have been met.						
Leading indicator criteria	None specified.						
Leading indicator criteria summary	Not required.						
Effectiveness of existing controls.	There is insufficient detail in care and maintenance inspection records to determine the effectiveness of the listed control and management strategies (as outlined in the PEPR dated February 2018).Since the Project was placed into care and maintenance in late 2018 and changing ownership in 2019, control and management strategies have been implemented on a reduced basis to reflect reduced site activities. It is the intention of the current ownership to restore control and management strategies (as outlined in the PEPR) to meet compliance requirements moving forward.						
Supporting report reference	Care and maintenance inspection records (not appended).						
Forward work plan	Care and maintence records to include records of disturbance to Aboriginal heritage sites, objects or artefacts. Barton Gold to continue to maintain incident/ heritage sites register. Site inductions for staff and visitors to advise that any potential Aboriginal heritage sites, objects or artefacts (including observation of and/or disturbance to) are reported to Barton Gold.						

Aspect:	Aboriginal and Non-Aboriginal heritage	Tenement:	ML 6455	Impact ID:	T50	Compliance status:	Compliant
Environmental outcome:	No disturbance to non-Aboriginal heritage sites, objects or artefacts unless prior approval under the relevant legislation has been obtained.						
Outcome measurement criteria	Results of annual audits of records and incident and corrective action reports demonstrate compliance with *Heritage Places Act 1993*, and approved Heritage Management Plan.						
Outcome measurement criteria	**What will be measured and form (method) of measurement**		**Locations**		**Outcome achievement**		**Frequency**

	Disturbance to non- Aboriginal heritage sites.	ML	Records indicate where non-Aboriginal heritage sites have been identified, actions are compliant with *Heritage Places Act 1993*, and approved Heritage Management Plan.	Annual
Outcome measurement criteria summary	A review of care and maintenance records do not indicate suspected heritage sites have been uncovered during the reporting period. As a result, achievement of the Outcome during the ACR period is considered to have been met.			
Leading indicator criteria	None specified.			
Leading indicator criteria summary	Not required.			
Effectiveness of existing controls.	There is insufficient detail in care and maintenance inspection records to determine the effectiveness of the listed control and management strategies (as outlined in the PEPR dated February 2018).Since the Project was placed into care and maintenance in late 2018 and changing ownership in 2019, control and management strategies have been implemented on a reduced basis to reflect reduced site activities. It is the intention of the current ownership to restore control and management strategies (as outlined in the PEPR) to meet compliance requirements moving forward.			
Supporting report reference	Care and maintenance inspection records (not appended).			
Forward work plan	Care and maintence records to include records of disturbance to Aboriginal heritage sites, objects or artefacts. Barton Gold to continue to maintain incident/ heritage sites register. Site inductions for staff and visitors to advise that any potential non-Aboriginal heritage sites, objects or artefacts (including observation of and/or disturbance to) are reported to Barton Gold Barton Gold to perform annual audits and ensure compliance with Heritage Places Act 1993, and approved Heritage Management Plan.			

Table 21 Radiation, asbestiform minerals and silica environmental outcome and compliance status

Aspect:	Radiation, Asbestiform Minerals and Silica	**Tenement:**	ML 6455	**Impact ID:**	T53	**Compliance status:**	Compliant

Environmental outcome:	No risk to human health from asbestiform minerals.			
Outcome measurement criteria	Mine records demonstrate that upon discovery of asbestiform minerals the Fibrous Minerals Management Plan and procedures were complied with.			
Outcome measurement criteria	**What will be measured and form (method) of measurement**	**Locations**	**Outcome achievement**	**Frequency**
	In the event of discovery of asbestiform minerals, an annual audit by an independent occupational hygienist indicates compliance with Fibrous Minerals Management Plan.	ML area where potential for exposure ML area where potential for exposure.	In the event of discovery of asbestiform minerals, the Fibrous Minerals Management Plan is complied with.	Annually, if potential asbestiform containing material exposed in open pit.
Outcome measurement criteria summary	It's understood that historical waste, potentially containing asbestos, was removed from site by EPA licensed asbestos waste handlers in 2018, and this was reported to DEM at the time. Care and maintence records do not indicate that potential asbestos materials were identified during the reporting period and therefore there are no known quantities of asbestiform minerals on site that should be managed in accordance with the Fibrous Minerals Management Plan. As a result, achievement of the Outcome during the ACR period is considered to have been met.			
Leading indicator criteria	Operational monitoring for fibrous minerals as part of WHS protocols.			
Leading indicator criteria summary	It's not known whether operational monitoring for fibrous minerals as part of WHS protocols was undertaken.			
Effectiveness of existing controls.	There is insufficient detail in care and maintenance inspection records to determine the effectiveness of the listed control and management strategies (as outlined in the PEPR dated February 2018).Since the Project was placed into care and maintenance in late 2018 and changing ownership in 2019, control and management strategies have been implemented on a reduced basis to reflect reduced site activities. It is the intention of the current ownership to restore control and management strategies (as outlined in the PEPR) to meet compliance requirements moving forward.			
Supporting report reference	Care and maintenance inspection records (not appended).			
Forward work plan	Continue to maintain records of asbestiform mineral discoveries and comply with the Fibrous Minerals Management Plan and procedures.			

Table 22 Blasting environmental outcome and compliance status

Aspect:	Blasting	**Tenement:**	ML 6455	**Impact ID:**	T62, T63	**Compliance status:**	Compliant
Environmental outcome:	No adverse impacts to: • public safety; • adjacent public roads; • adjacent railway infrastructure and operations; • third party property (including stock); • aircraft; and • other receptors. from air blast, fly rock and vibrations caused by blasting.						
Outcome measurement criteria	**What will be measured and form (method) of measurement**		**Locations**		**Outcome achievement**		**Frequency**
	Blast records kept on site in accordance with AS 2187.2 and provided to DSD on request. Vibration and air- blast over- pressure as per AS 2187.2. Exceedances reviewed and causes rectified.		Locations specified in Drill and Blast Management Plan. ML area.		All blast events comply with AS 2187.2 as measured by vibration and air- blast over- pressure at specific monitoring locations (Appendix B of the PEPR) No fly rock beyond ML boundary.		Annual
Outcome measurement criteria summary	Due to the project being in care and maintenance, no blasting was undertaken during the reporting period. Therefore, achievement of the Outcome during the ACR period is considered to have been met.						
Leading indicator criteria	None specified.						
Leading indicator criteria summary	Not required.						
Effectiveness of existing controls.	N/A All controls and management strategies relate to blasting activity. No blasting activity has occurred during reporting period.						
Supporting report reference	Care and maintenance inspection records (not appended).						
Forward work plan	In the event that blasting is planned and undertaken, maintain blast records and investigate any unplanned fly rock events or fly rock beyond the ML.						

Table 23 Public safety environmental outcomes and compliance status

Aspect:	Public Safety	**Tenement:**	ML 6455	**Impact ID:**	T64	**Compliance status:**	Compliant
Environmental outcome:	Unauthorised entry to the ML does not result in public injuries and/or deaths that could have been reasonably prevented.						
Outcome measurement criteria	**What will be measured and form (method) of measurement**		**Locations**		**Outcome achievement**		**Frequency**
	Report by an independent third party into any unauthorised entry which includes an investigation into the cause of any injury or death.		ML area.		No public injuries and or deaths resulting from unauthorised entry to the site that could not have been reasonably prevented.		Report within 14 days (or as agreed with DSD, now DEM).
Outcome measurement criteria summary	A review of care and maintenance inspection records indicate that while there were likely several unathorised entries (based on observation of tracks and bund damage) to the ML there was no indication of public injuries and/or deaths occurred during unauthorised entry to the ML.						
Leading indicator criteria	Near miss reports.						
Leading indicator criteria summary	A review of care and maintenance inspection records indicates there were likely several unathorised entries (based on observation of tracks and bund damage) to the ML.						
Effectiveness of existing controls.	Care and maintenance inspection records indicate unauthorised entry is ocuring and therefore the effectiveness of the control and management strategies (as outlined in the PEPR dated February 2018) should be reviewed. Since the Project was placed into care and maintenance in late 2018 and changing ownership in 2019, control and management strategies have been implemented on a reduced basis to reflect reduced site activities. It is the intention of the current ownership to restore control and management strategies (as outlined in the PEPR) to meet compliance requirements moving forward.						
Supporting report reference	Care and maintenance inspection records (not appended).						

Forward work plan	Care and maintence records to include specific records of unauthorised entries to the ML. Barton Gold to continue to maintain incident register and review controls for unauthorised access.						
Aspect:	Public Safety	**Tenement:**	ML 6455	**Impact ID:**	T65	**Compliance status:**	Compliant
Environmental outcome:	No adverse impact to public as a result of transport of fuels to site (including explosives).						
Outcome measurement criteria	**What will be measured and form (method) of measurement**		**Locations**		**Outcome achievement**		**Frequency**
	Report by an independent third party into any incident which includes an investigation into the cause of any adverse impact to public health and safety.		ML and adjacent area.		No adverse impact to human health and safety, from an incident, that could not have been reasonably prevented.		Report within 14 days (or as agreed with DSD, now DEM).
Outcome measurement criteria summary	It's understood fuel (including explosives) is not being transported to site during the care and maintenance period. A review of care and maintenance records indicate no adverse impact to public as a result of transport of fuels to site (including explosives) occurred during the reporting period. As a result, achievement of the Outcome during the ACR period is considered to have been met.						
Leading indicator criteria	Near miss reports.						
Leading indicator criteria summary	A review of care and maintenance inspection records indicate no near miss reports were recorded or required.						
Effectiveness of existing controls.	There is insufficient detail in care and maintenance inspection records to determine the effectiveness of the listed control and management strategies (as outlined in the PEPR dated February 2018).Since the Project was placed into care and maintenance in late 2018 and changing ownership in 2019, control and management strategies have been implemented on a reduced basis to reflect reduced site activities. It is the intention of the current ownership to restore control and management strategies (as outlined in the PEPR) to meet compliance requirements moving forward.						
Supporting report reference	Care and maintenance inspection records (not appended).						
Forward work plan	Care and maintence records to include records of transport of fuel (including explosives) to the ML. Barton Gold to continue to maintain incident register.						
Aspect:	Public Safety	**Tenement:**	ML 6455	**Impact ID:**	T133	**Compliance status:**	Compliant
Environmental outcome:	No adverse impact to public as a result of transport of ore from Tarcoola to Challenger that could have been reasonably prevented.						
Outcome measurement criteria	**What will be measured and form (method) of measurement**		**Locations**		**Outcome achievement**		**Frequency**
	Report by an independent third party into any accidents at the rail crossing which includes an investigation into the cause of any injury or death.		Rail crossing.		No public injuries and or deaths resulting from accidents involving haulage trucks to the site, that could not have been reasonably prevented.		Report within 14 days (or as agreed with DSD, now DEM).
Outcome measurement criteria summary	No ore has ben transported during the reporting period. No adverse impact to public as a result of transport of ore from Tarcoola to Challenger occurred during the reporting period. As a result, achievement of the Outcome during the ACR period is considered to have been met.						
Leading indicator criteria	Near miss reports.						
Leading indicator criteria summary	A review of care and maintenance inspection records indicate no near miss reports were recorded or required.						
Effectiveness of existing controls.	N/A Control strategies relate to the transport of ore from Tarcoola to Changeller. No ore was transported during the reporting period.						
Supporting report reference	Care and maintenance inspection records (not appended).						
Forward work plan	Barton Gold to continue to maintain incident register.						
Aspect:	Public Safety	**Tenement:**	ML 6455	**Impact ID:**	T134	**Compliance status:**	Compliant
Environmental outcome:	Unauthorised entry to the haul road does not result in public injuries and/or deaths that could have been reasonably prevented.						
Outcome measurement criteria	**What will be measured and form (method) of measurement**		**Locations**		**Outcome achievement**		**Frequency**
	Report by an independent third party into any unauthorised entry which include an investigation into the cause of any injury or death.		Haul Road.		No public injuries and or deaths resulting from unauthorised entry to the haul road, that could have been reasonably prevented.		Report within 14 days (or as agreed with DSD, now DEM).
Outcome measurement criteria summary	A review of care and maintenance records indicate no public injuries and/ or deaths as a result of unauthorised entry to the haul road occurred during the reporting period. As a result, achievement of the Outcome during the ACR period is considered to have been met.						
Leading indicator criteria	Near miss reports.						

Leading indicator criteria summary	A review of care and maintenance records indicate no near miss reports were recorded or required.
Effectiveness of existing controls.	Care and maintenance inspection records indicate unauthorised entry is ocuring and therefore the effectiveness of the control and management strategies (as outlined in the PEPR dated February 2018) should be reviewed. Since the Project was placed into care and maintenance in late 2018 and changing ownership in 2019, control and management strategies have been implemented on a reduced basis to reflect reduced site activities. It is the intention of the current ownership to restore control and management strategies (as outlined in the PEPR) to meet compliance requirements moving forward.
Supporting report reference	Care and maintenance inspection records (not appended).
Forward work plan	Continue to maintain incident/ complaints register and investigate as required, review efficacy of controls for restricting access.

Table 24 Land use, third party property and Infrastructure environmental outcome and compliance status

Aspect:	Land Use, Third Party Property and Infrastructure	**Tenement:**	ML 6455	**Impact ID:**	T66, T70 & T71	**Compliance status:**	Compliant
Environmental outcome:	No adverse impacts to third party land use and no unauthorised damage to adjacent public or private property and infrastructure as a result of mining operations (including uncontrolled fires and geotechnical failure), other than those agreed between the Tenement Holder and the affected user.						
Outcome measurement criteria	**What will be measured and form (method) of measurement**		**Locations**		**Outcome achievement**		**Frequency**
	Damage to adjacent public and private property and infrastructure.		Adjacent public or private property.		No unauthorised damage (including caused by uncontrolled fire) caused by mining operations.		Investigation within 14 days (or as agreed with DSD, now DEM).
Outcome measurement criteria summary	A review of care and maintenance records indicate no unauthorised damage to adjacent public or private property and infrastructure as a result of mining operations occurred during the reporting period. As a result, achievement of the Outcome during the reporting period is considered to have been met.						
Leading indicator criteria	Near miss reports.						
Leading indicator criteria summary	A review of care and maintenance records indicate no near miss reports were recorded or required.						
Effectiveness of existing controls.	N/A Control strategies relate to damage as a result of mining operations. No mining operations occurred during reporting period.						
Supporting report reference	Care and maintenance inspection records (not appended).						
Forward work plan	Continue to maintain incident/ complaints register and investigate as required.						

Table 25 Legacy waste disposal environmental outcome and compliance status

Aspect:	Legacy waste disposal	**Tenement:**	ML 6455	**Impact ID:**	T201	**Compliance status:**	Yet to be determined
Environmental outcome:	No impacts to groundwater, surface water, soil and land use from PAF material within the waste rock facility and open pit.						
Outcome measurement criteria	See Surface Water T87, T88 OMC, Measurement Criteria and Leading indicator criteria. See Groundwater T77, T78 OMC, Measurement Criteria and Leading indicator criteria.						
Aspect:	Legacy waste disposal	Tenement:	ML 6455	Impact ID:	T202	Compliance status:	Yet to be determined
Environmental outcome:	No impacts to groundwater, surface water, soil and land use from PAF material within the waste rock facility and open pit.						
Outcome measurement criteria	Field pH measurements of surface water collected in the WRF toe drain, following every rainfall event that produces a monitorable surface water flow, demonstrate that runoff pH from the WRF is > 6. See Surface Water T87, T88 OMC, Measurement Criteria and Leading indicator criteria. See Groundwater T77, T78 OMC, Measurement Criteria and Leading indicator criteria.						

5.2 Compliance with non-outcome based mining lease or tenement conditions

Table 26 summarises the compliance status of tenement conditions of ML 6455 that do not relate to an environmental outcome in the approved PEPR. Any non-compliances are also reported in Section 5.4. Information within Table 26 has been taken from records, where available, and staff advice.

Table 26 Compliance with non-outcome-based mining lease conditions

Lease condition	Compliance status	Summary and supporting evidence of compliance status determination
21. The Tenement Holder must not carry out mining operations unless there is an approved program for environment protection and rehabilitation (an approved PEPR).	Complaint	No mining activities were conducted during the reporting period. The site was placed into care and maintenance in October 2018 in accordance with the approved PEPR.
25. In accordance with regulation 35 of the Regulations, unless otherwise determined or agreed by the Minister, the Tenement Holder must: 25.1. Commence mining operations in accordance with the APPROVED PEPR within twelve (12) months after its approval; and 25.2. Thereafter continue mining operations in accordance with the requirements of the program in the APPROVED PEPR.	Complaint	No mining activities were conducted during the reporting period. The site was placed into care and maintenance in October 2018 in accordance with the approved PEPR.
First Schedule: Additional Terms		
1. The grant of the Mining Tenement authorises mining operations (only) for the recovery of: 1.1. Gold; and 1.2. Silver.	Compliant	No mining activities were conducted during the reporting period.
2. The grant of the Mining Tenement authorises mining operations (only) that are consistent with the mining operations described in the Mining Lease Proposal document dated 6 August 2015 and subsequent Response Document dated 17 November 2015.	Compliant	No mining activities were conducted during the reporting period. The site was placed into care and maintenance in October 2018 in accordance with the approved PEPR.
Second Schedule: Additional Conditions		
1. The Tenement Holder must ensure that no fly rock from the blasting activities undertaken on the land encroaches on the adjacent railways and the adjacent third party infrastructure unless the Tenement Holder obtains a registered Waiver of Exemption under the Act to undertake mining activities that would include such encroachment.	Compliant	No mining or blasting activities were conducted during the reporting period. The site was placed into care and maintenance in October 2018 in accordance with the approved PEPR.
2. The Tenement Holder must develop and implement a blasting schedule in consultation with the owners and operators of the adjacent railways to ensure blasting does not coincide with trains passing the Mining Tenement.	Compliant	
3. The Tenement Holder must notify the owners and operators of the adjacent railways of each blast within a timeframe determined in the communication protocol required by Second Schedule Condition 4.	Compliant	
4. The Tenement Holder must develop (in consultation with the owners and operators of the adjacent railways and to the satisfaction of the Director of Mines or other authorised officer), a communication and operating protocol between the tenement holder and owners and operators of the adjacent railways prior to the commencement of mining operations that includes the following matters: 4.1. Notification of the owners and operators of the adjacent railways by the Tenement Holder of each proposed blast in advance of those blasts, within a timeframe determined between the Tenement Holder and the owners and operators of the adjacent railways; 4.2. A process to deal with an unanticipated change of blasting time and/or changes to the time that trains pass the Mining tenement; 4.3. Emergency procedures; and 4.4. Any matters identified by the Director of Mines or other authorised officer in writing.	Compliant	
7. The Tenement Holder must comply with all State and Commonwealth legislation and regulations applicable to the activities undertaken pursuant the grant of the Mining Tenement including (but not limited to) the: • *Aboriginal Heritage Act 1988;* • *Environment Protection Act 1993;* • *Environment Protection and Biodiversity Conservation Act 1999;* • *Development Act 1993;* • *Explosives Act 1936;*	Compliant	There have been no records of noncompliance with legislative requirements within the reporting period.

Lease condition	Compliance status	Summary and supporting evidence of compliance status determination
• *Dangerous Substances Act 1979;* • *Natural Resources Management Act 2004;* • *Public and Environmental Health Act 1987;* • *Heritage Places Act 1993;* • *Work Health and Safety Act 2012;* • *Native Vegetation Act 1991;* • *Mines and Works Inspection Act 1920;* and • *Road Traffic Act 1961.*		

5.3 Compliance with mine closure criteria

Compliance assessment against mine completion criteria, i.e. those not already included in Section 5.1 are outlined in Table 27.

Table 27 Assessment against mine completion outcomes

Impact ID	Outcome	OMC				Leading Indicator Criteria	Compliance status	Summary and supporting evidence of compliance status determination
		What will be measured and form (method) of measurement	Locations	Outcome achievement	Frequency			
T72 T73	Integrate and harmonise final rehabilitated landforms with the surrounding landscape.	Audit by an independent suitably qualified and experienced specialist of rehabilitated landforms against closure strategies in the PEPR (Section 8.9).	ML area	• Final rehabilitated landforms have been integrated and harmonised with the surrounding landscape in accordance with the closure strategies in the PEPR (see Section 8.9).	Prior to mine completion	N/A	Not relevant to assess	Mine is in care and maintenance and has not yet entered into a closure stage. Final rehabilitated landforms are yet to be constructed.
T77 T78	No compromise to the groundwater quantity and quality to other users and groundwater environmental value post mine completion.	Groundwater levels and quality will be measured six monthly for two years during closure, prior to completion.	Trigger wells TTW1, TTW2 (see Figure 1) Operational monitoring bores TMB1, TMB2, TMB3 (Figure 50)	• Groundwater environmental value (beneficial use) is not reduced by increased TDS concentrations. • Water quality parameters (EC and metals) at operational wells for three consecutive events, are within an acceptable range of average values observed in trigger wells (demonstrated by a comparison of plotting the average concentration determined for each data set (operational and trigger wells) for EC and metals for each sampling round and demonstrating that the rate of increase in average concentrations in the operational wells is not more than 20% greater than the rate of change in average concentrations in trigger wells over the monitoring period. • pH of each operational well is not reduced by more than 1 pH unit compare to average pH for the trigger wells. • SWL gauging confirms modelled direction of groundwater flow towards open pit. • Groundwater assessment report for closure verifies that groundwater outcomes have been achieved.	Bi-annual (six monthly) groundwater monitoring for a period of two years during closure, prior to completion. Assessment of groundwater monitoring during closure, prior to completion.	N/A	Not relevant to assess	Mine is in care and maintenance and has not yet entered into a closure stage. Post closure monitoring cannot yet be implemented. TGO-PLN-005-Groundwater Management.
T86	At completion of mining operations, surface water flows to not cause inundation of third-party property and infrastructure (to a greater extent than would have been	Visual inspections and photo monitoring of ARTC's rail infrastructure. Audit of inspection, maintenance, incident and corrective action records.	ARTC rail infrastructure on ML south- west boundary). Up flow of third-party infrastructure.	• No observable changes to third party infrastructure adjoining the ML compared to outside ML. • No predicted flood flow leaving ML towards the location of third party infrastructure outside of rainfall events which cause flooding outside of this location.	Annual audits Opportunistic inspections – following rainfall events At completion	Operational observations and incidents involving surface water flows and third-party property and infrastructure.	Compliant to date	Mine is in care and maintenance and has not yet entered into a closure stage. There have been no reports surface water flows causing

Impact ID	Outcome	OMC					Compliance status	Summary and supporting evidence of compliance status determination
		What will be measured and form (method) of measurement	Locations	Outcome achievement	Frequency	Leading Indicator Criteria		
	expected prior to mining operations).	Predicted (modelled) surface water flow of post-completion landforms.	ML area					inundation to third party property during the reporting period.
T87 T88	No surface water contaminated prior to mining completion remains within the land after mine completion. No contamination of surface water occurs after mine completion as a result of mining operations.	Abundance and diversity of vegetation during annual vegetation survey. Audit report demonstrates WRF is stable. All infrastructure and waste is removed from ML (Figure 56).	Impact monitoring sites (Figure 49) ML area, WRF, ML	• No significant difference in abundance and diversity of vegetation compared to baseline. • Audit report demonstrates WRF is stable and that all infrastructure and waste has been removed from the ML (Figure 56).	Annual spring surveys Prior to mine completion	N/A	Not relevant to assess	Mine is in care and maintenance and has not yet entered into a closure stage. Vegetation surveys have not been undertaken in the reporting period. Mine is in care and maintenance and final rehabilitated landforms are yet to be constructed.
T97 T98	Post mining landforms are physically stable and risks to the health and safety of the public and fauna are as low as reasonably practicable.	Stability of open pit and WRF post-mining landform.	Open pit and WRF	• Open pit and WRF post-mining landform are geotechnically stable, the pit safety bund has been constructed in accordance with the approved design, warning signage is installed and any other strategies from the PEPR have been appropriately implemented.	During closure, prior to completion	N/A	Not relevant to assess	Mine is in care and maintenance and has not yet entered into a closure stage. Final rehabilitated landforms are yet to be constructed.
T100	All infrastructure (unless otherwise agreed with the pastoralist or other third parties) removed from the site prior to mine completion.	Removal of infrastructure (not authorised to remain) from site confirmed by a suitably qualified professional. See Waste OMC T132 Measurement criteria and Leading indicator criteria.	ML	• All infrastructure removed (unless otherwise agreed by landowner or other third party) prior to mine completion.	At closure, prior to mine completion	Incidents and corrective actions associated with operational waste management and monitoring.	Not relevant to assess	Mine is in care and maintenance and has not yet entered into a closure stage.
T101 T102 T103	Re-establishment of pre-mining ecosystem and landscape function, where practical within the site.	Re-establishment of pre-mining ecosystem and landscape function certified by an independent suitably qualified and experienced professional.	Representative sites on rehabilitated areas (to be identified during operation)	• Re-establishment of pre-mining/ agreed post-completion land use (Figure 56) condition, where practical.	At closure, prior to completion Spring surveys	N/A	Not relevant to assess	Mine is in care and maintenance and has not yet entered into a closure stage. Vegetation surveys have not been undertaken in the reporting period.
T105	No disturbance to non-Aboriginal heritage sites (from mining and rehabilitation activities undertaken) on the ML.	No disturbance to Aboriginal and non- Aboriginal heritage sites demonstrated by audit undertaken by suitably qualified and experienced professional.	ML	• No disturbance to non- Aboriginal heritage sites (from mining and rehabilitation activities undertaken) other than in accordance with the approved Heritage Management Plan and associated Heritage Area Risk Assessment Framework (PEPR Appendix N).	Prior to mine completion	N/A	Not relevant to assess	Mine is in care and maintenance and has not yet entered into a closure stage. Heritage Management Plan is currently implemented.

Impact ID	Outcome	OMC				Leading Indicator Criteria	Compliance status	Summary and supporting evidence of compliance status determination
		What will be measured and form (method) of measurement	Locations	Outcome achievement	Frequency			
T106 T107 T108 T121 T125	No impacts to groundwater, surface water, soil and land use from PAF material within the waste rock facility and open pit. No adverse impacts to adjacent land uses including, but not limited to, growth of native vegetation, from seepage from the WRF.	Audit of WRF construction and PAF material placement against design specifications (Appendix J), permeability tests (hydraulic conductivity) of NAF base and WRF capping, results of surface water and groundwater monitoring, and the rehabilitated landform performance. See Surface Water T87, T88 OMC, Measurement Criteria and Leading indicator criteria. See Groundwater T77, T78 OMC, Measurement Criteria and Leading indicator criteria.	WRF	• Audit indicates specifications and ARD Management Plan requirements have been achieved.	During closure, prior to completion	Field pH measurements of surface water collected in the WRF toe drain, following rainfall events that produce a monitorable surface water flow, demonstrate that runoff pH from the WRF is > 6 demonstrating acidification has not occurred. Quarterly monitoring of pressure differentials within the NAF base layer of the PAF cell (once-capped) measured by two piezometers installed beneath or within the base of the NAF layer near the centre and western wall, will demonstrate that seepage has been mitigated. Implementation and compliance with ARD Management Plan (PEPR Appendix L).	Not relevant to assess	Mine is in care and maintenance and has not yet entered into a closure stage. Groundwater monitoring was not undertaken during the erporting period.
T114	No post mine completion adverse impacts to adjacent land use and third-party infrastructure as a result of mining operations.	See Surface Water OMC T86 Measurement criteria and Leading indicator criteria.						
T116	Reduced vegetation species abundance due to increased density of weeds and new introduced weed species and pathogens.	Re-establishment of pre-mining ecosystem and landscape function certified by an independent suitably qualified and experienced professional.	Representative sites on rehabilitated areas (to be identified during operation).	• Re-establishment of pre-mining condition, where practical.	At closure, prior to completion Spring survey	N/A	Not relevant to assess	Mine is in care and maintenance and has not yet entered into a closure stage.
T131	Where practicable, the pre-mining land use can be recommenced after mine completion.	See outcome measurement criteria and measurement criteria for public safety (T97) and Aboriginal and non-Aboriginal Heritage (T105).				N/A	Not relevant to assess	Mine is in care and maintenance and has not yet entered into a closure stage.
T132	All industrial and commercial waste is disposed of in accordance with relevant legislation.	Audit by independent qualified experienced professional of waste management.	ML	• Waste has been disposed in accordance with relevant legislation and approved wastes (by EPA) remain on site post-completion.	Prior to completion	N/A	Not relevant to assess	Mine is in care and maintenance and has not yet entered into a closure stage.
T135	Where practicable, the pre-mining land use can be recommenced after mine completion.	Site contamination at closure compared to pre-mining.	ML area	• Pre-mining land use can recommence with no harm to ecological and human health.	Closure	N/A	Not relevant to assess	Mine is in care and maintenance and has not yet entered into a closure stage. Baseline soil assessment was completed in 2017 (LBWep 2017) Mine is

Impact ID	Outcome	OMC				Leading Indicator Criteria	Compliance status	Summary and supporting evidence of compliance status determination
		What will be measured and form (method) of measurement	Locations	Outcome achievement	Frequency			
								currently in care and maintenance. A soil assessment will be undertaken prior to mine completion.

5.4 Summary of non-compliances and corrective actions

Table 28 provides a summary of criteria for which compliance could not be confrimed for the reporting period. Table 29 summarises the recommended corrective actions to address criteria where compliance could not be demonstrated. The overarching contributor to the lack of compliance actions has been the absence of mining activity and the resulting reduced site presence during the care and maintenance period. It is the intention of Barton Gold to review the PEPRs, with the specific intent to address compliance obligations that will apply during periods of care and maintenance so that they better reflect the reduced risks and resources available for undertaking compliance activities.

Table 28 Summary of non-compliances

Aspect of environment	Impact ID	Status
Vegetation	T1, T2, T3, T4, T5	Unable to determine
Fauna	T10, T11	Unable to determine
Weeds, Pests and Pathogens	T16, T17, T18, T19	Unable to determine
Groundwater	T20, T21, T22	Unable to determine
Surface Water	T25, T26, T27, T28	Unable to determine
Acid Rock Drainage	T34, T36	Yet to be determined

Table 29 Non-compliances and corrective actions

Aspect	Vegetation		
Impact ID	**T1, T2** **Tenement**		**ML 6455**
Environmental Outcome	No permanent loss of abundance or diversity of native vegetation on or off the ML through: • clearance; • dust/contamination deposition; • fire; or • other damage. unless prior approval under the relevant legislation is obtained.		
OMC	Annual vegetation survey at impact monitoring sites (Figure 49) demonstrates no significant difference in abundance and diversity of vegetation compared to baseline (PEPR Appendix H). Results of weekly surveys of cleared areas on the mining tenement during construction, and annual surveys of the tenement during operations, demonstrates that the clearance areas of each native vegetation type does not exceed the associated total approved clearance areas (PEPR Figure 47).		
Cause of non-compliance	No annual vegetation survey undertaken over reporting period, project in care and maintenance throughout reporting period.		
Summarise any actions taken or yet to be taken to rectify the non-compliance and to prevent the reoccurrence of any such non-compliance	Undertake vegetation surveys to demonstrate the abundance and diversity of vegetation. Care and maintenance records to include a register of land clearance.		
Aspect	**Vegetation**		
Impact ID	**T3, T4, T5** **Tenement**		**ML 6455**
Environmental Outcome	No significant difference in abundance and diversity of vegetation compared to baseline.		
OMC	Annual vegetation survey at impact monitoring sites (PEPR Figure 49) demonstrates no significant difference in abundance and diversity of vegetation compared to baseline (Appendix H). Results of weekly surveys of cleared areas on the mining tenement during construction, and annual surveys of the tenement during operations, demonstrates that the clearance areas of each native vegetation type does not exceed the associated total approved clearance areas (PEPR Figure 47).		
Cause of non-compliance	No annual vegetation survey undertaken over reporting period, project in care and maintenance throughout reporting period.		
Summarise any actions taken or yet to be taken to rectify the non-compliance and to prevent the reoccurrence of any such non-compliance	Undertake vegetation surveys to demonstrate the abundance and diversity of vegetation. Care and maintenance records to include a register of land clearance.		
Aspect	**Fauna**		
Impact ID	**T10, T11**	**Tenement**	**ML 6455**
Environmental Outcome	No native fauna injuries or death caused by mining operations (including fire) that could have been reasonable prevented.		
OMC	Annual fauna incident report (PEPR Table 44) indicates no native fauna injuries or death caused by vehicle collisionod or by mining operations (including fire), that could have been easily prevented. During regular monthly Care and Maintenance reports evidence was provided that fauna injuries/ impacts were being considered during the routine inspections.		
Cause of non-compliance	There is no specific reference to the occurrence or otherwise of fauna injuries/deaths or fires within the Care and Maintenance reports evidence. There is insufficient detail in Care and maintenance inspection records to determine compliance with the outcome measurement criteria.		
Summarise any actions taken or yet to be taken to rectify the non-compliance and to prevent the reoccurrence of any such non-compliance	Care and maintenance records to include a register of native fauna injuries or deaths and fires on the ML.		

Aspect	Weeds, Pests and Plant Pathogens
Impact ID	**T16, T17, T18, T19** **Tenement** **ML 6455**
Environmental Outcome	No increased abundance or introduction of new or sustained increase in abundance of existing weed or pest and/or pathogen species on the ML or adjoining property.
OMC	Annual survey of vegetation monitoring sites (PEPR Figure 49) indicate no new weed, pest and/or pathogen species incursions or increase in the density or distribution of weeds, pests and/or pathogens compared to baseline (PEPR Appendix H), as a result of mining operations. Records of weeds, pests and pathogens identified within the site, and measures taken, are kept on site to demonstrate appropriate actions have been implemented.
Cause of non-compliance	As annual vegetation surveys have not been conducted, compliance with the OMC and achievement of the Outcome cannot be demonstrated
Summarise any actions taken or yet to be taken to rectify the non-compliance and to prevent the reoccurrence of any such non-compliance	Undertake vegetation surveys to demonstrate the abundance and diversity of vegetation. Care and maintenance records to include observations and management of weeds on the ML.

Aspect	**Groundwater**
Impact ID	**T20** **Tenement** **ML 6455**
Environmental Outcome	No adverse impact to the quality and quantity of groundwater to existing users and groundwater environmental value caused by mining operations.
OMC	Quantity to existing users Quarterly monitoring of groundwater levels/ drawdown in installed boundary (trigger) groundwater monitoring wells (TTW1 and TTW2) confirms standing water levels (SWL) are within 2 m of modelled (predicted) drawdown levels (based on Jacobs 2016), at that location, at the time of measurement, validating the modelled radius of drawdown and confirming that the pastoral bores and production wells are outside of the predicted radius of influence from pit dewatering (Figure 27).
Cause of non-compliance	No groundwater monitoring events were undertaken during the reporting period..
Summarise any actions taken or yet to be taken to rectify the non-compliance and to prevent the reoccurrence of any such non-compliance	Undertake groundwater monitoring to demonstrate compliance to OMC

Aspect	**Groundwater**
Impact ID	**T21** **Tenement** **ML 6455**
Environmental Outcome	No adverse impact to the quality and quantity of groundwater to existing users and groundwater environmental value caused by mining operations.
OMC	Quality to existing users 6-monthly monitoring of water quality parameters (pH, EC, TDS, metals) at operational groundwater monitoring wells (TMB1, TMB2, TMB3) confirms that there is no reduction in water quality compared to that observed in boundary (trigger) groundwater monitoring wells (TTW1, TTW2) by comparing average concentrations for each data set (operational and trigger wells) for each sampling round to demonstrate that the rate of increase in average concentrations in the operational wells will not be more than 20% greater than the rate of change in average concentrations in trigger wells over the operational period for EC, TDS and metals and that pH in each operational monitoring well will not be reduced by more than 1 pH unit compared to average pH for the trigger wells.
Cause of non-compliance	No groundwater monitoring events were undertaken during the reporting period..
Summarise any actions taken or yet to be taken to rectify the non-compliance and to prevent the reoccurrence of any such non-compliance	Undertake groundwater monitoring to demonstrate compliance to OMC

Aspect	Groundwater
Impact ID	**T22 Tenement ML 6455**
Environmental Outcome	No adverse impact to the quality and quantity of groundwater to existing users and groundwater environmental value caused by mining operations.
OMC	Fuel storage Six monthly monitoring of parameters (anthropogenic TRH) in operational groundwater monitoring wells (TMB1, TMB2, TMB3) (Figure 50) indicates TRH concentrations less than the laboratory limit of detection or within 10% of baseline concentrations should TRH be detected in baseline samples. Protecting Environmental Values Six monthly groundwater monitoring of water quality parameters (pH, EC, TDS) at operational groundwater monitoring wells (TMB1, TMB2, TMB3) demonstrates that there is no reduction in groundwater environmental value and beneficial use based on TDS compared to the environmental value (EPP (WQ))compared to the environmental value and beneficial use attributed to groundwater in the mining area prior to commencement of mining.
Cause of non-compliance	No groundwater monitoring events were undertaken during the reporting period.
Summarise any actions taken or yet to be taken to rectify the non-compliance and to prevent the reoccurrence of any such non-compliance	Undertake groundwater monitoring to demonstrate compliance to OMC Care and maintenance records to include records (or absence) of spills and management to address on the ML.

Aspect	Surface Water		
Impact ID	**T26**	**Tenement**	**ML 6455**
Environmental Outcome	Mining operations do not cause inundation of third-party property and infrastructure by water (to a greater extent than would be expected to occur prior to mining operations commencing).		
OMC	Results of annual audits demonstrate that any inundation of third party property could not reasonably have been prevented and records will demonstrate that surface water control infrastructure is inspected, monitored and maintained, and that corrective actions are implemented for all incidents and that mining operations are not adversely impacting ARTC's rail infrastructure. Results of visual assessments of water pooling extent following intense rainfall events show that water pooling extent at and beyond the lease boundary post rainfall event are within 20% of the predicted model (LBWep 2016) for rainfall event of that depth and duration (recorded by local rain gauge and verified by BOM records) and that no off-site inundation of ARTC rail infrastructure occurs due to mining activities (or is no different to the pre-mining scenario).		
Cause of non-compliance	Annual audit not completed and there is no record regarding surface water infrastructure or monitoring post rainfall events.		
Summarise any actions taken or yet to be taken to rectify the non-compliance and to prevent the reoccurrence of any such non-compliance	Conduct an inspection of drainage and containment systems specific to the rail infrastructure (at surface water monitoring locations) to assess potential for surface water impacts to ARTC infrastructure. Ensure observation/ photographic records monitoring in relation to inundation of third party property (ARTC rail infrastructure) are retained. Care and maintenance records to include records demonstrating evidence of monitoring and maintenance of surface water infrastructure.		

Aspect	**Surface Water**		
Impact ID	**T27**	**Tenement**	**ML 6455**
Environmental Outcome	No surface water contaminated as a result of mining operations leaves the mining lease area or results in increased sediment load off the lease area.		
OMC	Annual vegetation survey at impact monitoring sites (Figure 49 in PEPR) demonstrates no significant difference in abundance and diversity of vegetation compared to baseline (Appendix H in PEPR).		
Date of incident	Throughout reporting period	**Date of initial report**	Not previously reported, first reporting in 2021 ACR.
Cause of non-compliance	There has been no vegetation survey conducted during the reporting period and as such, compliance with the OMC and achievement of the Outcome cannot be demonstrated.		
Summarise any actions taken or yet to be taken to rectify the non-compliance and to prevent the reoccurrence of any such non-compliance	Undertake vegetation surveys to demonstrate the abundance and diversity of vegetation. Care and maintenance records to include observations and management of surface water impacts on the ML.		

Aspect	Acid Rock Drainage		
Impact ID	**T34**	**Tenement**	**ML 6455**
Environmental Outcome	No impacts to groundwater, surface water, soil and land use from PAF material within the waste rock facility and open pit.		
OMC	See Surface Water T87, T88 OMC, Measurement Criteria and Leading indicator criteria (below): • Annual vegetation survey at impact monitoring sites (Figure 49 in PEPR) demonstrates no significant difference in abundance and diversity of vegetation compared to baseline. See Groundwater T77, T78 OMC, Measurement Criteria and Leading indicator criteria (below): • 6-monthly measurements of water quality parameters (pH, EC, TDS, metals) at operational groundwater monitoring wells (TMB1, TMB2, TMB3) for three consecutive sampling events, indicate results are within an acceptable range of average values observed in boundary (trigger) groundwater monitoring wells (TTW1, TTW2) demonstrated by • a comparison of plotting the average concentration determined for each data set (operational and trigger wells) for EC and metals for each sampling round and demonstrating that the rate of increase in average concentrations in the operational wells is not more than 20% greater than the rate of change in average concentrations in trigger wells over the monitoring period • pH in each operational monitoring well not reduced by more than 1 pH unit compared to average pH for the trigger wells. • 6-monthly SWL gauging at the installed boundary (trigger) groundwater monitoring wells (TTW1 and TTW2) and existing monitoring bores (TMB1, TMB2, TMB3) confirms that the net hydraulic gradient in WRF area is towards the pit as per the groundwater model. A Groundwater Assessment Report for closure prepared by an independent, qualified and experienced professional verifies that groundwater levels, quality and pit hydraulic gradient demonstrates achievement of the outcome.		
Cause of non-compliance	No annual vegetation survey undertaken over reporting period and regular groundwater monitoring not undertaken over most of reporting period or at specified intervals.		
Summarise any actions taken or yet to be taken to rectify the non-compliance and to prevent the reoccurrence of any such non-compliance	Undertake vegetation surveys to assess diversity and abundance of vegetation. Undertake groundwater monitoring. Undertake saturation monitoring of PAF cell. Care and maintenance records to include observations and management of surface water impacts on the ML, including within the toe drain.		

Aspect	**Acid Rock Drainage**		
Impact ID	**T36**	**Tenement**	**ML 6455**
Environmental Outcome	No impacts to groundwater, surface water, soil and land use from PAF material within the waste rock facility and open pit.		
OMC	Field pH measurements of surface water collected in the WRF toe drain, following every rainfall event that produces a monitorable surface water flow, demonstrate that runoff pH from the WRF is > 6. See Surface Water T87, T88 OMC, Measurement Criteria and Leading indicator criteria (below): • Annual vegetation survey at impact monitoring sites (Figure 49) demonstrates no significant difference in abundance and diversity of vegetation compared to baseline. See Groundwater T77, T78 OMC, Measurement Criteria and Leading indicator criteria (below): • 6-monthly measurements of water quality parameters (pH, EC, TDS, metals) at operational groundwater monitoring wells (TMB1, TMB2, TMB3) for three consecutive sampling events, indicate results are within an acceptable range of average values observed in boundary (trigger) groundwater monitoring wells (TTW1, TTW2) demonstrated by • a comparison of plotting the average concentration determined for each data set (operational and trigger wells) for EC and metals for each sampling round and demonstrating that the rate of increase in average concentrations in the operational wells is not more than 20% greater than the rate of change in average concentrations in trigger wells over the monitoring period • pH in each operational monitoring well not reduced by more than 1 pH unit compared to average pH for the trigger wells. • 6-monthly SWL gauging at the installed boundary (trigger) groundwater monitoring wells (TTW1 and TTW2) and existing monitoring bores (TMB1, TMB2, TMB3) confirms that the net hydraulic gradient in WRF area is towards the pit as per the groundwater model. A Groundwater Assessment Report for closure prepared by an independent, qualified and experienced professional verifies that groundwater levels, quality and pit hydraulic gradient demonstrates achievement of the outcome.		
Cause of non-compliance	No annual vegetation survey undertaken over reporting period and regular groundwater monitoring not undertaken over most of reporting period or at specified intervals.		
Summarise any actions taken or yet to be taken to rectify the non-compliance and to prevent the reoccurrence of any such non-compliance	Undertake saturation monitoring of PAF cell. Care and maintenance records to include observations and management of surface water impacts on the ML, including within the toe drain. Collect surface water samples following significant rain events, if safe to do so, to demonstrate compliance, and/or consider revising stormwater sampling (during a future PEPR revision) to sediment testing as an indicator of surface water impacts.		

6. Disturbance and rehabilitation activities

No disturbance or rehabilitation activities took place during the reporting period. Table 30 provides the clearance and rehabilitation activities for the Project to date. Operational and exploration disturbances to the Project have not exceeded the 82.84 ha approved for mining operations under PEPR2016/062 (rev. 4). Disturbance and/or rehabilitation works for the next reporting period have not yet be finalised.

Table 30 Summary total of native vegetation clearance

Summary total	Clearance (Ha)
Total area of native vegetation cleared in the reporting period	**0**
Total area of native vegetation cleared to date	**73.38**
Estimated area proposed to be cleared in the next reporting period	**-**
Approved maximum native vegetation clearance	**82.84**

Note: figures in the table are subject to rounding

7. Reconciliation of native vegetation clearance

The site is currently under care and maintenance and there was no clearing undertaken during the reporting period. Any future clearance will be subject to an internal application processes to ensure compliance with the Native Vegetation Management Plan (NVMP) and Significant Environmental Benefit (SEB) approved clearance. A SEB has been established as a payment to the Native Vegetation Fund (NVF) and will provide an overall ecological benefit, and the amount equates to up to 82.84 ha disturbance on ground on the ML.

Targeted annual vegetation monitoring is to be reinstated to enable assessment of unauthorised impacts/disturbance to (if any) vegetation during operations. Designated monitoring sites will be compared to baseline (EBS 2013, 2014) and monitoring will include assessment of:

- changes in the abundance, composition or condition of vegetation communities;
- impacts to vegetation due to project activities;
- increase in the density and distribution of known weed infestations; and
- introduction of new weed species.

The monitoring will be undertaken typically in spring and during operation to ensure the best results for comparison and at closure to confirm completion criteria have been met.

8. *Environment Protection and Biodiversity Conservation Act 1999* reporting

ML 6455 is not subject to an approval under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

9. Exempt land

Exemption details are outlined in Table 31.

A Waiver has been obtained from the ARTC, as the landowner and owner of the infrastructure, in relation to any potential activities occurring in the south-western corner of the tenement.

A Waiver has also been obtained from NextGen, as owner of the optic fibre cable infrastructure.

Table 31 Exempt land

Name of person entitled to exemption	Certificate of title or crown land details	Reason for exemption	Area of exemption	Waiver required under the *Mining Act 1971*	Date waiver registered/ obtained
NextGen	CR5750/379 CR5764/54 CL6222/573	Optic fibre cable	Installation of above ground water pipeline is <150 m from infrastructure	Yes	15 September 2016
ARTC	CR5750/379 CR5764/54 CL6222/573	Rail track	Upgrade to haul road is <150 m from infrastructure	Yes	September 2016

10. Complaints

No complaints were received during the reporting period.

11. Audits and management system review

During care and maintenance regular inspections have been undertaken. The findings and actions arising from these have been recorded as care taker inspections.

11.1 Management system reviews

No management system reviews, or audits have been undertaken during the reporting period. Barton Gold will review and implement appropriate management systems and review processes to ensure compliance with environmental and mine closure outcomes.

12. Verification of uncertainty

No PEPR uncertainties have been addressed during the reporting period, as the Project was in care and maintenance for the reporting period. Please see the forward work plan for planned works to address identified uncertainties.

13. Forward work plans

A summary of the proposed current and future works is provided in Table 32. The works have been proposed based on existing uncertainties or lack of data identified as part of defining the environmental outcomes. Table 32 does not include items that are considered controls, operational monitoring or actions required to confirm completion or components associated with Barton Gold's Environmental Management System or, which will be implemented, reviewed, continuously improved and maintained in order to ensure compliance and to manage risks associated with uncertainties and assumptions.

Table 32 Tarcoola forward work plan

Activity	Start Date	Completion Date	Planned Date for Submission	Justification of Timing for Works	Responsibility	Status
Undertake Autumn ecology monitoring survey	2021	2022	To be submitted in 2022 ACR	Change of ownership and high demand for ecological services during spring	General Manager	Scope developed and scheduled
PEPR review	2021	2022	2022	Review of PEPR to consider changes/additions to mining scope, operational environmental monitoring; updated environmental assessments, modelling and other works; ongoing community and stakeholder consultation; and as the Land Use Plan is finalised with DEW	General Manager	Not yet commenced

14. Changes to mining operations and emerging environmental hazards

No changes that required a Program Notification to mining operations occurred during the reporting period. Exploration details are summarised in Appendix A.

15. Technical reports

No technical studies were completed relevant to the OMC during the reporting period.

16. Voluntary information

Barton Gold is actively building relationships with neighbouring stakeholders and regular communication is on-going. During the reporting period Barton Gold has engaged in regular dialogue with Commonwealth Hill Station regarding its operations and use of shared infrastructure (roads).

Appendix A Public liability insurance

DUAL

Certificate of Currency

Class of Business: Resource Industry Public & Products Liability

Policy Number: P-RL/0/300878/20/L-6

Policyholder: **Barton Gold Pty Ltd; Roma Resources SA Pty Ltd; Challenger 2 Pty Ltd; Tunkillia 2 Pty Ltd; Tarcoola 2 Pty Ltd; Jumbuck Equipment Pty Ltd**

Business Description: Mineral Exploration including Mine on Care & Maintenance

Insurance Period: From 4:00pm on 31/10/2020 to 4:00pm on 31/10/2021
Australian local time in the State or Territory where this **policy** was purchased

Indemnity Limit: Section A: $ 20,000,000
Section B: $ 20,000,000
Section C: $ 20,000,000

Deductibles: Worker to Worker Excess $ 25,000
Other Excess: $ 5,000

Territorial limits: Worldwide excluding USA and Canada

Insurer: DUAL Australia Pty Ltd on behalf of certain underwriters at Lloyd's

Signature:

Damien Coates - Chief Executive Officer, DUAL Asia Pacific

DUAL AUSTRALIA PTY LTD
Tel: 1300 789 772
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Website : www.dualaustralia.com.au
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Certificate of Currency

The policy referred to is current as at the date of this certificate and whilst a due date has been indicated it should be noted that the policy may be cancelled in the future. Accordingly, reliance should not be placed on the expiry date.

Policy Number:	10M 8272185
Insured:	Barton Gold Pty Ltd, Roma Resources SA Pty Ltd, Challenger 2 Pty Ltd, Tunkillia 2 Pty Ltd, Tarcoola 2 Pty Ltd, Jumbuck Equipment Pty Ltd
Period of Insurance:	*(From)* 31 October 2020 at 4:00pm local time at the place of issue *(To)* 31 October 2021 at 4:00pm local time at the place of issue
Policy Type:	Excess Liability
Limit of Liability:	
Public Liability:	$30,000,000 any one Occurrence in excess of $20,000,000
Advertising Liability:	$30,000,000 any one Occurrence in excess of $20,000,000
Products Liability:	$30,000,000 any one Occurrence and in the aggregate for any one Period of Insurance in excess of $20,000,000
Wording:	CGU Excess Liability Insurance Policy CID0343 REV1 0918
Interest Noted:	It is noted and agreed that this Policy is endorsed to include the interests of: N/A
Remarks:	The above is subject always to the terms, conditions, exclusions and endorsements of the Policy.

Signed for and on behalf of Insurance Australia Limited trading as CGU Insurance.

Tami Sorensen
Technical Liability Underwriting Manager
Southern Region, Australia Division
04/11/2020

Insurance Australia Limited trading as CGU Insurance
ABN 11 000 016 722 AFSL 227681 cgu.com.au
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Appendix B Exploration on mining leases

B1 Exploration activities, exploration rehabilitation, exploration liabilities on the mining lease

Table 33 Exploration activities

Have any exploration activities been conducted during the current reporting period?	Yes	If yes, complete all sections of Appendix B
Have rehabilitation activities been undertaken during the reporting period?	Yes	
Is there any outstanding rehabilitation from current or previous reporting periods to be undertaken?	No	

If no to all of above, no further information on exploration activities is required.

B2 Summary of exploration activities and status of rehabilitation

Table 34 Summary of exploration activities

Tenement number	Program notification submit date	Drillholes or sites	Rehabilitated drill sites	Drill lines / access tracks	Drill line/access track length	Costeans	Costeans rehabilitated	Comments
ML6455	28/05/20	37 RC drillholes	All sites rehabilitated including some nearby previous drill sites	Existing lines used	Drilling completed adjacent to the Perseverance open pit. No new access lines cleared – existing tracks used.	Nil	Nil	All drill sites from the 2020 program were rehabilitated which included additional clean-up for any nearby legacy drill sites from previous operators. All evidence of the collar was removed and all rubbish and plastic bags and tarps were removed. Additional drill sites from previous company drilling operations in the near vicinity were also cleaned up.

Table 35 Drillhole or site rehabilitation status

Tenement number	Program notification submit date	Drillholes or sites	Date drilled	Drilling method	Hole depth	Number of sumps and dimensions	Drill pad size	Easting (GDA 2020)	Northing (GDA 2020)	Zone	Rehabilitation date	Status	Planned rehabilitation date	Comments
ML6455	28/05/20	TBM0001	27/07/2020	RC	48	0	25x25	455117	660293	Zone 53	09/02/2021	Drillsite completely rehabilitated		Drillholes located in previously drilled area and existing pads or access tracks used. Rehabilitation included cutting the PVC collar below surface, all sample material and cutting removed or disposed down the drillhole. Rubbish removed.
ML6455	28/05/20	TBM0002	27/07/2020	RC	68	0	25x25	455111	660289	Zone 53	09/02/2021	Drillsite completely rehabilitated		
ML6455	28/05/20	TBM0003	27/07/2020	RC	66	0	25x25	455101	660285	Zone 53	09/02/2021	Drillsite completely rehabilitated		
ML6455	28/05/20	TBM0004	28/07/2020	RC	36	0	25x25	455155	660292	Zone 53	09/02/2021	Drillsite completely rehabilitated		
ML6455	28/05/20	TBM0005	28/07/2020	RC	54	0	25x25	455156	660288	Zone 53	09/02/2021	Drillsite completely rehabilitated		
ML6455	28/05/20	TBM0006	28/07/2020	RC	93	0	25x25	455153	660284	Zone 53	09/02/2021	Drillsite completely rehabilitated		
ML6455	28/05/20	TBM0007	28/07/2020	RC	80	0	25x25	455195	660285	Zone 53	09/02/2021	Drillsite completely rehabilitated		
ML6455	28/05/20	TBM0008	29/07/2020	RC	76	0	25x25	455235	660285	Zone 53	09/02/2021	Drillsite completely rehabilitated		
ML6455	28/05/20	TBM0009	29/07/2020	RC	63	0	25x25	455235	660288	Zone 53	09/02/2021	Drillsite completely rehabilitated		
ML6455	28/05/20	TBM0010	29/07/2020	RC	36	0	25x25	455236	660293	Zone 53	09/02/2021	Drillsite completely rehabilitated		
ML6455	28/05/20	TBM0011	30/07/2020	RC	60	0	25x25	456249	660331	Zone 53	09/02/2021	Drillsite completely rehabilitated		Single drillhole located at Old Flame prospect located to the east of Perseverance to confirm results from previous company drilling.
ML6455	28/05/20	TBM0012	30/07/2020	RC	54	0	25x25	455197	660288	Zone 53	09/02/2021	Drillsite completely rehabilitated		

Tenement number	Program notification submit date	Drillholes or sites	Date drilled	Drilling method	Hole depth	Number of sumps and dimensions	Drill pad size	Easting (GDA 2020)	Northing (GDA 2020)	Zone	Rehabilitation date	Status	Planned rehabilitation date	Comments
ML6455	28/05/20	TBM0013	30/07/2020	RC	102	0	25x25	454717	660257	Zone 53	09/02/2021	Drillsite completely rehabilitated		
ML6455	28/05/20	TBM0014	31/07/2020	RC	108	0	25x25	454734	660260	Zone 53	09/02/2021	Drillsite completely rehabilitated		
ML6455	28/05/20	TBM0015	31/07/2020	RC	90	0	25x25	454762	660263	Zone 53	09/02/2021	Site rehabilitated		
ML6455	28/05/20	TBM0016	01/08/2020	RC	156	0	25x25	454787	660267	Zone 53	09/02/2021	Drillsite completely rehabilitated		
ML6455	28/05/20	TBM0017	01/08/2020	RC	174	0	25x25	454757	660270	Zone 53	09/02/2021	Drillsite completely rehabilitated		Historic drillholes nearby were also rehabilitated near this location. Five holes were cleaned up including cutting collar casing below ground.
ML6455	28/05/20	TBM0018	02/08/2020	RC	214	0	25x25	454729	660273	Zone 53	09/02/2021	Drillsite completely rehabilitated		Historic drillholes were also rehabilitated at 454727E;6602747N, 454720E;6602730N, 454750E;6602700N (two collars) and 454755E;6602695N.
ML6455	28/05/20	TBM0019	03/08/2020	RC	138	0	25x25	454738	660265	Zone 53	09/02/2021	Site rehabilitated		Cleaned up historic hole in the same area, collar pipe removed, cuttings disposed down drillhole.
ML6455	28/05/20	TBM0020	03/08/2020	RC	186	0	25x25	454712	660268	Zone 53	09/02/2021	Drillsite completely rehabilitated		
ML6455	28/05/20	TBM0021	04/08/2020	RC	234	0	25x25	454683	660271	Zone 53	09/02/2021	Drillsite completely rehabilitated		Small historic costean at location 454687E ; 6602737N was rehabilitated as part of the site work for this drillhole.
ML6455	28/05/20	TBM0022	05/08/2020	RC	246	0	25x25	454670	660267	Zone 53	09/02/2021	Drillsite completely rehabilitated		
ML6455	28/05/20	TBM0023	06/08/2020	RC	198	0	25x25	454692	660265	Zone 53	09/02/2021	Drillsite completely rehabilitated		
ML6455	28/05/20	TBM0024	07/08/2020	RC	150	0	25x25	454713	660263	Zone 53	09/02/2021	Drillsite completely rehabilitated		
ML6455	28/05/20	TBM0025	07/08/2020	RC	150	0	25x25	454696	660259	Zone 53	09/02/2021	Drillsite completely rehabilitated		
ML6455	28/05/20	TBM0026	08/08/2020	RC	198	0	25x25	454673	660261	Zone 53	09/02/2021	Drillsite completely rehabilitated		
ML6455	28/05/20	TBM0027	09/08/2020	RC	246	0	25x25	454653	660263	Zone 53	09/02/2021	Drillsite completely rehabilitated		
ML6455	28/05/20	TBM0028	11/08/2020	RC	198	0	25x25	454917	660262	Zone 53	09/02/2021	Drillsite completely rehabilitated		Other historical WPG drillholes were rehabilitated near to this location at Eclipse. Seven old holes cleaned up including collar casing and removal of old cuttings.
ML6455	28/05/20	TBM0029	11/08/2020	RC	168	0	25x25	454859	660262	Zone 53	11/02/2021	Drillsite completely rehabilitated		Old WPG drillholes rehabilitated at 454868E;6602680N, 454876E;6602680N, 454885E;6602680E.
ML6455	28/05/20	TBM0030	12/08/2020	RC	216	0	25x25	454876	660260	Zone 53	11/02/2021	Drillsite completely rehabilitated		
ML6455	28/05/20	TBM0031	13/08/2020	RC	216	0	25x25	454854	660257	Zone 53	11/02/2021	Drillsite completely rehabilitated		
ML6455	28/05/20	TBM0032	14/08/2020	RC	240	0	25x25	454876	660255	Zone 53	11/02/2021	Drillsite completely rehabilitated		
ML6455	28/05/20	TBM0033	15/08/2020	RC	84	0	25x25	454803	660256	Zone 53	09/02/2021	Drillsite completely rehabilitated		Historic pit or old working near this drillhole and located at 454795E ; 6602584N was used for disposal of drill cuttings and backfilled.
ML6455	28/05/20	TBM0034	16/08/2020	RC	252	0	25x25	454832	660253	Zone 53	11/02/2021	Drillsite completely rehabilitated		
ML6455	28/05/20	TBM0035	17/08/2020	RC	318	0	25x25	454772	660292	Zone 53	11/02/2021	Drillsite completely rehabilitated		
ML6455	28/05/20	TBM0036	18/08/2020	RC	12	0	25x25	454810	660255	Zone 53	09/02/2021	Drillsite completely rehabilitated		
ML6455	28/05/20	TBM0037	18/08/2020	RC	300	0	25x25	454748	660283	Zone 53	09/02/2021	Drillsite completely rehabilitated		

Table 36 Access track or drill line rehabilitation status

Tenement number	Program notification submit date	Track identification	Tracks or lines created (km)	Rehabilitated tracks or lines (km)	Area of disturbance (ha or m2)	Rehabilitation date	Rehabilitation method	Tracks or lines to be rehabilitated (km)	Planned rehabilitation date	Comments
ML 6455	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

Drilling was completed adjacent to the Perseverance open pit where there were existing tracks and sites from previous company drilling operations. No new access lines cleared and existing tracks were used.

Table 37 Costean rehabilitation status

Tenement number	Program notification submit date	Costean identification	Date excavated	Dimensions (length, width, depth)	Total area of disturbance	Easting (GDA 2020)	Northing (GDA 2020)	Zone	Rehabilitation date	Status	Planned rehabilitation date	Comments
ML 6455	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

Additional rehabilitation will be undertaken in late 2021 and 2022 as part of the rehabilitation of Barton Gold's Phase 2 drilling program on the Tarcoola Mining Lease.

Table 38 Drillhole abandonment summary

Tenement number	Drillhole	Aquifer(s) intersected?	Backfilling requirements	Total depth (m)	Drilling completion date	Aquifer formation name	Aquifer interval (m)	Type of aquifer(s) intersected	Cementing interval (m)	Comments
ML 6455	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

B3 Photos

Table 39 Photo monitoring

Site identification or details	Date taken	Easting (GDA 2020)	Northing (GDA 2020)	Zone	Comments	Photo
Drillhole TBM0015	14/12/2020	454753	6602674	Zone 53	Drill site conditions prior to rehabilitation taken looking to the southwest.	
Drillhole TMB0015	09/02/2021	454776	6602651	Zone 53	Photograph taken after rehabilitation looking to the southwest	

Site identification or details	Date taken	Easting (GDA 2020)	Northing (GDA 2020)	Zone	Comments	Photo
Drillhole TBM0019	14/12/2020	454753	6602674	Zone 53	Photograph looking southwest taken before rehabilitation	
Drillhole TBM0019	09/02/2021	454753	6602674	Zone 53	Photograph taken after rehabilitation looking toward the southwest	

Site identification or details	Date taken	Easting (GDA 2020)	Northing (GDA 2020)	Zone	Comments	Photo
Drillhole TBM0021	14/12/2020	454700	6602727	Zone 53	Photograph looking southwest taken before rehabilitation	
Drillhole TBM0021	09/02/2021	454700	6602727	Zone 53	Photograph taken after rehabilitation looking southwest	

Site identification or details	Date taken	Easting (GDA 2020)	Northing (GDA 2020)	Zone	Comments	Photo
Drillhole TBM0032	14/12/2020	454887	6602545	Zone 53	Photograph looking northwest taken before rehabilitation	
Drillhole TBM0032	09/02/2021	454887	6602545	Zone 53	Photograph taken after rehabilitation looking northwest	

Site identification or details	Date taken	Easting (GDA 2020)	Northing (GDA 2020)	Zone	Comments	Photo
Drillhole TBM0033	17/01/2021	454830	6602567	Zone 53	Photograph looking west taken before rehabilitation	
Drillhole TBM0033	09/02/2021	454822	6602563	Zone 53	Photograph taken after rehabilitation looking west	

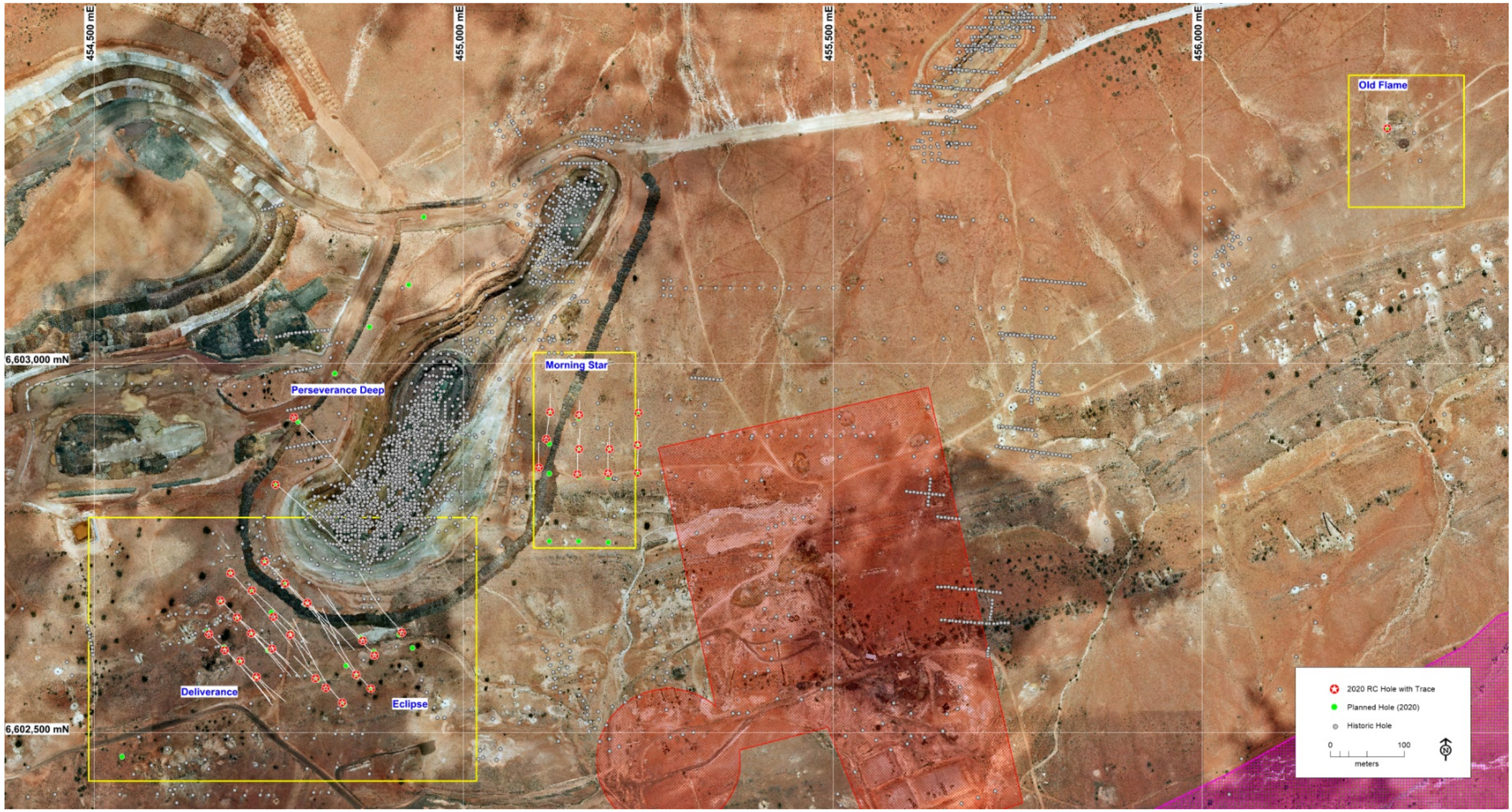
Site identification or details	Date taken	Easting (GDA 2020)	Northing (GDA 2020)	Zone	Comments	Photo
Drillhole TBM0035	17/12/2020	454770	6602925	Zone 53	Photograph before rehabilitation facing toward northeast	
Drillhole TBM0035	11/02/2021	454770	6602925	Zone 53	Photograph taken after rehabilitation looking northeast	

Site identification or details	Date taken	Easting (GDA 2020)	Northing (GDA 2020)	Zone	Comments	Photo
Drillhole TBM0037	20/01/2021	454750	6602825	Zone 53	Photograph taken from the south before rehabilitation	
Drillhole TBM0037	09/02/2021	454750	6602841	Zone 53	Photograph taken after rehabilitation viewed from the north	

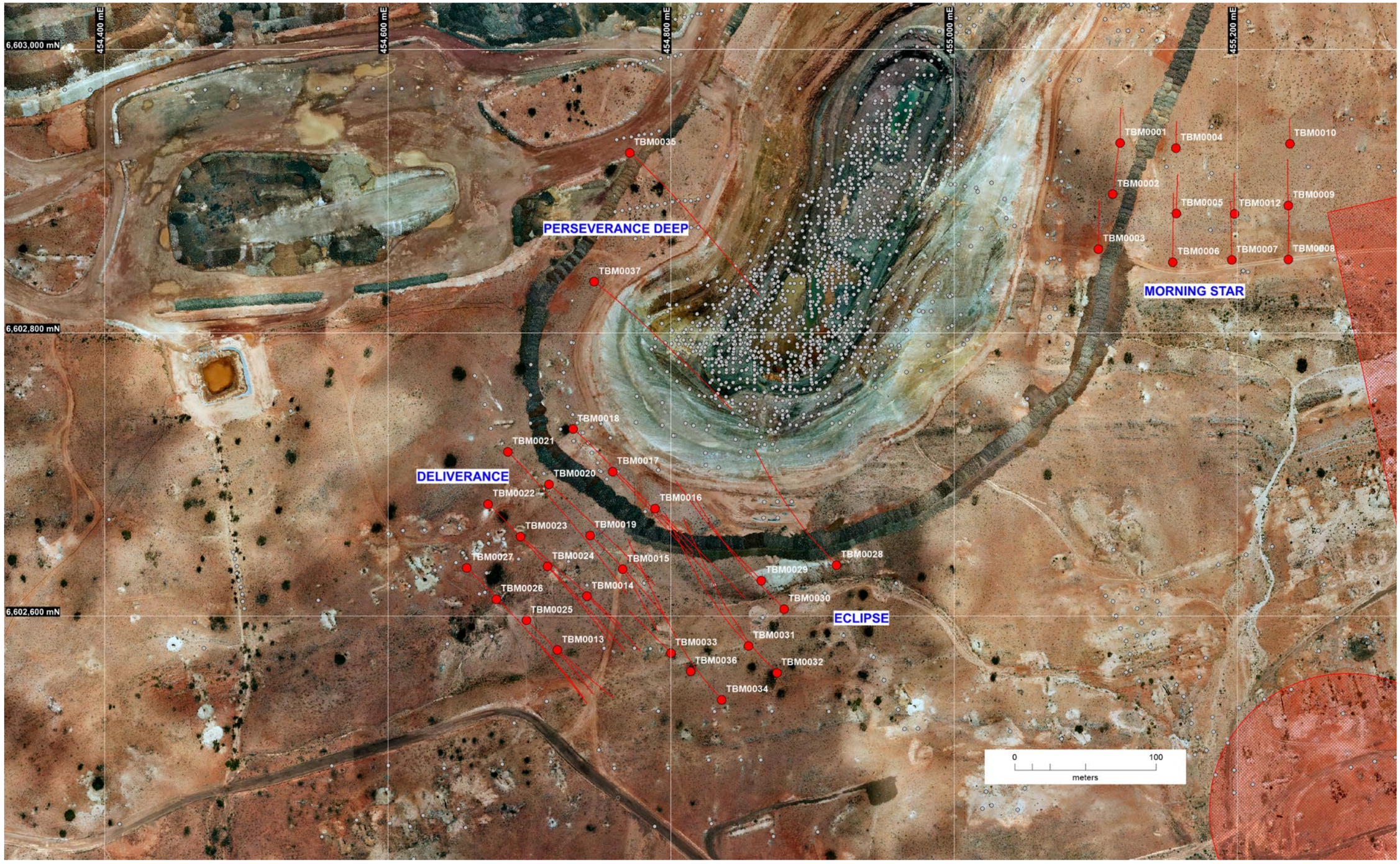
B4 Maps

Table 40 Maps showing exploration activities

Date Prepared	Site Identification / details	Comments
March 2021	ML 6455	Map showing all drilling completed during the 2020 program with the majority of drillholes completed close to the Perseverance open pit and one drillhole at Old Flame prospect



Date Prepared	Site Identification / details	Comments
March 2021	ML 6455	Inset map showing drilling completed during the 2020 program with the majority of drillholes close to the Perseverance open pit and within previous WPG drilled areas.



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