



Tropicana Gold Project
Compliance Assessment Plan
(Ministerial Statement 839)

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INTEGRATED MANAGEMENT SYSTEM

**Tropicana Gold Project
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(MS 839)**

1 INTRODUCTION

This Compliance Assessment Plan (CAP) has been prepared to meet conditions 4-1 and 4-2 of Ministerial Statement 839 (the Ministerial Statement) for the Tropicana Gold Project (the Project). The CAP forms part of the Project's Compliance Management System, which is an integral part of the Project's Integrated Management System (IMS) called "ONE". "ONE" ensures the effective management of all health, safety, environment, community and operational issues associated with the Project (Figure 1)..

"ONE" (including the CAP) establishes the framework and standards that must be achieved for all activities associated with the Project. It includes the development and management of policies, management strategies, procedures and reporting requirements.

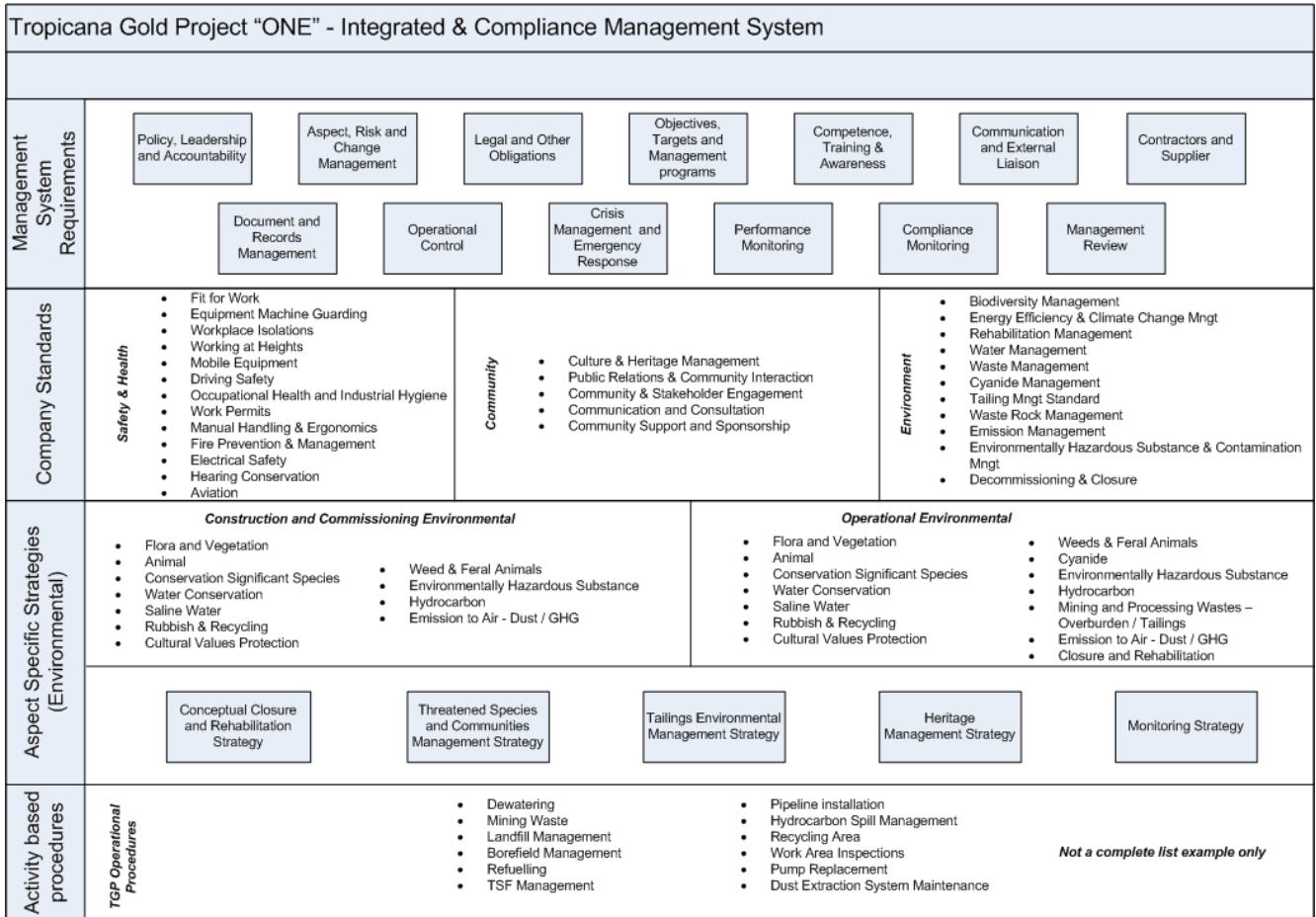


Figure 1 Project Integrated & Compliance Management System "ONE"

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2 PURPOSE OF THE COMPLIANCE ASSESSMENT PLAN

In accordance with conditions 4-1 and 4-2 of the Project Ministerial Statement 839, a CAP is required to be prepared and maintained to the satisfaction of the Chief Executive Officer (CEO) of the Office of the Environmental Protection Authority (OEPA).

This CAP has been prepared, in accordance with the OEPA's Draft Guidelines for Proponents – Preparing a Compliance Assessment Plan (OEPA 2009), to indicate:

- The frequency of compliance reporting;
- The approach and timing of compliance assessments;
- The retention of compliance assessments;
- The method of reporting of potential non-compliances and corrective actions taken;
- The table of contents of compliance reports; and
- Public availability of compliance reports.

3 FREQUENCY OF COMPLIANCE REPORTING

Submission of compliance reports to the CEO of the OEPA is to be undertaken on an annual basis following the submission of the first report which is due by the 24 December 2011. This requirement is outlined in Condition 4-6 of the Ministerial Statement which was published on the 24 September 2010.

4 APPROACH AND TIMING OF COMPLIANCE ASSESSMENTS

Compliance with the conditions of the Ministerial Statement will be assessed as set out in the approach and timing table below (Table 1). Documents required by the Ministerial Statement to be made publicly available will be made available on the project website and provided to the DEC (library) and the PIMB (OEPA)

Table 1 Approach and timing

Audit Code	How Compliance will be assessed	Timing
M1-1	Summarised in the 'Current Status' Section of the Compliance Assessment Report	Annually
M2-2	Correspondence with the OEPA	Within 30-days
M3-1 & M3-2	Correspondence with the OEPA	On or before 23 Sept 2015.
M4-1 & 4-2	Correspondence with the OEPA and Compliance Assessment Report	Submission of CAP before 24 June 2011 or before ground disturbing activities.
M4-4	Internal Audit available of request	Annually
M4-5 & M4-6	Compliance Assessment Report (Available on Website)	Annually by 24 December Within 14days of submission of the CAR

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Audit Code	How Compliance will be assessed	Timing
M5-1 & M5-2	Internal Audit of the Project Threatened Species & communities Management Strategy (TS&CMS) and the Environmental Monitoring Strategy available on request Approval to take DRF Correspondence with OEPA (revisions) and DEC	Annually
M5-3	Analysis of the Monitoring Data Report to the CEO of the OEPA	In accordance with the Environmental Monitoring Strategy Report within 21 days if required.
M5-4	Report to the CEO of the OEPA	As required
M6-1 & M6-2	Internal audit of TS&CMS available on request Correspondence with OEPA (revisions) and DEC	Annually 3-yearly (first review to be completed by 23 Sept 2013)
M6-3	Website	Within 14days of submission
M7-1	Internal audit of Trench inspection records	Quarterly for the duration of construction
M7-2	Correspondence with OEPA regarding training program Internal Audit of training records available on request	Audit of records on completion of construction
M7-3 & M7-4	Internal Audit of inspection records & design drawings	Audit of records on completion of construction
M7-5	Trench Inspection fauna report submitted to OEPA	Within 21 days of completions of the pipeline and communication link construction
M8-1 to M8-4	Internal Audit of: 1. Water Monitoring results against table 3.4.2 of Chapter 3 Australian Water Quality Guidelines for Fresh and Marine Waters (2000) (as updated) 2. Internal Audit of Water Monitoring results Australian Guidelines for Water Quality Monitoring and Reporting (as updated) 3. Groundwater and Surface Water Monitoring Program 4. Groundwater and Surface Water Monitoring Reports available on request	Annually
M8-5, M8-6	Correspondence with CEO of the OEPA Report to the CEO of the OEPA	Within 21 days of a potential changing being identified
M8-7	Monitoring Report available on the Website	Within 14days of submission
M9-1	Internal Audit of Rehabilitation and Closure activities and records available on request Correspondence with OEPA and DEC on Monitoring Strategy Analysis of the Monitoring Data	Annually post construction As required In accordance with the Monitoring Strategy
M9-2	Analysis of the Monitoring Data Correspondence with OEPA and DMP	In accordance with the Monitoring Strategy As required
M10-1 to M10-5	Final Closure and Decommission Strategy (FC&DS)	Preparation and submission of strategy 5-

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Audit Code	How Compliance will be assessed	Timing
	Correspondence with OEPA and DMP Internal Audit of FC&DS available on request External Audits as required of FC&DS available on request Website	years prior to mine completion Closure in accordance with the Plan Internal Audits – Annually post strategy development External audits as required – 3-years post strategy development Within 14days of submission

Each strategy referred to in the Table contains actions and targets. Each strategy also contains measures that are required to be implemented to achieve the objective in the Ministerial Statement. Assessment of compliance will occur annually via internal audits. The audits will be undertaken by the Senior Environmental Specialist (or appropriately qualified delegate) and audit plans for each strategy will be prepared in accordance with the Ministerial Statement compliance will be as set out in the Audit Table (Appendix A).

5 RETENTION OF COMPLIANCE ASSESSMENTS REPORTS

In accordance with Condition 4-4 of the Ministerial Statement, all compliance assessment reports (CAR) shall be retained for the life of the Project and be made available when requested by the CEO of the OEPA.

The compliance reports will be retained electronically using the Project’s document management system and report library and made publicly available via either the Tropicana JV website or an equivalent website. Information lodged in the document management system and associated library will be backed-up and retained for the duration of the Project.

6 TABLE OF CONTENTS OF COMPLIANCE ASSESSMENT REPORTS

Table 2 outlines the table of contents that will be used in the Project’s compliance reports against the Ministerial Statement. The structure of the reports is based on the DEC’s *Draft Compliance Monitoring and Reporting – Guidelines for Proponents* (DoE, 2006). If a change to the CAP is proposed this will also be outlined within the compliance report when required. It is not anticipated that information will be included in each CAR.

Table 2 Proposed “Table of Contents”

Heading	Description
Introduction	Introduction to the Project. Include reference to the Ministerial Statement number/s, relevant management strategies, and the period of time covered by the report.
Current Status	Summarise the current implementation status of the Project, specifically any major

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Heading	Description
	milestones /achievements within the reporting period, having regard to the key characteristics table of in schedule 1 of the Ministerial Statement.
Compliance	Inclusion of a statement as to whether the Proponent has complied with the conditions of the Ministerial Statement, over the reporting period. Make reference to the Audit Table/s and implementation of the management strategies. Identification of all potential non- compliances and description of the corrective and preventative actions taken.
Environmental Monitoring	Summarise the environmental monitoring undertaken over the period and provision of details regarding any research or studies that may were undertaken during the reporting period.
Endorsement	Endorsement by the proponent's Chief Executive Officer or a person delegated to sign on the Chief Executive Officer's behalf.
Figures	Any relevant figures, which may include but are not limited to facility location maps, and monitoring locations.
Appendices	Compliance Audit Table

7 REPORTING NON-COMPLIANCES AND CORRECTIVE MEASURES

The CEO of the OEPA will be advised within seven working days of a potential non-compliance being known in accordance with the condition 4-5 of the Ministerial Statement.

Non-compliances, and the corrective and preventative actions taken, will also be outlined in the compliance report.

8 OTHER REPORTS

Reports required under the conditions of the Ministerial Statement will be provided as required by those conditions and reported in the Compliance Assessment Report

9 PUBLIC AVAILABILITY OF COMPLIANCE ASSESSMENT REPORTS

Compliance reports will be placed on the Tropicana Joint Venture website or an equivalent website for the life of the Project. The Tropicana JV website is available through the following link; <http://www.tropicana-jv.com.au/>.

A URL link to each report uploaded will be sent to the Proposal Implementation Monitoring Branch through the pims@epa.wa.gov.au email address.

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Compliance reports will also be sent (1 hard copy and 1 CD) to:

- The CEO of the OEPA, c/- The Manager, Proposal Implementation Monitoring Branch (PIMB), Locked Bag 33, Cloisters Square, PERTH WA 6850; and
- Department of Environment and Conservation Library (Atrium) Locked Bag 104, BENTLEY DELIVERY CENTRE WA 6983.

10 REFERENCES

- Department of Environment (2006). *Draft Compliance Monitoring and Reporting – Guidelines for Proponents*. Department of Environment, Government of Western Australia.
- Office of the Environmental Protection Authority (2010a). *Draft Guidelines for Proponents – Preparing a Compliance Assessment Plan*. Office of the Environmental Protection Authority, Government of Western Australia.
- Office of the Environmental Protection Authority (2010b). *Draft Guidelines for Proponents – Preparing an Audit Table*. Office of the Environmental Protection Authority, Government of Western Australia.
- Office of the Environmental Protection Authority (2010c). *Draft Fact Sheet No 1 – Making Documents Publicly Available*. Office of the Environmental Protection Authority, Government of Western Australia.

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AUDIT TABLE

Proposal Implementation Monitoring Section

PROJECT: Tropicana Gold Project, Shire of Menzies, Shire of Laverton and The City of Kalgoorlie-Boulder

Note:

- Phases that apply in this table = **Pre-Construction, Construction, Operation, Decommissioning, Overall (several phases)**
- This audit table is a summary and timetable of conditions and commitments applying to this project. Refer to the Minister's Statement for full detail/precise wording of individual elements.
- Code prefixes: M = Minister's condition; P = Proponent's commitment; A = Audit specification; N = Procedure.
- Any elements with status = "Audited by proponent only" are legally binding but are not required to be addressed specifically in compliance reports, if complied with.
- Acronyms list:- Minister for the Environment - Min for Env; Chief Executive Officer – CEO of the OEPA; Department of Environment – DoE (now DEC – Dept of Environment and Conservation); Evaluation Division - Part IV; Pollution Prevention Division - Part V; Waste Management Division - WMD; Department of Conservation and Land Management - CALM; Department of Minerals and Energy - DME; Environmental Protection Authority - EPA; Health Department of WA - HDWA; Water and Rivers Commission - WRC; Bush Fires Board - BFB.

Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Status
839:M1.1	Proposal Implementation	The proponent shall implement the proposal as assessed by the Environmental Protection Authority and described in Schedule 1 of this statement subject to the condition and procedures of this statement.	As per Schedule 1, Statement 839	Compliance Report	Min for Env		Overall	Ongoing	
839:M2.1	Proponent Nomination and Contact Details	The proponent for the time being nominated by the Minister for Environment under sections 38(6) or 38(7) of the <i>Environmental Protection Act 1986</i> is responsible for the implementation of the proposal.	Notify in writing a letter that provides details of the name and address of the new proponent	Letter applying for a transfer of proponent and a copy of the Statement endorsed by the proposed replacement proponent	Min for Env		Overall	On going	
839:M2.2	Proponent Nomination and Contact Details	The proponent shall notify the Chief Executive Officer of the Office of the Environmental Protection Authority of any change of the name and address of the proponent for the serving of notices or other correspondence within 30 days of such change	Notify in writing a letter that provides details of the name and address of the new proponent		CEO		Overall	Within 30 days of such change	
839:M3.1	Time Limit of Authorisation	The authorisation to implement the proposal provided for in this statement shall lapse and be void five years after the date of this statement if the proposal to which this statement relates is not substantially commenced	Notify in Writing	Letter of notification	CEO		Overall	Before the 23 September 2015	
839:M3.2	Time Limit of Authorisation	The proponent shall provide the Chief Executive Officer of the Office of the Environmental Protection Authority with written evidence which demonstrates that the proposal has substantially commenced on or before the expiration of five years from the date of this statement	Notify in Writing	Letter of notification.	CEO		Overall	Before the 23 September 2015	
839:M4.1	Compliance Reporting	The proponent shall prepare and maintain a compliance assessment plan to the satisfaction of the Chief Executive Officer of the Office of the Environmental Protection Authority	Correspondence with the OEPA Preparation of a Compliance Assessment Plan and an audit table in compliance with the requirements of the OEPA.	Approved Compliance Assessment Plan (CAP). A completed and approved Audit Table (this document). Compliance Report	CEO		Overall	Ongoing	
839:M4.2	Compliance Reporting	The proponent shall submit to the Chief Executive Officer of the Office of the Environmental Protection Authority, the compliance assessment plan required by condition 4-1 at least 6 months prior to the first compliance report required by condition 4-6, or prior to ground disturbing activity, whichever is sooner. The compliance assessment plan shall indicate: 1. the frequency of compliance reporting; 2. the approach and timing of compliance assessments; 3. the retention of compliance assessments; 4. the method of reporting of potential non-compliances and corrective actions taken; 5. the table of contents of compliance reports; and 6. public availability of compliance reports.	The compliance assessment plan shall indicate: 1. the frequency of compliance reporting; 2. the approach and timing of compliance assessments; 3. the retention of compliance assessments; 4. reporting of potential non-compliances and corrective actions taken; 5. the table of contents of compliance reports; and 6. public availability of compliance reports.	Approved Compliance Assessment Plan Correspondence with OEPA	CEO		Pre-construction	By 24 June 2011 or prior to ground disturbing activities, whichever is sooner.	
839:M4.3	Compliance Reporting	The proponent shall assess compliance with conditions in accordance with the compliance assessment plan required by condition 4-1.	As specified in CAP	Overview provided in Compliance Report	Min for Env		Overall	Compliance Report – Annually by 24 December	

AUDIT TABLE

Proposal Implementation Monitoring Section

PROJECT: Tropicana Gold Project, Shire of Menzies, Shire of Laverton and The City of Kalgoorlie-Boulder

Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Status
839:M4.4	Compliance Reporting	The proponent shall retain reports of all compliance assessments described in the compliance assessment plan required by condition 4-1 and shall make those reports available when requested by the Chief Executive Officer of the Office of the Environmental Protection Authority	Records and reports will be maintained in accordance with the Proponent's document management system requirements so that they can be retrieved if requested.	Availability at the request of the CEO	CEO		Overall	When requested by the CEO	
839:M4.5	Compliance Reporting	The proponent shall advise the Chief Executive Officer of the Office of the Environmental Protection Authority of any potential non-compliance within seven days of that non-compliance being known	Notify in writing	Correspondence to CEO of OEPA	CEO		Overall	Within 7 days of non-compliance being known	
839:M4.6	Compliance Reporting	The proponent shall submit to the Chief Executive Officer of the Office of the Environmental Protection Authority the first compliance assessment report fifteen months from the date of issue of this Statement addressing the twelve month period from the date of issue of this Statement and then annually from the date of submission of the first compliance assessment report. The compliance assessment report shall: 1. be endorsed by the proponent's Chief Executive Officer or a person delegated to sign on the Chief Executive Officer's behalf; 2. include a statement as to whether the proponent has complied with the conditions; 3. identify all potential non-compliances and describe corrective and preventative actions taken; 4. be made publicly available in accordance with the approved compliance assessment plan; and 5. indicate any proposed changes to the compliance assessment plan required by condition 4-1.	In accordance with CAP	1. Endorsement in Compliance Report. 2. Compliance Report. 3. Uploaded on to proponent's website and copies sent to DEC Library and PIMB (OEPA).	CEO		Overall	The First CAR submitted due by 24 December 2011. Then annually by 24 December	
839:M5.1	Flora and Vegetation	The proponent shall ensure that there is no loss of plants of Declared Rare Flora species due to construction or operational activities unless otherwise approved.	Implementation and internal audit of DRF management strategies in Section 13 of the Threatened Species and Community Management Strategy (TS&CMS). Implementation and internal audit of Environmental Monitoring Strategy Application for Licence to Take DRF (Regulation 17) where applicable	Species location records, design/location records and any incident reports/logs in monitoring report and summary in Compliance Report Approvals for license to take DRF	Min for Env		Overall	Ongoing	
839:M5.2	Flora and Vegetation	The proponent shall undertake monitoring of the condition and abundance of vegetation and flora at reference and potential impact sites in accordance with the "Tropicana Gold Project Environmental Monitoring Strategy, Version: 1.0, Author: B Bastow, Issue Date: 18 February 2010" or subsequent revisions approved by the Chief Executive Officer of the Office of the Environmental Protection Authority. This monitoring is to be carried out to the requirements of the Chief Executive Officer of the Office of the Environmental Protection Authority on advice of the Department of Environment and Conservation	Implementation and internal audit of Environmental Monitoring Strategy Correspondence with OEPA (revisions) and DEC	Monitoring report included in Project Annual Environmental Report (AER) and summary in Compliance Report. Monitoring Records Maps and Photos Correspondence with OEPA (revisions) and DEC	CEO	DEC	Overall	Ongoing	
839:M5.3	Flora and Vegetation	Should the potential impact sites show a 25 per cent (or greater) decline in cover or productivity as compared to the reference sites, the proponent shall provide a report to the Chief Executive Officer of the Office of the Environmental Protection Authority within 21 days of the decline being identified which 1). describes the decline; 2). provides information which allows determination of the likely root cause of the decline; and 3). if likely to be caused by activities undertaken in implementing the proposal, states the actions and associated timelines proposed to remediate the decline.	Internal audit of monitoring records and analysis of monitoring data Notify in writing	Monitoring Records Report outlining decline, potential causes and corrective actions taken Report to CEO of OEPA	CEO		Overall	Within 21 days of the decline being identified	

AUDIT TABLE

Proposal Implementation Monitoring Section

PROJECT: Tropicana Gold Project, Shire of Menzies, Shire of Laverton and The City of Kalgoorlie-Boulder

Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Status
839:M5.4	Flora and Vegetation	The proponent shall, on approval of the Chief Executive Officer of the Office of the Environmental Protection Authority, implement the actions identified in 5-3 (3) and continue to implement such actions until the Chief Executive Officer of the Office of the Environmental Protection Authority determines that the remedial actions may cease.	Implement the actions identified in 5-3 (3)	Correspondence with the OEPA	CEO		Overall	On approval of the CEO	
839:M5.5	Flora and Vegetation	The proponent shall make the Environmental Monitoring Strategy referred to in 5-2 publically available in a manner approved by the Chief Executive Officer of the Office of the Environmental Protection Authority	1. In accordance with Proposal Implementation Monitoring Section – Fact Sheet 1 – Draft - Making Documents Publicly Available, unless otherwise instructed by the CEO; 2. Adherence to a condition in a Statement requiring public availability of documents must occur within 14 days of submission of the documents to the CEO; and 3. 14 days from the date of making documents publicly available, proponents shall provide evidence to the CEO to confirm that advertising or lodgement on website has been completed.	Document available on website (and letter to CEO to confirm) Copy of Document to DEC Library and PIMB (OEPA)	CEO		Overall	Ongoing and within 14 days of submission and approval of any revisions	
839:M6.1	Threatened Species	The proponent shall implement the “Tropicana Gold Project Threatened Species and Communities Management Strategy, Version 2.0, Author: B Bastow, Issue Date: July 2009”, or subsequent revisions approved by the Chief Executive Officer of the Office of the Environmental Protection Authority. The objective of this strategy is to minimise adverse impacts to conservation significant species and communities.	Implementation and internal audit of DRF management strategies in Section 13 of the Threatened Species and Community Management Strategy (TS&CMS). Internal Audit Correspondence with OEPA (revisions)	Monitoring report included in Project Annual Environmental Report (AER) and summary in Compliance Report. Electronic Species location records Design/location records Site inductions Maps and Photos	CEO		Overall	Ongoing	
839:M6.2	Threatened Species	The proponent shall review and revise the Tropicana Gold Project Threatened Species and Communities Management Strategy referred to in 6-1, in consultation with the Department of Environment and Conservation, every three years to ensure that the mitigation and management techniques remain valid and incorporate any relevant new research.	Formal review by specialist advisers and DEC	Correspondence with DEC Revised Strategy Research records	Min for Env	DEC	Overall	Review and revise every 3 years with the first review due 24 September 2013.	
839:M6.3	Threatened Species	The proponent shall make the Tropicana Gold Project Threatened Species and Communities Management Strategy referred to in 6-1 publically available in a manner approved by the Chief Executive Officer of the Office of the Environmental Protection Authority.	1. In accordance with Proposal Implementation Monitoring Section – Fact Sheet 1 – Draft - Making Documents Publicly Available, unless otherwise instructed by the CEO; 2. Adherence to a condition in a Statement requiring public availability of documents must occur within 14 days of submission of the documents to the CEO; and 3. 14 days from the date of making documents publicly available, proponents shall provide evidence to the CEO to confirm that advertising or lodgement on website has been completed.	Document available on website (and letter to CEO to confirm) Copy of Document to DEC Library and PIMB (OEPA)	CEO		Overall	Ongoing and within 14 days of submission and approval of revision	
839:M7.1	Trapped Fauna	The proponent shall ensure that open trenches associated with construction of the water pipeline and the communications link are cleared of trapped fauna by fauna-rescue personnel at least twice daily. Details of all fauna recovered shall be recorded. The first daily clearing shall take place no later than three hours after sunrise and shall be repeated between the hours of 3:00 pm and 6:00 pm. The open trenches shall also be cleared, and fauna details recorded, by fauna-rescue personnel no more than one hour prior to backfilling of trenches.	Internal audit of trench inspection records and procedures	Trench Inspection Fauna Report Trench inspection records Backfilling records Fauna removal and relocation records	Min for Env		Construction	Duration of pipeline construction Trench inspection fauna report will be submitted no later than 21 day from the cessation of	

AUDIT TABLE

Proposal Implementation Monitoring Section

PROJECT: Tropicana Gold Project, Shire of Menzies, Shire of Laverton and The City of Kalgoorlie-Boulder

Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Status
		Note: "fauna-rescue personnel" means employees of the proponent whose responsibility it is to walk the open trench to recover and record fauna found within the trench.		Fauna injury/mortality records Correspondence with the DEC				construction	
839:M7.2	Trapped Fauna	The fauna-rescue personnel shall be trained in the following, through a program that meets the requirements of the Chief Executive Officer of the Office of the Environmental Protection Authority: 1. fauna identification, capture and handling (including venomous snakes); 2. identification of tracks, scats, burrows and nests of conservation-significant species; 3. fauna vouchering (of deceased animals); 4. assessing injured fauna for suitability for release, rehabilitation or euthanasia; 5. familiarity with the ecology of the species which may be encountered in order to be able to appropriately translocate fauna encountered; and 6. performing euthanasia.	Training program approved by CEO of OEPA Internal audit of training records	Training Program records Correspondence with the OEPA	CEO		Construction	Program approved prior to the commencement of pipeline construction	
839:M7.3	Trapped Fauna	Open trench lengths shall not exceed a length capable of being inspected and cleared by the fauna-clearing personnel within the required times as set out in condition 7-1.	Internal audit of inspection records Appropriate planning of pipeline construction	Trench Inspection Fauna Report Trench inspection records	Min for Env		Construction	During pipeline construction	
839:M7.4	Trapped Fauna	Ramps providing egress points and/or fauna refuges providing suitable shelter from the sun and predators for trapped fauna are to be placed in the trench at intervals not exceeding 50 metres.	Internal audit of inspection records and design drawings	Trench Inspection Fauna Report Trench inspection records Backfilling records Photographs	Min for Env		Construction	During pipeline construction	
839:M7.5	Trapped Fauna	The proponent shall produce a report on fauna management within the water pipeline lateral easement and communication corridor at the completion of pipeline and communication link construction. The report shall include the following: 1. details of all fauna inspections; 2. the number of fauna cleared from trenches; 3. fauna mortalities; and 4. all actions taken. The report shall be provided to the Chief Executive Officer of the Office of the Environmental Protection Authority no later than 21 days after the completion of pipeline installation, and shall be made publicly available in a manner approved by the Chief Executive Officer of the Office of the Environmental Protection Authority	1. As per PIMB fact sheet 1 Making documents publicly available. Preparation of report as per criteria following finalisation of pipeline installation and submit to OEPA within 21 days. Report published in a manner approved by CEO of OEPA	Trench Inspection Fauna Report Document available on website (and letter to CEO to confirm) Copy of Document to DEC Library and PIMB (OEPA)	CEO		Overall	Trench inspection fauna report will be submitted no later than 21 days after the completion of pipeline installation	
839:M8.1	Groundwater and Surface Water Quality	The proponent shall ensure that run-off and/or seepage from the tailings storage facility and waste material landforms does not impact the quality of surface water or groundwater within or adjacent to the proposal area to exceed the trigger values for a slightly to moderately disturbed ecosystem provided for in Table 3.4.2 of Chapter 3 of the Australian and New Zealand Environment and Conservation Council and Agriculture and Resource Management Council of Australia and New Zealand 2000, <i>Australian Water Quality Guidelines for Fresh and Marine Waters</i> and its updates, taking into consideration natural background water quality	Internal audit of water monitoring results against table 3.4.2 of Chapter 3 of <i>Australian Water Quality Guidelines for Fresh and Marine Waters (2000)</i> as updated	Monitoring Report included in Project AER and summary included as part of the Compliance Report	Min for Env		Overall	Ongoing	
839:M8.2	Groundwater and Surface Water Quality	The proponent shall monitor the quality of surface water and groundwater upstream and downstream of the tailings storage facility and waste material landforms to ensure that the requirements of condition 8-1 are met. This monitoring is to be carried out using methods consistent with Australian and New Zealand Environment and Conservation Council	Implementation of Environmental Monitoring Strategy Internal audit of water monitoring methodology against <i>Australian Guidelines for Water Quality Monitoring and Reporting (2000)</i> and its updates	Monitoring report included in Project AER and Summary included in Compliance Report	CEO		Overall	Ongoing	

AUDIT TABLE

Proposal Implementation Monitoring Section

PROJECT: Tropicana Gold Project, Shire of Menzies, Shire of Laverton and The City of Kalgoorlie-Boulder

Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Status
		and Agriculture and Resource Management Council of Australia and New Zealand 2000, <i>Australian Guidelines for Water Quality Monitoring and Reporting</i> (and its updates) and to the satisfaction of the Chief Executive Officer of the Office of the Environmental Protection Authority.							
839:M8.3	Groundwater and Surface Water Quality	The proponent shall commence the water quality monitoring required by 8-2 before ground disturbing activities in order to collect baseline data	Implementation of Environmental Monitoring Strategy Internal audit of groundwater and surface water monitoring program	Monitoring report included in Project AER and Summary included in Compliance Report	CEO		Pre-construction	Before ground disturbing activities.	
839:M8.4	Groundwater and Surface Water Quality	The proponent shall submit annually the results of monitoring required by condition 8-2 to the Chief Executive Officer of the Office of the Environmental Protection Authority	Written submission of results within the annual compliance reports	Correspondence with OEPA Monitoring report included in Project AER and Summary included in Compliance Report	CEO		Overall	Compliance Report – Annually by 24 December	
839:M8.5	Groundwater and Surface Water Quality	In the event that monitoring required by condition 8-2 indicates that the requirements of condition 8-1 are not being met, the proponent shall: 1. report such findings to the Chief Executive Officer of the Office of the Environmental Protection Authority within 21 days of the decline in water quality being identified; 2. provide evidence which allows determination of the root cause of the decline in water quality; and 3. if determined to be a result of activities undertaken in implementing the proposal, state the actions and associated timelines proposed to be taken to remediate the water quality.	Preparation of report as per criteria and submit to OEPA within 21 days. Internal review of monitoring results against criteria outlined in condition 8.1	Report outlining the water quality change, potential causes and corrective actions taken	CEO		Overall	No later than 21 days of the decline in water quality being identified.	
839:M8.6	Groundwater and Surface Water Quality	The proponent shall, on approval of the Chief Executive Officer of the Office of the Environmental Protection Authority, implement the actions identified in 8-5 (3) and continue to implement such actions until the Chief Executive Officer of the Office of the Environmental Protection Authority determines that the remedial actions may cease.	Implement the actions identified in 8-5 (3)	Correspondence with OEPA	CEO		Overall	On approval of the CEO	
839:M8.7	Groundwater and Surface Water Quality	The proponent shall make the monitoring reports required by condition 8-2 publicly available in a manner approved by the Chief Executive Officer of the Office of the Environmental Protection Authority	1. In accordance with Proposal Implementation Monitoring Section – Fact Sheet 1 – Draft - Making Documents Publicly Available, unless otherwise instructed by the CEO; 2. Adherence to a condition in a Statement requiring public availability of documents must occur within 14 days of submission of the documents to the CEO; and 3. 14 days from the date of making documents publicly available, proponents shall provide evidence to the CEO to confirm that advertising or lodgement on website has been completed. In accordance with CAP	Document available on website (and letter to CEO to confirm) Copy of Document to DEC Library and PIMB (OEPA)	CEO		Overall	Within 14 days of submission	
839:M9.1	Rehabilitation	The proponent shall undertake progressive rehabilitation over the life of the proposal to achieve the following outcomes: 1. The waste material landforms and tailings storage facility shall be non-polluting and shall be constructed so that their stability, surface drainage, resistance to erosion and ability to support local native vegetation are similar to undisturbed natural analogue landforms as demonstrated by Ecosystem Function Analysis or other methodology acceptable to the Chief Executive Officer of the Office of the Environmental Protection Authority. 2. Waste material landforms, tailings storage facility and other areas disturbed through implementation of the proposal (excluding mine pits), shall be progressively rehabilitated with vegetation composed of native plant species of local	Implementation of Operational Management Strategy, Tailings Environmental Management Strategy and Conceptual Closure and Rehabilitation Management Strategy (and approved future revisions) Internal audit of rehabilitation and closure activities and records Correspondence with OEPA and DEC on Monitoring Strategy Analysis of monitoring data	Rehabilitation Records Annual Mine Plan Map and photos of rehabilitation Rehabilitation Monitoring Records	CEO	DEC	Overall	Ongoing	

AUDIT TABLE

Proposal Implementation Monitoring Section

PROJECT: Tropicana Gold Project, Shire of Menzies, Shire of Laverton and The City of Kalgoorlie-Boulder

Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Status
		<p>provenance (defined as seed or plant material collected within the Great Victoria Desert Bioregions 1 and 2).</p> <p>3. The percentage cover and species diversity of living self sustaining native vegetation in all rehabilitation areas shall be comparable to that of undisturbed natural analogue sites as demonstrated by Ecosystem Function Analysis or other methodology acceptable to the Chief Executive Officer of the Office of the Environmental Protection Authority.</p> <p>4. No new species of weeds (including both declared weeds and environmental weeds) shall establish in the area as a result of the implementation of the proposal.</p> <p>5. The coverage of weeds (including both declared weeds and environmental weeds) within rehabilitated areas shall be no greater than the average of three reference sites on nearby land, with the reference sites to be chosen in consultation with the Department of Environment and Conservation. Note: The methodology for Ecosystem Function Analysis is set out in Tongway DJ and Hindley 2004 <i>Landscape Function Analysis – Procedures for Monitoring and Assessing Landscapes</i>, Commonwealth Scientific and Industrial Research Organisation Sustainable Ecosystems, Canberra.</p>							
839:M9.2	Rehabilitation	Rehabilitation activities shall continue until such time as the requirements of condition 9-1 are met, and are demonstrated by inspections and reports to be met, for a minimum of five years following mine completion to the satisfaction of the Chief Executive Officer of the Office of the Environmental Protection Authority, on advice of the Department of Mines and Petroleum	<p>Activities will continue until the M9.1 requirements are met for a minimum of 5 years</p> <p>Seek advice from DMP following mine completion.</p>	<p>Rehabilitation records</p> <p>Rehabilitation Monitoring Records</p> <p>Correspondence with OEPA and DMP</p>	CEO	DMP	Overall	Ongoing until the requirements of M9-1 are met for a minimum of 5 years	
839:M10.1	Final Closure and Decommissioning Plan	At least five years prior to mine completion, the proponent shall prepare and submit a Final Closure and Decommissioning Plan to the requirements of the Chief Executive Officer of the Office of the Environmental Protection Authority, on advice of the Department of Mines and Petroleum	Preparation of a Final Closure and Decommissioning Plan in accordance with criteria.	Correspondence with OEPA approving the Plan	CEO	DMP	Overall	At least five years prior to mine completion	
839:M10.2	Final Closure and Decommissioning Plan	The Final Closure and Decommissioning Plan shall be prepared consistent with: 1. ANZMEC/MCA 2000, <i>Strategic Framework for Mine Closure Planning</i> ; and 2. Department of Industry Tourism and Resources 2006 <i>Mine Closure and Completion</i> (Leading Practice Sustainable Development Program for the Mining Industry), Commonwealth Government, Canberra;	Preparation of a Final Closure and Decommissioning Plan in accordance with criteria.	Submit plan to CEO of OEPA and DMP Approval of Plan by OEPA.	CEO	DMP	Overall	At least five years prior to mine completion	
839:M10.3	Final Closure and Decommissioning Plan	The Final Closure and Decommissioning Plan shall provide detailed technical information on the following: 1. final closure of all areas disturbed through implementation of the proposal so that they are safe, stable and non-polluting; 2. decommissioning of all plant and equipment; 3. disposal of waste materials; 4. final rehabilitation of waste dumps; tailings storage facilities and other areas (outside the mine pit(s)); 5. Management and monitoring following mine completion; and 6. inventory of all contaminated sites and proposed management.	Preparation of a Final Closure and Decommissioning Plan in accordance with criteria.	Submit plan to CEO of OEPA and DMP. Approval of the plan by OEPA.	CEO	DMP	Overall	At least five years prior to mine completion	
839:M10.4	Final Closure and Decommissioning Plan	The proponent shall close, decommission and rehabilitate the proposal in accordance with the approved Final Closure and Decommissioning Plan	<p>Implementation of the Final Closure and Decommissioning Plan</p> <p>Internal and external audits (as required) of the Final Closure and Decommissioning Plan</p>	<p>Closure, rehabilitation and Decommissioning activities detailed in the Project AER and summary included in Compliance Report</p>	Min for Env		Overall	Ongoing	

AUDIT TABLE

Proposal Implementation Monitoring Section

PROJECT: Tropicana Gold Project, Shire of Menzies, Shire of Laverton and The City of Kalgoorlie-Boulder

Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Status
839:M10.5	Final Closure and Decommissioning Plan	The proponent shall make the Final Closure and Decommissioning Plan required by conditions 10-1 and 10-2 publicly available in a manner approved by the Chief Executive Officer of the Office of the Environmental Protection Authority	1. In accordance with Proposal Implementation Monitoring Section – Fact Sheet 1 – Draft - Making Documents Publicly Available, unless otherwise instructed by the CEO; 2. Adherence to a condition in a Statement requiring public availability of documents must occur within 14 days of submission of the documents to the CEO; and 3. 14 days from the date of making documents publicly available, proponents shall provide evidence to the CEO to confirm that advertising or lodgement on website has been completed.	Document available on website (and letter to CEO to confirm) Copy of Document to DEC Library and PIMB (OEPA)	CEO		Overall	Within 14 days of submission	