

## **Annexure 4 – Operational Example, Waste Dumps at Mine Site**

If a risk based approach to approvals is adopted, there would be less variations to proposals which would require Roy Hill to come back less to the Government for a new/further approval. Roy Hill also notes that in the example given below, the required process involves amending and producing its entire Mining Proposal document, which is a time consuming and inefficient way to do things.

A good example is the approvals regarding waste dumps at the mine site.

Roy Hill undertook a thorough study of the mining lease area, and got approvals which included the approval for and the specific locations of two waste dumps stockpiles.

Given the thorough study Roy Hill knows that there are few/any areas of environmental significance within the mine site area. However, if Roy Hill ever wants to increase the number of the stockpiles or change their location within the mine site area, we need to submit a complete new, revised mine proposal.

We think that on a risk based approach, the environmental impact risks of relocating already approved waste dumps or increasing the number of them are low given the low environmental significance in our mine area. Therefore, Roy Hill's view is that on a risk based approach, such changes to the waste dumps should be treated in the circumstances as incremental changes. These types of changes should not really need approval at all. Rather, notification to the Government department should suffice, with the relevant Department to check that once implemented, Roy Hill has kept to its notified plans. Instead currently such changes are classified as significant amendments and ones which require a revised mine proposal to be prepared and submitted by Roy Hill for approval.