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Department of Regional NSW



Compliance audit program

EL6372 and EL7844 Mt Adrah Exploration Project

Wildcat Gold Pty Ltd

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1. Introduction

1.1. Background

Exploration licence 6372 (1992) was granted to Golden Cross Operations Pty Ltd on 2 February 2005. The licence was transferred to Wildcat Gold Pty Ltd on 30 May 2019.

Exploration licence 7844 (1992) was granted to Gossan Hill Gold Limited on 20 September 2011. The licence was transferred to Wildcat Gold on 15 July 2019.

The exploration area was about 20 kilometres north-west of Adelong in southern NSW.

As part of the compliance audit program, an audit of the exploration activities associated with the Mt Adrah exploration project within EL6372 and EL7844 was undertaken on 6 September 2023 by the NSW Resources Regulator within the Department of Regional NSW.

1.2. Audit objectives

The objectives of the audit were to:

- undertake a compliance audit of the Wildcat Gold exploration activities against the requirements of the *Mining Act 1992* and the conditions of the exploration licences and activity approvals issued pursuant to that Act.
- assess the operational performance of the exploration activities and the ability of the licence holder and/or its operator to implement management systems and controls to provide for sustainable management of the operations.

1.3. Audit scope

The scope of the audit included:

- the exploration activities associated with the Mt Adrah exploration project including:
 - exploration activities within EL6372 and EL7844 including a selected sample of exploration drillholes
 - borehole sealing and rehabilitation activities for selected drilling activities undertaken since May 2020
- a review of documents and records pertaining to the exploration activities
- the assessment of compliance for the period commencing 1 September 2021 and ending 6 September 2023.

1.4. Audit criteria

The audit criteria against which compliance was assessed included:

- *Mining Act 1992*, specifically, Sections 5, 30, 140, 163C to 163E, 163G, 378D
- Mining Regulation 2016, specifically clauses 59 to 68

- Conditions attached to EL6372 (granted 2 February 2005, last renewed 30 January 2023)
- Conditions attached to EL7844 (granted 20 September 2011, last renewed 14 August 2019)
- Assessable prospecting operations application dated 16 August 2022 for up to 18 RC drill holes as part of the Greater Hobbs Pipe project, and associated approval dated 16 August 2022 (APO0001185)
- Assessable prospecting operations application dated 2 May 2020 for up to 11 diamond drill holes as part of the Mt Adrah project, and associated approval dated 4 June 2020 (MAAG0007125)
- Assessable prospecting operations application dated 31 March 2021 for up to 11 RC/diamond drill holes as part of the Mt Adrah project, and associated approval dated 25 May 2021 (MAAG0010553)
- Exploration code of practice: Environmental management (Version 4, June 2021 and Version 5, March 2022)
- Exploration code of practice: Rehabilitation (Version 4, June 2021 and Version 5, March 2022)
- Exploration code of practice: Community Consultation (Version 2.0, October 2022 and Version 2.1, May 2023)
- Exploration code of practice: Produced water management, storage and transfer (Version 3, September 2017, Version 4, June 2021 and Version 5, March 2022)
- Exploration reporting: A guide for reporting on exploration and prospecting in New South Wales (Version 3, October 2021 and Version 4, January 2022)
- Exploration guideline: Annual activity reporting for prospecting titles (Version 3.0, December 2020 and Version 4, October 2022) published by Department of Regional NSW

1.5. Publishing and disclosure of information

This audit report was published on the Regulator's website consistent with:

- Section 365 of the *Mining Act 1992*
- Resources Regulator's [Public comment policy](#)
- *Government Information (Public Access) Act 2009*.

2. Audit methods

The audit process involved interviewing site personnel, reviewing documentation and samples of records provided by the licence holder and/or operator to determine the level of compliance of the operations and assess the status of the operational performance. The audit process and methodology are described in more detail in the sections below.

2.1. Opening meeting

An opening meeting was held onsite on 6 September 2023. The audit team was introduced, and the scope of their responsibilities was conveyed to the auditees. The objectives and scope of the audit were outlined. The methods to be used by the team to conduct the audit were explained, including the interview of personnel, review of documentation, examination of records and a site inspection to assess specific compliance requirements.

2.2. Site interviews and inspections

2.2.1. Data collection and verification

Where possible, documents and data provided during the audit process were reviewed electronically on the day. Where documents were unable to be reviewed on the day, they were provided following the audit.

All information obtained during the audit process was verified by the audit team where possible. For example, statements made by site personnel were verified by viewing documentation and records, including site photographs, where possible. Where suitable verification could not be provided, this has been identified in the audit findings as not determined.

2.2.2. Site inspections

A site inspection was undertaken of the following exploration activities on EL6372:

- RC drill holes WCRC003 and WCRC004 drilled from the same pad in February 2023 and rehabilitated in August 2023
- RC drill hole WCRC012 drilled in February 2023 and rehabilitated in August 2023
- RC drill holes WCRC010 and WCRC011 drilled from the same pad in February 2023 and rehabilitated in August 2023
- RC drill holes WCRC007 and WCRC009 drilled from the same pad in February 2023 and rehabilitated in August 2023
- RC drill hole WCRC008 drilled in February 2023 and rehabilitated in August 2023
- Core and sample storage on site at the Mount Adrah property.

2.3. Closing meeting

A closing meeting was held on site on 6 September 2023. The objectives of this meeting were to discuss any outstanding matters, present preliminary findings and outline the process for finalising the audit report.

2.4. Compliance assessment definitions

The reporting of results from the compliance audit was determined based on the definitions presented below in Table 1.

Table 1 Compliance assessment definitions

Assessment	Criteria
Compliance	Sufficient and appropriate evidence is available to demonstrate the particular requirement has been complied with.
Non-compliance	<p>Clear evidence has been collected to demonstrate the particular requirement has not been complied with. There are three subcategories of non-compliance reflecting the severity and level of risk associated with the non-compliance:</p> <p>NC1 – the absence of planning or implementation of a required operational element which has the potential to result in a significant risk.</p> <p>NC2 – an isolated lapse or absence of control in the implementation of an operational element which is unlikely to result in a significant risk.</p> <p>NC3 – an administrative or reporting non-compliance which does not have a direct environmental or safety significance.</p> <p>Note: The identification of a non-compliance in this audit may or may not constitute a breach of, or offence under, the <i>Mining Act 1992</i>. Non-compliances identified in this audit report may be further investigated by the Regulator and regulatory actions may be undertaken.</p>
Observation of concern	<p>Where an auditee may be compliant at the time of the audit but there are issues that exist that could result in the potential for future non-compliance if not addressed.</p> <p>Observation of concern was also used where an issue may not have particular compliance requirements, but which was not conducive to good management or best practice.</p>
Suggestion for improvement	Where changes in processes or activities inspected or evaluated at the time of the audit could deliver improvement in relation to risk minimisation, sustainable outcomes and management practices.
Not determined	<p>The necessary evidence has not been collected to enable an assessment of compliance to be made within the scope of the audit.</p> <p>Reasons why the audit team could not collect the required information include: insufficient information on the file relating to the period covered by the audit or insufficient evidence collected to reach a conclusion</p> <p>the wording on the criteria (approval condition) meant that no evidence could be gathered, or it was too difficult to gather the evidence.</p>

Assessment	Criteria
	A 'not determined' assessment was also made where the condition was outside the scope of the audit.
Not applicable	<p>The circumstances of the authorisation or licence holder have changed and are no longer relevant (e.g. no longer mining, mining equipment and plant has been removed).</p> <p>An invoking element in the criteria was not activated within the scope of the audit.</p>

2.5. Reporting

Following completion of the audit, the audit checklists were completed, and audit notes were reviewed to compile a list of outstanding matters to be noted in the audit report. This report was prepared to provide an overview of the operational performance of the site in relation to the exploration activities and identify any non-compliances or observations of concern noted by the auditors during the documentation review and interviews.

The draft audit findings were forwarded to Wildcat Gold for comment. Consideration was given to the representations made during the finalisation of the audit report as discussed in the audit findings.

3. Audit findings

3.1. Work program

Condition 1 of EL6372 and EL7844 required the licence holder to carry out the operations described in the approved work program. The following work programs were in force during the audit period:

- WP-EL6372-2020-2023
- WP-EL7844-2018-2024

Evidence was available to confirm that exploration activities were progressing. Annual reports for the 2022 and 2023 reporting periods were reviewed for EL6372 and EL7844. Exploration completed included:

- EL6372
 - structural field study
 - rock chip sampling and geochemistry
 - soil sampling and geochemistry
 - sampling of diamond core
 - induced polarisation (IP) survey
 - reverse circulation (RC) drilling program.
- EL7844
 - field reconnaissance and rock chip sampling
 - diamond core assays
 - soil sampling and geochemistry
 - IP survey
 - aeromagnetic survey.

Wildcat Gold exploration staff said the annual reporting process was used to review and monitor the approved work program. Work programs were also noted to be reviewed before each drilling program. Exploration data was noted to be maintained by the Wildcat Gold geologists and submitted to Mining, Exploration and Geoscience (MEG) with the annual activity reports as required.

3.2. Access arrangements

Section 140 of the *Mining Act 1992* stated, ‘the holder of a prospecting title must not carry out prospecting operations on any particular area of land except in accordance with an access arrangement or arrangements applying to that area of land’. The access arrangement was required to be agreed in writing between the holder of the prospecting title and each landholder of that area of land.

Evidence was provided to confirm that written land access agreements were in place for the exploration activities undertaken on EL6372 and EL7844. The land access agreements reviewed

during the audit were generally noted to be prepared using a standard AMEC template. The land access agreement was noted to include:

- conditions to be observed by the licence holder (section 6)
- ground disturbance for drilling (section 11)
- rehabilitation requirements and methods (section 12)
- any specific farm protocols negotiated by the land holder (Annexure C).

3.3. Native title and exempted areas

Condition 2 of EL6372 and EL7844 required the licence holder to obtain the prior written consent of the Minister before carrying out any activities on land on which native title had not been extinguished. Similarly, Section 30 of the *Mining Act 1992* required the consent of the Minister before a licence holder undertook any activities within an exempted area.

Wildcat Gold staff said exploration activities were generally being conducted in areas of freehold land within EL6372 and EL7844. It was noted previous exempted area approvals were given for exploration at Mt Adrah. No further approvals under Section 30 of the Mining Act were required.

Wildcat Gold staff said most of the licence area was under freehold title where native title had generally been extinguished. Although not a compliance requirement, confirmation of extinguishment had not been sought from MEG. No further approvals under Condition 2 of the licence were required for EL6372 and EL7844.

3.4. Community consultation

Condition 3 of EL6372 and EL7844 required the licence holder to carry out community consultation in relation to the planning and conduct of exploration activities. Community consultation was required to be carried out in accordance with the requirements of Exploration code of practice: Community consultation.

An assessment against the mandatory requirements of the code of practice was undertaken as documented in the following sections.

3.4.1. Risk assessment

Mandatory requirement 1 of the code of practice required the licence holder to conduct a risk assessment to identify and consider the range of opportunities and potential threats associated with community consultation and engagement.

Wildcat Gold used the activity impact level assessment from the guidance material in the code of practice as the community consultation risk assessment. While this provided a tool to assess the potential sensitivity of the project overall, it did not necessarily take into account risks that needed to be managed to ensure an effective and inclusive consultation program. This was raised as observation of concern number 1. It was recommended that Wildcat Gold conduct a community consultation risk assessment against the objectives for consultation such that the risk assessment can focus on the risks and opportunities that need to be identified and managed to facilitate an inclusive and effective consultation program.

3.4.2. Community consultation strategy

Mandatory requirement 2 required the preparation of a community consultation strategy to manage the risks identified in the risk assessment. Mandatory requirement 3 set out the requirements for preparation of the community consultation strategy.

Wildcat Gold prepared a combined community consultation strategy across 4 of its tenements in the Adelong area. The strategy was noted to follow the guidance material in the code of practice and included:

- objectives for consultation
- a description and analysis of community stakeholders and impacts
- a description of how consultation would be undertaken
- a process for review and amendment of the strategy when required.

3.4.3. Implementation and reporting

Mandatory requirement 4 required the licence holder to implement, monitor and report annually on the community consultation strategy.

Evidence was available to confirm that Wildcat Gold was undertaking community consultation generally in accordance with the methods outlined in the community consultation strategy. Given the location of exploration activities remote from sensitive receptors, liaison with landholders was the key consultation undertaken.

It was noted records of consultation activities were maintained in a consultation log. The log included:

- details of interactions with landholders
- details of interactions with other stakeholders
- a description of the issues and outcomes from consultation.

Up until the change to the code of practice in October 2022, annual community consultation reports were prepared and submitted by Wildcat Gold, generally in accordance with the reporting guidance in Appendix 2 of the code of practice.

As suggestion for improvement number 1, Wildcat Gold should consider undertaking an analysis of any community consultation outcomes and complaints to identify any common issues, emerging trends or key outcomes, and documenting this in the annual reports.

3.5. Exploration activity approvals

Section 23A of the *Mining Act 1992* required the holder of an exploration licence to obtain an activity approval before carrying out assessable prospecting operations.

Evidence was available to confirm that exploration activity approvals were sought and granted for exploration activities. Exploration activity approvals granted included:

- assessable prospecting operations application dated 16 August 2022 for up to 18 RC drill holes as part of the Greater Hobbs Pipe project, and associated approval dated 16 August 2022 (APO0001185)
- assessable prospecting operations application dated 2 May 2020 for up to 11 diamond drill holes as part of the Mt Adrah project, and associated approval dated 4 June 2020 (MAAG0007125)
- assessable prospecting operations application dated 31 March 2021 for up to 11 RC/diamond drill holes as part of the Mt Adrah project, and associated approval dated 25 May 2021 (MAAG0010553).

Generally, evidence was provided to indicate that the exploration activities were carried out in accordance with the description provided in the applications and in accordance with the approvals given.

3.6. Environmental management

Condition 4 of EL6372 and EL7844 required the licence holder to prevent or minimise so far as is reasonably practicable, any harm to the environment arising from the activities carried out under the licence. Condition 2 of the exploration activity approval required the licence holder to carry out the activity in compliance with Part B of the Exploration code of practice: Environmental management.

No evidence of environmental harm was observed at the sites visited during the site inspection. The RC and diamond drilling programs were completed at the time of the audit and all plant and equipment had been removed from site. All holes were rehabilitated. An assessment against the Exploration code of practice: Environmental management was not completed but the following observations were made:

- No evidence of hydrocarbon spill or chemical contamination was observed at any of the sites inspected. Wildcat Gold staff said rig nappies were used under the rig at each hole to catch any leaks or spills from the rig.
- Wildcat Gold exploration staff said inground sumps were typically prepared at each hole to manage any incidental water from drilling operations. Aboveground sumps were used at some holes depending on the terrain and ground conditions.
- Sumps were backfilled at the completion of drilling.
- All holes were said to be backfilled with drill cuttings.
- No waste was observed at any of the sites inspected. Wildcat Gold staff said RC sample bags were collected and sent to the local landfill for disposal.
- All holes were observed to have been drilled in cleared paddock areas with minimal impact to native vegetation.
- Generally, existing farm tracks were used wherever possible. Wildcat Gold exploration staff said all access points and tracks were agreed with the landowner before starting drilling.
- Drilling activities stopped during heavy rain and site access was restricted to minimise the risk of damage to farm roads and tracks. It was noted during the site inspection that Wildcat Gold repaired eroded tracks left by the previous titleholder.

3.6.1. Risk assessment

Mandatory requirement 12.1 required the licence holder to monitor the risks associated with activities and, if the risk associated with an activity changes, implement revised environmental management controls.

Wildcat Gold prepared a comprehensive environmental risk assessment for its exploration operations which discussed the typical environmental risks associated with the exploration activities. It was noted the risk assessment generally addressed the mandatory requirements of the code of practice. Suitable controls were detailed for each risk identified.

3.7. Security deposit

Condition 5 of EL6372 and EL7844 required the licence holder to provide a security deposit to secure funding for the fulfilment of obligations under the licence.

The security amount required for EL6372 was \$49,000, which department records confirmed was held. It was noted the drilling programs in 2022 and 2023 on EL6372 triggered an increase in security that was paid before drilling commenced.

The security amount required for EL7844 was \$13,000 which department records confirmed was held.

Observations made on site during the site inspection confirmed that the security held was adequate for the drilling programs completed.

3.8. Rehabilitation

Condition 6 of EL6372 and EL7844 required the licence holder to carry out rehabilitation of all disturbance caused by activities carried out under the licence in accordance with the requirements of the Exploration code of practice: Rehabilitation.

An assessment against the mandatory requirements of the code of practice was undertaken for the exploration activities as documented in the following sections.

3.8.1. Risk assessment

Mandatory requirement 1 required the licence holder to conduct a risk assessment to evaluate the range of potential threats and opportunities associated with rehabilitating disturbed areas to a condition that could support the intended final land use.

Wildcat Gold prepared an exploration rehabilitation management plan for the drilling programs. It was noted this plan provided the framework and a template for the risk assessment but there was limited evidence to confirm that a site-specific risk assessment was undertaken. This was raised as observation of concern number 2. It was recommended Wildcat Gold undertake a site-specific rehabilitation risk assessment for the exploration activities. It was suggested this be done by identifying and relating rehabilitation risks to the rehabilitation objectives and completion criteria to provide a more robust framework for managing rehabilitation risks.

3.8.2. Rehabilitation objectives and completion criteria

Mandatory requirement 2 required the licence holder, no later than 14 days prior to the commencement of surface disturbing activities, to provide to the Secretary a copy of clear, specific, achievable and measurable rehabilitation objectives and completion criteria (ROCC). For higher risk prospecting operations, a rehabilitation management plan was required to be prepared and submitted with the rehabilitation objectives and completion criteria.

The exploration activity approval applications lodged by Wildcat Gold indicated that the total surface disturbance area was less than 5 hectares. The drilling programs did not fall within the definition of a higher risk activity under the code of practice and a rehabilitation management plan was not required to be developed. It was noted Wildcat Gold prepared a rehabilitation management plan for the drilling program, even though one was not required by the mandatory requirements.

Evidence was available in department records to confirm that ROCCs were submitted for the drilling program as part of the application for assessable prospecting operations. It was noted that the ROCCs submitted were generally based on the template provided in Appendix 2 of the code of practice.

3.8.3. Rehabilitation program

Mandatory requirement 3 required the licence holder to develop, implement and complete a rehabilitation program (which includes a monitoring program) to rehabilitate disturbed areas to a condition that could support the intended final land use. Mandatory requirement 4 required the licence holder to commence rehabilitation of a site as soon as reasonably practicable following the completion of activities on that site.

Wildcat Gold exploration staff said rehabilitation of drill sites was generally contracted to the landholder or a third party, depending on the landholder capacity to undertake the works.

Rehabilitation works included:

- removal of sample bags
- grouting of holes to one metre below ground level
- earthworks to fill sumps
- remedial works to farm tracks and roads where required
- natural regeneration of vegetation.

Wildcat Gold exploration staff said rehabilitation monitoring involved a site inspection and collection of photographs at 3 to 6 monthly intervals. Inspections were noted to be documented electronically using a checklist in the Coreplan system.

Figure 1, Figure 2, Figure 3, and Figure 4 show rehabilitation of a sample of the holes inspected. Drilling was completed in February 2023 with rehabilitation being undertaken in August 2023. Given that rehabilitation was completed one month prior to the audit, Wildcat Gold had not yet submitted the application for rehabilitation signoff. Wildcat Gold exploration staff said further vegetation growth and monitoring was required before sign-off could be sought.

Figure 1 WCRC012 - drilled February 2023 and rehabilitated in August 2023



Figure 2 WCRC008 - drilled February 2023 and rehabilitated August 2023



Figure 3 WCRC010 and WCRC011 - drilled from the same drill pad in February 2023



Figure 4 WCRC007 and WCRC009 - drilled from the same drill pad in February 2023



3.9. Annual activity reporting

Section 163C of the *Mining Act 1992*, clause 59 of the *Mining Regulation 2016* and condition 8 of EL6372 and EL7844 required the licence holder to submit an activity report annually within one calendar month following grant anniversary date. Annual activity reports were required to be prepared in accordance with the *Exploration guideline: Annual activity reporting for prospecting titles*.

During the audit scope period, Wildcat Gold submitted annual activity reports comprising:

- annual geological report
- environmental rehabilitation and compliance report
- community consultation report (up to October 2022).

Generally, reports were found to be in accordance with the MEG and/or Resources Regulator templates and guidance material.

3.10. Core and sample storage

Clause 65 of the Mining Regulation 2016 required the holder of an authority to, so far as is reasonably practicable, collect, retain and preserve:

- all drill cores remaining after sampling
- characteristic samples of the rock or strata encountered in any drill holes.

All core and samples collected were required to be labelled, stored and managed in a manner that preserved the integrity of the core or samples.

The drilling programs conducted by Wildcat Gold on EL6372 and EL7844 were RC and diamond drilling. This resulted in the generation of both core and chip samples.

The core generated from diamond drilling was observed to be stored in plastic core trays on the Mount Adrah property. Core trays were stored on pallets by hole number (see Figure 5) and were observed to be adequately labelled with hole number and depth (see Figure 6).

Figure 5 Core tray storage on Mt Adrah property



Figure 6 Core tray labelling



3.11. Record keeping

Sections 163D and 163E of the *Mining Act 1992* related to the creation and maintenance of records required under the Act, the Regulations, or a condition of title. Records must be kept in a legible form for production to any inspector and must be maintained for a period of four years after the expiry or cancellation of the title. Specific requirements for the types of records to be maintained for exploration activities were detailed in the mandatory requirements of the exploration codes of practice as follows:

- mandatory requirement 6 of the rehabilitation code of practice
- mandatory requirement 13.1 of the environmental management code of practice
- mandatory requirement 5 of the community consultation code of practice.

Records reviewed during the audit demonstrated that Wildcat Gold had generally maintained records as required by the licence conditions and the exploration codes of practice. It was noted that relevant documents and records were readily retrievable upon request, and most were able to be accessed remotely.

Examples of records reviewed included:

- land access agreements
- Coreplan drilling management system
- drill request documentation
- environmental management plan
- environmental inspection checklist
- rehabilitation management plan
- rehabilitation objectives and completion criteria
- pre, during and post drilling photos
- community consultation strategy
- community consultation register
- community consultation records
- annual activity reporting.

4. Compliance management

4.1. Identifying compliance obligations

Identifying compliance obligations is a critical step in the development of an effective compliance management system. Compliance obligations for an exploration project can include:

- regulatory requirements (for example, the *Mining Act 1992*)
- conditions imposed on the grant, renewal, or transfer of exploration licences
- exploration activity approvals
- exploration codes of practice
- specific commitments made by the organisation (for example, commitments made in the approved exploration activity application).

Once identified, compliance obligations should be reviewed periodically to identify any changes in those obligations (for example, changes in legislation).

The Wildcat Gold exploration staff generally had a good understanding of the compliance requirements for exploration. Systems and processes for managing compliance requirements were developed and implemented. However further development of these systems would be beneficial as noted in the suggestions for improvement documented in the audit report.

It was noted that records were generally being maintained to demonstrate compliance.

4.2. Subcontractor management

Contractors are often used to undertake specialist tasks, for example, exploration drilling. Whilst the responsibility for compliance or the implementation of environmental controls is often passed to the contractor, the licence holder will retain accountability for compliance with its licence conditions and other compliance obligations. It is important that the licence holder exercises management control of its contractors by specifying contract requirements, providing oversight of contracted works, and evaluating the performance of the contractor during the contracted works.

Wildcat Gold used contract drillers to complete the exploration drilling program. Drilling was completed at the time of the audit, but evidence was available to confirm management of the contract drillers by Wildcat Gold personnel. For example, the drill request documentation provided to the drillers was noted to be comprehensive and address any specific environmental or rehabilitation requirements for the drilling program. Before starting drilling, the drilling personnel were given a site specific induction where requirements were reinforced. Wildcat Gold exploration staff were on site to supervise drilling operations.

4.3. Inspections, monitoring and evaluation

An effective inspection, monitoring and evaluation process is required to:

- monitor the implementation of the risk controls

- evaluate the effectiveness of those controls based on an assessment of inspection and monitoring data
- implement an adaptive management approach if monitoring shows that controls may be ineffective.

Wildcat Gold exploration staff established an inspection and monitoring process that was suitable for the low impact nature of the exploration activities being conducted. These processes were noted to include monitoring of contract drilling works, inspection of drill sites and rehabilitation to confirm works are completed in accordance with the controls identified in the risk assessments.

The environmental and rehabilitation risk assessments prepared by Wildcat Gold were noted to include risks related to exploration activities and environmental management controls were in place. Exploration staff advised that the process for checking the implementation and effectiveness of controls was informal and not documented. As suggestion for improvement no. 2, Wildcat Gold should consider the development of a documented process to evaluate the effectiveness of the risk controls implemented, with revised controls identified where those risks changed, or controls were identified as being ineffective.

5. Audit conclusions

From the evidence reviewed during the audit, it was concluded that the exploration operations undertaken by Wildcat Gold were well managed. Evidence was available to demonstrate that systems and processes were developed to identify and manage compliance requirements. It was observed that records were being maintained as required to demonstrate compliance.

Wildcat Gold was compliant with the requirements of the exploration licence, exploration activity approvals and the environmental management, rehabilitation, and community consultation exploration codes of practice, for the elements reviewed during the audit. No non-compliances were identified during the audit.

Two observations of concern and 2 suggestions for improvement were noted during the audit, as summarised in Table 2 and Table 3.

Table 2 Summary of observations of concern

Observation of concern No.	Description of Issue	Recommendation
1	Wildcat Gold used the activity impact level assessment from the guidance material in the code of practice as the community consultation risk assessment. Whilst this provided a tool to assess the potential sensitivity of the project overall, it did not necessarily take into account risks that needed to be managed to ensure an effective and inclusive consultation program.	It was recommended that Wildcat Gold conduct a community consultation risk assessment against the objectives for consultation such that the risk assessment can focus on the risks and opportunities that need to be identified and managed to facilitate an inclusive and effective consultation program.
2	Wildcat Gold prepared an exploration rehabilitation management plan for the drilling programs. It was noted this plan provided the framework and a template for the risk assessment but there was limited evidence to confirm that a site specific risk assessment was undertaken.	It was recommended Wildcat Gold undertake a site specific rehabilitation risk assessment for the exploration activities. It was suggested this be done by identifying and relating rehabilitation risks to the rehabilitation objectives and completion criteria to provide a more robust framework for managing rehabilitation risks.

Table 3 Summary of suggestions for improvement

Suggestion for Improvement No.	Description of Issue
1	Wildcat Gold should consider undertaking an analysis of any community consultation outcomes and complaints to identify any common issues, emerging trends or key outcomes, and documenting this in the annual reports.
2	Wildcat Gold should consider the development of a documented process to evaluate the effectiveness of the risk controls implemented, with revised controls identified where those risks changed, or controls were identified as being ineffective.