

## Rum Jungle Rehabilitation Project - Auditor Endorsement

Endorsement Elements	
<b>Title:</b>	Auditor Endorsement of the Preliminary Remediation Action Plan (PRAP)
<b>Dated:</b>	27 September 2023
<b>Reference:</b>	RJ-Audit-AE-002
<b>NT Approval Clause:</b>	9
<b>Recipient:</b>	The Approval Holder (DITT, c/- Paul Jones, HSE Director – RJRP)
<b>Short description:</b>	A document to provide confirmation (and endorsement) that the auditor is satisfied that the PRAP meets the requirements of the NT Approval.

### 1. NT Approval requirements

Clause 9 states:

- 9-1 *Prior to the commencement of remediation works, the approval holder must engage a suitably qualified and experienced person to prepare a RAP detailing the remediation objectives, work required to meet the remediation objectives, performance criteria for the remediation works, and corresponding contingency actions.*
- 9-2 *The RAP required by condition 9-1 must:*
- (1) *be informed by a health risk assessment and environmental risk assessment;*
  - (2) *be prepared in accordance with the relevant guidelines produced or approved under the ASC NEPM and NRF; and*
  - (3) *be reviewed and endorsed in writing by the site auditor appointed under condition 8-1*
  - (4) *be revised to address any comments of the independent peer review required by condition 10-1, and approved by the site auditor.*
- 9-3 *The approval holder must implement the RAP that has been approved by the site auditor under condition 9-2(4).*
- 9-4 *As part of the RAP required by condition 9-1 the approval holder must include the following:*
- (1) *Cultural heritage management plan (see condition 5);*
  - (2) *Long-term environmental management plan (see condition 15);*
  - (3) *Erosion and sediment control plan (see condition 16);*
  - (4) *Revegetation management plan (see condition 17);*
  - (5) *Receiving environment monitoring program (see condition 20); and*
  - (6) *Water management plan (see condition 21).*

## 2. Remediation Action Plan (RAP) to be prepared in stages

The auditor, on 30 August 2023 (Ref. RJ-Audit-AA-001b), issued an approval to prepare the RAP in stages. Specifically, the auditor approved the preparation of a Preliminary Remediation Action Plan (PRAP) for Stage 3 Early Works.

## 3. Relationship to future stages

A detailed RAP is to be prepared (and finalised following consultation) for the purpose of the main works.

## 4. Consultation with Traditional Owners and Northern Land Council (NLC)

The auditor has been advised verbally and in writing that DITT has consulted with Traditional Owners and NLC. The auditor notes written feedback provided by NLC on 25 August 2023 relating to the review of the draft PRAP and draft CHMP.

## 5. Auditors' assessment of compliance against NT Approval

NT Approval Requirements (EP2023/022-001)		
8-1(1)	Auditor must be appointed by DITT	Todd Mitchell was appointed by DITT on 15 August 2023.
8-1(1)(a), 9-2(3)	Auditor must review the RAP	The auditor reviewed PRAP v0.3, v0.4 and v0.5
	Auditor must endorse the RAP	This document
8-1(2)	Minister for ECCWS must agree to Auditor appointment	Todd Mitchell is the Site Auditor and was agreed to by the Minister on 25 July 2023.
9-1	DITT must engage a suitably qualified and experienced person to prepare the RAP	DITT has engaged SLR Consulting (an ACLCA member company) who is considered to be a SQP
	The RAP must contain:	
	remediation objectives	Section 1.2
	performance criteria for remediation works	Section 7.0
	contingency actions	Section 8.0
9-2 (1)	The RAP must be informed by a HERA	Section 9.0 and Appendix B
9-2 (2)	The RAP must be prepared in accordance with the ASC NEPM and NRF	Section 1.3
9-2 (4)	The RAP must be revised to address any comments provided by the Peer Reviewer	Under separate cover
9-4	The RAP must include:	
(1)	Cultural Heritage Management Plan	Section 10.8 & Appendix D
(2)	Long Term Environmental Management Plan	Section 13.1
(3)	Erosion and Sediment Control Plan	Section 10.3
(4)	Revegetation Management Plan	Section 10.9
(5)	Receiving Environment Monitoring Program	Section 10.2.4
(6)	Water Management Plan	Section 10.2.3

NT Approval Requirements (EP2023/022-001)		
30-1(1)	The RAP may be prepared in stages	Auditor approval issued
30-1(2)	Plans or programs may be combined	Currently not applicable
30-1(3)	Plans or programs may be updated.	The Auditor expects this will be as required for staging purposes and thereafter annually.

**6. Triggers for updating the plan**

The auditors' requirements for updating the plan include:

- Major departures from the works proposed by the PRAP.
- Annually should the early works not be completed within 12 months of 27 September 2023.

**7. Auditors' Endorsement**

I, Todd Mitchell, having been consulted on and having reviewed the *Preliminary Remediation Action Plan, Stage 3 Early Works – Rum Jungle Mine Site* (SLR, 2023) am of the opinion that the document meets the requirements of the NT Approval. I am of the opinion that the PRAP provides suitable information and direction relating to the proposed Stage 3 early works as described in the Preliminary Remediation Action Plan.

I hereby endorse the *Preliminary Remediation Action Plan, Stage 3 Early Works – Rum Jungle Mine Site* (SLR, 2023).

Yours faithfully



Todd Mitchell

Environmental Auditor & Site Auditor (Rum Jungle Rehabilitation Project)

*Appointed pursuant to the Environment Protection Act 2017 (Vic) and Waste Management & Pollution Control Act 1998 (NT)*

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## Rum Jungle Rehabilitation Project - Auditor Approval

Approval Elements	
<b>Title:</b>	Approval to prepare Remediation Action Plan (RAP) in Stages
<b>Dated:</b>	30 August 2023
<b>Reference:</b>	RJ-Audit-AA-001b
<b>NT Approval Clause:</b>	30-1(1)
<b>Recipient:</b>	The Approval Holder (DITT, c/- Paul Jones, HSE Director – RJRP)
<b>Short description:</b>	A document to approve the preparation of the Preliminary Remediation Action Plan for Stage 3 Early Works.

### 1. NT Approval requirements

Clause 30 (Staging, combining and updating plans or programs) includes sub-clause (1) which requires the site auditor to approve the preparation and submission of any plans or programs required by the NT Approval on a staged basis. It is required that there is a clear description provided of the specific stage and scope, and relationship to any future stages. It must also include the triggers for updating the plan or program.

### 2. Remediation Action Plan to be prepared in Stages

The auditor approves the preparation of the RAP in stages. Specifically, the auditor approves the preparation of a Preliminary Remediation Action Plan (PRAP) for Stage 3 Early Works.

### 3. Scope of the PRAP Stage 3 Early Works

The auditor approves the PRAP Stage 3 Early Works with the following scope:

- Site establishment (including any signage, fencing, site facilities and laydown area)
- Construction of a creek crossing culvert
- Relocation of cycad and sand palms from within the proposed Waste Storage Facility (WSF) – existing activity

Further details of these activities are to be provided in the text of the PRAP.

### 4. Existing Activities

Pre-existing monitoring, maintenance and revegetation activity may continue.

### 5. Relationship to future stages

A detailed RAP is to be prepared for the purpose of the main works.

### 6. Triggers for updating the plan

The auditors' requirements for updating the plan include:

- Major departures from the works subject to the scope listed in Section 3 above.
- Annually should the early works not be completed within 12 months of 1 September 2023.

Please contact the undersigned if you would like to discuss this letter in more detail.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Todd Mitchell', written in a cursive style.

Todd Mitchell

Environmental Auditor & Site Auditor (Rum Jungle Rehabilitation Project)

*Appointed pursuant to the Environment Protection Act 2017 (Vic) and Waste Management & Pollution Control Act 1998 (NT)*

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## Rum Jungle Rehabilitation Project - Auditor Approval

Approval Elements	
<b>Title:</b>	Approval to prepare Cultural Heritage Management Plan in stages
<b>Dated:</b>	14 September 2023
<b>Reference:</b>	RJ-Audit-AA-002b
<b>NT Approval Clause:</b>	5 and 30-1(1)
<b>Recipient:</b>	The Approval Holder (DITT, c/- Paul Jones, HSE Director – RJRP)
<b>Short description:</b>	A document to approve the preparation of an Interim Protocol - Cultural Heritage Protection for Preliminary Works as a stage of the Cultural Heritage Management Plan.

### 1. NT Approval requirements

Clause 30 (Staging, combining and updating plans or programs) includes sub-clause (1) which requires the site auditor to approve the preparation and submission of any plans or programs required by the NT Approval on a staged basis. It is required that there is a clear description provided of the specific stage and scope, and relationship to any future stages. It must also include the triggers for updating the plan or program.

### 2. Cultural Heritage Management Plan (CHMP) to be prepared in Stages

The auditor approves the preparation of the CHMP in stages. Specifically, the auditor approves the preparation of an Interim Protocol - Cultural Heritage Protection for Preliminary Works.

The Auditor is satisfied that the Interim Protocol represents a staged approach to the development of a formal CHMP.

### 3. Scope of the Interim Protocol for Stage 3 Early Works

The auditor approves the Interim Protocol with the following scope:

- Culvert crossing over the diversion channel onsite
- Temporary tool laydown area nearby to the diversion channel onsite
- Revegetation areas planned for this year
- Cycad relocation areas planned for this year

Further details of these activities are to be provided in the text of the Interim Protocol and within the text of the Preliminary Remediation Action Plan (PRAP).

### 4. Interim Protocol to be Endorsed

It is noted that an Interim Protocol has been drafted and provided to the NLC for consultation (as required by Condition 5-2) and to the Site Auditor for review and endorsement (as required by Condition 5-1). This endorsement is provided under separate cover.

### 5. Existing Activities

Pre-existing monitoring and maintenance activity that do not pose a cultural heritage risk may continue.

## 6. Relationship to future stages

A detailed CHMP has been prepared for the purpose of the main works and consultation with Traditional Owners and the Northern Land Council (NLC) is on-going.

It is noted that the NLC (in its review comments provided on the Draft PRAP and Draft CHMP, dated 25 August 2023) recommends the adoption of an Interim Protocol while the CHMP is being finalised.

## 7. Triggers for updating the plan

The auditors' requirements for updating the plan include:

- Major departures from the works subject to the scope listed in Section 3 above.
- Annually should the early works not be completed within 12 months of 14 September 2023.

Please contact the undersigned if you would like to discuss this letter in more detail.

Yours faithfully



Todd Mitchell

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*Appointed pursuant to the Environment Protection Act 2017 (Vic) and Waste Management & Pollution Control Act 1998 (NT)*

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## Rum Jungle Rehabilitation Project - Auditor Endorsement

Endorsement Elements	
<b>Title:</b>	Auditor Endorsement of the Interim Protocol – Cultural Heritage Protection for Preliminary Works (the <i>Interim Protocol</i> )
<b>Dated:</b>	27 September 2023
<b>Reference:</b>	RJ-Audit-AE-001
<b>NT Approval Clause:</b>	5
<b>Recipient:</b>	The Approval Holder (DITT, c/- Paul Jones, HSE Director – RJRP)
<b>Short description:</b>	A document to provide confirmation (and endorsement) that the auditor is satisfied that the Interim Protocol meets the requirements of the NT Approval.

### 1. NT Approval requirements

Clause 5-1 states:

*The RAP that the approval holder is required to prepare under condition 9-1, must include a CHMP that has been prepared by a suitably qualified and experienced person, in consultation with traditional owners and the NLC, and must be endorsed by the site auditor.*

Clause 5-2 states:

*If the RAP is prepared in stages, the consultation on the CHMP required by condition 5-1 must be undertaken for each stage.*

Clause 5-3 states:

*The CHMP must include measures to provide for:*

- (1) *protection of sacred sites within the approved extent and compliance with Authority Certificates issued to the approval holder under the Northern Territory Aboriginal Sacred Sites Act 1989;*
- (2) *protection of known heritage places and objects within the approved extent and compliance with any statutory authorisations issued to the approval holder under the Heritage Act 2011;*
- (3) *cultural heritage induction procedures for site personnel;*
- (4) *an internal approval process prior to ground disturbing activities and use of visual barriers and signs where appropriate;*
- (5) *further archaeological survey and assessment where required;*
- (6) *procedures to mitigate risks to unidentified heritage places and objects;*
- (7) *stop work procedures to follow in the event suspected or actual unidentified human remains, or Aboriginal archaeological places or objects are encountered;*
- (8) *measures for effective consultation and engagement with stakeholders, including traditional owners and the NLC; and*
- (9) *detail of how compliance would be monitored and reported and how the outcomes of investigative and/or adaptive management actions would be notified to the relevant government authorities.*



**2. Cultural Heritage Management Plan (CHMP) to be prepared in stages**

The auditor, on 14 September 2023 (Ref. RJ-Audit-AA-002b), issued an approval to prepare the CHMP in stages. Specifically, the auditor approved the preparation of an Interim Protocol – Cultural Heritage Protection for Preliminary Works as a sub-plan to the Preliminary Remediation Action Plan (PRAP) for Stage 3 Early Works.

**3. Relationship to future stages**

A detailed CHMP is to be prepared (and finalised following consultation) for the purpose of the main works.

**4. Consultation with Traditional Owners and Northern Land Council (NLC)**

The auditor has been advised verbally and in writing that DITT has consulted with Traditional Owners and NLC. The auditor notes written feedback provided by NLC on 25 August 2023 relating to the review of the draft PRAP and draft CHMP including a recommendation for an Interim Protocol. The Interim Protocol is seen as a useful compromise that would enable broader consultation and feedback on the main CHMP.

**5. Auditors’ assessment of compliance against NT Approval**

NT Approval Requirements (EP2023/022-001)		
Clause	Condition	Auditors’ Observation
5-3(1)	protection of sacred sites within the approved extent and compliance with Authority Certificates issued to the approval holder under the Northern Territory Aboriginal Sacred Sites Act 1989	Section 3 and 4
5-3(2)	protection of known heritage places and objects within the approved extent and compliance with any statutory authorisations issued to the approval holder under the Heritage Act 2011	Section 3 and 4
5-3(3)	cultural heritage induction procedures for site personnel	Section 4.2
5-3(4)	an internal approval process prior to ground disturbing activities and use of visual barriers and signs where appropriate	Section 4.1
5-3(5)	further archaeological survey and assessment where required	DITT has confirmed that further archaeological survey is required and is consulting with TOs and NLC regarding the extent of this.
5-3(6)	procedures to mitigate risks to unidentified heritage places and objects	Section 4.1
5-3(7)	stop work procedures to follow in the event suspected or actual unidentified human remains, or Aboriginal archaeological places or objects are encountered	Section 4.3
5-3(8)	measures for effective consultation and engagement with stakeholders, including traditional owners and the NLC	The Auditor is aware that consultation is actively being pursued. The Interim Protocol includes measures for

NT Approval Requirements (EP2023/022-001)		
		stakeholder involvement in this stage of works.
5-3(9)	detail of how compliance would be monitored and reported and how the outcomes of investigative and/or adaptive management actions would be notified to the relevant government authorities	Section 4.4

**6. Triggers for updating the plan**

The auditors’ requirements for updating the plan include:

- Major departures from the works proposed by the PRAP.
- Annually should the early works not be completed within 12 months of 27 September 2023.

**7. Auditors’ Endorsement**

I, Todd Mitchell, having been consulted on the *Interim Protocol – Cultural Heritage Protection for Preliminary Works* (DITT, 27 September 2023) am of the opinion that the document meets the requirements of the NT Approval. I am of the opinion that the Interim Protocol provides suitable information and direction regarding cultural heritage management relating to the proposed Stage 3 early works as described in the Preliminary Remediation Action Plan (SLR, 2023).

I hereby endorse the *Interim Protocol – Cultural Heritage Protection for Preliminary Works* (DITT, 27 September 2023).

Yours faithfully



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