Department of Planning, Housing and Infrastructure

NSW Planning ref: MP07_0143-PA-32

Kiara Crook
Environment and Compliance Superintendent
Tarago Operations Pty Ltd
22/10/2025

Sent via the Major Projects Portal only

Subject: Woodlawn Copper - Annual Review

Dear Ms Crook

I refer to your revised Annual Review for the period 1 July 2024 to 30 June 2025, submitted to the NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 17 October 2025, as required by Schedule 6 Condition 4 for the Woodlawn Copper Mine Project, MP07_0143 as modified (Consent).

NSW Planning has reviewed the revised Annual Review and considers it to generally satisfy the reporting requirements of the Consent and the NSW Planning Annual Review Guideline (October 2015). NSW Planning's acceptance of this Annual Review is not an endorsement of the compliance status of the project.

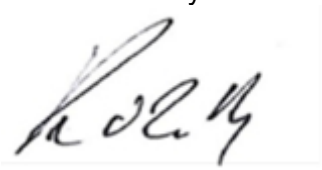
Non-compliances identified in the Annual Review have been assessed by NSW Planning in accordance with its Compliance Policy, with NSW Planning on this occasion determining to record the breaches with no further enforcement action proposed. However, please note that recording the breach does not preclude NSW Planning from taking an alternative enforcement action, should it become apparent that an alternative response is more appropriate.

In accordance with Schedule 6 Condition 5 of the Consent, following submission of the Annual Review you are required to review and if necessary, revise the strategies, plans, and programs required under this Consent within 3 months.

As required by Schedule 6 Condition 11 of the Consent please make publicly available a copy of the revised Annual Review on the company's website.

Should you wish to discuss the matter further, please contact Jennifer Rowe, (Senior Compliance Officer) on 0242471851 or email compliance@planning.nsw.gov.au

Yours sincerely



Katrina O'Reilly
Team Leader - Compliance
Compliance
As nominee of the Planning Secretary

SML 20
Annual Review
1 July 2024 – 30 June 2025
Woodlawn Mine

Document Review/Change History

Date	Review Change Summary Created, Reviewed, Changed or Obsolete	Revision No.	Authors	
			Reviewed by	Approved by
17/10/2025	Document drafted and issued to DPHI via the major projects portal	1	KC	CT

Table 1-1 Annual Review Title Block

Name of operation	Woodlawn Mine
Name of mine operator	DEVELOP Global Limited
Development consent / project approval #	07-0143 MOD2
Name of Development consent / project approval	TriAusMin Limited
Mining Lease #	S(C&PL)L0020
Mining Lease Holder	Tarago Operations Pty Limited
Water Licence # (held by Tarago Operations)	WAL42034 WAL42366
Water Licence # (held by Veolia)	WAL28983
RMP start date	30 May 2024
RMP end date	30 May 2027
Annual Review start date	1 July 2024
Annual Review end date	30 June 2025

I, Christopher Taylor, certify that this audit report is a true and accurate record of the compliance status of Woodlawn Mine for the period 1 July 2024 to 30 June 2025 and that I am authorised to make this statement on behalf of Tarago Operations Pty Limited.

Note.
a) The Annual Review is an 'environmental audit' for the purposes of section 9.39(2) of the Environmental Planning and Assessment Act 1979. Section 9.42 provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, $1 million and for an individual, $250,000.
b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or $22,000, or both).

Name of authorised reporting officer	Christopher Taylor
Title of authorised reporting officer	General Manager - Woodlawn
Signature of authorised reporting officer	
Date	

Glossary

Acronym	Definition	Acronym	Definition
CCC	Community Consultative Committee	PA	Project Approval
DCCEEW	Department of Climate Change, Energy, the Environment and Water	PFMP	Paste Fill Management Plan
DEVELOP	Develop Global Limited	PM10	Particulate matter <10 µm
DPIE	Department of Planning, Industry and Environment	Project	Woodlawn Copper-Zinc Mine
DPHI	Department of Planning, Housing and Infrastructure	RMP	Rehabilitation Management Plan
DSNSW	Dam Safety NSW	ROM	Run-of-mine
EA	Environmental Assessment	RWRD	Rehabilitated Waste Rock Dump
EC	Electrical Conductivity	SML20	Special Mining Lease 20
ED1	Evaporation Dam 1	TCLP	Toxicity Characteristic Leachate Procedure
ED2	Evaporation Dam 2	TDN	Tailings Dam North
EL	Exploration Licence	TDS	Tailings Dam South
EMS	Environmental Management Strategy	TDW	Tailings Dam West
EPA	Environment Protection Authority	TSF4	Tailings Storage Facility 4
EPL	Environmental Protection License	TSP	Total Suspended Particulate
EQuIS	EQuIS Solutions Environmental Database Software	Veolia	Veolia Environmental Services
Heron	Heron Resources	VMP	Vegetation Management Plan
HVAS	High Volume Air Sampler	WAL	Water Access Licence
Iberdrola	Formerly Infigen Energy	WM300	Pollution Control Dam
LFA	Landscape Function Analysis	WMP	Water Management Plan
LOI	Landscape Organisation Index	WOO	Woodlawn Organic Output
mbgl	Metres below ground level	WR Dam	Waste Rock Dam
NEPM	National Environment Protection Measure	WRMP	Waste Rock Management Plan
NSW	New South Wales		

Contents

TABLES

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1. STATEMENT OF COMPLIANCE

A summary of compliance at Woodlawn Mine during the 2024-2025 reporting period is provided in Table 1-2.

Table 1-2 Statement of Compliance

Relevant Approvals	Compliance (Yes/No)
S(C&PL)L0020	Yes
Project Approval 07_0143MOD2	Yes – with exceptions
EPL 20821	Yes – with exceptions

A summary of the non-compliances during the reporting period are provided in Table 1-3. The non-compliance categories are further described in Table 1-4. All pf the PA07 non-compliances were identified in the most recent Independent Environmental Audit as discussed in Section 8.1.1 and presented in Appendix 7.

Table 1-3 Project Approval Compliance Summary

Relevant approval	Condition	Condition Description	Compliance Status	Comment	Where addressed
PA07_ 0143MOD2	Schedule 3, Condition 1 (g)	Source of seepage from Tailings Dam South is identified and repaired within 3 years of commencing tailings reprocessing operations on the site	Non-compliant	Tailings are not being reprocessed. Subject to Resources Regulator Section 240 Notice	Section 8.1.1, Appendix 7
PA07_ 0143MOD2	Appendix 2	Waste rock storage area differs from approved	Non-compliant	No risk of environmental harm and better environmental outcome	Section 8.1.1, Appendix 7
PA07_ 0143MOD2	PA Schedule 4, Condition 3	Passive treatment system for waste rock dam.	Non-compliant	No risk of environmental harm.	Section 8.1.1, Appendix 7
EPL 20821	Various	Various relating to sample frequency and analytes being monitored	Non-compliant	No risk of environmental harm.	Section 8.1.2

Table 1-4 Compliance status key for Table 1-3.

Risk Level	Colour Code	Description
High	Non-compliant	Non-compliance with potential for significant environmental consequences regardless of the likelihood of occurrence
Medium	Non-compliant	Non-compliance with: Potential for serious environmental consequences, but is unlikely to occur; or Potential for moderate environmental consequences but is likely to occur
Low	Non-compliant	Non-compliance with: Potential for moderate environmental consequences, but is unlikely to occur; or Potential for low environmental consequences but is likely to occur
Administrative non-compliance	Non-compliant	Only to be applied where the non-compliance does not result in any risk of environmental harm (e.g. submitting a report to government later than required under approval conditions)

2. INTRODUCTION

2.1. Background

The Woodlawn Zinc-Copper mine (the Project) is located approximately 7 km northwest of Tarago in New South Wales (NSW) within Special (Crown and Private Land) Mining Lease 20 (SML20) as shown in Plan 1, Appendix 1. The original Woodlawn mine operated from 1978 to 1998 and processed 13.8Mt of ore from the Woodlawn open pit, underground and minor satellite deposits. Following its prolonged closure, the Project was acquired by ASX-listed Heron Resources (Heron) who secured Project Approval in July 2013 following the public exhibition of an Environmental Assessment (EA). Heron completed the construction of the project and developed the new underground mine in accordance with the Project Approval (PA) before it was put on care and maintenance in March 2020. Heron was placed in administration in July 2021. Develop Global Limited (DEVELOP) completed its acquisition of the Project in May 2022 and Tarago Operations Pty Limited which holds SML20 and Environmental Protection Licence (EPL) 20821. Veolia Environmental Services (Veolia) operates an eco-precinct, including a licensed landfill, within SML20 but separated from the project and has separate EPL's as shown in Plan 1, Appendix 1.

This Annual Review has been prepared in accordance with the *Post-approval requirements for State significant mining developments – Annual Review Guideline – October 2015* and is submitted in compliance with Condition 4 (6) of PA 07_0143 MOD2.

The Project operates five declared dams under the *Dams Safety Act 2015.* This Act is administered by DSNSW, a government statutory authority and is appliable to the following DEVELOP operated dams:

- Tailings Dam North (TDN)
- Tailings Dam South (TDS)
- Tailings Dam West (TDW)
- Tailings Storage Facility 4 (TSF4)
- Evaporation Dam 2 (ED2)

Annual Dams Safety Standard Reports are produced every year for each of these dams which is separate to this report.

2.2. Project contacts

Contact details for the personnel responsible for environmental management and stakeholder & community relations of the Project during the reporting period are provided in Table 2-5.

Table 2-5 Primary contacts for the mine

Contact	Position	Contact Details
Chris Taylor	General Manager	507 Collector Road Tarago NSW 2580 1800 371 124 https://www.develop.com.au/contact-us/
Kiara Crook	Environment and Compliance Superintendent	
Ngaire Baker	External Relations Superintendent	

2.3. Project approval

The conditions of the PA as relevant to this Annual Review, and where they have been addressed are presented in Table 2-6.

Table 2-6 PA 07_0143 Annual Review Conditions

Condition ID	Condition description	Where addressed
Sch 2 Condition 6	The Proponent shall not: (a) process more than 1.5 million tonnes of tailings and/or ore on the site in a calendar year; or (b) transport more than 150,000 tonnes of concentrate from the site in a calendar year.	Section 3.1
Sch 4 Condition 25	The Proponent shall: (a) keep accurate records of the: • amount of copper, lead and zinc concentrate transported from the site (on a monthly basis); and • the date and time of loaded heavy vehicle movements from the site; and (b) provide the Secretary with a summary of these heavy vehicle movements in the Annual Review.	Section 3.4
Sch 6 Condition 4	By the end of December each year (or other such timing as agreed by the Secretary), the Proponent shall review the environmental performance of the project to the satisfaction of the Secretary. This review must:	This annual review
	(a) describe the development (including any rehabilitation) that was carried out in the past year, and the development that is proposed to be carried out over the next year;	Section 3 Section 5.10
	(b) include a comprehensive review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the: • the relevant statutory requirements, limits or performance measures/criteria; • requirements of any plan or program required under this approval; • the monitoring results of previous years; and • the relevant predictions in the Environmental Assessment(EA);	Section 5 Section 7
	(c) identify any non-compliance over the past year, and describe what actions were (or are being) taken to ensure compliance;	Section 5 Section 8.1.2
	(d) identify any trends in the monitoring data over the life of the project;	Section 5
	(e) identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies; and	Section 5
	(f) describe what measures will be implemented over the next year to improve the environmental performance of the project.	Section 8.2

2.4. Consents, leases and licenses

The Project is regulated by a range of consents, mining leases and licenses which are summarised in Table 2-7.

Table 2-7 Consents, leases and licenses

Number	Issue date	Expiry date	Details
NSW Department of Trade and Investment Resources and Energy			
S(C&PL)L0020	31/10/1973	16/11/2029	Special (Crown and Private Lands) Lease 20 (known as SML20). Established under the Mining Act 1963. 0.2368 km2
Woodlawn-1	13/07/2017	30/06/2040	Approval to Extract within Woodlawn Notification Area
Woodlawn-3	13/07/2017	30/06/2040	Approval to Extract within Woodlawn Notification Area
Department of Planning, Infrastructure and Environment			
MP07_0143-PA-17	04/07/2013	04/07/2034	TriAusMin Woodlawn Mine Project Approval
MP07-0143MOD1	22/04/2016	for the period of the original consent	Modification of the PA for the relocation of Mine Portal and Overland Haul road
MP07-0143 MOD2	06/07/2017	for the period of the original consent	Site Layout Update
Environment Protection Authority (EPA)			
EPL20821	22/09/2023	Next review due 29/03/2027	First issued 29/03/2017
5110694	20/10/2022	20/10/2025	Radiation license
Department of Primary Industries - Water			
WAL28983	Unknown	Continuous	Held by Veolia under agreement with Tarago Operations, extraction of 600ML/a from Lachlan Ford Belt
WAL42034	17/08/2018	Continuous	Extraction of 0 ML/a from Goulburn Fractured Rock Groundwater Source
WAL42366	17/05/2019	Continuous	Extraction of 400ML/a from Goulburn Fractured Rock Groundwater Source
SafeWork			
XSTR200095	15/12/2023	30/08/2028	License to Store Explosives

2.4.1. Management plan updates

Within the reporting period DEVELOP continued the management plan updating process following a briefing with Department of Planning, Housing and Infrastructure (DPHI) in Sydney in November 2024 and DPHI approval of the endorsed persons. The status of each of these are presented in Table 2-8. Due to the significant time that has elapsed between updates of this plan and the site changes that have occurred including site operators submitted plans have been uploaded to DEVELOPs web page while awaiting this review.

Table 2-8 Management plan status

Management plan	Consultation	Status at end of reporting period
Heritage management plan	Completed	Submitted to DPHI for approval
Air quality management plan	Completed	Submitted to DPHI for approval
Vegetation management plan	Completed	Submitted to DPHI for approval
Road Transport Protocol	Completed	Approved within the reporting period
Water management plan (WMP)	Completed	Submitted to DPHI for approval
Blast management plan	Completed	Submitted to DPHI for approval
Noise management plan	Completed	Submitted to DPHI for approval
Mine extraction management plan (and subsidence monitoring program)	None required	Submitted to DPHI for approval
Vegetation management plan (VMP)	Completed	Submitted to DPHI for approval
Waste rock management plan (WRMP)	In progress	Being updated
Paste fill management plan (PFMP)	None required	Being updated
Environmental management strategy (EMS)	None required	Being updated
Rehabilitation management plan (RMP)	In progress	Being updated
Tailings rehabilitation strategy	In progress	As above

2.4.2. Modifications

Following discussions with DPHI DEVLEOP is in the process of drafting a Modification (# 3) and has add ongoing feedback from DPHI on this throughout the reporting period. The modification has not yet been submitted.

2.5. Actions required from previous annual review

The 2023/2024 Annual Review was uploaded to the Major Projects Portal on 19 July 2024 and email acknowledgement received the same day by DPHI. Confirmation of fulfilment of the Annual Review requirements was received on 4 October following submission of a revised report

A summary of the proposed action from last year's Annual Review and the status of each item at the end of this reporting period is included in Table 2-9.

Table 2-9 Actions from the previous Annual Review

Action	Requested by	Action taken	Where discussed
Further updates and refinements to the management plans including consultation and potential re-approvals depending on consultation and requirements.	DEVELOP	Meetings held with DPHI, endorsed persons approved, numerous plans updated and submitted as per Section 2.4.1	Section 2.4.1
Updates to sampling figures to reflect management plan updates especially for the water management plan.	DEVELOP	As per above	Section 2.4.1
Progressive preparation and planting of the next stages of the revegetation area.	DEVELOP	Significant progress has been made including the planting of more than 2,0000 trees in the reporting period as further detailed in Section 5.2.	Section 5.2
Ongoing implementation and reliance on the EQuIS for data presentation and trigger reporting.	DEVELOP	Ongoing and in effect as demonstrated throughout Section 5 and appendices	Section 5
Ongoing rehabilitation trials and further refinement of rehabilitation management plan including suitability of capping materials.	DEVELOP	Ongoing material acceptance and management as detailed in Section 5.10.	Section 5.10
Modifications to be drafted and submitted as the project develops	DEVELOP	Modification 3 has been drafted but not yet submitted during the reporting period.	Section 2.4.2

3. OPERATIONS SUMMARY

3.1. Production numbers

A summary of the mining and production figures for the reporting period is presented in in Table 3-10 alongside an estimated volume for the next reporting period. There are no applicable limits for the reporting period, instead a calendar year summary is presented in Table 3-11 to fulfil project approval schedule 2, condition 6.

Table 3-10 Production and waste summary

Material	Previous reporting period (actual)	This reporting period (actual)	Next reporting period (forecast)
Waste rock / course reject (t)	108,720	174,767	426,462
ROM Ore (t)	0	194,496	218,990
Fine reject: tailings (t)	0	176,304	750,000
Saleable product	0	10,900	100,000

Table 3-11 Calander year summary

Material	Approved limit	2023	2024	2025 (Jan to Jul)
Tailings and/or ore processed (t)	1.5 million	0	0	191,027
Concentrate transported from site (t)	150,000	0	0	10,900

3.2. Mining operations

Mining operations are presented in detail in the Mine Extraction Management Plan which has been updated in the reporting period and re-submitted to DPHI for approval. The underground mine involves the development of a new access decline located on the western side of the open pit. This decline will provide access primarily to new areas that were identified from exploration activities, whilst also providing access to areas that were previously mined (remnant resources).

During mine operations, several development drives are established at intervals within the ore zone. A series of holes are then drilled from each drive and sequentially loaded with explosives prior to the ore being blasted. The ore is then removed from the stope or open void using an underground loader, operated remotely where required, and loaded into haul trucks for transportation to the Run-of-mine (ROM) pad. To ensure stability of sections of the mine, once mining operations have been completed in those sections, mined-out stopes are backfilled using either waste rock material or hydraulic backfill from the batch plant in the Processing Plant.

While predominately mining was limited to development within the reporting period, operations increased in the second half with the first stope executed as part of the mine extraction process occurring in March 2024. The current mine plan is presented in Plan 2, Appendix 1.

3.3. Processing operations

The processing plant consists of a three-stage crushing circuit, single stage ball mill grinding circuit, four-stage flotation circuit and dewatering circuit including thickening and filtration. Three separate concentrates (copper, lead and zinc) are produced and trucked to port for shipping while tailings are either pumped to tailings dams or to a paste plant for underground backfill. The process is summarised in Figure 3-1. Following an intensive re-commissioning program the processing plant began processing ore for the first time since 2020 in March 2025.

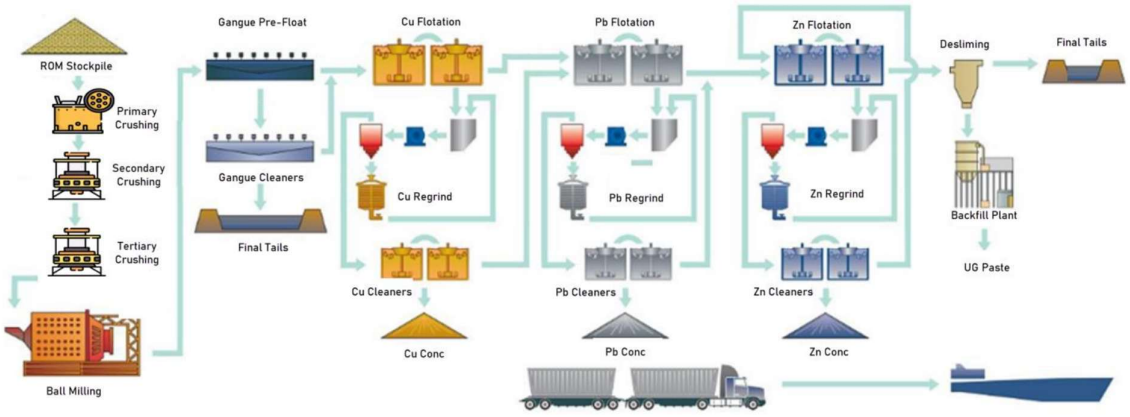


Figure 3-1 Woodlawn processing plant overview

3.4. Heavy vehicle movements

All concentrate is transported off-site in accordance with the approved road transport protocol which has been updated, re-submitted and approved by DPHI in the reporting period. Concentrate dispatch started in April 2025 as presented in Table 3-12 with no amounts prior to this during the reporting period. The concentrate vehicle movements (date and time of site departure) are provided in Appendix 2 which demonstrate:

- Transportation of ore concentrate from the site occurred between 7am to 10pm, 7 days per week.
- Within the Goulburn Mulwaree Council area including on Collector Road concentrate trucks did not travel during the school bus operation times between 8 am to 9:30 am and 2:30 pm to 4 pm, on an official school day.

Table 3-12 Net weight concentrate transported from site each month

Month	Copper (t)	Lead	Zinc
April	948	0	0
May	1014	1489	993
June	2993	473	2990

3.5. Hours of operation

During the reporting period, all activities were undertaken in accordance with the approved hours of operation.

- Construction and rehabilitation: 7am to 7pm, 7 days per week
- Mining, maintenance and processing operations: 24 hours, 7 days per week
- Transportation of ore concentrate from the site: 7am to 10pm, 7 days per week
- Underground blasting: anytime

3.6. Exploration

No surface exploration drilling was completed within the SML20 or associated Exploration Licences (ELs) during the reporting period.

4. WATER BALANCE

4.1. Meteorological summary

Meteorological information is recorded continuously by the onsite weather station, operated by Veolia, and approved for the purpose of monitoring by DEVELOP EPL 20821 Identification No 5. Meteorological monitoring data is regularly reported on in monthly and quarterly reporting available on DEVLEOPs website, a summary is presented in Table 4-13 for each month. A wind rose for the current reporting period is shown in Figure 4-2. Westerlies dominate the site and although easterlies are often experienced these were not as strong as the westerlies.

Table 4-13 Monthly averages and total weather data for the reporting period

Month	Air Temp (°C) @ 10m	Wind Direction (°)	Wind speed (m/s)	Rainfall total (mm)	Evaporation total (mm)
Jul-24	5.98	218.37	15.08	22.00	36.09
Aug-24	-90.38[1]	217.78	13.32	30.50	61.06
Sept-24	-99.95[1]	233.38	17.49	34.00	96.72
Oct-24	10.52	177.76	10.89	20.50	69.98
Nov-24	17.41	158.64	13.15	108.00	136.10
Dec-24	19.17	190.12	12.44	24.00	165.66
Jan-25	18.15	130.92	13.11	78.00	128.07
Feb-25	18.64	129.81	10.45	63.50	120.69
Mar-25	17.92	122.28	12.11	41.50	81.29
Apr-25	14.27	157.47	9.94	24.50	45.83
May-25	10.63	174.68	11.14	48.00	35.12
June-25	5.55	247.00	12.53	28.00	22.16

[1]Air temperature data presents extreme negative values between 4/8/2025 and 4/10/2025 due to sensor failure

Monthly rainfall since January 2018 is presented in Graph 4-1 and displays a reduction in rainfall compared to the previous years. Total rainfall recorded for the 2024/25 reporting period of 522.5mm represents the first year since 2019-20 to be below the average rainfall (622.7mm) (Source BOM: Goulburn 1971-2020). Preceding years rainfall was 828.5mm (2023/24) and 972.1mm (2022/23). Only one month in the reporting period recorded a rainfall total more than 100 mm (September) compared to three the previous period.

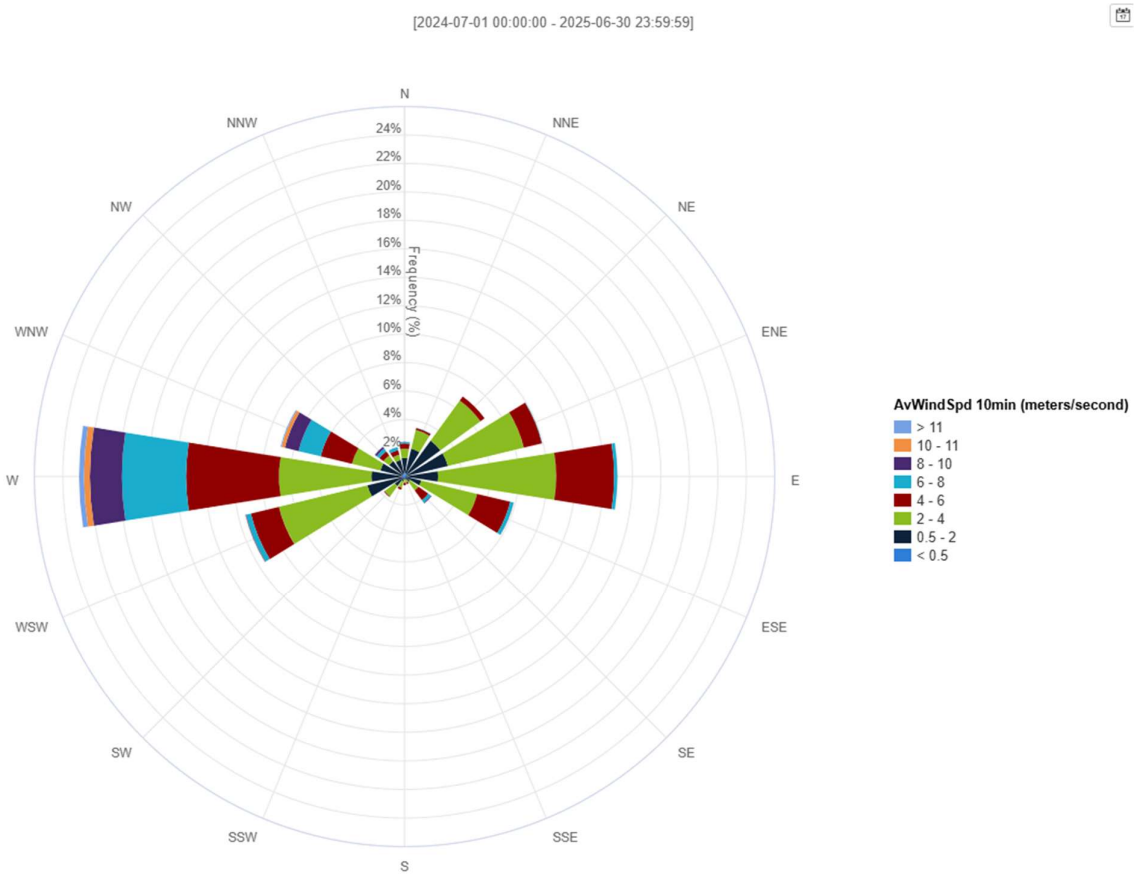
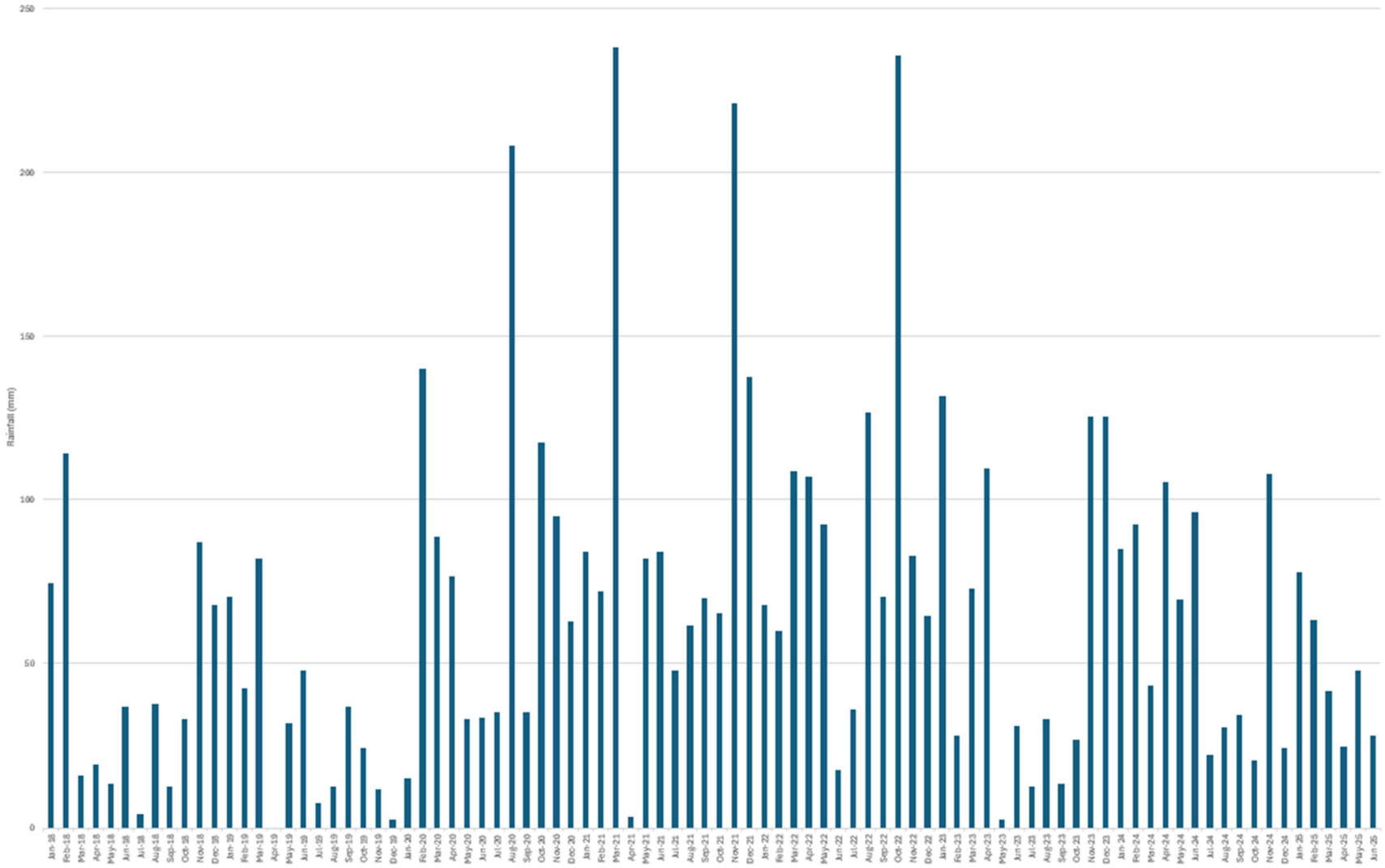


Figure 4-2 Woodlawn Weather Station Wind Rose 01/07/2024 to 30/06/2025



Graph 4-1 Woodlawn total rainfall on site 01/01/2018 to 30/06/2025

4.2. Water use

Table 4-14 shows water taken by the operation, exclusive of Veolia's take, for the period 1 July 2024 until 30 June 2025. Water use was mainly associated with dust suppression, domestic uses and processing plant maintenance/cleaning activities.

Table 4-14 Water Access License (WAL) usage

License holder	Water Licence	Entitlement (ML)	Use / extraction (ML)	Water used for
Veolia	WAL28983	500	249	Surface and underground operations: dust suppression, processing plant, domestic
Tarago Operations	WAL 42034	400	3	Dewatering of the new workings

4.3. Water storage

The storage assets still represent the wet weather and care and maintenance period the site experienced over the last 5 years. However, there have been improvements with the total volume reducing over the reporting period as summarised in Table 4-15. This water typically has a low pH and elevated metals and is not suitable for re-use in its current state. Improvements made in the reporting year include:

- The purchase and installation of 3 new evaporation units on TDN to assist in water level reduction.
- Bathymetry survey completed across all dams to improve level of accuracy on the volume and capacity of each asset. Data from this will be used for the next reporting period.
- Progressing of scopes of work to investigate suitable treatment options for the tailings dam water in order to supplement operational water supply while also reducing liability held in the dams.

Due to the improvements made monthly review of the water balance has only occurred since January to coincide with operations re-starting as summarised in Table 4-16. The EA only considered a water deficit scenario rather than a surplus the site has experienced over the last 5 years in care and maintenance.

Table 4-15 Water storage summary

Storage asset	Volume held (ML)			
	Start of reporting period	Inputs (transfers and rainfall)	At end of reporting period	Water storage capacity
TDN	310	201	281	423
TDS	1,370	437	1,368	2,168
TDW	90	230	57	129
TSF4	630	126	NA[1]	NA[1]
ED2	555	142	658	875
Total	2,955	1,136	2,364	3,595

[1]Excluded as this is now an operational dam which receives tailings (or solids), however, inputs are still required to be managed

Table 4-16 Monthly water balance

Monitoring period	Weather data		Inputs		Outputs		Water balance		
	Evaporation (mm)	Rainfall (mm)	Estimated rainfall inputs into dams (ML)	Total pumped inputs into dams (ML)	Natural evaporation (ML)	Mechanical evaporation (ML)	Modelled water balance (ML)	Measured water storage (ML)	Monthly loss/gain (ML)
Jan-2025	128.1	78	91.1	18.3	77.7	31.7	0	1997	N/A
Feb-2025	120.7	63.5	74.1	22.1	73.2	44.6	-21.6	2015	18.0
Mar-2025	81.3	41.5	48.4	64.9	49.3	37.5	26.5	2000	-14.5
Apr-2025	45.8	24.5	28.6	61.9	27.8	9.5	53.2	2028	27.7
May-2025	35.1	48	56.0	65.8	21.3	8.1	92.4	2082	54.5
Jun-2025	22.2	28	32.7	75.5	13.4	6.4	88.3	2133	50.3

5. ENVIRONMENTAL PERFORMANCE

Each section below summarises the environmental performance of the site for the year in reference to any long term trends. Graphs and tables for the year and longer term are included in Appendix 4. Project plans and maps are included in Appendix 1.

5.1. EQuIS Solutions Environmental Database Software (EQUIS)

The site is complex and results in the collection of a large amount of field and analytical data to monitor and track environmental performance across all aspects. The aim is to utilise DEVELOPs selected cloud-based software (EQuIS) for as much of this data collection and storage as possible. To date the focus has been on analytical or laboratory date most applicable to water management, however, implementation and improvements are ongoing.

5.2. Vegetation

Flora and fauna are managed in accordance with the updated Vegetation Management Plan (VMP). Management measures undertaken in the reporting period in regards to vegetation management include:

- Review and updates to the Vegetation Management Plan which includes further detail on how the re-vegetation area will be established and managed.
- Bi-annual Landscape Function Analysis (LFA) monitoring which are further discussed in Section 5.2.1.
- Ongoing weed management especially blackberries and pampas grass.
- Ongoing shade house and related work including local seed collection, seed sowing and management of both on-site and off-site sourced seedlings and tube-stock. Progress for the reporting period is summarised in in Table 5-17.
- Continued work on the establishment, management and monitoring of the re-vegetation area. Most of the plants identified in Table 5-17 as being uses on-site (4,832) were planted in the revegetation area during the reporting period. The area completed is now so large (refer to Figure 5-3) that the most northern plantings are visible from Collector Road.

Table 5-17 Shade house stocktake

Source	Plant type	Start of Reporting Period	Number used/planted on site within the reporting period	At end of reporting Period
Site grown	Trees	903	875	1,302
Site grown	Understorey	1,158	320	271
Purchased	Trees	0	3,637	0
Total		2,061	4,832	1,302

Figure 5-3 Re-vegetation area progress stage with the rip lines and tree guards evident (May 2025)

5.2.1. Biodiversity monitoring

LFAs are utilised in order to assess the progress of rehabilitation works on site by assessing landscape health and function through various indices. These indices are Soil Stability Index, Infiltration Rate Index, Nutrient Cycling and Landscape Organisation Index (LOI). Higher average percentages in Soil Stability Index, Infiltration Rate Index and Nutrient Cycling Index are indicators of a well-functioning landscape. LOI is an indicator of vegetation coverage and sediment wash in the landscape. LFA monitoring has been undertaken bi-annually by DEVELOP since Q3 2023. There are currently 22 LFA locations across key site features as further described in the updated vegetation management plan. An additional location was established in the reporting period in order to represent a reference site for grazing land. This is located outside of the mining lease.

The results collected to date are presented in Appendix 3. There is insufficient data currently available to complete any long term trend analysis. Given the LFA methodology is an assessment of a site's trajectory towards a sustainable ecosystem it would not be expected to change considerably in the period of a year. Having now reviewed five consecutive bi-annual monitoring results collected to date which also demonstrate this, LFA monitoring is proposed to be completed annually going forward. Data and literature review will be completed in the next reporting period to determine the most suitable time to implement this going forward.

5.2.1. Proposed improvements

Vegetation management is currently considered effective based upon biodiversity monitoring and planting rates done to date. Planting within the revegetation area is expected to continue at the current rate for the next reporting period.

5.3. Air Quality

The updated air quality management plan should be referred to for further background and detail for the following section of this annual review. Specifically, the following points are important to note:

- There is a large amount of data that has been collected utilising the monitoring program that was installed by Veolia in early 2000 and expanded by Heron during their commissioning in 2017.
- This dataset subsequently includes the 2020 to 2023 period when the site was in care and maintenance and the mining activity limited.
- The management plan clarifies the approval condition for triggers which relates to the any residence on privately owned land.

Air quality is monitored via dust deposition jars which are collected monthly and High Volume Air Samplers (HVAS) which run for 24 hours every 6 days.

5.3.1. HVAS results

The results presented in Appendix 4 verify that there was very little dust generated from the site with both Particulate matter <10µm (PM10) (Graph 8-7) and Total Suspected Particulate (TSP) (Graph 8-8) readings below the criteria during the reporting period. Appendix 4 also includes a summary of the long term HVAS results from first installation in 2017 (Table 8-23, Appendix 4) which demonstrates a declining trend in both PM10 and TSP results since installation. This is likely due to the limited site activities which have occurred in the same period and the elevated rainfall in the region being received.

During the reporting period there was one instance whereby the total suspended solids for PM10 exceeded the 24 hour criterion, (refer to Graph 8-7, Appendix 4). This coincides with a major dust event which was recorded at the Goulburn weather station, as such is not attributable to the project.

The EA refers to a cumulative predicted emission at a similar location as the HVAS unit of being a PM_{10} of 43 $\mu g/m^3$. All readings apart from the major dust event one were recorded below this. Due to the surrounding land and currently limited period the site has been operations it is not possible to compare the results being obtained with the HVAS unit to this prediction.

5.3.2. Deposited dust

Deposited dust sampling on-site has been routinely sampled for over 10 years with these long term results statistically summarised in Table 8-24, Appendix 4. During the reporting period there was one instance whereby the insoluble solids at DG28 exceeded the criteria (refer to Table 5-18). However, when the ash content result and prevailing wind direction during this period is considered, this elevated reading is due to organic matter rather than soil dust attributed to the Project. DG28 is located in an orchard and is often surrounded by grass, as fencing and water logging prevents grazing or lawn maintenance undertaken by Veolia.

Table 5-18 Deposited dust exceedances

Location	Monitoring period	Result	Criterion
DG28	February 2025	Insoluble solids: 4.2 g/m^2/month Ash content: 1.63 g/m^2/month	4 g/m^2/month

5.3.3. Greenhouse Gas

DEVELOP reports annually to the National Greenhouse and Energy Reporting (NGER) programme. Table 5-19 summaries the results from this draft report. The environmental assessment split up the projects forecast emissions between the Woodlawn Underground Project (WUP) and Woodlawn Retreatment Project (WRP). DEVLEOP are not currently re-processing tailings, however, it is uncertain what activities were associated with each so both have been included. Year 2 has been used as year 1 would have been primarily construction rather than operations related.

Table 5-19 Summary of GHG emissions reporting for 2024-2025 financial year

Activity	Amount	GHG emissions (t CO2-e) Scope 1	GHG emissions (t CO2-e) Scope 2
Diesel combusted	1,265 kL	3,430	
Grease used as lubricant	1.95 kL	0.265	
Lubricating oil used	16.3 kL	8.82	
Non-lubricant fluid oils	28.0 kL		
SF6 Stock	323 t	2.87	
Electricity Consumption	17,521 MWh		11,564
Total		3,442	11,564
EA prediction for WUP Year 2		4,382	8,306
EA prediction for WRP Year 2		4,304	9,771

5.3.4. Proposed improvements

Currently there are no further improvements proposed. DEVELOP will continue operating in accordance with the Air Quality Management Plan which documents mitigation measures to reduce energy and fuel use.

5.4. Water

Within the reporting period DEVELOP has updated the water management plan (WMP) for the project. This updated plan has been prepared by DPHI endorsed people including a hydrogeologist and includes consultation with WaterNSW, Department of Climate Change, Energy, the Environment and Water (DCCEEW), Veolia, wind farm operator (Iberdrola) and the EPA. This plan has now been approved post reporting period and is on the DEVELOP website. This updated plan should be referred to for further background and detail for the following section of this annual review. Specifically, the following points are important to note:

- Given the history of the site and associated water monitoring programs, there has been a significant amount of historical data collected. Baseline data, before the site was initially mined however, is not available.
- In lieu of pre-mining baseline sites, the updated WMP defines adopted background sites to be used as a baseline and key sites for assessing impacts of the current operation.
- The updated WMP includes the sampling of more sites for more analytes than previous versions and includes new groundwater bores installed by Heron and DEVELOP.

- More detail and clarification of the areas of existing contamination and updates on their status are provided.
- Water types on site are defied as clean, leachate affected or mine water and the management and monitoring of water on site has been designed based on this.

All graphs presented in this year's Annual Review in regard to water are direct copies from the web based interface dashboard DEVELOP is now using to review, monitor and track results throughout the year.

The following sections discus how samples form this reporting period compare to long term trends as presented graphically in Appendix 5.

5.4.1. Surface water quality

Surface water sample locations are presented on Plan 3, Appendix 1. As discussed in the WMP there are four ephemeral creek monitoring sites which are integral for determining off-site impact from the project and as such the updated management plan has now assigns trigger values for these. These locations are 105 and 109 located in the Crisps Creek catchment and 100 and 115 located in the Lake George catchment.

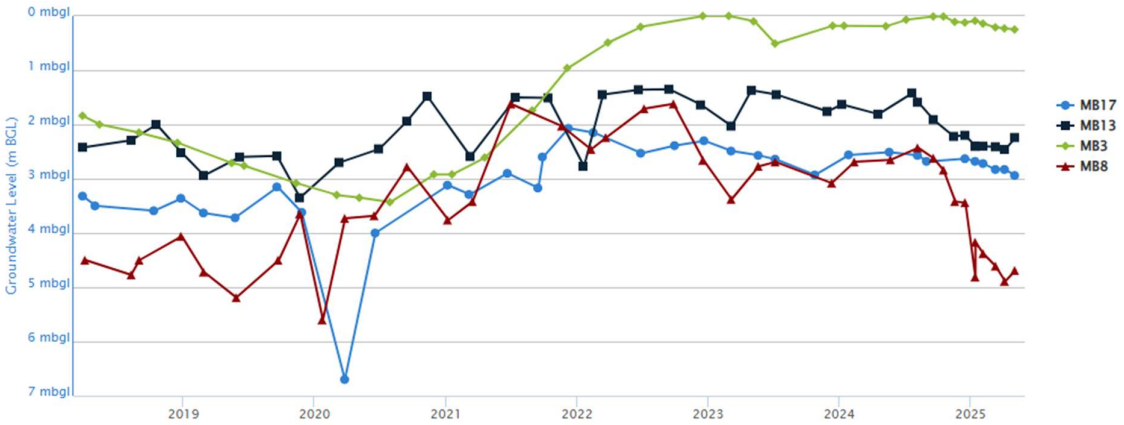
Graphs depicting the background results for pH, Electrical Conductivity (EC), sulphate, zinc, copper and lead over the last 10 year period are included in Appendix 5 for these four locations. Results for the additional surface water locations sampled as per the WWMP are also included in Appendix 5. Key observations from surface water sampling results over the reporting period indicate that:

- The baseline surface water locations remain unaffected by mining operations or features. There was some elevated results received for metals, EC and sulphate for the Q4 result, however, this is typical of these location when there are dry conditions preceding them such as what was recorded.
- On-site dams continue to have poor water quality which is being successfully managed and retained on the site. This applies to surface water sample locations TSF4 and WM300.
- pH remains neutral across the four baseline sites with all results for these locations recorded below within their respective trigger levels.
- ED2 and TSF4 continue to show no indications of seepage as indicated by the TSF4-return water dam and ED2 seepage collection trench.
- There were minor trigger exceedances across all locations for various analytes as depicted in Appendix 5. As none of the results or parameters recorded exceedances across three consecutive monitoring rounds the next level of the trigger action response plan has not been activated in the reporting period.
- There have been several individual analytes across numerous surface water sites that have warranted investigations due to triggering yellow level responses in the updated WMP TARP. This include EC, TDS, chloride some metals (potassium, zinc, aluminium, barium and magnesium at sites 100, 105, 109, 115, ED2-SCT and TSF4-RWD. These have been found to either be caused by single point events, with subsequent monitoring showing positive trends, or have been within the range of historical values. No sites have triggered an escalation in TARP level and will continue to be monitored.

5.4.2. Groundwater levels

As detailed in the WMP, groundwater levels are monitored across site to ensure compliance with Water Access Licenses (WAL) and dam safety requirements. There are four bores that require monitoring in accordance with WAL42366 works approval 40WA417428. The results for the monitoring period presented in Graph 5-2 indicate that groundwater levels remain elevated across all bores and are compliant with the set triggers which for each location are as follows which all apply following 3 consecutive quarterly periods:

- MB3: between 5 – 6 metres below ground level (mbgl)
- MB8: between 7.5 – 8.5 mbgl
- MB17: between 7 – 8 mbgl
- MB13: between 6 – 7 mbgl



Graph 5-2 Water levels in MB3, MB8, MB13 and MB17 2018 to present

5.4.3. Groundwater quality

Groundwater sample locations are presented on Plan 3, Appendix 1. As discussed in the WMP there are four background locations which have been defined in lieu of any pre-mining groundwater data. These locations are integral for determining off-site impact from the project and as such the updated WMP has also now assigned trigger values for these. These locations are MB3 and MB8 in the Crisps Creek catchment and MB13 and HMB6 located in the Lake George catchment. DEVELOP has included HMB6, although installed relatively recently (2020), as there were previously no other suitable baseline bores to the west of the rehabilitated waste rock dump.

Graphs are presented in Appendix 6 for the key analytes of pH, EC, sulphate and zinc over an extended period. As the database is still being implemented and data being brought across for legacy sources these graphs represent the data that has been migrated across to the data base which may not necessarily be the same as the full extent of data available. Sample locations have been grouped on these graphs as follows:

- Baseline bores: Graph 8-16 to Graph 8-19
- Bores downgradient from the Rehabilitated Waste Rock Dump (RWRD): Graph 8-20 to Graph 8-23
- Bores downgradient from ED2: Graph 8-24 to Graph 8-27
- Bores downgradient from the legacy tailings dams: Graph 8-28 to Graph 8-31

- Bores downgradient from TSF4: Graph 8-32 to Graph 8-35

Results for the additional groundwater locations sampled as per the WMP are also included in Appendix 6.

Key observations from groundwater sampling results over the reporting period indicate that:

- The baseline bores remain unaffected by mining operations or features.
- Although zinc appeared to be increasing in the baseline bores as reported in the last Annual Review this trend appears to have subsided with concentrations at all locations returning to very low levels of less than 0.1 mg/L.
- HMB6 was only sampled twice in the reporting period in accordance with previous procedures. As per the updated WMP they are proposed to be sampled quarterly going forward.
- There were minimal exceedances of the adopted trigger values across all locations apart from dissolved aluminium. Dissolved aluminium exceeded the adopted site-specific trigger value for MB3 and MB8 for every sample collected in the reporting period. Following a review these exceedances are considered minor as the exceedance is less than a factor of 2 and still below the National Environment Protection Measure (NEPM) Groundwater Investigation Level for fresh water of 0.055 mg/L.
- EC does not appear to be decreasing across the network in general and has predominately returned to more baseline typical conditions likely due to the change in rainfall pattern during the reporting period compared to the years prior (discussed in Section 4.1).
- HMB6 has elevated sulphates compared to the other baseline locations. However, given the pH of this bore remains neutral, the elevated results are more likely to be a function of the geology it has been installed in. Dissolved zinc results have also reduced in the reporting period.
- MB4 represents an upgradient bore from the new mine operations including the processing plant and TSF4. Elevated sulphate and EC results were recorded recently, however, these values are still considered low compared to other bores on site and similar to historical values recorded for this location.
- MB15 recorded a spike in EC, however, this is isolated and this bore has recorded spikes in this analyte before so is not considered significant.
- There are no declining groundwater trends evident that would trigger an escalation to the Trigger, Action and Response Plan as detailed in the WMP. This is defined as a change of more than 20% over three consecutive monitoring periods. Additional comments on known areas of the site known to be contaminated as detailed in the WMP are provided in Section 5.10.

5.4.4. Underground water

The method of ensuring paste fill is non-polluting has changed significantly in the updated management plan. WaterNSW specifically commented on their support for this change, therefore, it has been implemented for this Annual Review despite the management plan still subject to DPHI approval. Previously baseline bores were selected, however as detailed in the WMP the water being pumped out from the new mine will instead be sampled and monitored for any changes specifically in reference to the use of paste fill. In the reporting period DEVLEOP has collected monthly samples from this location over a nine-month period before paste filling activities recommenced in early June. The results are presented in Table

5-20 are in reference to the 'target analytes' as justified in the WMP. These reference values will be used to assess impacts of paste fill in subsequent reporting periods.

Table 5-20 Underground water sampling results to date

Parameter	Units	No. of sample points	Min	Max	Median	Mean
pH	-	9	5.53	7.51	6.62	6.63
EC	µs/cm	9	4460.00	6990.00	5860.00	5776.67
Total aluminium	mg/L	9	1.60	129.00	5.64	32.76
Total cadmium	mg/L	9	0.04	0.96	0.12	0.22
Total copper	mg/L	9	0.03	5.94	0.47	1.78
Total iron	mg/L	8	1.08	497.00	9.17	112.85
Total lead	mg/L	9	0.03	3.61	0.38	1.25
Sulfate	mg/L	9	1710.00	4220.00	2000.00	2442.22
Total zinc	mg/L	9	35.50	199.00	74.50	83.39
Nitrogen (ammonia)	mg/L	9	5.80	87.40	32.20	42.53

5.4.1. Proposed improvements

The site is complicated with significant understanding gained in the previous reporting period as part of the management plan drafting process. The revised water management plan details significant improvements in terms of monitoring water use/distribution and comparison of water quality analytical results to triggers. Improvements

Water is being managed effectively are currently considered effective based upon compliance of with air quality criteria.

5.5. Noise

Noise was managed in accordance with the updated Noise Management Plan. The management plan was updated with the results of a baseline noise survey which was completed in December 2024. This survey was completed by the same company that completed the original EA and at similar locations and made the conclusions that, in general, noise in the area had increased independent from the project as the mine did not recommence operations (including crushing, grinding and night works) until March 2025.

Monthly attended noise monitoring in accordance with the updated Noise Management Plan was completed from May 2025 with the results presented in the quarterly reporting available on DEVLEOPs website. Monitoring to date is limited to just May and June and indicate that while project activities can be heard from some monitoring locations these are not solely attributable to site activities and remain below project limits. In addition, no noise related complaints have been received. Due to the time that has elapsed since the site was formerly operating and changes to the surrounding noise environment no comparison or interpretation of long term trends can be performed.

5.5.1. Proposed improvements

Noise management controls are considered effective based upon compliance with the noise criteria.

5.6. Blasting

Blasting was managed in accordance with the updated Blast Management Plan. A third vibration monitor was also installed in the reporting period to assist this monitoring which is equipped with telemetry facilitating real time reporting of results. Although limits do apply to this monitoring as part of Veolia obligations and DEVLEOPs approval to mine in a declared area the project approval limits do not as they are applicable to residences on privately owned land. All three vibration monitors were located within the mining lease for the entirety of the reporting period.

A summary of the blast monitoring results is provided in Table 5-21 which indicate that despite a large number of underground blast events only a fraction of these are recorded by any one of the three vibration monitors located on the surface and only at very low levels. This is because blasting activities were located at depth (100's of meters below surface) and the other mitigation measures applied as detailed in the management plan. For context the declared dam area approval for Evaporation Dam 1 (ED1) is 50 mm/s.

Table 5-21 On-site blast monitoring results

Month	No. of blast events	No. detected at surface	Maximum detection recorded (mm/s)	Comment
July 2024	0	-	-	No blasting occurred
August 2024	11	1	0.21	Below trigger levels
September 2024	24	1	0.347	Below trigger levels
October 2024	20	0	-	No events detected
November 2024	28	3	0.46	Below trigger levels
December 2024	40	14	0.76	Below trigger levels
January 2025	57	1	0.31	Below trigger levels
February 2025	54	12	0.497	Below trigger levels
March 2025	60	17	1.38	Below trigger levels
April 2025	60	16	1.381	Below trigger levels
May 2025	58	9	2.687	Below trigger levels
June 2025	62	10	0.84	Below trigger levels

5.6.1. Proposed improvements

Blasting management controls are considered effective based upon compliance with the criteria and lack of any indications of surface movement.

5.7. Waste

General and putrescible waste produced by the Project was disposed of off-site via a licensed contractor. Tailings and waste rock produced by the project are presented in Section 3.1. An estimated 216 tonnes of waste was removed from site.

5.7.1. Proposed improvements

An internal waste management plan will be drafted to assist in identifying areas for improvements in regards to waste management including how to track and account for the different types of wastes removed from site so they can be subsequently reported in future annual reviews.

5.8. Heritage

Based on previous Aboriginal and Heritage surveys undertaken during the EA, no areas of Aboriginal or European Heritage have been impacted by the Project or as a result of activities on the Site. The Heritage Management Plan has been revised including consultation and has been submitted to DPHI for approval. There were no unexpected finds during the reporting period.

5.8.1. Proposed improvements

Heritage will continue to be managed in accordance with the Heritage management plan with no further improvements required.

5.9. Mine subsidence

The Mine Extraction Plan which includes the subsidence monitoring program has been updated in this reporting period to reflect the monitoring and reporting required during mining and submitted to DPHI for approval. Monitoring activities were primarily focused on ED1 and reported in monthly reports supplied to Dam Safety NSW (DSNSW) in accordance with that approval. The results do not indicate any subsidence, nor as there been any visual indications which would indicate mine subsidence.

5.9.1. Proposed improvements

Subsidence management controls are considered effective based upon compliance with the criteria and lack of any indications of surface movement.

5.10. Rehabilitation

Given feedback on last year's Annual Review DEVELOP has amended the projects resources regulator required rehabilitation reporting so that it aligns with the annual review. This reporting period however includes the following submissions:

- Forward Program: 16 November 2024 to 15 November 2027
- Forward Program: 1 July 2025 to 30 June 2028
- Annual Rehabilitation Report: 16 November 2023 to 15 November 2024
- Annual Rehabilitation Report: 16 November 2024 to 30 June 2025

The reports are included on DEVLEOPs website under "rehabilitation management" https://www.develop.com.au/woodlawn-sustainability/. Rehabilitation status and a plan identifying the status of rehabilitation at the completion of the reporting periods are in the Annual Rehabilitation Report. A summary of the rehabilitation status as included in these reports is presented in Table 5-22. A plan identifying the status of rehabilitation at the completion of the reporting period is presented in Plan 4, Appendix 1.

Table 5-22 Rehabilitation status

Mine Area Type	Previous reporting period (actual) 2023-2024 (ha)	This reporting period (actual) 2024-2025 (ha)	Next reporting period (forecast) 2025-2026 (ha)
Total mine footprint	289.17	289.17	289.17
Total active disturbance	194.9	194.9	190.67

Mine Area Type	Previous reporting period (actual) 2023-2024 (ha)	This reporting period (actual) 2024-2025 (ha)	Next reporting period (forecast) 2025-2026 (ha)
Land being prepared for rehabilitation	4.23	4.23	4.23
Land under active rehabilitation	90.5	90.5	90.5
Completed rehabilitation	0	0	0

In summary the key rehabilitation related activities during the reporting period include:

- External consultant engaged to assist in updating the rehabilitation management plan (RMP). While significantly progressed during the reporting period this plan has not yet been finalised.
- Ongoing works in the re-vegetation area and tree planting as discussed in Section 5.2
- Ongoing works on the 4.5 ha rehabilitation trial adjacent to the northern embankment of TDN including:
    - Receipt of the high pH, tailings neutralising alkaline product for use in future rehabilitation activities (total of 8,778 tonnes received during the reporting period).
    - Transfer and placement of the Woodlawn Organic Output (WOO) as per the existing RMP (total of 4,565 tonnes received during the reporting period).
    - Ongoing infilling of the trial area in accordance with the RMP (refer to Figure 5-4).

Figure 5-4 Rehabilitation trial area progress (September 2024) aerial image

The current rehabilitation plan relied on the use of WOO material. This material was only permitted for use under an EPA issued Resource Recovery Order and Exemption which lapsed without an extension being granted in May 2025. Although material was accepted and placed into the trial area while still approved DEVELOP still needs to complete the subsequent capping layers and infilling which has not yet been completed in the reporting period. Similarly, the RMP also requires updates to be finalised in order to inform subsequent measures in this space. The WOO rehabilitation trial which was previously in effect has therefore had be cancelled in the reporting period as the material it relied on is now no longer permitted.

5.10.1. Post mining land-use

DEVELOP is currently in the process of updating the rehabilitation management plan to align with regulatory requirements and the EA. Through this process it has been identified that the EA specifies that the final land use that would be in accordance with the zoning (which is industrial), but in other sections also says that grazing is envisaged. The project approval does not specify a final land use.

5.10.2. Proposed improvements

Given the uncertainty on the approved post mining land-use DEVELOP will seek to clarify this in the next modification for the site while continuing to finalise the rehabilitation management plan including consultation. In the interim rehabilitation activities will be focussed on progressing further understanding of the site and it's features in order to inform rehabilitation planning. This includes:

- Reviewing historical documentation and photographs for information on the construction and volumes of the Rehabilitated Waste Rock Dump (RWRD).
- Completing a non-intrusive survey of the (RWRD) to provide insight into construction and volumes.
- Reviewing historical documentation and photographs to determine if there are additional soil or rock stockpiles remaining on-site from the original mine which are not yet identified as such.
- Progressing works to determine volumes and characteristics of stockpiled material identified from above exercise.

6. AREAS OF EXISTING CONTAMINATION INCLUDING ACID MINE DRAINAGE

6.1. Rehabilitated Waste Rock Dump (RWRD)

As identified in the updated WMP the RWRD was used during previous mining of the Woodlawn open cut between 1978 and ~1987. Although it was previously capped seepage from the dump is collected in the adjacent purpose-built dam referred to as the Waste Rock Dam (WR Dam). Water quality from this dam depicts that leachate from the RWRD is very acidic (pH of 3), saline (25,000 µS/cm), has elevated sulphate (40,000 mg/L) and dissolved zinc (4,000 mg/L). Collected water is pumped to evaporation dams via a dedicated pump and delivery pipeline.

There are several bores which monitor for potential of seepage from the RWRD with their corresponding sample results presented in Appendix 6 (Graph 8-20 to Graph 8-23). As the updated WMP details there are a number of distinct host rock types that monitoring bores are installed in within the project. The bores downgradient from the RWRD depict three of these are displayed in Figure 6-5 which uses data from this Annual Review period.

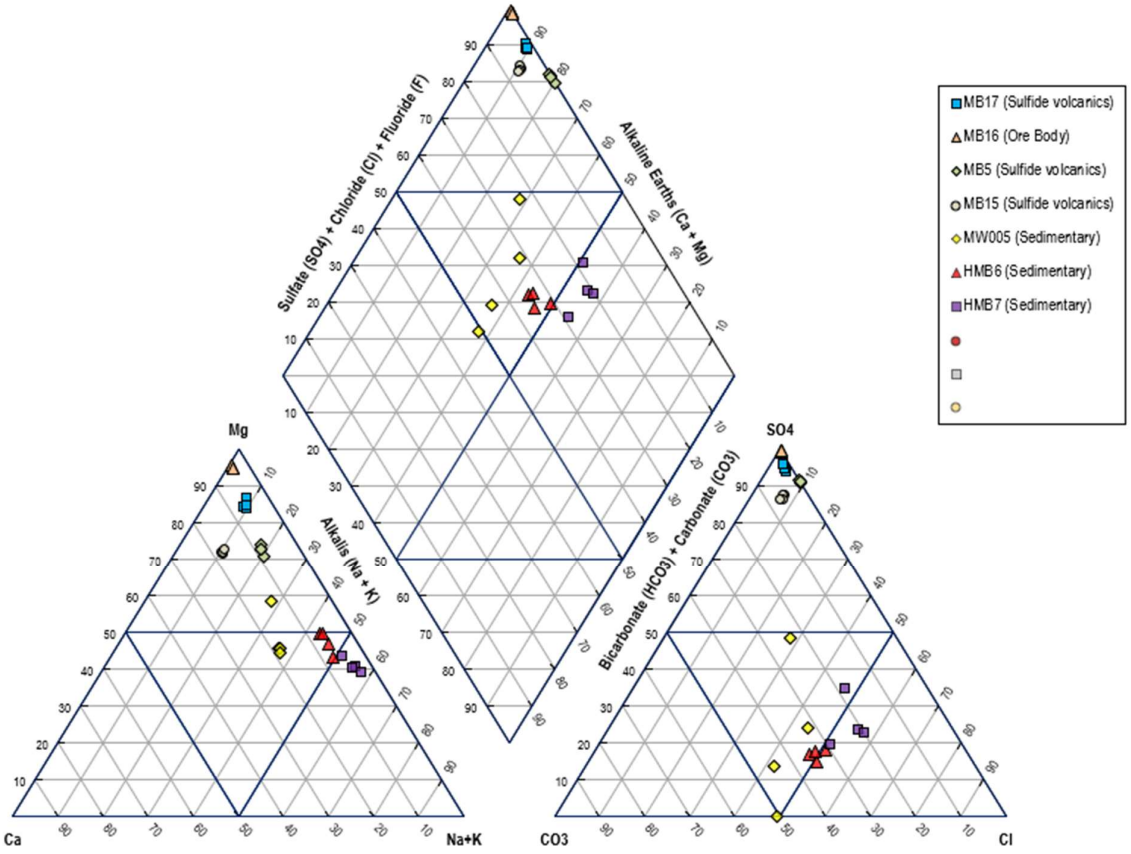


Figure 6-5 Piper plot of bores downgradient from RWRD

For this reporting period the following observations are made:

- There is considerable variability in each location with results in general consistent with the previous reporting period for all analytes and reflective of the geological nature each bore is installed within.
- Compared to MB15 and MB17, MB16 is installed in a shallower aquifer (screen of 3-6 m) which is connected to the surface through a clayey gravel/gravelly clay layer. As a result, the water quality in this bore can change quite quickly potentially reflecting

rainfall trends which cases dilution and concentration of analytes accordingly. Between 2021 to 2024 EC as well as concentrations of sulphate and dissolved metals decreased, these have subsequently started increasing in this reporting period coinciding with a reduction in rainfall being received.

- HMB6, HMB7 and MW005 continue to remain unaffected either be seepage or natural geology with neutral pH, low EC, low sulphate and low dissolved zinc concentrations. MB15 has elevated EC but still neutral pH, low sulphate and low dissolved zinc concentrations.
- MB5, MB16 and MB17 have always had poor quality water. These locations are correlated with being installed into a sulphide volcanic host rock (MB5 and MB17) or an 'ore body' host rock (MB16) as further described in the WMP. Although they do have elevated sulphate and dissolved zinc these are less than half of what is observed in the WR Dam.
- There remains no evidence of impacts in the creek downgradient from the RWRD and WR Dam (as indicated by surface water location 100).

6.2. ED2 historical seepage

As clarified in the updated management plan seepage was previously investigated from ED1/ED2 with ED2 subsequently lined in 2019 to further reduce the risk. Current water quality in ED2 Cell 5 is moderately acidic (pH 4), has elevated dissolved metals (~500 mg/L Zinc, ~20 mg/L Copper, ~100 mg/L Aluminium, ~3 mg/L Cadmium), is saline (12,600 µS/cm), and has elevated sulphate (8460 mg/L) and ammonia (247 mg/L). There are several bores downgradient from ED2 with their corresponding sample results presented in Appendix 6 (Graph 8-24 to Graph 8-27). For this reporting period the following observations are made:

- Seepage impacts are still discernible in MB11 and MB12, the closest bores to ED2. However, EC, sulphate and dissolved metal concentrations are continuing to reduce.
- Water quality in MB19 is showing some signs of declining potentially reflective the historical seepage moving, however, is still of considerable quality compared to MB11 and MB12.
- The sample locations on the edge of the mining lease boundary (MB13 and surface water location 115) remain unaffected with neutral pH and low sulfate, EC and metal concentrations.
- There are no discernible impacts to bores further downgradient (MB23, MB24, MB25 and MB13) with near neutral pH and low EC, sulphate and dissolved zinc concentrations.
- The ammonia results for downgradient bores and surface water sites corroborate ED2 water not impacting water quality, as all sample locations aside from MB11, MB12 and ED2-SCT present values below the detect-limit (< 0.1 mg/L). MB11, MB12 and ED2-SCT show minimal impact from ED2, with levels of ammonia between 0.2 – 0.8 mg/L (compared to 247 mg/L in ED2 Cell 5).
- There is variability noticeable in the newer installed bores with less data available (MB23, MB24 and MB25). These will continue to be monitored as per the WMP.

6.3. Legacy tailings dams

Tailings dam water is generally very acidic (pH of 3.0), saline (10,000 µS/cm) and has elevated sulphate (10,000 mg/L) and dissolved zinc (400 mg/L), however, these values can vary significantly between dams and be affected by environmental factors. All tailings dams have downgradient sample locations with their corresponding sample results presented in Appendix 6 (Graph 8-28 to Graph 8-31). For this reporting period the following observations are made:

- The newer MW bores are still recording elevated sulphate and EC, however, these are significantly lower than TDS which they are adjacent to. Their low dissolved zinc readings and neutral pH mean the elevations are more likely indicative of the geology they are installed in. Given data is currently limited for these bores they will continue to be monitored.
- MB22 has recorded elevated zinc, copper in the most recent sampling round which is under further review and investigation due to its significance and sudden appearance compared to preceding results. MB21 which is directly adjacent to this yet installed into a deeper aquifer has not recorded similar trends.
- Dissolved zinc concentrations remain low across all bores compared to tailings dam water.
- ETP8 is adjacent to TDN and although has elevated sulphide and EC it is minor compared to the water held within this dam. In addition, there are very low dissolved metals and a neutral pH indicating no seepage impacts from TDN.

6.4. Old underground workings

The WMP includes known details on the contamination known to existing in the old workings. The old workings refer to the historical underground voids which were left when the mine ceased in the 90's. Heron and now DEVELOP have only every operated in the new mine workings which are adjacent and beneath the old workings although physically separated. Given the old workings are inundated with elevated levels of organics and other chemicals DEVELOPs mine operations in the reporting period was designed to avoid interactions with this area or any intersecting features like drill holes or faults. DEVELOP continues to work with the EPA on a strategy for removing this water so that the mineral resources adjacent and within these areas can also be extracted. Although an original dewatering strategy was approved in 2017 under the EPL, no corresponding dewatering activities were undertaken in the reporting period.

7. COMMUNITY RELATIONS

7.1. Employee accommodation village

Develop has initiated planning for the construction of a 120-person employee accommodation village intended to alleviate pressure on local accommodation providers and reduce traffic on local roads as workers are shuttled a short distance to the mine.

The proposed site of the workers accommodation village is approximately 5km from the Woodlawn Mine, on privately owned land on Collector Road, Currawang.

The site is located within the Queanbeyan-Palerang Regional LGA and is expected to be in place throughout the lifetime of the mine. It is currently under assessment as a development application with Queanbeyan-Palerang Regional LGA.

7.2. Community hotline

A 24/7 community hotline number has been established and implemented as follows:

- Advertising on local AM/FM radio station from March 2025 and ongoing throughout the year.
- CCC notified at the meeting on 13 March 2025.
- Signs installed at the entrance to the mine and at the main administration building (Figure 7-6)
- Tarago Times Newsletter article from March 2025 as part of the DEVLEOP update including paid advertising monthly to notify the community of the Community Hotline details.

Figure 7-6 New signs installed at the front entrance to the main site administration building and front entrance to the mine

7.3. Complaints

There were no complaints received by DEVELOP during the reporting period.

7.4. Consultation and engagement

Key consultation and engagement activities with the community over the reporting period include:

- Two Community Consultative Committee (CCC) meetings were held during the reporting period on 13 February and 12 June 2025. The CCC attended the March meeting on site and were hosted to an underground and surface tour prior to the commencement of the meeting. A new community member joined the CCC at the June meeting. The minutes of these meetings are available on the DEVELOP website: https://www.develop.com.au/corporate-governance/ccc-meeting-minutes/
- Provided certified first aid officers for the Tarago Car, Bike and Truck show in October 2024.
- Sponsorship certified first aid officers, and a community information display were provided at the Tarago Show in March 2025.
- Sponsorship certified first aid officers, and a community information display were provided at the Bungendore Preschool Fair and Pig Races in March 2025.
- Participated in Local Emergency Management Committee meetings.
- Contribution of regular company and site updates in the monthly editions of the Tarago Times newsletter.
- Ongoing consultation with local neighbours, Tarago businesses, community organisations and the primary school and preschool to introduce the 24/7 Community Hotline and to hand out fridge magnets with the phone number included commencing March 2025.
- Ongoing consultation with Local Aboriginal Land Council's including, Pejar, Ngambri and Mulwaree.
- Engagement with local Aboriginal registered businesses at events in Goulburn and Canberra.
- Hosted site tours and meetings with relevant stakeholders to introduce local Aboriginal business Yara Co to the mining industry.
- Consultation in April 2025 with local neighbours in person and by letter drop to advise of monthly noise monitoring.
- Consultation in June 2025 with local neighbours in person and by letter drop to advise of mock training exercise on site.
- Engaged with students at local high school careers expos in Bungendore, Goulburn and Queanbeyan including presentations by Develop employees.

7.5. Contributions

A Community Sponsorship Fund Guideline was established during the reporting period.

We distribute funding each year to support and enhance community groups and organisations in the Goulburn Mulwaree and Queanbeyan Palerang Local Government Areas (LGA's).

Our Community Sponsorship Fund Guidelines also includes funding for tertiary education facilities where mining related faculties are included in New South Wales.

Contributions to local community organisations and educational institutions over the reporting period include:

- Tarago CWA
- Tarago ANZAC Day Ceremony
- Goulburn & District Legacy
- Tarago Show Society
- Bungendore Pre-School and Pig Races
- The University of New South Wales Geoscience Society
- The Australian Institute of Mining & Metallurgy (AusIMM) Illawarra Branch
- The University of New South Wales Mineral & Energy Resources Society

7.6. Aboriginal Engagement Policy

The Develop Global Limited (Develop) Aboriginal Engagement Policy was established during the reporting period.

Develop believes that the support and endorsement of its activities by the Aboriginal peoples in the communities in which it operates is fundamental to the long-term success of its business.

8. CONCLUSION

8.1. Assessment of Environmental Performance

8.1.1. Independent Audit

An independent audit of the Project was completed in the reporting period. The final report is dated 28 August 2024 and is available on DEVELOPs website. The non-compliances and actions are presented in Appendix 7 and include each items current status. The next 3-yearly audit is due in 2027.

8.1.2. Incidents and non-compliances

There have been no reportable environmental incidents during the reporting period.

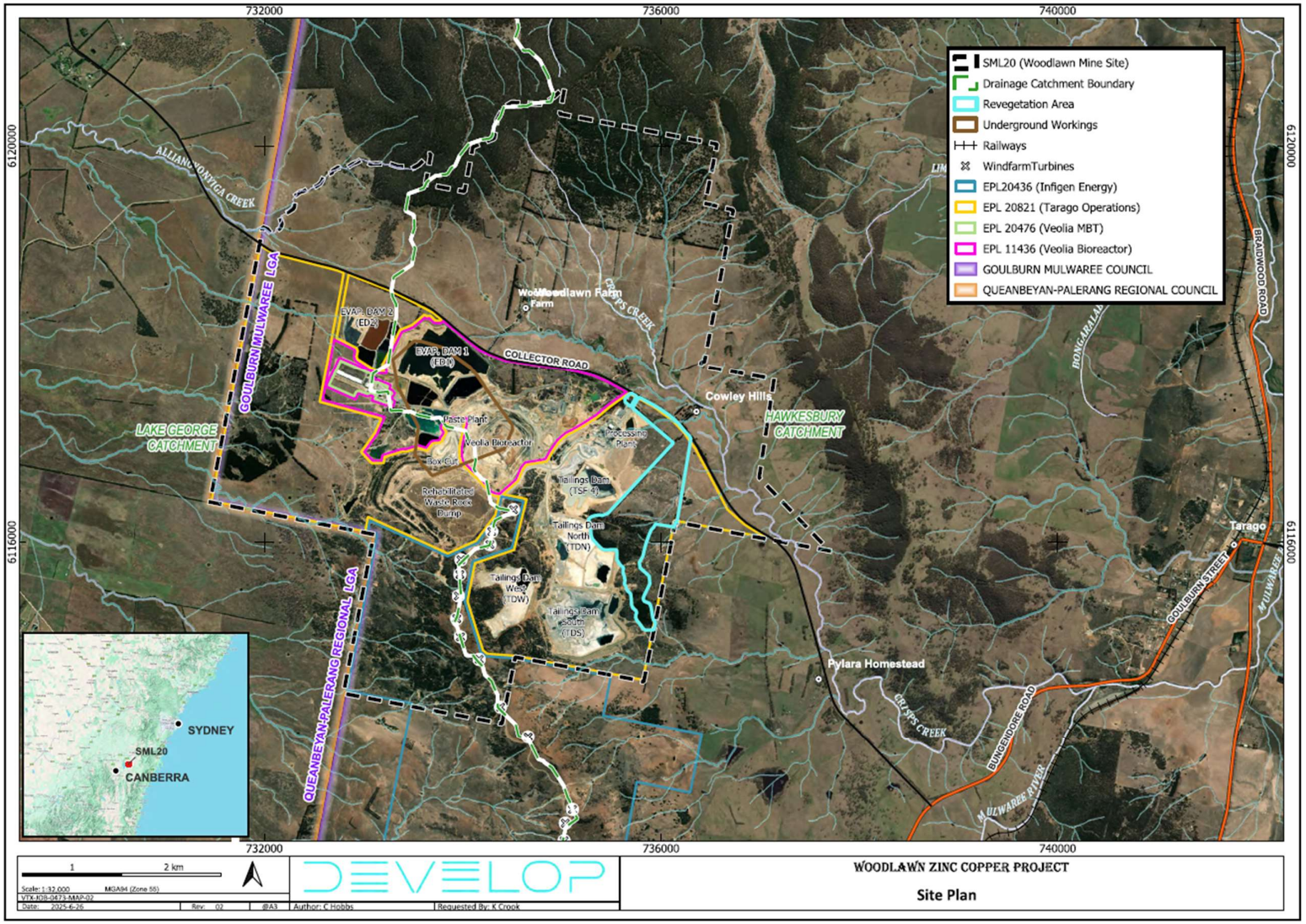
EPL non-compliances were minor and related to sample locations being dry or laboratory errors not progressing analysis of some analytes despite being requires. The details are included in the EPA Annual Return on DEVELOP's website.

8.2. Improvements proposed

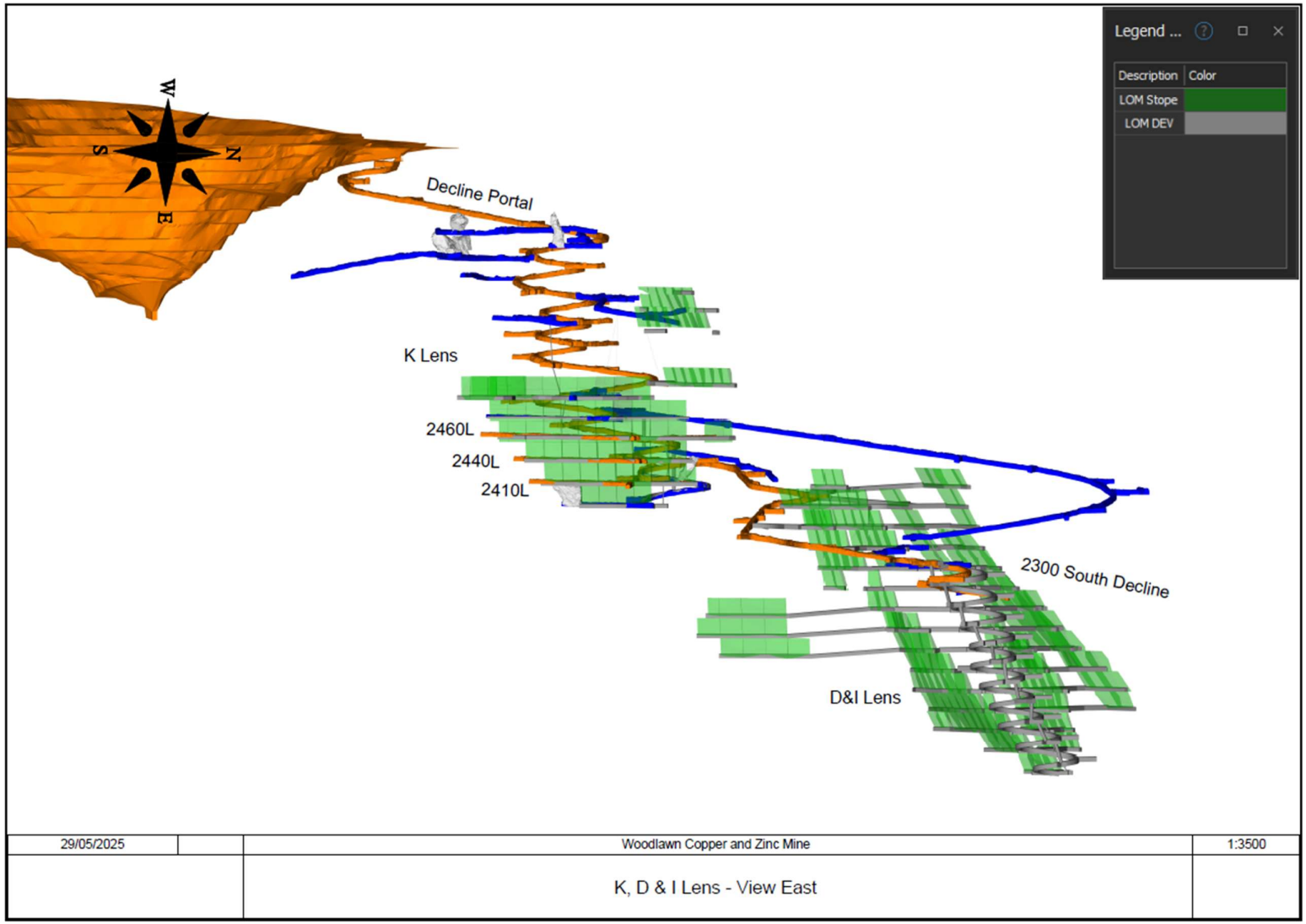
Following the sites construction, care and maintenance, acquisition and re-start works the next reporting period is forecast to be the first full reporting year as an operational site under the existing project approval. Activities proposed for the next reporting period include:

- Review of site collected LFA data and literature to determine a suitable timing to vary the bi-annual monitoring events to annual.
- Finalise the TDN trial area with surface capping and infilling following the lapsing of the WOO material approval.
- Ongoing review and assessment of analytical results from underground water being pumped out of the mine to determine trigger levels or approaches to assess impacts of paste fill.
- Finalise updates to the remaining management plans (rehabilitation, waste rock, paste fill and the EMS, complete required consultation and submit to DPHI for approval.
- Submit a modification to support project activities.

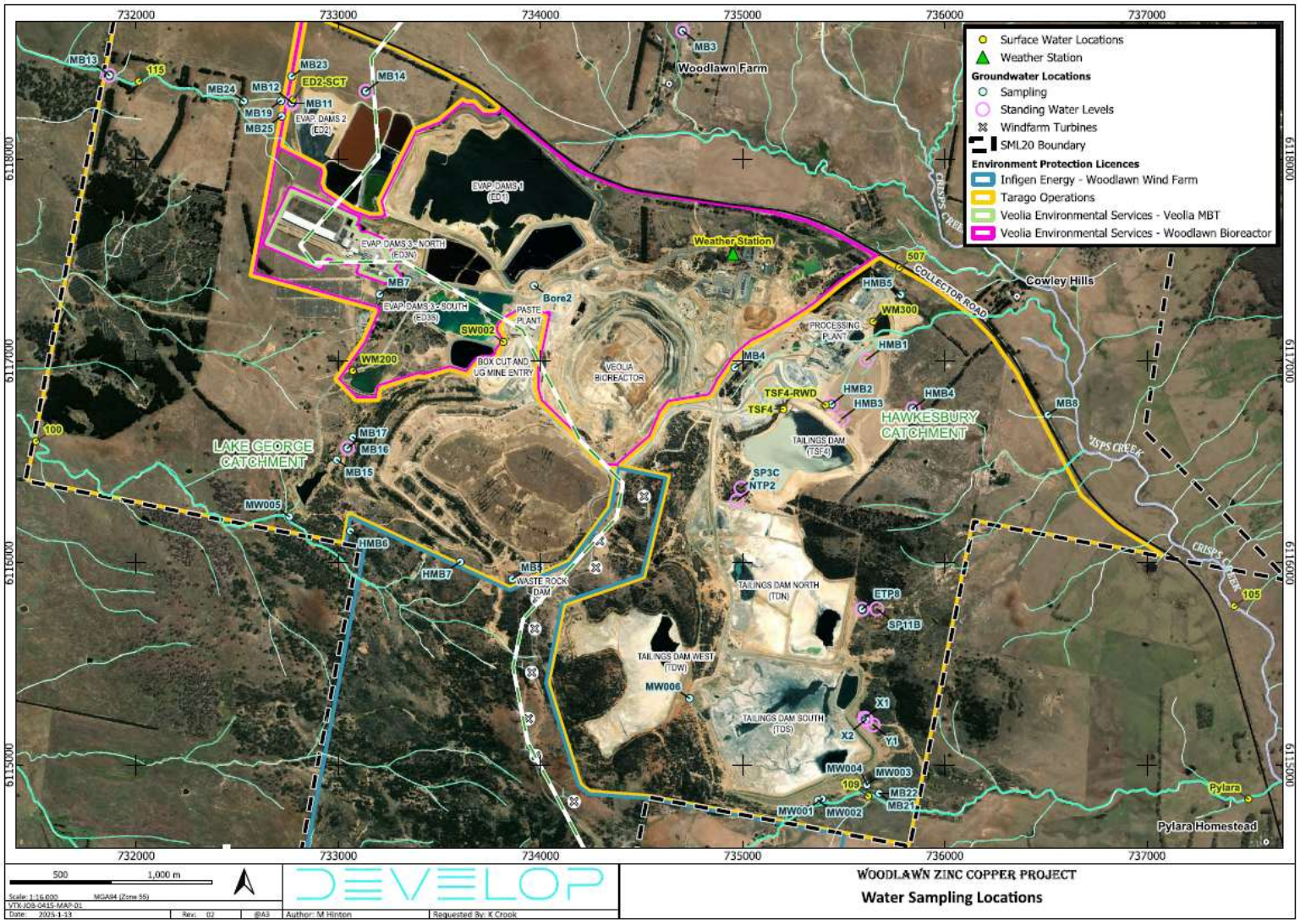
Appendix 1 Plans



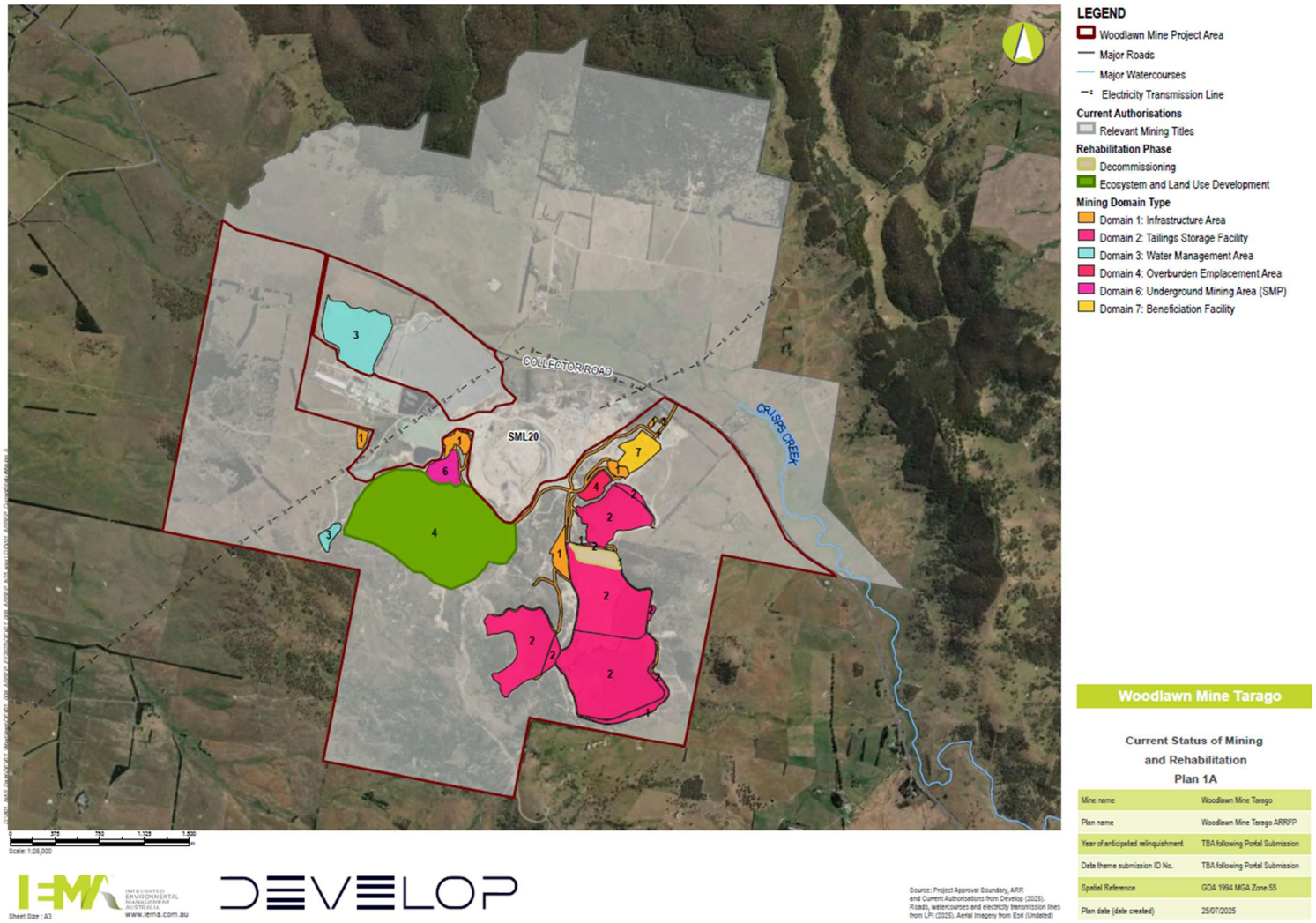
Plan 1 Woodlawn Site – Locality Plan



Plan 2 Current mine plan



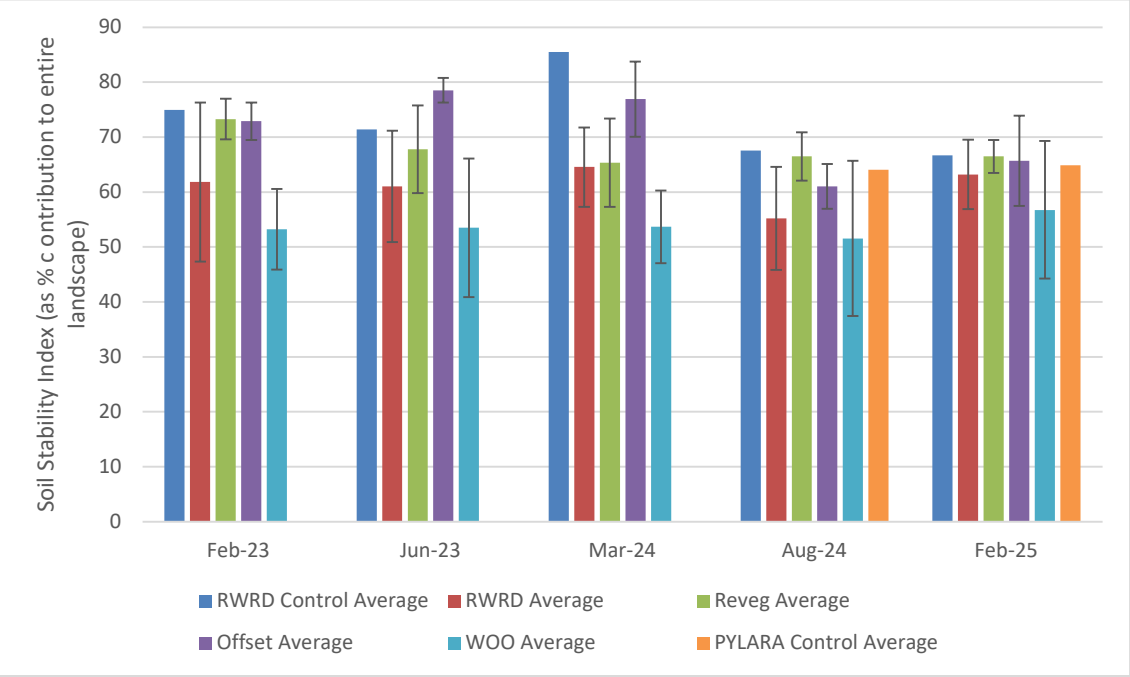
Plan 3 Water sampling locations



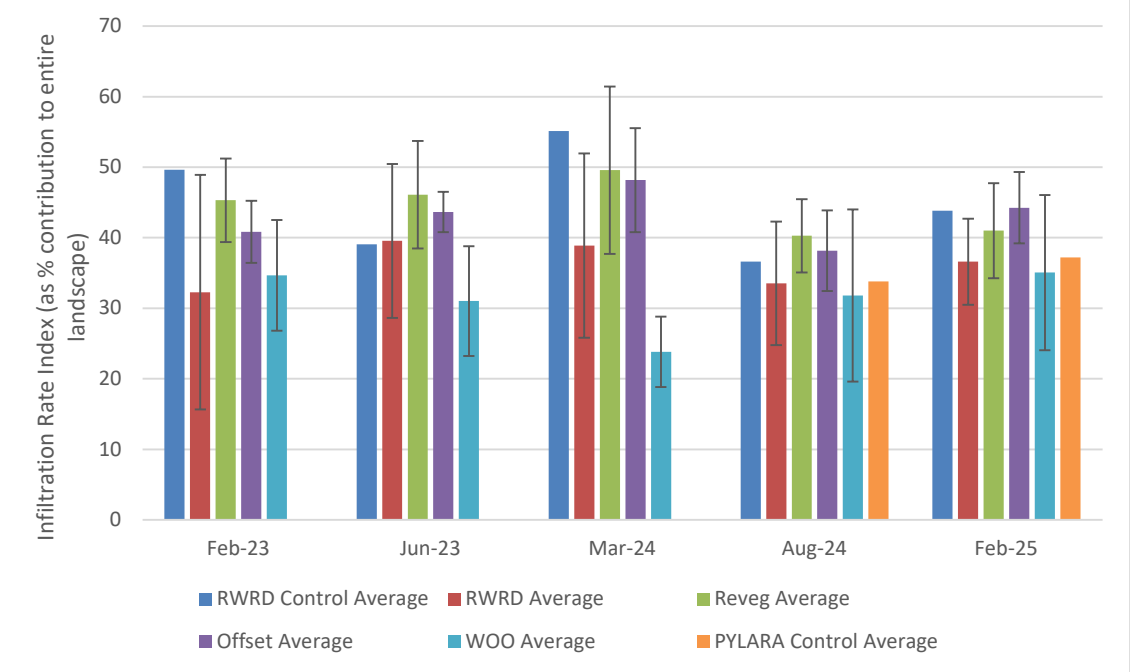
Plan 4 Plan identifying the status of rehabilitation at the completion of the reporting period

Appendix 2 Concentrate vehicle movements from site

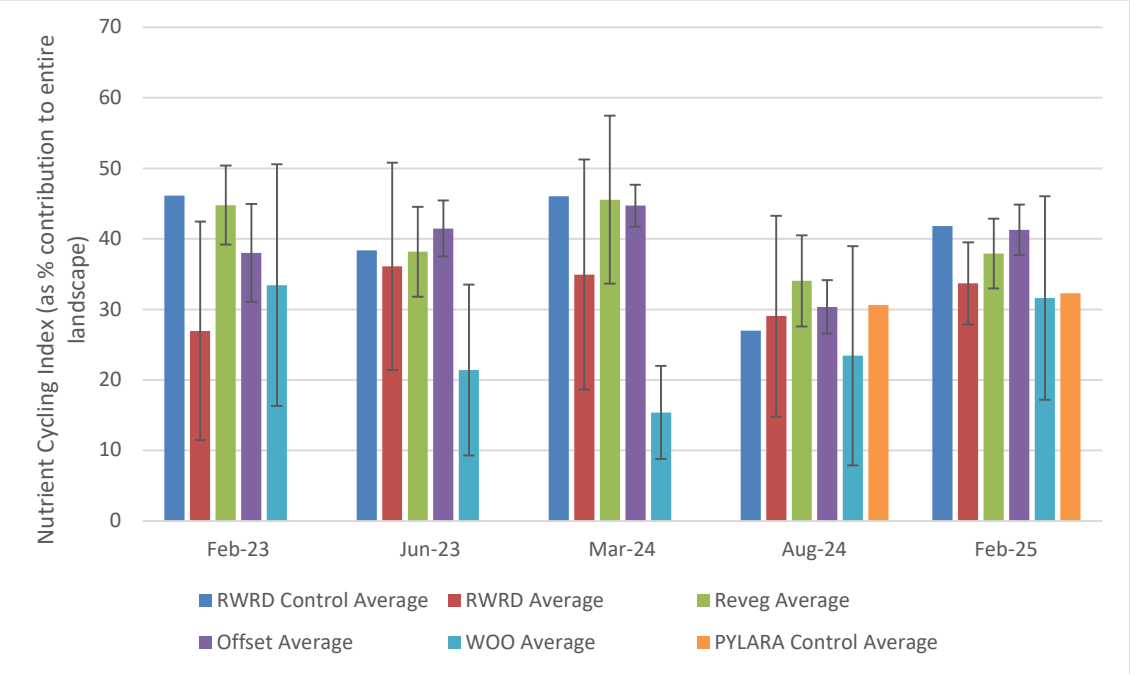
Appendix 3 LFA monitoring results



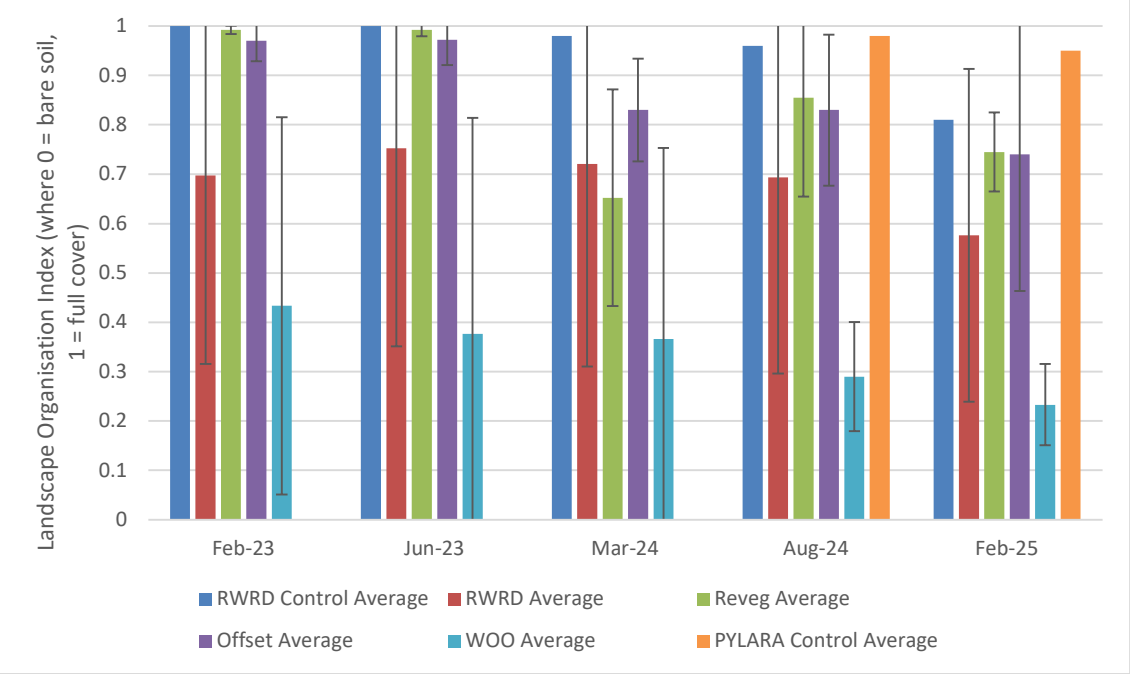
Graph 8-3 **Average soil stability index (as % contribution to entire landscape)**



Graph 8-4 **Average infiltration rate index (as % contribution to entire landscape)**

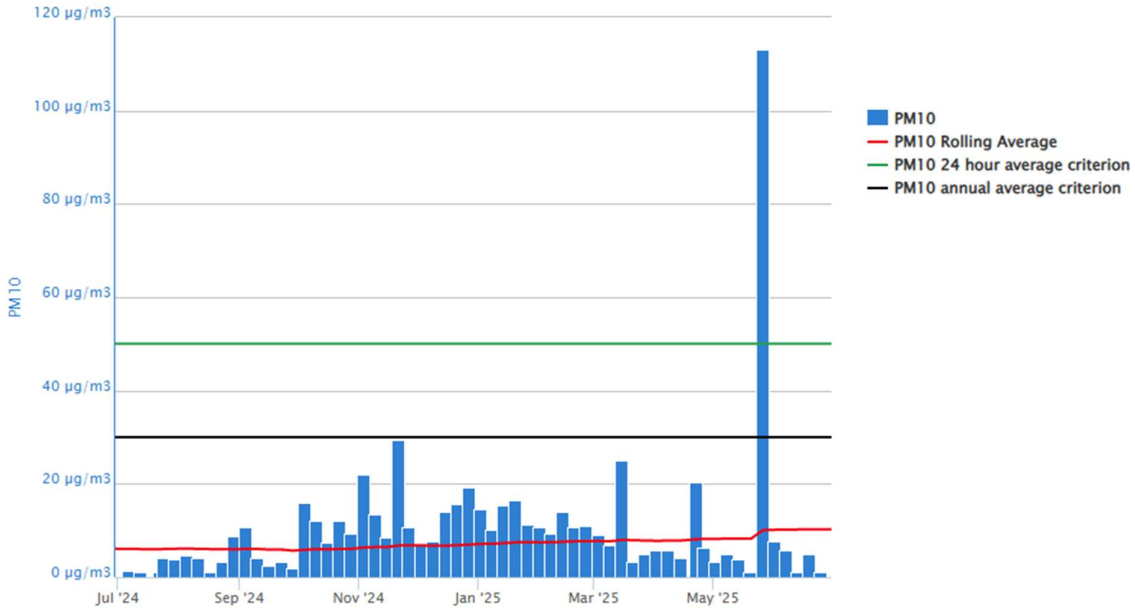


Graph 8-5 **Average nutrient cycling index (as % contribution to entire landscape)**

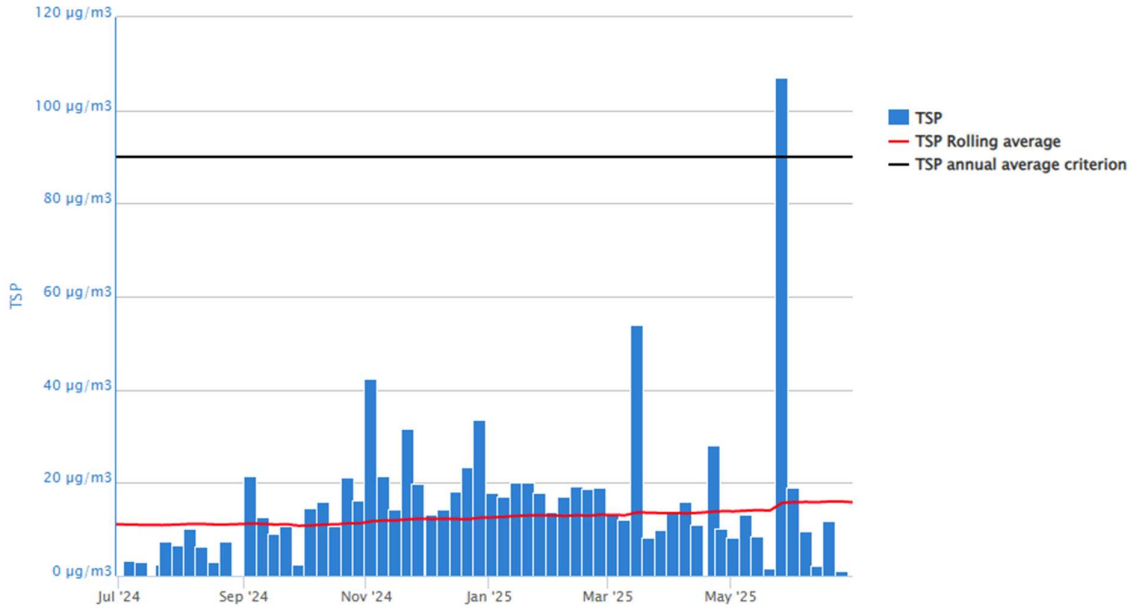


Graph 8-6 **Average landscape organisation index (where 0 is bare soil and 1 is full cover)**

Appendix 4 Air quality monitoring results



Graph 8-7 **PM10 monitoring results (raw data and rolling average)**

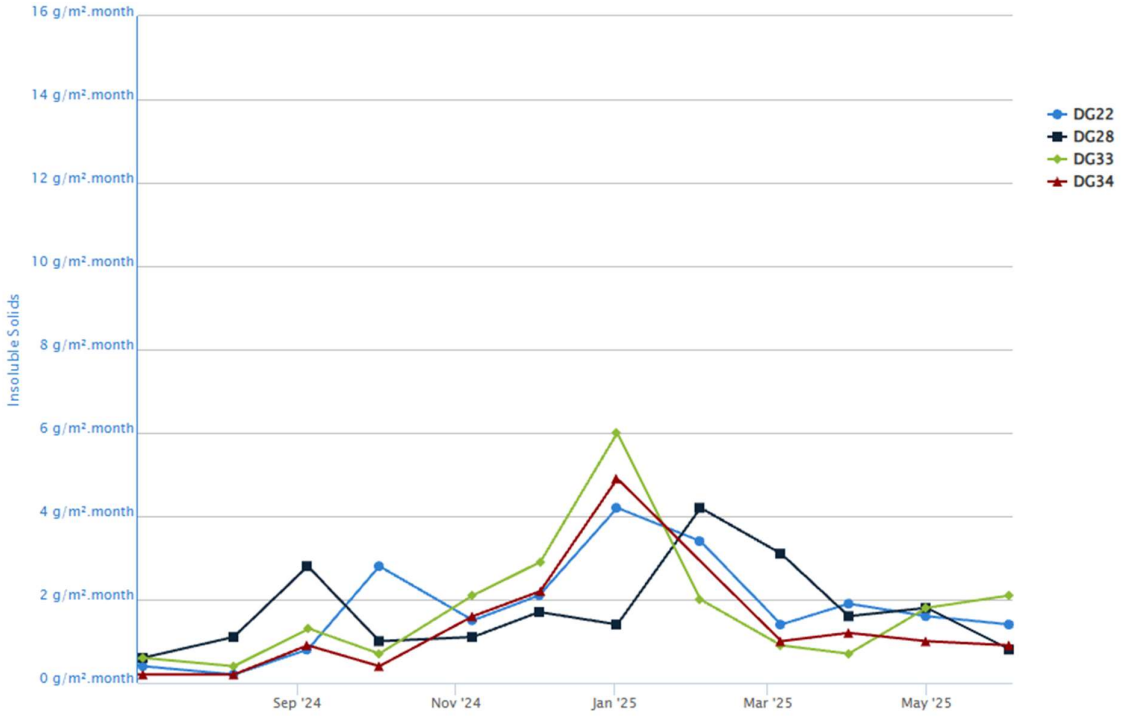


Graph 8-8 **TSP monitoring results (raw data and rolling average)**

Table 8-23 Long term HVAS results

Year	PM10			TSP		
	Avg	Min	Max	Avg	Min	Max
2017-2018	13.43	2.70	48.30	25.95	4.60	102
2018-2019	11.00	1	40	23.37	3.70	69.80
2019-2020	24.33	1	147	41.19	1.9	288
2020-2021	6.71	1	19.10	13.2	1	43.30
2021-2022	6.56	1	27.60	14.25	3.30	41.30
2022-2023	6.33	4	22.50	14.24	2.40	56.40
2023-2024	6.18	1	16.40	11.34	1	27.70
2024-2025	**10.37**	**1**	**113[1]**	**16.22**	**1**	**107[1]**

[1]Due to dust storm event



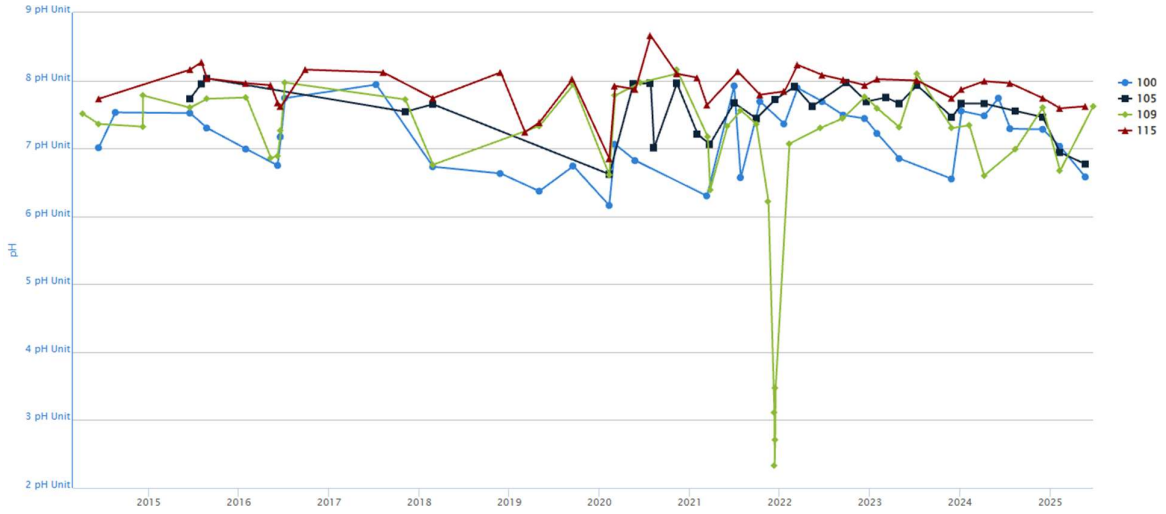
Graph 8-9 Deposited dust in the reporting period (insoluble solids)

Table 8-24 Long term deposited dust results (Insoluble Solids)

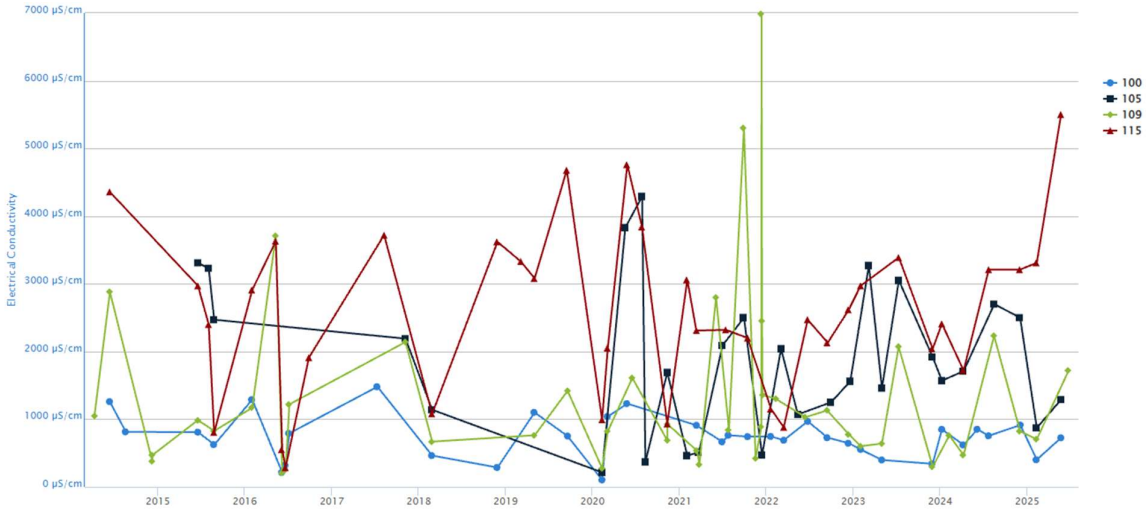
Year	DG 22 East of Void			DG 28 Pylara Homestead			DG 33 Waste Rock Dam			DG34 West of Void		
	Avg	Min	Max	Avg	Min	Max	Avg	Min	Max	Avg	Min	Max
2017-2018	3.69	1.60	8.60	1.79	0.40	4.00	0.78	0.20	2.40	1.61	0.20	4.70
2018-2019	4.58	0.70	8.00	4.42	0.40	8.80	1.64	0.20	4.20	4.64	0.40	12.60
2019-2020	4.42	0.30	15.80	4.28	0.40	10.50	2.27	0.30	6.80	4.42	0.30	16.60
2020-2021	2.27	0.20	10.40	1.91	0.40	3.70	1.48	0.30	2.90	2.22	0.60	5.70
2021-2022	1.83	0.50	4.80	0.98	0.40	2.30	0.96	0.30	2.70	8.35	0.60	27.60
2022-2023	2.75	0.30	8.60	2.51	0.40	12.50	1.04	0.20	3.80	9.98	1.40	72.10
2023-2024	3.40	0.40	11.90	1.24	0.20	4.80	1.12	0.20	3.90	2.36	0.20	6.00
2024-2025	**1.81**	**0.20**	**4.20**	**1.77**	**0.60**	**4.20**	**1.79**	**0.40**	**6.00**	**1.32**[1]	**0.20**	**4.90**

[1]Only 11 samples due to breakage in transit

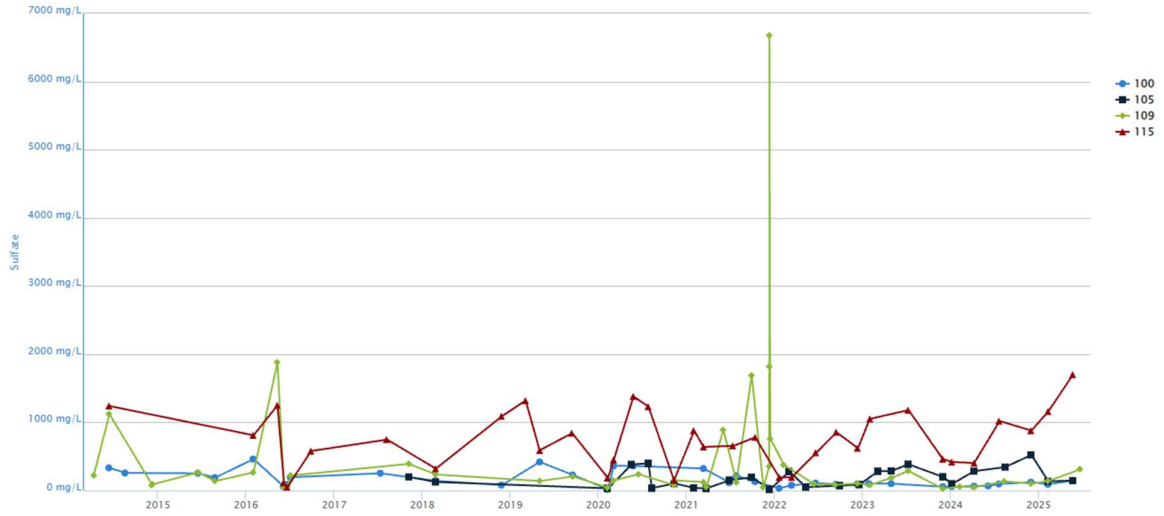
Appendix 5 Surface Water Monitoring Results



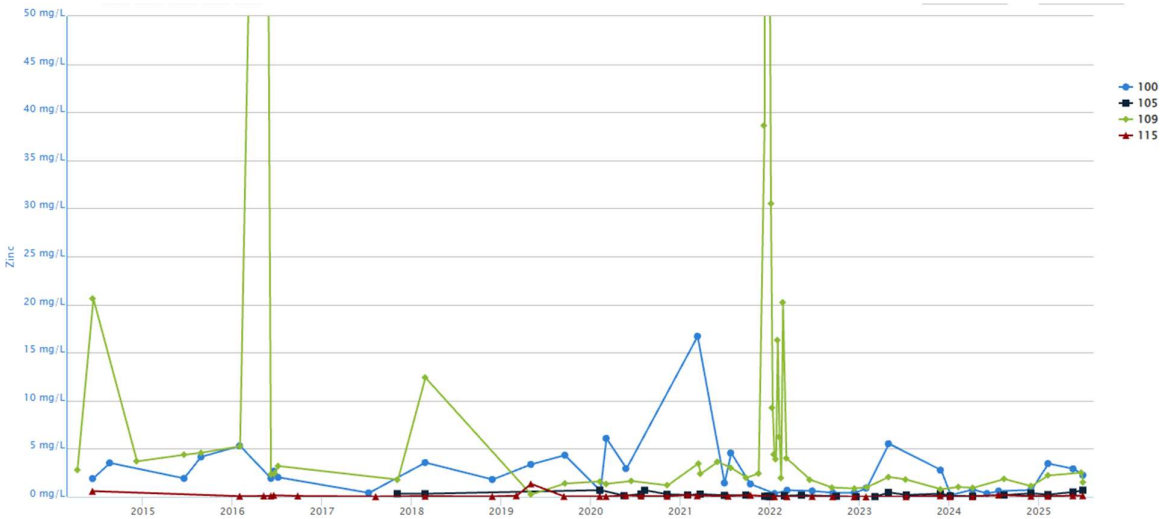
Graph 8-10 **Surface water baseline results last 10 years – laboratory pH**



Graph 8-11 **Surface water baseline results last 10 years – laboratory EC**

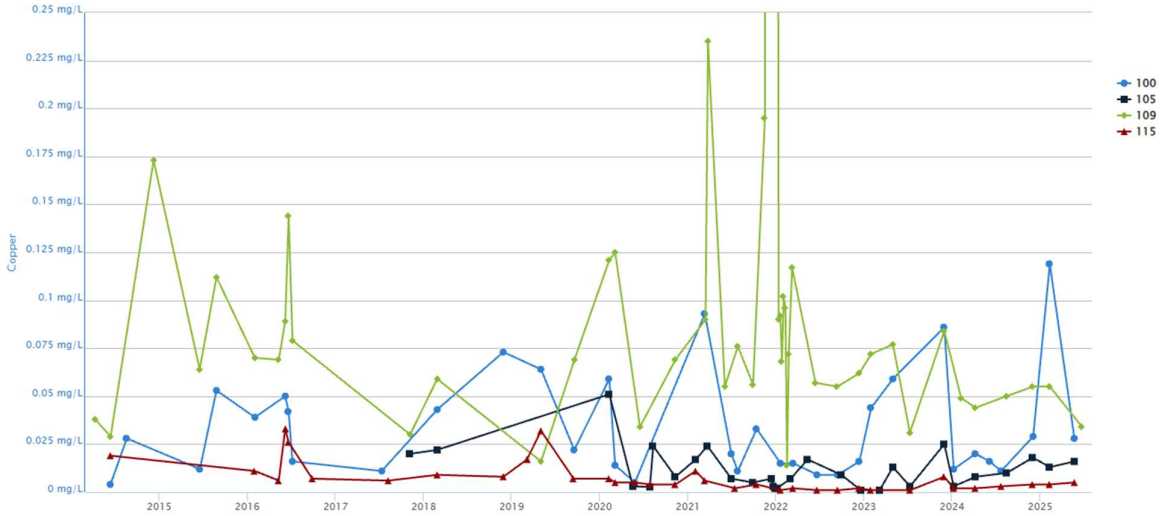


Graph 8-12 Surface water baseline results last 10 years – sulphate



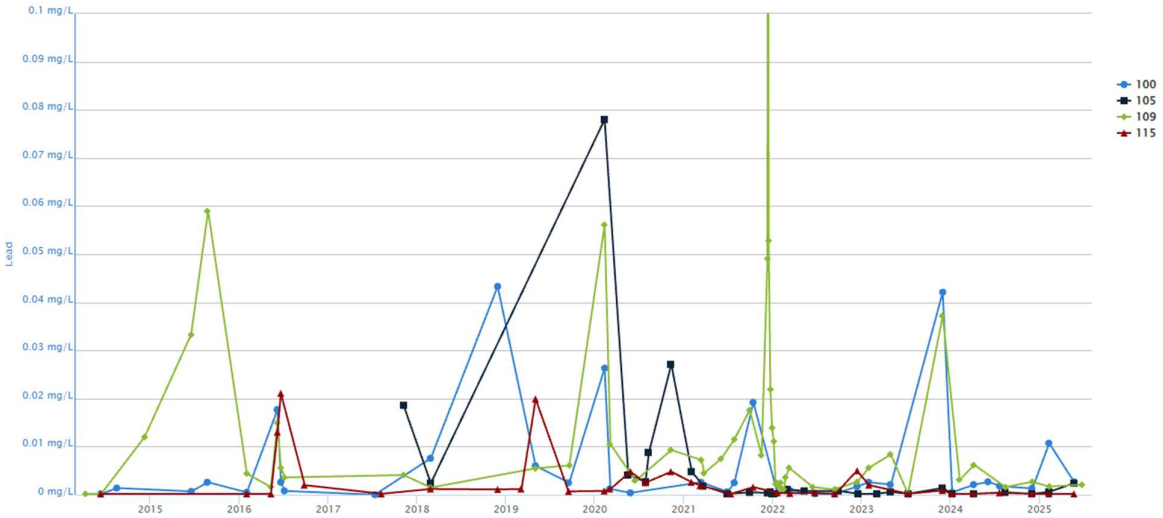
Graph 8-13 Surface water baseline results last 10 years – total zinc

*Results between 11/12/2021 and 05/01/2022 omitted. These values represent a spike in copper concentrations due to TDW discharge.



Graph 8-14 Surface water baseline results last 10 years – total copper*

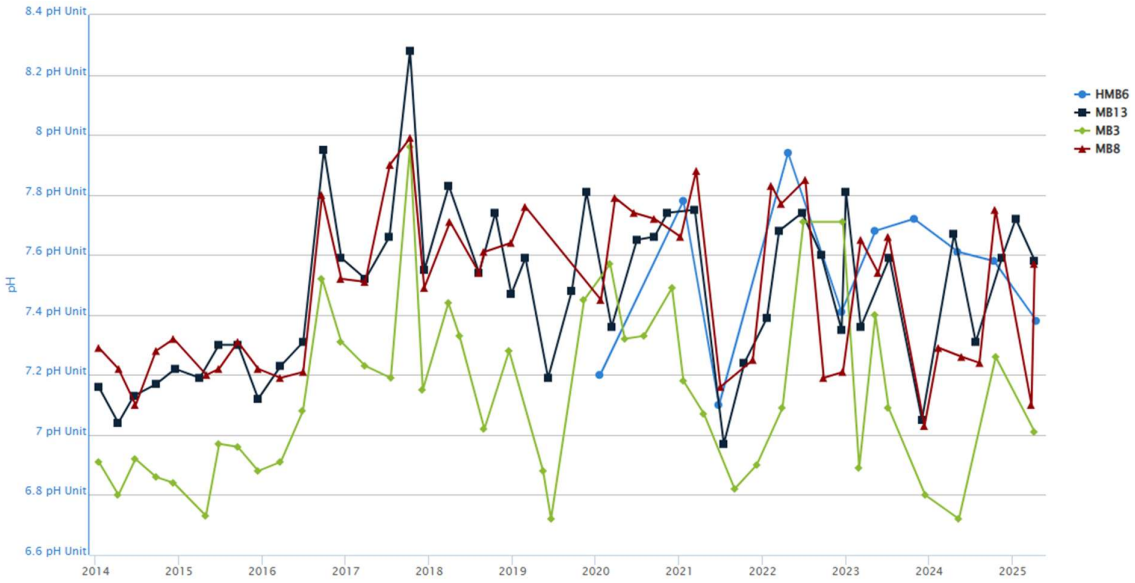
*Results between 10/12/2021 and 05/01/2022 omitted. These values represent a spike in copper concentrations due to TDW discharge.



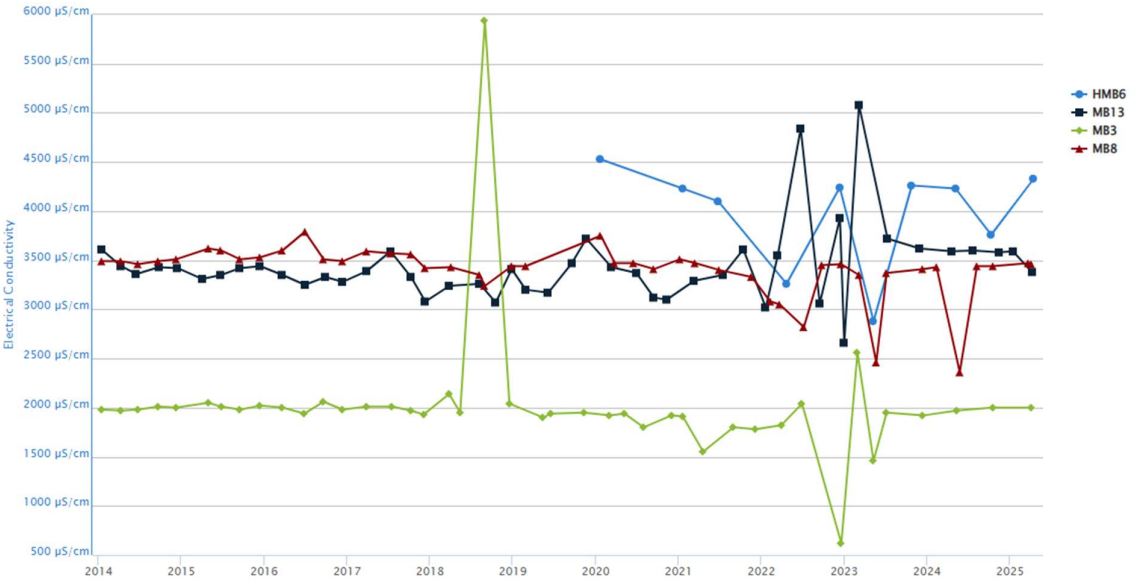
Graph 8-15 Surface water baseline results last 10 years – total lead*

*Results between 11/12/2021 and 13/12/2021 omitted. These values represent a spike in lead concentrations due to TDW discharge.

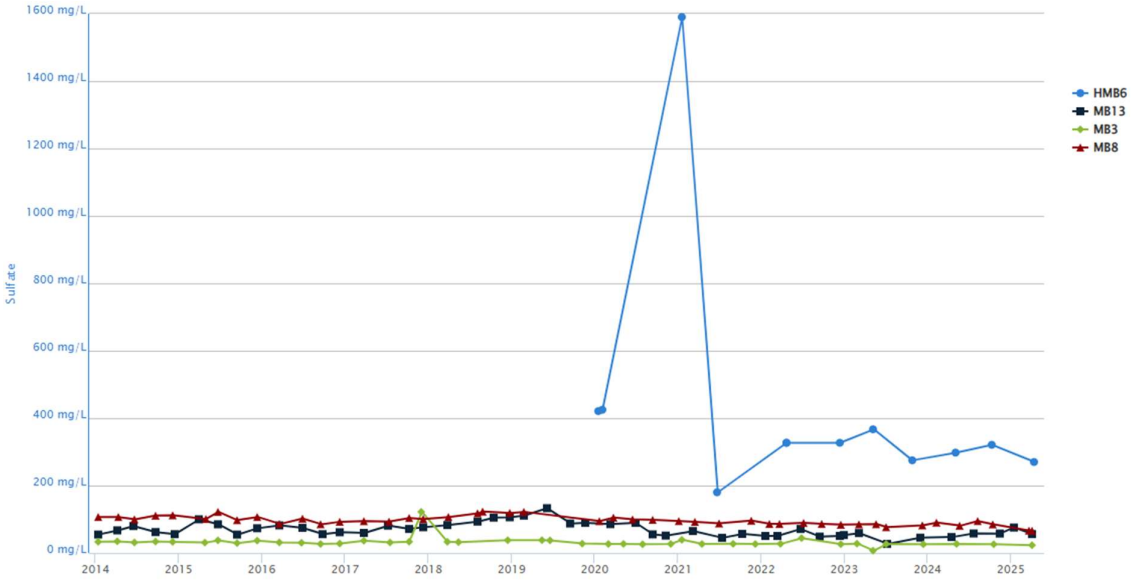
Appendix 6 Groundwater monitoring results



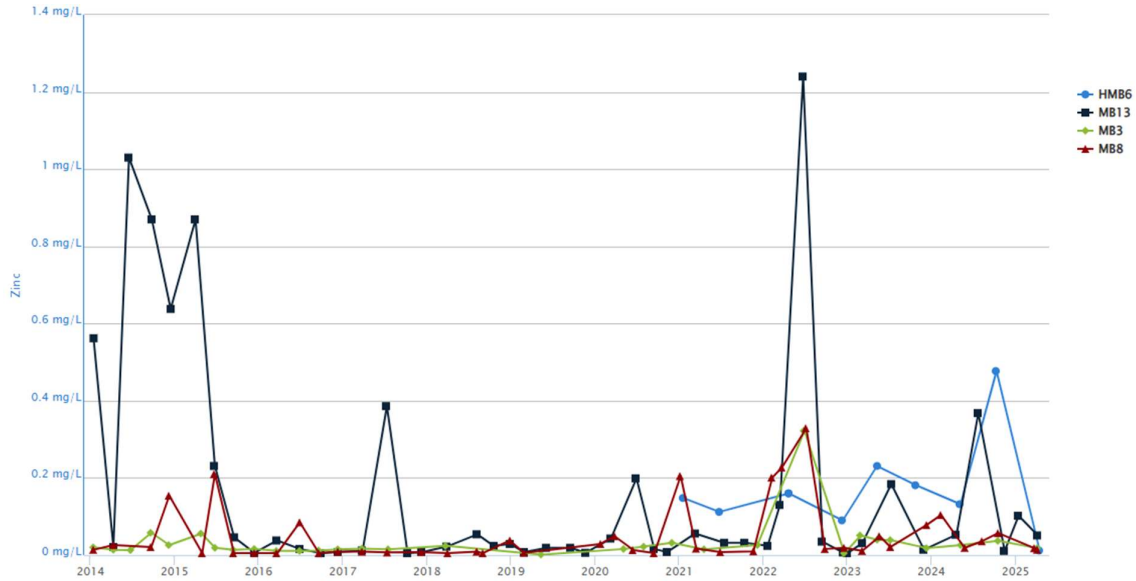
Graph 8-16 Groundwater baseline bore results – laboratory pH



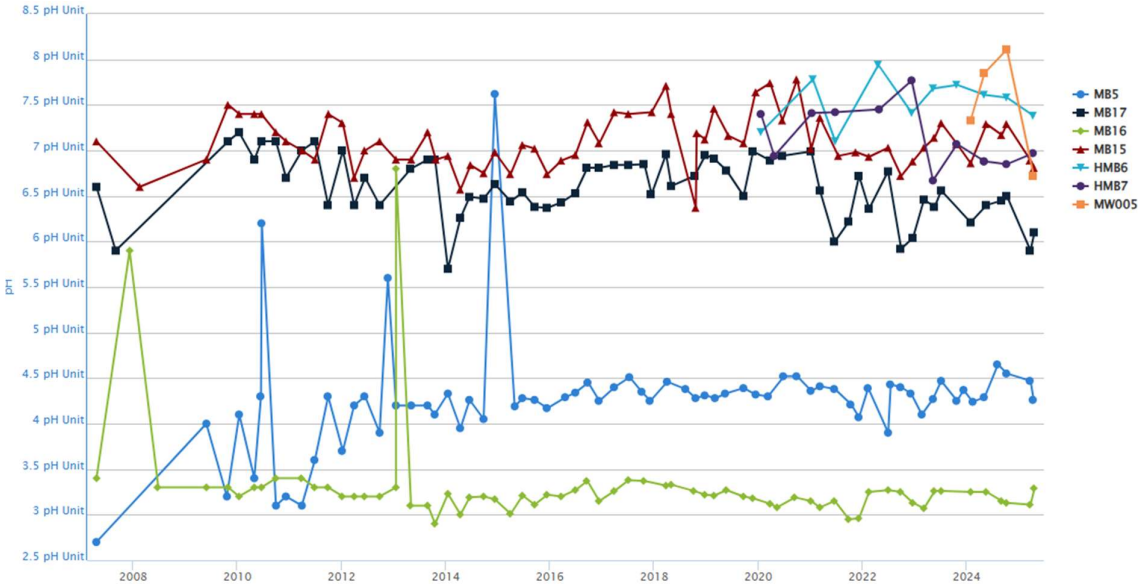
Graph 8-17 Groundwater baseline bore results – laboratory EC



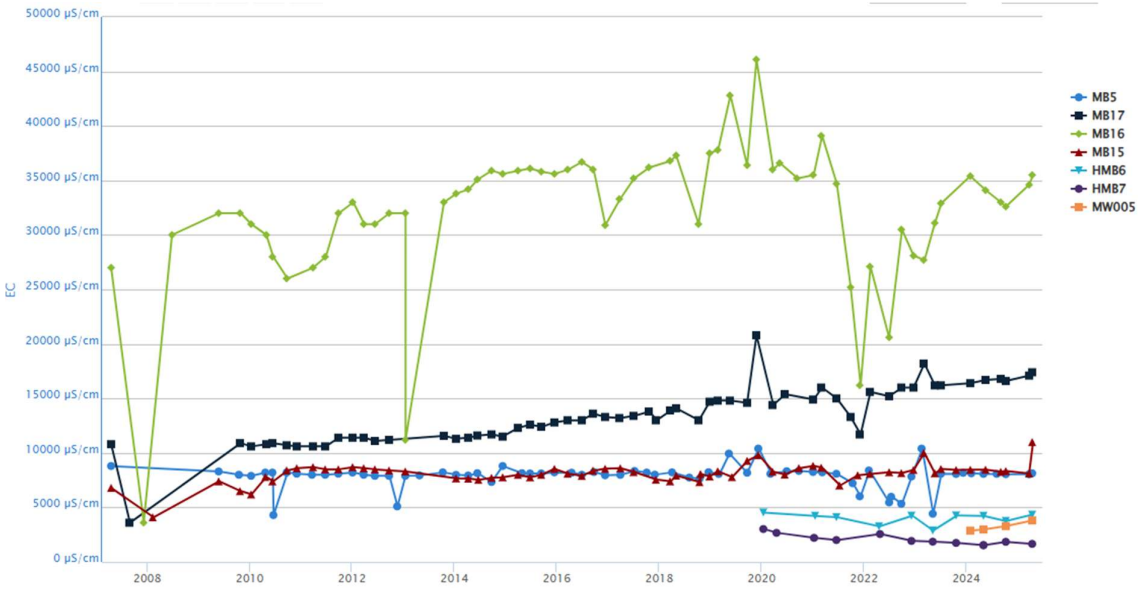
Graph 8-18 Groundwater baseline bore results – sulphate



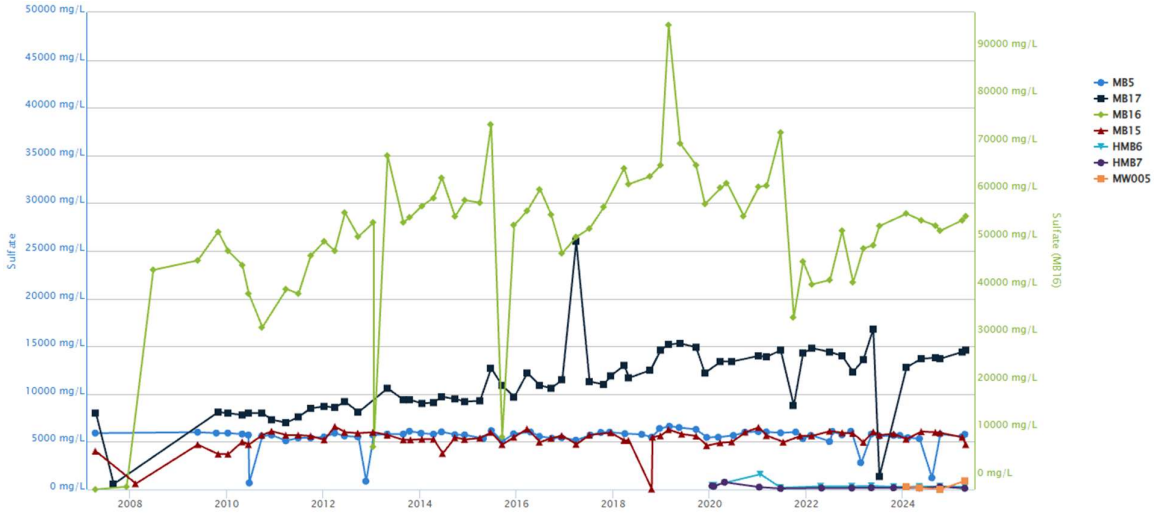
Graph 8-19 Groundwater baseline bore results – dissolved zinc



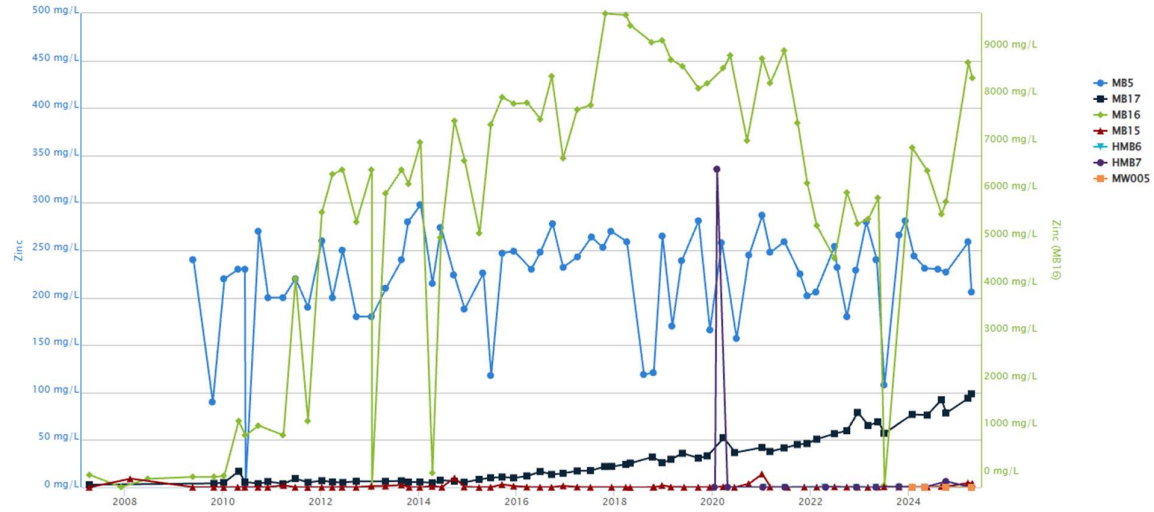
Graph 8-20 Groundwater RWRD bore results – laboratory pH



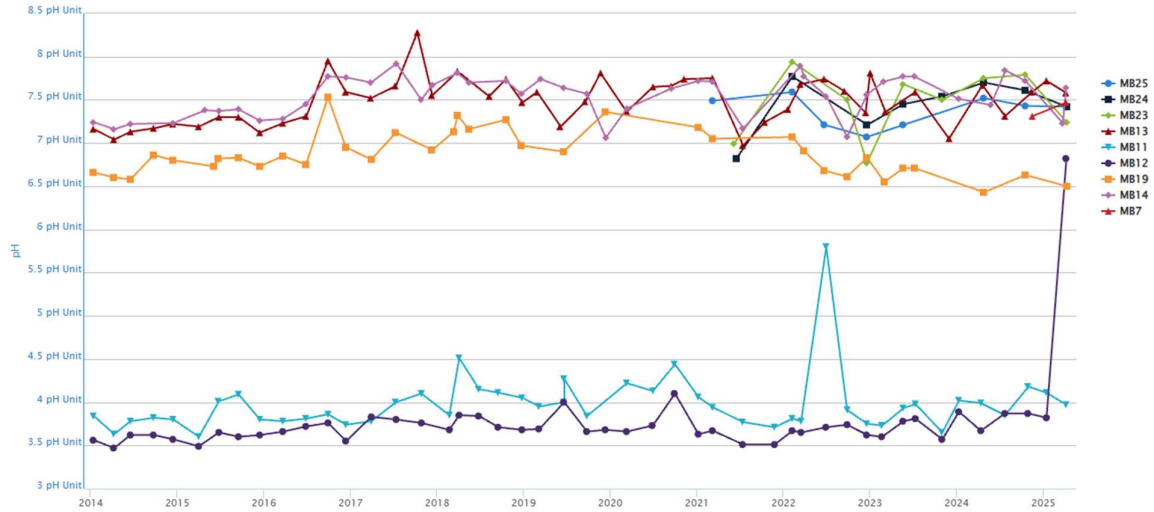
Graph 8-21 Groundwater RWRD bore results – laboratory EC



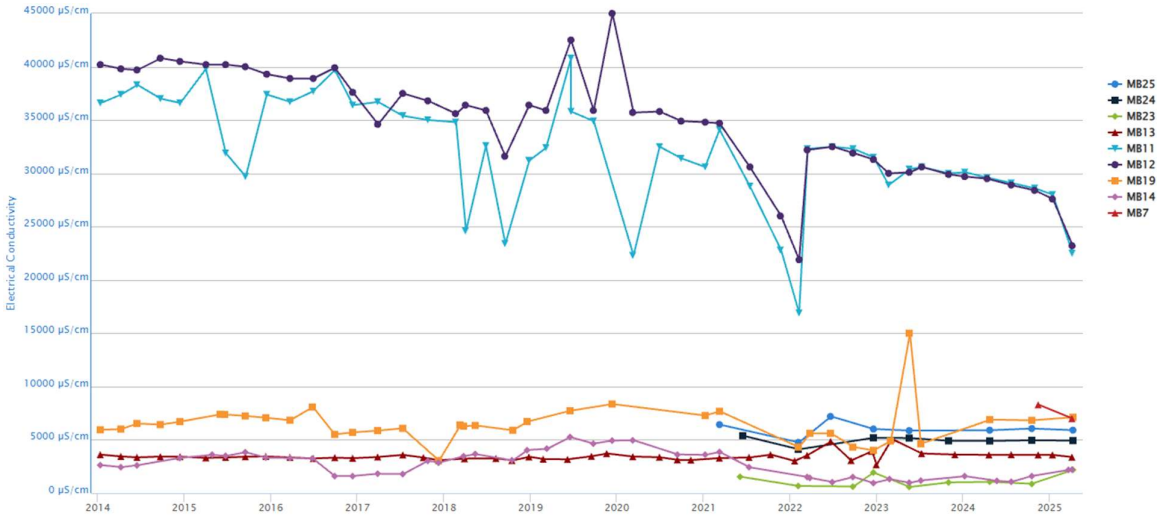
Graph 8-22 Groundwater RWRD bore results – sulphate



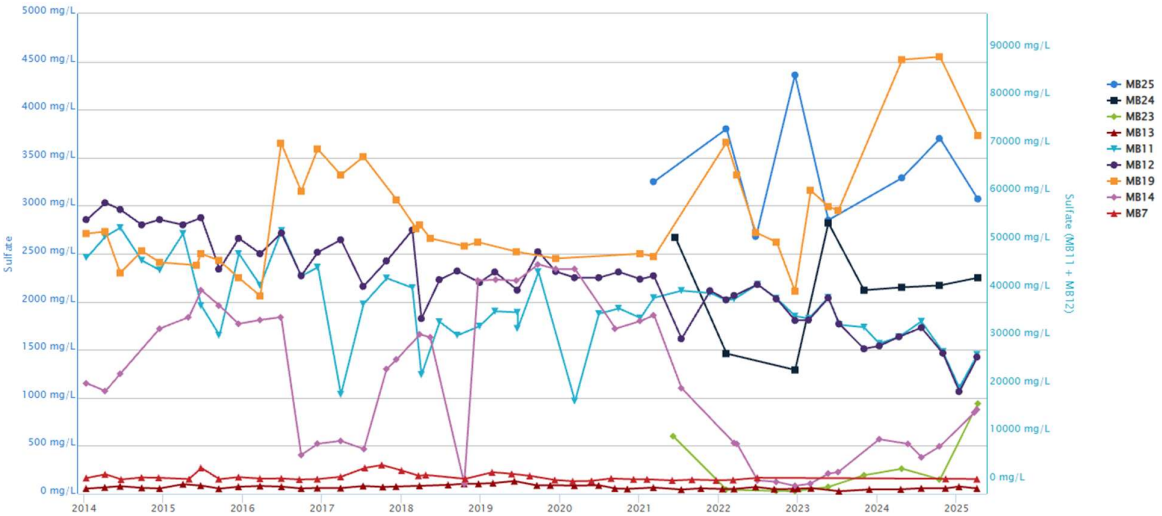
Graph 8-23 Groundwater RWRD bore results – dissolved zinc



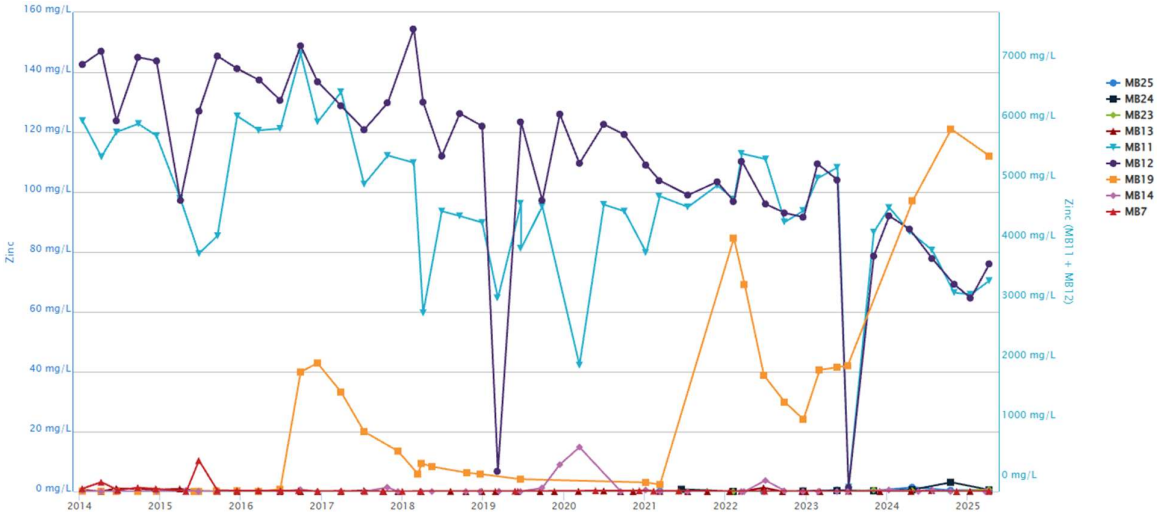
Graph 8-24 Groundwater ED2 bore results – laboratory pH



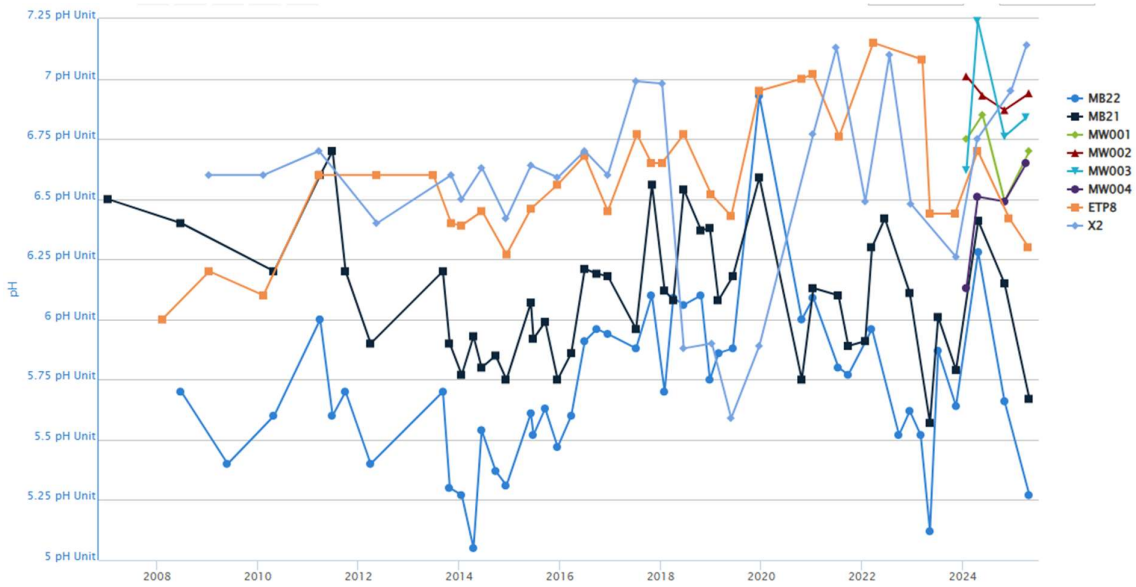
Graph 8-25 Groundwater ED2 bore results – laboratory EC



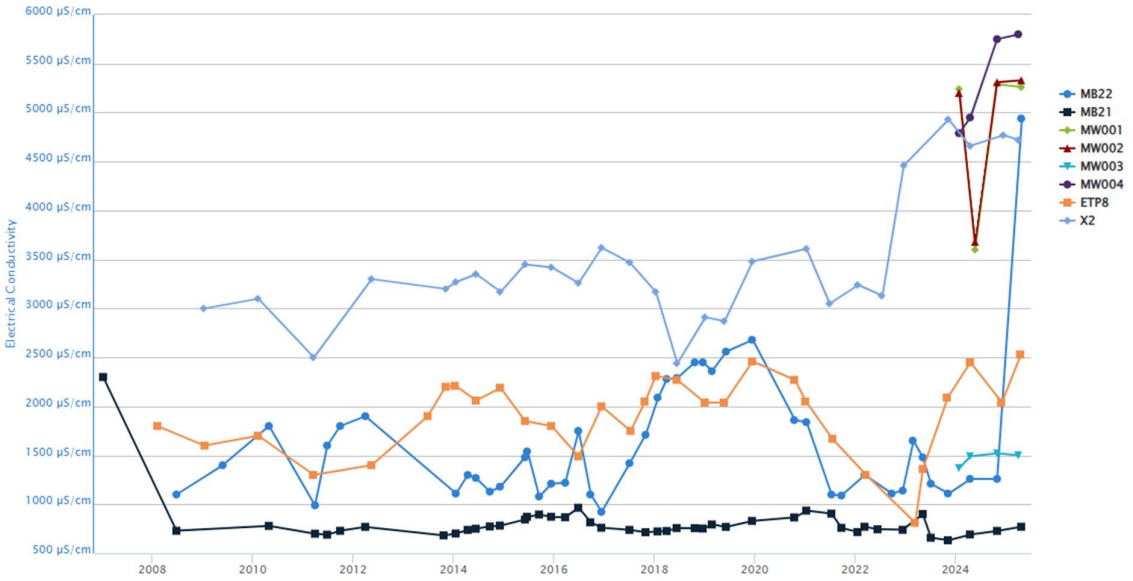
Graph 8-26 Groundwater ED2 bore results – sulphate



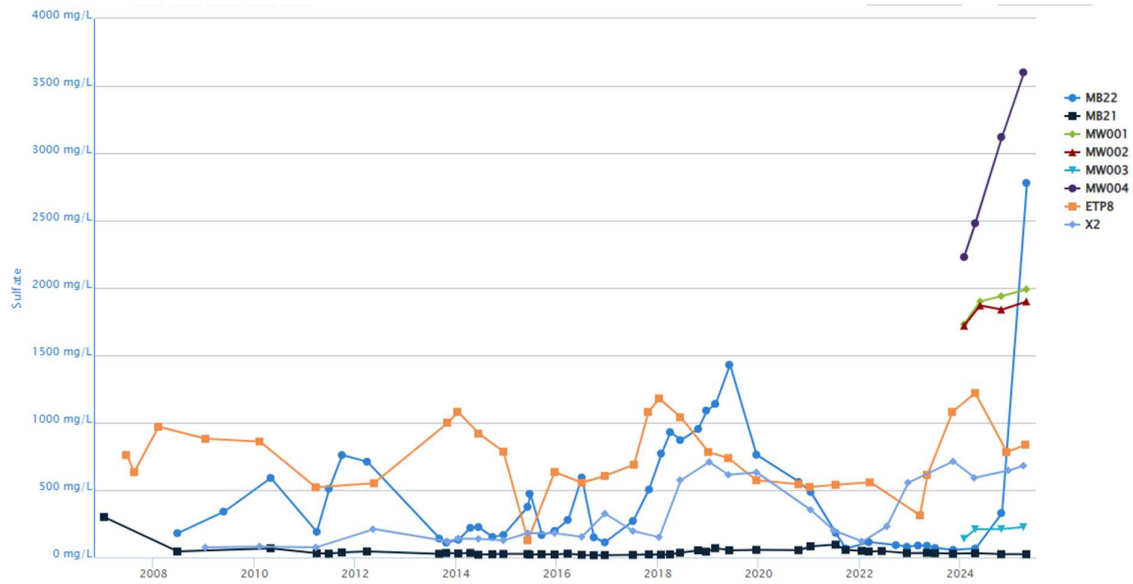
Graph 8-27 Groundwater ED2 bore results – dissolved zinc



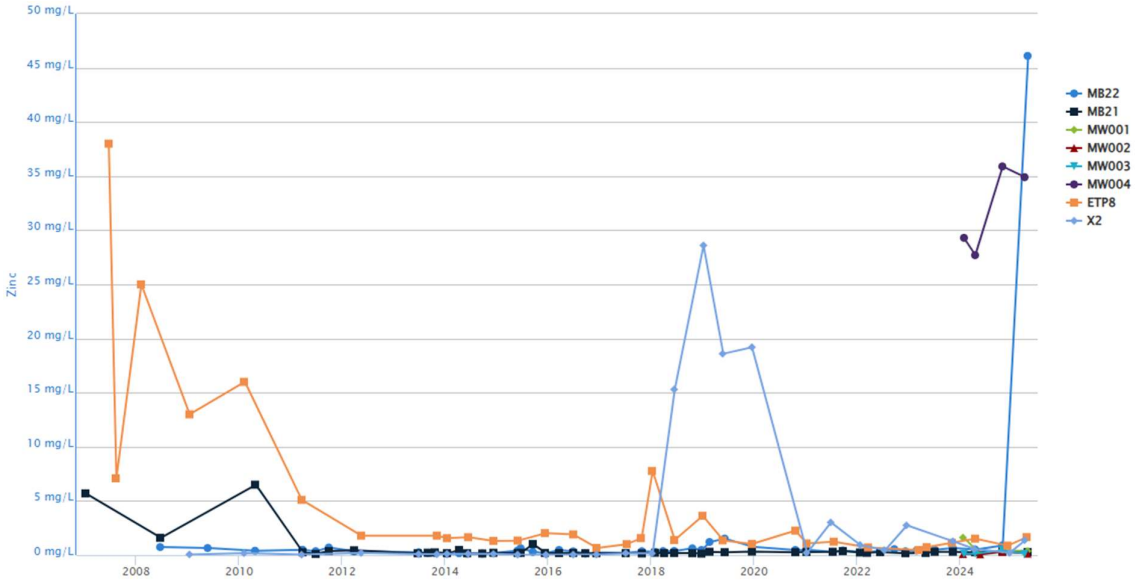
Graph 8-28 Groundwater legacy tailings dams results – laboratory pH



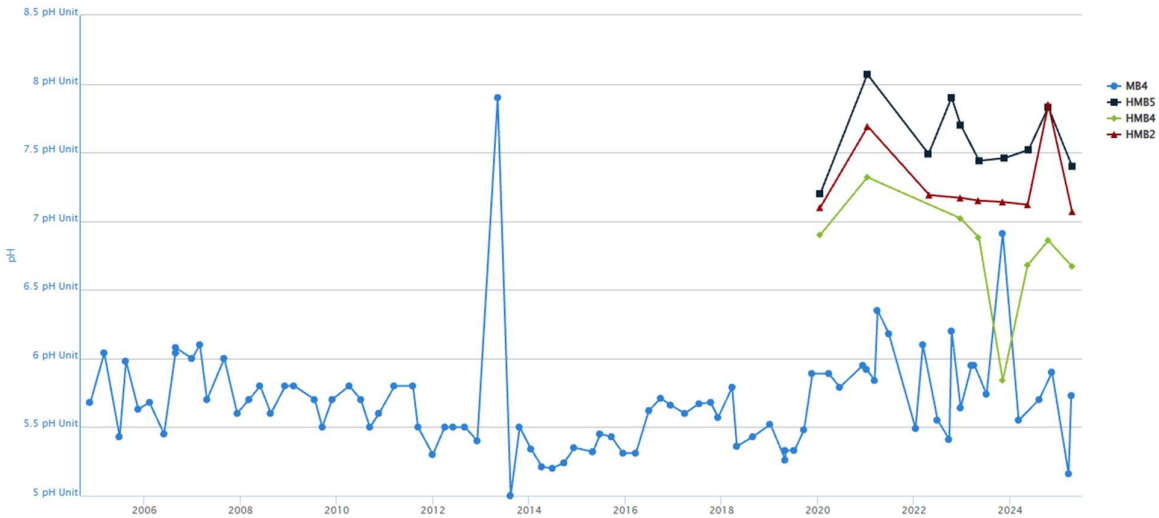
Graph 8-29 Groundwater legacy tailings dams results – laboratory EC



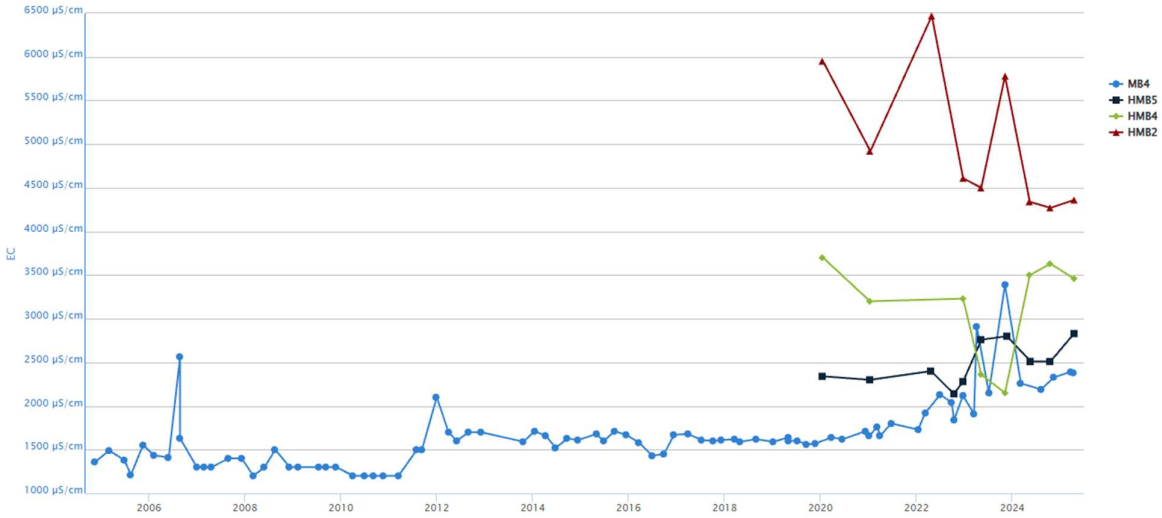
Graph 8-30 Groundwater legacy tailings dams results – sulphate



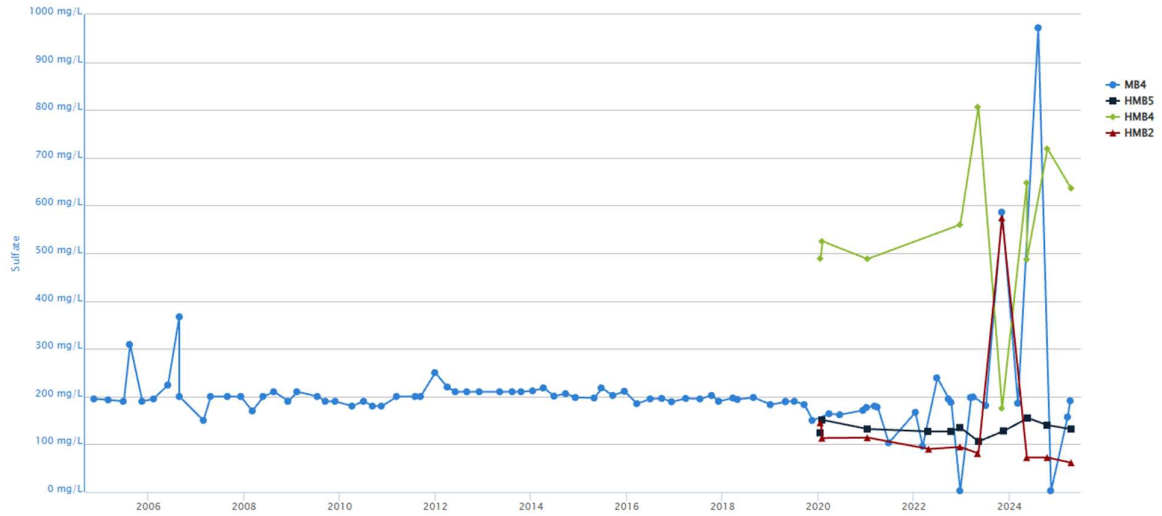
Graph 8-31 Groundwater legacy tailings dams results – dissolved zinc



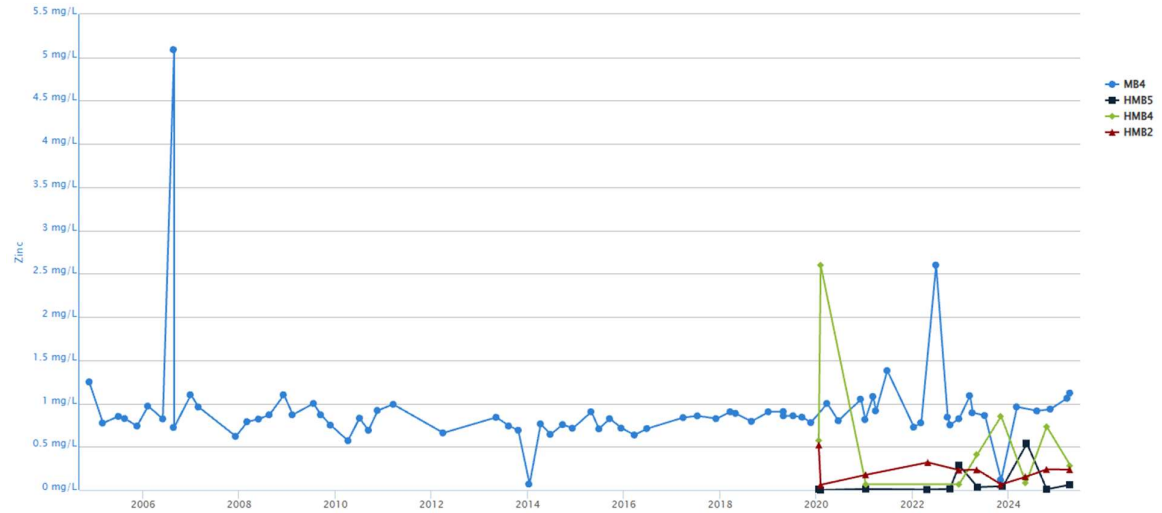
Graph 8-32 Groundwater TSF4 results – laboratory pH



Graph 8-33 Groundwater TSF4 results – laboratory EC



Graph 8-34 Groundwater TSF4 results – sulphate



Graph 8-35 Groundwater TSF4 results – dissolved zinc

Appendix 7 Independent audit findings and response

Condition	Comment / Audit Finding	Proponent Response	Status
Retained Recommendations from Previous Audit			
Schedule 3 Condition 3: Underground Mining, Performance Measures	Mine Extraction Plan Section 4.2.1 details an exclusion zone of 200 m around the existing open cut (Woodlawn Landfill). Heron/Develop confirmed that construction operations conformed with the approved design including the 200 m exclusion zone, verified by a design review and sign-off process. **Recommendation**: Include a process to verify compliance with this condition in the next revision of the Mine Extraction Plan.	The current mine plan (conceptual mine design) completed in 2020/2021 complies with this conditions. The underground excavation design approval processes (final design for execution) will be revised to incorporate a specific check of the planned excavation against this condition and formal documentation of this process will be incorporated into the Extraction Plan. The mine planning and approval process for all underground excavation activity on the site has incorporated into it the 200m exclusion zone from the pit and the exclusion zone is also incorporated into the Inrush and Inundation Principle Hazard Management Plan.	Management plan submitted to DPHI for approval.
Schedule 3 Condition 5: Underground Mining, Paste Fill	The PFMP includes results of the paste fill chemical analysis trial, approved by the Department on 29/8/2019. It also requires the backfill to be physically and chemically stable and non-polluting. TCLP results from the paste fill trial indicate that the concentration of the majority of metals in leachate, including lead (46 mg/L), copper (4.84 mg/L) and zinc (13.9 mg/L), exceeded the adopted site-specific trigger values. These results indicate that the paste fill is potentially polluting. **Recommendation**: Reassess the method of paste fill testing and the adopted trigger values prior to paste plant recommissioning. Ongoing testing of the paste will be required following paste plant recommissioning. Consider further leachate testing including ASLP.	The PFMP will be reviewed prior to resumption of paste fill operations. Monitoring during paste fill production operations will be undertaken on an ongoing basis as detailed in the PFMP. As well as this, the technical pastefill review and re-establishment contract that has just been awarded will provide paste fill recipes that will include these parameters as considerations.	Paste plant has been recommissioned in the reporting period. Updates to the PFMP are awaiting paste production and further testing. The water management plan has been updated with a monitoring trigger.

Condition	Comment / Audit Finding	Proponent Response	Status
Retained Recommendations from Previous Audit			
Schedule 4 Condition 3: Water Resources, Existing Acid Drainage	PA 07_0143 is dated 4/7/2013 and this condition became non-compliant from 4/7/2018. A passive treatment system has been proposed for the WRD and the WRMP specifies implementation of the system by the end of mining operations. **Recommendation**: It is recommended that the timeframe and agreed management method be aligned between the WWRM and the proposed PA MOD3.	Verbal discussions with the resources regulator at their last visit indicate that potentially improving the cap and eliminating/minimising the source may be a better approach rather than ongoing treatment. Further discussions and investigative work will be completed in order to inform a modification for this.	To be included in a modification.
Schedule 4 Condition 29: Waste	A large amount of demolition material (including reinforced concrete) was present on the western edge of TDS **Recommendation:** The long-term plan for the use/placement of the demolition material should be expressed in the EMS.	A separate waste management plan has been drafted during this audit period. Ongoing updates for the fate of this material will be specified when known. Alternatively, it may be more applicable to be considered as part of site closure and rehabilitation planning.	Waste is not from the project and is legacy, therefore, will be included in a rehabilitation management plan.
Schedule 5 Condition 1: Notification of Landowners	**Recommendation**: Review this condition as part of PA MOD3 such that notification of landowners is not required in the case of off-site generated dust exceedances.	Agree. This will be included in a subsequent modification.	To be included in a subsequent modification
Schedule 6 Condition 5: Revision of Strategies, Plans and Programs	While most Plans have been submitted to the Regulator and approval received in 2017, approval of the latest Plan versions will be required prior to recommencement of extractive mining operations. It is noted that while Department comments were received for the WWRMP, TMP and EMS, no evidence of approval of the revised plans was available. **Recommendation**: It is recommended that document control sections for each management plan are clarified to differentiate between document reviews, revisions and submissions to stakeholders. All Plans under this PA require Secretary approval, to be appended to the Plan documents.	Agree. Following improvements plans will be re-submitted and the consultation log updated accordingly.	Management plans have been updated as suggested with management plans being issued to DPHI once drafted and consulted for approval.
SML20 3. Mining Operations Plan and Rehabilitation Report	The location of the waste rock dump was moved from the approved location. The approved location was an existing vegetated area and rather than remove the vegetation, the dump was moved to an already cleared location a short distance away. Heron notified the DPIE of the breach and the non-compliance was reported in the NSW Resources	Agree. This will be included in a subsequent modification.	To be included in a subsequent modification

Condition	Comment / Audit Finding	Proponent Response	Status
Retained Recommendations from Previous Audit			
	Regulator Compliance Audit (Feb 2020). The location of the box cut mine entry was also altered and was the subject of a penalty notice. Heron advised that the new locations will be included in the PA MOD3 application.		
PA 07_0143-MOD2			
Schedule 3 Condition 1 Tailings Dams, Performance Measures	Seepage from TDS has been managed through lining of the seepage return dam and drainage upgrade works, in lieu of seepage source identification. **Recommendation**: This condition requires review in PA MOD3 to remove reference to tailings reprocessing and note the alternative management strategy, as approved by the Regulator.	Agree. This will be included in a subsequent modification.	To be included in a subsequent modification
Schedule 3 Condition 4 Extraction Plan	It is noted that the subsidence monitoring program was reduced relative to the Extraction Management Plan during the audit period. Develop advised this was because extractive mining had ceased (mine development however continued). Develop advised that Dam Safety NSW were reviewing the appropriateness of the reduced monitoring at the time of this audit. **Recommendation**: Following Dam Safety NSW review, provision to reduce the subsidence monitoring program (for example during mine development and not extraction) should be considered in the next version of the Extraction Plan.	This has been clarified with dam safety and currently no reduction in monitoring is suitable. Monitoring during development will be the same as extraction and as per the subsidence monitoring program. This may be subject to change following the approval review process.	Extension to the approval and conditions for mining in a declared dam area is being progressed with the resources regulator and DSNSW.
Schedule 4 Condition 2 Water Resources, Water Discharges EPL Condition L1.1 Pollution of Waters	Section 120 of the POEO Act prohibits the pollution of waters. Overtopping of TDW occurred on 10/12/2021 causing pollution of Crisps Creek in non-compliance with this condition. CUP Notice 3501608 was issued in relation to this incident requiring response actions and reporting. EPA letter DOC22/163830 dated 4 March 2022 noted that the licensee had fulfilled their obligations under the CUP and sampling frequencies could return to those listed under Condition M2 of the licence.	This incident occurred prior to Develop acquiring the site. Ongoing sampling indicates the creek has since returned to pre-spill water quality. A number of mitigation measures have also been introduced to limit chance of reoccurrence.	Ongoing monitoring being completed in accordance with the updated water management plan.
Schedule 4 Condition 4 Water Resources,	**Recommendation**: A plan of the monitoring locations should be included in the WMP.	Agree. The WMP is under review and these recommendations will be incorporated.	Updated water management plan

Condition	Comment / Audit Finding	Proponent Response	Status
Retained Recommendations from Previous Audit			
Water Management Plan	**Recommendation**: The WMP should more clearly set out the trigger levels applicable to surface and groundwater; this may be included in Section 7.1. It is noted that revision of the WMP is proposed in preparation for mining recommencement, including finalisation of the dewatering plan.		with triggers drafted and submitted to DPHI for approval.
Schedule 4 Condition 14 Air Quality, Odour EPL Condition L5. Potentially Offensive Odour	An odour emissions assessment was undertaken on 7 March 2024 and indicated that the dewatering ponds had a very low odour emission potential and that odour from the receiving dam on 7 March 2024 would be unlikely to lead to off-site impact. This assessment includes a plan of sampling locations correctly targeting ED2, however refers to ED3 throughout. **Recommendation**: Review reference to ED2/3 in the odour emissions assessment and update as necessary.	Although it was this version that was sent to the EPA the report has since been reissued to us with the correct dam names. This report was about ED2 not ED3.	No further action required
Schedule 6 Condition 4 Environmental Management, Annual Review	The auditor notes that conformance with the groundwater quality, surface water quality, subsidence and dam freeboard trigger levels was not directly reported in the 2023-2024 Annual Review. **Recommendation**: The Annual Reviews should clearly state whether monitored parameters were above or below the relevant trigger levels.	Noted. This will be rectified in subsequent reviews.	This annual review considers this feedback.
EPL			
L4. Hours of Operation	It is understood from personnel interviews that no construction activities were undertaken outside of the hours of operation, however it is noted that the general site hours are 6am-6pm. **Recommendation:** The EPL and on-site hours of operation should be aligned to avoid inadvertent non-compliance with this condition.	Noted. This will be identified in the next subsequent EPL review.	EPL review to be considered in next reporting period.
L6 Other Conditions (Use and Transfer of Waters)	**Recommendation**: Since development of EPL Attachment 2: Woodlawn Site EPL Water Transfers, ED1 management has been transferred to Veolia and is no longer utilised for mine water transfers. This plan requires amendment in line with current water transfer operations	Noted. This will be identified in the next subsequent EPL review.	EPL review to be considered in next reporting period.

Condition	Comment / Audit Finding	Proponent Response	Status
Retained Recommendations from Previous Audit			
M4 Recording of Pollution Complaints	While no complaints were directly received by Develop during the audit period, one complaint and one query/concern were received via the EPA. The query received on 19 July 2023 regarding underground workings methane was recorded in the Complaints Register, available on the Develop website. However, the complaint received on 5 February 2024 regarding odour from mine water discharged into ED2 was not found in this register. Neither query/complaint were reported in the EPA Annual Returns. **Recommendation**: All complaints and concerns should be recorded as specified in this condition.	Noted. As these were not made directly to DEVLEOP they were not included. This will be rectified for subsequent reporting.	Process updated and ongoing.
M5 Telephone Complaints Line	Public notification of the complaints telephone line was not readily apparent on the Develop website or signage at the site entrance. **Recommendation**: The complaints telephone number and the fact that it is a complaints line should be notified to the public.	Agree. This is currently being investigated and will be implemented prior to extractive operations.	A phone number and signage has been implemented as further discussed in Section 7.2