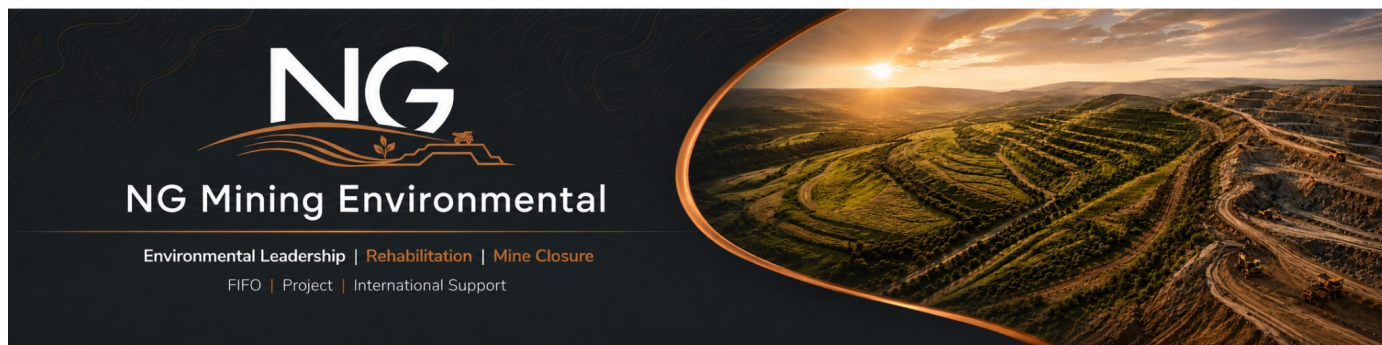




OPERATIONAL READINESS

Approvals do not operate the mine

Turning regulatory, environmental, social and lender commitments into practical controls that can actually operate.

A mining project can spend years securing approvals.

Environmental authorities, EIS or ESIA commitments, Commonwealth conditions, water approvals, rehabilitation and closure requirements, offsets, cultural heritage obligations, Traditional Owner and land-access agreements, lender requirements and community commitments may all form part of the project pathway.

Eventually, approval is granted. But approval does not mean the operation is ready.

Approvals do not operate the mine. People, systems and controls do.

Before construction or operations begin, those commitments still need to be translated into something the organisation can actually deliver. The task is not simply to hand the incoming environmental team a collection of approval documents and management plans. It is to convert those documents into a working operating system.

Approval is permission to proceed - not readiness to operate

Approval documentation is written to demonstrate that impacts can be managed and that the project can meet the conditions required to proceed. Operational teams need something more practical.

A condition protecting an environmental value may ultimately need to become a design requirement, construction hold point, contractor instruction, monitoring program, inspection, reporting deadline or escalation trigger.

A commitment made years earlier during an EIS or ESIA may eventually need to become an operating procedure for a supervisor or contractor who had no involvement in the original approval process.

The gap between an approval commitment and an operating control is where compliance risk starts to develop.

Commitments come from more places than the approval document

One practical challenge is that project obligations are rarely contained in one place. By the time a mine moves into construction or operations, commitments may have accumulated across:

- Environmental Authorities, licences and permits
- EIS or ESIA commitments
- Commonwealth approval conditions
- water approvals
- rehabilitation and closure requirements
- PRCP obligations

- biodiversity and offset commitments
- Traditional Owner, native title, cultural heritage and land-access agreements
- lender requirements and action plans
- community commitments
- management plans and internal standards
- regulator or stakeholder correspondence

A requirement may sit in an approval condition. Another may be buried in an EIS chapter. A lender obligation may sit in a separate action plan. A community undertaking may have been made during consultation without yet being converted into an operating process.

Operational readiness starts with understanding the full commitment landscape - not just the headline approval conditions.

The operation needs a clear, current and traceable view of what the project must do.

Turn obligations into owners and controls

An obligation register on its own is not enough. Each material requirement needs an accountable owner, a practical control and a way of demonstrating that the control is working.

That means defining:

- who owns the requirement
- what action or control is needed
- when it needs to occur
- what monitoring or inspection is required
- what evidence needs to be retained
- what reporting deadlines apply
- what happens if performance falls outside expectations

A water-quality condition may become a sampling program, laboratory schedule, trigger-response process and reporting requirement. A biodiversity commitment may become a clearing control, pre-disturbance survey process and contractor requirement. A cultural heritage obligation may become a land-disturbance hold point. A lender commitment may become a recurring monitoring or reporting action with a clearly assigned owner.

The obligation only becomes operational when somebody knows what they need to do, when they need to do it, and what evidence proves it was done.

Where practical, these controls should be integrated into normal business processes rather than creating a separate environmental administration system. Good operational readiness turns obligations into normal business controls.

Construction is where commitments can easily be lost

The transition from project development into construction is one of the highest-risk points for environmental and social commitments.

The workforce expands. Contractors arrive. Work fronts open. Schedules tighten. Design changes continue. New supervisors and project personnel may have little knowledge of the original approval process.

A requirement that was well understood during approvals can quickly become disconnected from the people actually doing the work. Commitments may therefore need to be built into contractor scopes and specifications, tender documentation, design criteria, construction management plans, disturbance controls, permits and hold points, inductions, inspections and assurance processes.

A commitment that stays in the approval document is vulnerable. A commitment built into the construction process is much more likely to be delivered.

Contractors need to be inside the system

Many activities with the greatest potential to affect environmental and social performance are delivered by contractors. Clearing, earthworks, civil construction, drilling, waste handling, water management, rehabilitation and monitoring may all involve third parties working under the project's approvals and commitments.

Those requirements need to be visible before the work starts. They may need to be incorporated into tender documentation, contract conditions, environmental specifications, inductions, permits, inspections, hold points and reporting requirements.

If controls are introduced after mobilisation, they become harder and more expensive to manage.

Good contractor management starts by making the requirements clear before the contractor prices, plans and mobilises the work.

A contractor may implement the control, but the project still needs to understand whether the obligation is actually being met. A clause in a contract does not demonstrate compliance. The requirement needs to be understood, implemented and verified.

Monitoring and reporting need to be ready before Day 1

Monitoring obligations rely on people, systems, contractors and data all being ready before the operation starts generating information.

A requirement to monitor water quality, dust, noise, groundwater, biodiversity or rehabilitation performance may depend on established monitoring locations, approved methods, calibrated equipment, laboratory arrangements, sampling schedules, trigger levels, data systems and reporting calendars.

If those elements are not ready, the project can quickly have an obligation but no reliable way of demonstrating that it is being met.

You cannot demonstrate compliance retrospectively if the monitoring system was never ready in the first place.

The practical questions are straightforward:

- Who collects the sample?
- Who reviews the result?
- Where is the data stored?
- What happens if a trigger is exceeded?
- Who needs to be notified?
- What evidence is retained?
- When does the result need to be reported?

Operational readiness should make sure the monitoring, data and reporting systems are functioning before the first compliance deadline arrives.

Systems should support control, not create administration

Operational readiness usually requires some form of system to manage obligations, actions, evidence and reporting. That may include obligation registers, compliance calendars, action trackers, document control, dashboards or tools such as SharePoint and Power BI.

The technology matters - but it should come after the workflow and governance are understood. A sophisticated system does not solve an unclear process.

Before choosing the tool, the project needs to know what obligations are being managed, who owns them, what actions need to occur, what evidence needs to be retained and what dates matter.

A good compliance system should make it easier to do the right thing and easier to demonstrate that it was done.

The system should support the operation, not become another administrative burden. Design the governance and workflow first. Then use technology to support it.

Operational readiness needs assurance - and resources

Operational readiness should not finish with a checklist showing that documents, registers and systems have been created. The real question is whether they are ready to work.

That means confirming material obligations have been captured, owners understand their responsibilities, procedures are current, monitoring arrangements are functional, contractor requirements have been embedded and remaining gaps have been closed.

Operational readiness is not about proving the paperwork is complete. It is about proving the control framework is ready to operate.

That work also needs to be properly resourced. There is little value in identifying obligations and developing controls if the project does not provide enough people, time and budget to make them work.

Environmental and social personnel, monitoring resources, specialist support, contractor oversight and systems administration all need to be considered before the project moves into delivery. Operational readiness cannot simply be completed around the edges of an already compressed project schedule.

Conditions can be lost in translation

Approval conditions are often the end result of negotiation. The people involved may understand why a condition was accepted, what alternatives were discussed, what the regulator was concerned about and where concessions were made. Sometimes a condition may also have been accepted under project-schedule pressure without the full operational practicality or long-term cost of compliance being completely understood. Years later, those people may have moved on. The operation inherits the wording - but not necessarily the context.

The project needs to preserve not only what was agreed, but where possible why it was agreed and what it means in practice.

Without that context, an apparently straightforward condition can be interpreted very differently by the people expected to implement it.

Commitments outlast project teams

The same principle applies beyond formal regulatory conditions. Projects make commitments through engagement with landholders, Traditional Owner groups, communities and other stakeholders.

Some are formally documented. Others may begin as agreements in principle, undertakings made through consultation, or commitments carried by senior managers through ongoing relationships.

The risk is that those commitments become dependent on individual memory. Senior managers move on. Project teams change. Consultants finish their assignments. But the people on the other side of those commitments often remain.

Landholders and Traditional Owner groups can remain part of the project relationship for decades - long after individual project personnel have changed.

Social licence commitments therefore need the same discipline as regulatory obligations. They need to be recorded, traceable, assigned to an owner and carried through organisational change.

A commitment that is meaningful to a stakeholder should not disappear because the person who made it has left the business.

People come and go through a project. The relationships and commitments often remain for the life of the mine.

The practical lesson

Operational readiness is the point where approvals stop being documents and start becoming operating requirements.

The strongest projects do not simply hand over approval conditions and management plans. They translate them into accountable owners, practical controls, monitoring and reporting systems, contractor requirements, adequate resources, assurance processes and continuity of regulatory and stakeholder commitments.

The objective is not to leave the operation with a folder of approvals. It is to leave the operation with a working system that tells people what needs to happen, who owns it, when it needs to happen and what evidence demonstrates that it was done.

Because approvals do not operate the mine. People, systems and controls do.

NG Mining Environmental

Client-side support for operational readiness - translating regulatory, environmental, social and lender commitments into practical controls, accountable ownership, monitoring, reporting, contractor requirements and assurance.

Turning approvals and commitments into controls that can actually operate.