



Ground Disturbance Permit Procedure

Environment

1 Purpose and Scope

This procedure specifies the operational environmental requirements relating to ground disturbance management at the Roy Hill Project. This procedure applies to all personnel involved in activities at the Mine, Rail and Port operations that affect ground disturbance management.

This document outlines the steps required to gain authorisation and conduct any ground disturbing activities across all project areas of the Mine, Rail and Port to prevent the unauthorised clearing of land and ensure compliance with regulatory requirements.

A Ground Disturbance Permit (GDP) is required for any work that will cause any change or disturbance to the ground surface and is specifically related to the scope of works. If the area in which a new GDP is proposed is within a previously cleared area and the purpose of the GDP relates to a change in land use, a new or revised GDP is required. The Ground Disturbance Application (GDA) process allows checks to be made to determine if the proposed works conflicts with any previous or proposed works. This acts as a safeguard to ensure that disturbance is not conducted in areas which have been dedicated to another function/purpose and also to ensure that any rehabilitation is not conducted in areas which may be required for operational use.

2 Procedure


2.1 GDA

2.1.1 Submitting a GDA

It is the responsibility of the Department Manager (or delegate) proposing the ground disturbance and the delegated applicant to ensure all steps outlined in this section are adhered to.

1. Lodge an Application for a Ground Disturbance Permit using the Sage SURPASS web based system via <https://citrix.royhill.com.au> (users external to Roy Hill) or <http://surpass/> (internal Roy Hill users). Please contact the GIS team on gis.team@royhill.com.au to request access to the system. Online training will be provided.
2. Submit a GDA at least two weeks prior to when a GDP is required to start work.
3. Apply for a GDP in areas for which Roy Hill currently have approvals and tenure. Any area outside the current approval areas is influenced by external authorities and their approval timeframes.
4. Identify any interface issues before a GDA is lodged and provide evidence at time of submitting the GDA.
5. Ensure the following is considered when creating the GDP boundary:
 - a. accessibility to the area to be disturbed, including access into and out of an area;
 - b. an area for machine mobilisation;
 - c. laydown requirements;

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- d. topsoil storage; and
 - e. larger areas for windrowing of material where windrowing is permitted.
6. Include the following information for all applications submitted through Sage SURPASS. If any of the details below are incorrect, unclear or lacking information then the GDP can potentially be delayed or rejected by returning the GDA to the Applicant for more information.
- a. General Details
 - i. GDA Name, Location, Commencement & Completion Dates
 - ii. Area Details - This figure is the proposed area of the GDP in hectares.
 - iii. Location, Port, Mine or Rail (indicating chainage)
 - iv. Purpose & Outline of Work - Include a detailed description of the works to be undertaken providing information on access to the area by using existing tracks or the requirement to create new access tracks or haul roads, the methodology used and the type of works to be undertaken including but not limited to:
 - Vegetation and topsoil clearing
 - Ore definition drilling
 - Mine pit development (including name of pit area)
 - Drill & Blast activities
 - Establishment of waste rock dump (including WRD name)
 - Backfilling
 - Establishment of topsoil stockpile (including TS stockpile name)
 - Access tracks
 - Installation of infrastructure (include building type)
 - Construction of Turkeys nests
 - Installation of water bores (monitoring, production, dewatering)
 - Crushing and screening etc..
 - v. Volume and Type of Material to be removed - Enter the volumes that are expected to be removed during the lifecycle of the GDP and indicate the type of material, e.g. topsoil, borrow material, mangroves, vegetation etc.
 - vi. Topsoil stockpile location - Enter the location of the topsoil stockpile location where the topsoil will be taken to. This must be topsoil stockpile location approved in the current mining proposal. Any topsoil stripped for access tracks, pipelines or ore definition activities and windrowed within the GDP must state so.
 - b. Project Area Details
 - i. Project Area. Project areas approved for disturbance.
 - ii. Area to be disturbed - This number is the proposed amount of clearing to be undertaken under the GDP. This will be the maximum amount of clearing allowed to be undertaken within the GDP boundary (in many cases this will be less than the total GDP area).
7. Attach spatial data (DXF, DWG or ArcGIS format) showing the location of the proposed GDP area to the GDA in Sage SURPASS at the time of lodgement.

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8. Submit a separate GDA for storage of topsoil within an approved stockpile location if there is not an existing GDP over the topsoil or subsoil stockpile.

2.1.2 Reviewing a GDA

It is the responsibility of the GIS team (or delegate) to ensure the GDA reviewing process is adhered to as outlined in this section.

1. Review by the GIS team to ensure adequate information is provided to accept the GDA. Any GDA rejected or returned to the Applicant for more information, will upon re-lodgement, be automatically assigned a new lodgement date in Sage SURPASS.
2. Review by the relevant site environmental teams to approve or reject the GDA.
3. Review by the Environment, Heritage and Land Access & Tenure Teams to add relevant conditions to the GDA.
4. Review by the GIS team to add relevant conditions, permit spatial data, maps and forms to the GDA.
5. Issue GDP to applicant by the GIS team with relevant spatial data, maps and forms.

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2.2 Ground Disturbance Permit

2.2.1 GDP Release

It is the responsibility of the Applicant (or delegate) conducting the ground disturbance works and the delegated applicant to ensure all steps outlined in this section are adhered to.

1. Do not commence any ground disturbing activities before a GDP release has been undertaken by a Site Environmental Representative.
2. Survey, peg and flag (with blue and white flagging) the boundary of the area approved under the GDP by an authorised Mine Surveyor using high precision GPS (+/-1m) prior to the GDP release.
3. Peg the boundary at intervals no more than 30m apart or within line of sight between points.
4. Submit a Traditional Owner request form 7 days prior to works if the GDP conditions state that a TO monitor is required for the initial grubbing works to the stakeholder engagement team.
5. Undertake a GDP release with the Site Environmental Representative. The release must include the works Supervisor, contractor Supervisors (where applicable), Roy Hill contractor representative (where applicable) and Roy Hill Environmental Representative. If possible, it is ideal for the equipment operator to also be present. Note: The Environmental representative may add additional conditions to the GDP release form if they do not believe issues have been adequately covered in the GDP conditions. These conditions will be treated like all GD conditions and must be complied with.
6. Sign the Ground Disturbance Permit Release Form (OP-FRM-00035) by all parties (Site Environmental Advisor, Supervisor and Superintendent) which states that the area has been pegged and all conditions of the GDP are understood. Note: The Superintendent is not required to attend the release, however is required to sign the release confirming that they understand and are willing to comply with all conditions.
7. Upload the signed GDP release form by the applicant onto Sage SURPASS within 7 days of the release sign-off.

2.2.2 Working under a GDP

It is the responsibility of the Applicant (or delegate) conducting the ground disturbance works and the delegated applicant to ensure all steps outlined in this section are adhered to.

1. Ensure all conditions specified within the GDP are complied with. Any non-compliances shall be recorded as incidents.
2. Ensure GDPs are used for the specified works and stated location only, defined by the GDP Map & spatial data issued with the permit.
3. Ensure all personal working under the GDP understand all GDP conditions and have copies of the GDP, associated maps and release form.
4. Ensure a Spotter is present during all clearing works where clearing is being conducted within 10m of any of the following:
 - a. A GDP boundary
 - b. A heritage, environmental avoidance site; or
 - c. A tenement boundary (avoidance areas).
5. Direct contact between the Spotter and the Operator must be adhered to at all times.
6. Access the approved GDP areas on existing tracks or within previously cleared approved GDP areas.
7. Ensure all clearing and disturbance works are undertaken within the GDP boundary, this includes stockpiling of soil, fallen vegetation, and vehicle and equipment access.

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8. Manage topsoil in accordance with the Clearing and Soil Management Procedure (OP-PRO-00187) and any GDP conditions. If topsoil has been stripped and stockpiled as part of the GDP the Topsoil and Subsoil Tracking Form (OP-FRM-00044) must be completed and uploaded onto Sage SURPASS within 7 days of commencement of clearing or this must be tracked through WENCO (fleet management system).
9. Manage weed risk areas identified on the GDP map in accordance with the Clearing and Soil Management Procedure (OP-PRO-00187) and any GDP conditions.
10. Do not enter or disturb Aboriginal Heritage sites. Aboriginal Heritage sites will be surveyed and flagged with pink and black striped tape by the Heritage Department prior to ground disturbance works.
11. Do not enter or disturb any environmental restricted areas unless permission has been granted prior.
12. The Applicant/Contractor is to upload the cleared area Shapefiles to the GDP in Sage SURPASS within one month of any clearing and every month thereafter until final clearing work has been undertaken or for GDPs at the Mine for Roy Hill, the Applicant shall contact the Roy Hill Survey Team and the Applicant shall provide confirmation to the GIS GDP Coordinator that the GDP area was included in the End of Month pickup by the Survey Team and the clearing file is available for loading to the GIS clearing database.
13. Once all clearing work has been undertaken the Applicant/Contractor shall load the final cleared area Shapefile to the GDP in Sage SURPASS or for GDPs at the Mine for Roy Hill, the Applicant shall contact the Roy Hill Survey Team and the Applicant shall provide confirmation to the GIS GDP Coordinator that the GDP area was included in the End of Month pickup by the Survey Team and the clearing file is available for loading to the GIS clearing database.
14. Apply for a Rehabilitation permit as per the Rehabilitation Permit Procedure (OP-PRO-00287) if rehabilitation works are required.
15. Upload Shapefiles of any areas rehabilitated where rehabilitation work has been undertaken.

2.2.3 GDP Closeout

A GDP shall be closed out once all clearing and / or activities identified in the Purpose & Outline of Work on the GDP have been completed and the following steps shall be undertaken.

1. The Applicant/Contractor is to upload Shapefiles of final cleared areas to the GDP in Sage SURPASS if clearing was part of the works undertaken or for GDPs at the Mine for Roy Hill, the Applicant shall contact the Roy Hill Survey Team and the Applicant shall provide confirmation to the GIS GDP Coordinator that the GDP area was included in the End of Month pickup by the Survey Team and the clearing file is available for loading to the GIS clearing database.
- 2.
3. Conduct a rehabilitation inspection using the Rehabilitation Operations Inspection Form (OP-FRM-00139) or Rehabilitation Permit Closeout Inspection Form (OP-FRM-00137) where rehabilitation work was undertaken.
4. Conduct a GDP closeout inspection by Site Superintendent Environment or delegate and/or the Superintendent Rehabilitation or delegate using the Ground Disturbance Permit Closeout Form (OP-FRM-00226) for GDPs where areas have been completed. This must be signed by a GDP Team Representative, Superintendent Environment or Delegate and the GDP applicant, Supervisor or authorised delegate. The applicant must upload the completed form to the GDP in Sage SURPASS.

2.3 Training and Awareness

1. Training will be provided for applicants and supervisors in which the GDA and GDP process is applicable.
2. Awareness material will be rolled out to all Roy Hill employees regarding the GDP process.

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2.4 Incidents, Audits and Inspections

1. Compliance audits and inspections shall be performed against this procedure in accordance with the Environmental Audit Procedure (OP-PRO-00018).
2. The GDP Applicant to report incidents in accordance with the Incident, Non-conformance and Action Management Procedure (OP-PRO-00702) and Incident Investigation Specification (OP-SPC-00156).
3. The GIS team (or delegate) will:
 - a. Conduct desktop audits GDP's to ensure GDPs are compliant (where applicable)
 - b. Validate the returned data against the clearing data and the latest aerial imagery.
4. The Superintendent Environment (or delegate) will:
 - a. Conduct GDP Site Inspections (OP-FRM-00233) to ensure all works have complied with the associated GDP conditions.
 - b. Conduct site GDP Close-Out Inspection using Ground Disturbance Permit Closeout Form (OP-FRM-00226)
5. The applicant/contractor shall ensure an adequate inspection/program is in place to manage compliance with this procedure.

2.5 Contingency Actions

1. Contingency/remedial actions relating to non-conformances to the GDP identified during inspections, audits and incident reporting must be implemented.

2.6 Reporting Requirements

1. Report and close out incidents in accordance with the Incident, Non-conformance and Action Management Procedure (OP-PRO-00702) and Incident Investigation Specification (OP-SPC-00156).
2. The Department manager and the delegated applicant are required to ensure all maps, shapefiles, survey data and forms required as part of this procedure are uploaded to Sage SURPASS within the relevant time frames.
3. Report areas cleared and areas rehabilitated in the Annual Environmental Report (AER) to the Department of Mines and Petroleum (DMP).

3 Accountabilities

Unless otherwise specified, the following roles are accountable or responsible for the activities outlined in this procedure.

Role	Responsibility
General Managers	Accountable for ensuring that resources are available to support the implementation of this procedure where it is relevant to their area of responsibility
Managers	Accountable for the implementation of this procedure where it is relevant to their area of responsibility
Superintendents	Responsible for the implementation of this procedure where it is relevant to their area of responsibility
Environment Team	Responsible for review and update of this procedure

Table 1: Accountabilities

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4 Abbreviations

Abbreviation	Definition
AER	Annual Environmental Report
DMP	Department of Mines and Petroleum
GD	Ground Disturbance
GDA	Ground Disturbance Application
GDP	Ground Disturbance Permit
GIS	Geographic Information System
GPS	Global Positioning System

Table 2: Abbreviations

5 Definitions

Term	Definition
Aboriginal Heritage Site	An Aboriginal site and/or an Aboriginal Object are site that have cultural significance to the Aboriginal people and include, but are not limited to those Aboriginal sites and places subject o the provision of the <i>Aboriginal Heritage Act 1972</i>
Applicant	The person who applies for a permit and/or responsible for managing/supervising the work on behalf of the Contractor or any entity conducting works on the ground on behalf of Roy Hill
Contractor	EPC contractors, subcontractors and any entity conducting works on the ground on behalf of Roy Hill
Demobilisation	The act of removing all equipment and infrastructure from an area due to the completion of works outlined under a contract.
GIS GDP Coordinator	Facilitator of the GDA/GDP process, GIS aspects of GDA/GDP process and approval of permits
Ground Disturbing Work / Clearing Works	Work that will in any way cause any change or disturbance to the ground surface including (but not limited to): clearing of vegetation, placement of survey pegs, placement of water bore lines, excavations, geotechnical investigations, water bore drilling and release of water, bulk earthworks installation of buildings and infrastructure, construction of roads, access tracks, laydown areas and any work associated with the construction and operation of the project
iSMS	Project incident reporting management system
Operational Environmental Requirements	A plan, procedure or work instruction that must be complied with.
Principal	Roy Hill
Project	Roy Hill project
RH Contract Manager	Roy Hill employee responsible for the implementation of the Contractor's
Rehabilitation	Rehabilitation is the process of returning the land to as close to its former state as possible. This includes ensuring that rehabilitated areas and
Rehabilitation GDP	Ground Disturbance Permit solely allocated to rehabilitation works
Shall	Indicates a mandatory requirement that must be complied with
Superintendent Environment	The Superintendent of the Roy Hill Environment Team
Superintendent Rehabilitation	The Superintendent of the Roy Hill Rehabilitation Team
Traditional Owners	Representatives from the local Aboriginal Native Title groups/families who

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Table 3: Definitions

6 References

Document number	Title
OP-PRO-00187	Clearing and Soil Management Procedure
OP-FRM-00226	Ground Disturbance Permit Closeout Form
OP-FRM-00233	Ground Disturbance Site Inspection Form
OP-FRM-00035	Ground Disturbance Permit Release Form
OP-SPC-00156	Incident Investigation Specification
OP-PRO-00018	Environmental Audit Procedure
OP-PRO-00702	Incident, Non-conformance & Action Management Procedure
OP-FRM-00044	Topsoil and Subsoil Tracking Form
OP-FRM-00139	Rehabilitation Operations Inspection Form
OP-PRO-00287	Rehabilitation Permit Procedure

Table 4: References

Note that up-to-date environmental documents should be accessed from the e-Care Roy Hill intranet portal to ensure that the current version is being used.

7 Review

This Procedure is to be reviewed as follows:

- Following the grant of or modification to relevant approvals;
- Annually; or
- As a result of findings or actions identified through inspections, audits and incident reporting.

Reviews are to examine the appropriateness of the procedure, taking into consideration corporate, system and compliance requirements and legislative changes since the last review was undertaken.

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