

Stratford Mining Complex - Independent Environmental Audit 2023
Response to Audit Findings

Table 1: IEA 2023 Audit Findings - Non-Compliances					
Condition Number (ID)	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Stratford Coal Proposed Action/Action Taken/Response	Proposed Action Due Date
Schedule 3, Condition 8	The Applicant shall record and make available on its website: (a) when the real-time monitoring and management system detects any potential exceedance of the noise limits; (b) when exemptions from noise limits due to meteorological conditions apply; (c) the specific reasonable and feasible measures that were taken when either (a) or (b) apply; and (d) facilitate the regular review of this information by	Non-Compliant - Real-time Noise Management Response Register has not been updated on website, with entries for October, November and December excluded.	Recommended that the website be updated.	SCPL Accepts the Recommendation. SCPL has maintained the Real-time Noise Management Response Register throughout the audit period and has demonstrated the intention to comply with this condition. SCPL acknowledges that at the time of review (12/12/24) the Real-time Noise Management Response Register had not been updated for October and November. Action: Update the Real-time Noise Management Response Register to the Stratford Coal Website	Complete
Schedule 3, Condition 23	The Applicant shall prepare and implement an Air Quality Management Plan for the development to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with the EPA, and submitted to the Secretary for approval prior to 31 December 2015, unless otherwise agreed by the Secretary; (b) describe the measures that would be implemented to ensure compliance with the relevant air quality criteria and operating conditions of this consent;	Non-Compliant - Less than required PM10 monitoring undertaken at HVAS unit-Point 13. Monitoring unit failed to operate on a single prescribed day resulting in less than required samples. The monitor has continued to function after this occurrence and therefore no further actions are required.	No further action required	SCPL notes that the HVAS at Point 13 failed to run on a single prescribed date during the reporting period. Failure was attributed to user error. Contracting company conducted HVAS operation refresher training with contractor field staff and data management staff. No further action required	
Schedule 3, Condition 23	(c) describe the proposed air quality management system; and (d) include an air quality monitoring program that: • uses a combination of real-time monitors and supplementary monitors to evaluate the performance of the development against the air quality criteria in this consent; • adequately supports the proactive and reactive air quality management system; • evaluates and reports on: -the effectiveness of the air quality management system; and -compliance with the air quality operating conditions; and -defines what constitutes an air quality incident and includes a protocol for identifying and notifying the	Non-Compliant - Craven TEOM in February, March and June resulted in a total PM10 data capture rate of 88.65% and a total PM2.5 data capture rate of 88.62%. Outages occurred due to maintenance, power loss and equipment failures. Yancoal advises that reliability of data capture was enhanced after this incident through the overhaul of monitor to improve reliability, replacement of major TEOM components and cooling system and critical spares held in house to reduce risk exposure to supply chain issues.	No further action required	Craven TEOM Unit suffered multiple outages due to power supply issues, system malfunctions and cooling system failures. SCPL has taken preventative maintenance steps and system upgrades to ensure future compliance. No further action required	
Schedule 3, Condition 27	Unless an EPL authorises otherwise, the Applicant shall comply with Section 120 of the POEO Act.	Non-Compliant - An uncontrolled discharge of mine related water from dams SD12, SD16 and SD17 reported to Avondale Creek on 20 March 2021 due to a heavy rainfall event. Water quality sampling was undertaken at the time of the spill and the incident reported to regulators as required. No follow up report was requested and no further action	No further action required	Reported in accordance with SSD-4966 and PIRMP. Spills occurred on Saturday 20 March 2021 at SMC as a result of a significant rainfall event exceeding design capacity. No further action required	
Schedule 3, Condition 27	Unless an EPL authorises otherwise, the Applicant shall comply with Section 120 of the POEO Act.	Non-Compliant - Breach of the Roseville Link Haul Road culvert crossing over Avondale Creek at the SMC, which occurred on 20 March 2021 during a significant rainfall event. Reported in accordance with SSD- 4966 and PIRMP.	No further action required	Reported in accordance with SSD-4966 and PIRMP. Breach occurred on Saturday 20 March 2021 during a significant rainfall event. No further action required	
Schedule 3, Condition 27	Unless an EPL authorises otherwise, the Applicant shall comply with Section 120 of the POEO Act.	Non-Compliant - Uncontrolled discharge of water from SMC sediment dam SD16 reporting offsite, which occurred on Tuesday 8 March 2022 as a result of a significant rainfall event exceeding design capacity. Submitted incident report to EPA and DPE. No further requirements or report was requested and	No further action required	Reported in accordance with SSD-4966 and PIRMP. Uncontrolled discharge of water from SMC sediment dam SD16 reporting offsite, which occurred on Tuesday 8 March 2022 as a result of a significant rainfall event exceeding design capacity. No further action required	

<p>Schedule 3, Condition 32</p>	<p>The Applicant shall prepare and implement a Water Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with the EPA and DPIE Water, by suitably qualified and experienced person/s whose appointment has been approved by the Secretary; (b) be submitted to the Secretary for approval prior to 31 December 2015, unless otherwise agreed by the Secretary; and (c) in addition to the standard requirements for management plans (see condition 3 of Schedule 5), include a: <ul style="list-style-type: none"> (i) Site Water Balance, that: <ul style="list-style-type: none"> • includes details of: <ul style="list-style-type: none"> • sources and security of water supply, including details of Water Access Licenses held, and contingency supply for future reporting periods; • water use and management on site; • any off-site water discharges; and • reporting procedures, including the preparation of a site water balance for each calendar year; and • investigates and implements all reasonable and feasible measures to minimise water use on site; (ii) Surface Water Management Plan, that includes: <ul style="list-style-type: none"> • detailed baseline data on water flows and quality in the watercourses that could potentially be affected by the development; • a detailed description of the water management system, 	<p>Non-Compliant - 21 Dec 2020: Rainwater runoff in the construction area for the Stratford East temporary clean water drain breached the containment bund discharging to a clean water area. The temporary clean water drain construction was in accordance with the approved clearing permit and the erosion and sediment control plan. No follow up was requested and no further action is required.</p>	<p>No further action required</p>	<p>No further action required</p>	
<p>Schedule 3, Condition 32</p>	<p>including the:</p> <ul style="list-style-type: none"> • clean water diversion systems; • erosion and sediment controls (mine water system); and • mine water management systems, including irrigation areas; • detailed plans, including design objectives and performance criteria for: <ul style="list-style-type: none"> • design and management of final voids; • design and management for the emplacement of coal reject materials and potential acid-forming or sulfate-generating materials; • management of sodic and dispersible soils; • diversion of the key tributary of Avondale Creek; • reinstatement of drainage lines on the rehabilitated areas of the site; and • control of any potential water pollution from the rehabilitated areas of the site • performance criteria for the following, including trigger levels for investigating any associated potentially adverse impacts: <ul style="list-style-type: none"> • mine water management system; • downstream surface water quality; • downstream flooding impacts, and • stream and riparian vegetation health for the Avon River and its tributaries, including Avondale and Dog Trap Creeks; • a program to monitor and report on: <ul style="list-style-type: none"> • effectiveness of the mine water management system; • effectiveness of the stream diversion for the key 	<p>Non-Compliant - 30 Dec 2020: Rainwater runoff in the construction area for the Stratford East temporary clean water drain breached the containment bund discharging to a clean water area. Sump improvement and pumping continued during the night to reduce the water level and allow greater water capture. No follow up was requested and no further action is required.</p>	<p>No further action required</p>	<p>No further action required</p>	

Schedule 5, Condition 11	<p>The Applicant shall:</p> <p>(a)make the following information publicly available on its website:</p> <ul style="list-style-type: none"> •the EIS; •all current statutory approvals for the development; •approved strategies, plans or programs required under the conditions of this consent; •a comprehensive summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent; •a complaints register, which is to be updated on a monthly basis; •minutes of CCC meetings; •the last five annual reviews; •any independent environmental audit, and the Applicant's response to the recommendations in any audit; •any other matter required by the Secretary; and 	<p>Non-Compliant -</p> <ul style="list-style-type: none"> •All current statutory approvals are required to be made available on the website. Draft EPL was viewed on website. •The last five annual reviews are required to be available on the website. The last four annual reviews (2019 – 2022) are uploaded on the Stratford website. 	<p>Recommended that the final version of the EPL is uploaded. Recommend ensuring the latest five annual reviews are uploaded onto website.</p>	<p>SCPL accepts the recommendation.</p> <p>Action: Ensure final version of the EPL is uploaded to Stratford Coal website. Action: Upload 2018 Annual Review onto website.</p>	Complete
Environment Protection Licence EPL 5161 Non-Compliance					
O6.12	<p>The licensee must:</p> <p>a. conduct an annual testing program of the mobile equipment on site to ensure that noise attenuation measures remain effective;</p> <p>b. restore the effectiveness of any noise attenuation if it is found to be defective; and</p> <p>c. report on the results of any testing and/or attenuation work within the fourth quarter noise report submitted to the EPA (required by Condition R4.1).</p> <p>Note: The abovementioned measures were identified by the proponent as feasible and reasonable measures to reduce noise levels to meet criteria</p>	<p>Non-Compliant - 2021 Annual noise testing program of mobile equipment not undertaken as per O6.2 Noise Operating Conditions. No adverse effects would be anticipated resulting from the non-compliance. The annual sound power testing program was undertaken during October 2021. Annual sound power testing must be undertaken yearly whilst operations occurring, unless condition varied.</p>	<p>Annual sound power testing must be undertaken yearly whilst operations occurring, unless condition varied.</p>	<p>SCPL accepts this recommendation.</p> <p>SCPL notes that the sound power testing did not occur through the 2021 EPL annual return period but was completed within the 2021 calendar year. Sound Power level testing successfully occurred in the 2022 and 2023 EPL annual return periods.</p> <p>Action: Ensure sound power level testing occurs annually within the EPL annual return period.</p>	Annually reoccurring.
M2.2	<p>Air Monitoring Requirements</p>	<p>Non-Compliant - Less than required PM10 monitoring undertaken as per EPL 5161 - M2.2 Air Monitoring Requirements at HVAS unit - Point 13. Monitoring unit failed to operate on a single prescribed day resulting in less than required samples being obtained. No adverse effects occurred from the non-compliance. Contracting company conducted HVAS operation refresher training with contractor field staff and data management staff. No further actions required.</p>	<p>No further action required</p>	<p>SCPL notes that the HVAS at Point 13 failed to run on a single prescribed date during the reporting period. Failure was attributed to user error. Contracting company conducted HVAS operation refresher training with contractor field staff and data management staff.</p> <p>No further action required</p>	
M2.3	<p>Water and/ or Land Monitoring Requirements</p>	<p>Non-Compliant - Oil and grease values could not be found in the EPL data spreadsheet for Points 33, 35, 36, 37, 38, 39, 42 and 43.</p> <p>Recommend updating to include in one location and/or provide alternate location</p>	<p>Recommend updating to include in one location and/or provide alternate location.</p>	<p>SCPL accepts the recommendation.</p> <p>Action: Include oil and grease in all future EPL data spreadsheet and upload to website</p>	31-Mar-24
R1.9	<p>The licensee must supply, with each Annual Return, a Blast Monitoring Report which must include the following information relating to each blast carried out within the premises during the reporting period covered by the Annual Return:</p> <p>a) the date and time of the blast;</p> <p>b) the location of the blast on the premises;</p> <p>c) the blast monitoring results at each blast monitoring station; and</p> <p>d) an explanation for any missing blast monitoring results.</p>	<p>Non-Compliant - Blast monitoring is available to the EPA via the website and within annual reports. However, blast reports were not specifically provided with each annual return.</p> <p>Recommend that blast reports are sent with Annual Returns.</p>	<p>Recommend that blast reports are sent with Annual Returns.</p>	<p>SCPL accepts the recommendation.</p> <p>SCPL notes that blasting results are updated and uploaded to the Stratford Coal website monthly.</p> <p>Action: Include blast reports with all future SMC EPL Annual Returns.</p>	21-Aug-24

Table 2: IEA 2023 Audit Findings - Recommendations					
Condition Number (ID)	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Stratford Coal Proposed Action/Action Taken/Response	Proposed Action Due Date
Development Consent SSD-4966 Recommendations					
Schedule 3, Condition 24	For the life of the development, the Applicant shall ensure that there is a meteorological station in the vicinity of the site that: (a) complies with the requirements in the Approved Methods for Sampling of Air Pollutants in New South Wales guideline and the NSW Industrial Noise Policy; and (b) is capable of continuous real-time measurement of temperature lapse rate data that are able to be transformed accurately and repeatably, and no more favourably, to those that would be obtained by the use of a 60 m tower, to the satisfaction of the EPA.	Recommendation - Yancoal advises that meteorological stations are no longer referenced in Approved Methods for Sampling of Air Pollutants in NSW guideline and have been replaced by noise policy for industry (2017) and AS 3580.14-2011: Methods for sampling and analysis of ambient air, Meteorological monitoring for ambient air quality monitoring applications (which the site operates in accordance with).	Recommend AQMP updated at next review to clarify this to ensure relevant regulators support this approach.	SCPL accepts this recommendation. Action: Update the SMC AQMP to reference specific relevant Noise Policy and Australian Standards.	31-Aug-24
Schedule 3, Condition 27	Unless an EPL authorises otherwise, the Applicant shall comply with Section 120 of the POEO Act.	Recommendation - The relocated dirty water pipeline across the Avondale Creek's risk assessment be reconsidered and mitigation implemented as required.	The relocated dirty water pipeline across the Avondale Creek's risk assessment be reconsidered and mitigation implemented as required. Recommend that disassembled culvert be removed from the area.	SCPL accepts this recommendation. Since the site inspection this redundant water transfer line has been removed. Update for the pipeline and pumping risk assessment is scheduled for update in March 2024. Action: Remove dirty water pipeline from the reconstructed Roseville West culvert (complete 20 December 2024). Action: Remove disassembled culvert from area adjacent.	31 June 2024
Schedule 3, Condition 30	The Applicant shall improve the riparian habitat along Avondale Creek to the satisfaction of the Secretary. These improvements must be made within the area of the proposed Biodiversity Enhancement Area (see Appendix 8) and include the re-establishment of flora species characteristic of the Cabbage Gum open forest vegetation community.	Recommendation - All plots in 2022 monitoring by WPC show a proliferation of exotic grasses, which may require management to ensure native species are not smothered. Of concern reference Q6 has decreased in native species diversity by half since 2019 and increased in exotic species diversity. Weed control works have been recommended for this management zone and are integral to prevent further degradation.	Management of exotic grasses is recommended to control and reduce smothering of native species regrowth, particularly within Q6. Investigation with relevant specialists on alternative management methods (e.g. grazing, with appropriate approvals and/or updated management plans).	SCPL accepts this recommendation. SCPL notes that weed mapping for the SMC Biodiversity Offset Areas was commissioned in November 2023 and completed in February 2024. Action: Undertake weed mapping for the SMC Biodiversity Offsets. Report to include a weed management target plan and proposed methods of weed management. Manual weed removal and low impact weed control methods methods to be completed in areas within riparian habitat along Avondale Creek (Q6).	Complete
Schedule 3, Condition 33	The Applicant shall implement the biodiversity offset strategy described in the EIS, summarised in Table 9 (below) and shown conceptually in Figure 1 in Appendix 8, to the satisfaction of the Secretary.	Recommendation - Details of each management area and vegetation community are provided within a table, in a similar manner to the Duralie Biodiversity Management Plan 2022 at next review. Cattle grazing to control grasses is not current permitted in offset areas in accordance with the BMP. Consider whether a justified amendment request to state and federal regulators should be made to facilitate cattle grazing as a weed control measure.	Details of each management area and vegetation community are provided within a table, in a similar manner to the Duralie Biodiversity Management Plan 2022 at next review. Cattle grazing to control grasses is not current permitted in offset areas in accordance with the BMP. Consider whether a justified amendment request to state and federal regulators should be made to facilitate cattle grazing as a weed control measure.	SCPL accepts this recommendation. SCPL notes that cattle grazing is not currently suitable for revegetated areas due to the potential risk to juvenile planted trees. SCPL notes that grazing will be more suitable as the vegetation matures. Action: Include further management area and vegetation community detail in the next SMC Biodiversity Management Plan at next update. Consider including this detail in a table similar manner to the Duralie Biodiversity Management Plan 2022. Action: Consider amending the SMC Biodiversity Management Plan to include Cattle Grazing.	31-Aug-24

<p>Schedule 3, Condition 40</p>	<p>By the end of June 2016, unless the Secretary agrees otherwise, the Applicant shall lodge a Conservation Bond with the Department to ensure that the Biodiversity Offset Strategy is implemented in accordance with the performance and completion criteria of the Biodiversity Management Plan. The sum of the bond shall be determined by: (a) calculating the full cost of implementing the Biodiversity Offset Strategy (other than land acquisition costs); and (b) employing a suitably qualified quantity surveyor to verify the calculated costs. If the Offset Strategy is completed generally in accordance with the completion criteria in the Biodiversity Management Plan to the satisfaction of the Secretary, the Secretary will release the bond. If the offset strategy is not completed generally in accordance with the completion criteria in the Biodiversity Management Plan, the Secretary will call in all, or part of, the conservation bond, and arrange for the satisfactory completion of the relevant works. Notes: •Alternative funding arrangements for long-term management of the biodiversity offset strategy, such as provision of capital and management funding as agreed by OEH as part of a Biobanking Agreement or transfer to conservation reserve estate can be used to reduce the liability of the conservation and biodiversity bond.</p>	<p>Recommendation - Recommend to review the bond in parallel with Duralie bond every 3 years and lodge with DPE.</p>	<p>Recommend to review the bond in parallel with Duralie bond every 3 years and lodge with DPE.</p>	<p>SCPL accepts this recommendation. SMC conservation Bond is currently under review, expected completion of the review 31 June 2024. Action: Finalise the SMC Conservation Bond.</p>	<p>31 June 2024</p>
<p>Schedule 3, Condition 43</p>	<p>The Applicant shall prepare and implement a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must: (a) be prepared by suitably qualified and experienced person/s whose appointment has been endorsed by the Secretary; (b) be prepared in consultation with OEH and local Aboriginal stakeholders (in relation to the management of Aboriginal heritage values); (c) be submitted to the Secretary for approval prior to 31 December 2015, unless the Secretary agrees otherwise; d) include the following: •a detailed archaeological salvage program for Aboriginal sites/objects within the approved disturbance area, including methodology and procedures/protocols for: staged salvage, based on anticipated mine planning (sites OS-3, OS-4, OS-5, IF-1, IF-2, IF-3, IF-4 shown on the figure in Appendix 7); osalvage of scarred trees (sites ST-2; ST-4 shown on the figure in Appendix 7); omonitoring of topsoil stripping during construction associated with the Wenham Cox / Bowens Road realignment in the vicinity of Dog Trap Creek; osite assessment and reporting; oprotection, storage, management and long-term protection of salvaged Aboriginal objects; and oaddressing relevant statutory requirements under the National Parks and Wildlife Act 1974; and •a description of the measures that would be</p>	<p>Recommendation - Viewed Site Induction Script v2 and did not see heritage information.</p>	<p>Recommend updated to include key training to ensure awareness prior to closure works commencing. Update PADs to polygons before closure to ensure extents know and disturbance avoided.</p>	<p>SCPL accepts this recommendation. SCPL acknowledges Yancoal Generic Induction includes cultural heritage training information Action: Update SMC Site specific induction to include site specific information regarding cultural heritage risks. Action: Update PADs to polygons before closure to ensure extents know and disturbance avoided.</p>	<p>31 June 2024</p>

Schedule 3, Condition 52	The Applicant shall: (a) implement all reasonable and feasible measures to minimise the waste (including coal reject) generated by the development; (b) ensure that the waste generated by the development is appropriately stored, handled, and disposed of; and (c) monitor and report on the effectiveness of waste minimisation and management measures in the Annual Review.	Recommendation - Site inspection revealed some residual coal adjacent the rail loader which requires investigation and confirmation that associated runoff remains on site. Manage to prevent further residual coal residing on site from the railway.	Waste management requires additional housekeeping at the pit top.	SCPL inspected the coal adjacent to the train loader. Investigation confirmed that the water run off from the train loader is managed within site dirty water system. Clean up of the minor coal spill was completed December 2023. Action: Clean up small volume of coal next to train loader.	Complete
Schedule 3, Condition 55	The Applicant shall prepare and implement a Rehabilitation Management Plan to the satisfaction of the Resources Regulator. This plan must: (a) be prepared in consultation with the Department, DPIE Water, BCD, and GSC; (b) be submitted to the Resources Regulator for approval at least 3 months prior to the commencement of mining operations in the new mining areas; unless the Resources Regulator agrees otherwise; (c) be prepared in accordance with any relevant DRG guideline; (d) describe how the rehabilitation of the site would be integrated with the implementation of the biodiversity offset strategy; (e) include detailed performance and completion criteria for evaluating the performance of the rehabilitation of the site, and triggering remedial action (if necessary); (f) describe the measures that would be implemented to ensure compliance with the relevant conditions of this consent, and address all aspects of rehabilitation including mine closure, final landform and final land use; (g) include interim rehabilitation where necessary to minimise the area exposed for dust generation; (h) include a program to monitor, independently audit and report on the effectiveness of the rehabilitation measures and progress against the detailed performance and completion criteria; and (i) build to the maximum extent practicable on the other management plans required under this consent. <i>Note: The Biodiversity Management Plan</i>	Recommendation - Continue detailed and early closure planning work in consultation with relevant regulators.	Continue detailed and early closure planning work in consultation with relevant regulators.	SCPL accepts this recommendation. Action: Continue detailed and early closure planning work in consultation with relevant regulators.	Ongoing - Current
Environment Protection Licence EPL 5161 Recommendations					
A1.1	This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation. Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.	Recommendation - Licence holder to consider whether a licence variation to reduce the scale of the activities is appropriate.	Licence holder to consider whether a licence variation to reduce the scale of the activities is appropriate.	SCPL accepts this recommendation. Action: Consider whether a licence variation to reduce the scale of the activities Listed in EPL5161 is appropriate. If deemed appropriate commence EPL variation.	31-Aug-24
L4.5	For the purposes of determining the noise generated at the premises Class 1 or Class 2 noise monitoring equipment, as defined by AS IEC61672.1-2004 and AS IEC61672.2-2004, or other noise monitoring equipment accepted by the EPA, must be used.	Recommendation - •At next update to NMP include details on the utilisation of Class 1 or Class 2 noise monitoring equipment, as defined by AS IEC61672.1-2004 and AS IEC61672.2-2004, or other noise monitoring equipment accepted by the EPA for determining noise production levels. •Any future noise monitoring reports confirm this detail.	•At next update to NMP include details on the utilisation of Class 1 or Class 2 noise monitoring equipment, as defined by AS IEC61672.1-2004 and AS IEC61672.2-2004, or other noise monitoring equipment accepted by the EPA for determining noise production levels. •Any future noise monitoring reports confirm this detail.	SCPL accepts this recommendation. Action: At next update to SMC NMP include details on the utilisation of Class 1 or Class 2 noise monitoring equipment, as defined by AS IEC61672.1-2004 and AS IEC61672.2-2004, or other noise monitoring equipment accepted by the EPA for determining noise production levels.	31-Aug-24
O5.8	Whenever the level of liquid and other material in any sedimentation basin exceeds the level indicated by the sedimentation basin marker, the licensee must take all practical measures as soon as possible to reduce the level of liquid and other material in the sedimentation basin.	Recommendation - Update Water Management Plan with the relevant requirements of the new EPL5161 conditions as at 15 September 2023.	Update Water Management Plan with the relevant requirements of the new EPL5161 conditions as at 15 September 2023.	SCPL accepts this recommendation. Action: Update Water Management Plan with the relevant requirements of the new EPL5161 conditions as at 15 September 2023.	31-Aug-24

O6.13	<p>Potential Acid Forming (PAF) Waste Rock Waste rock must be assessed to determine if it is Potential Acid Forming (PAF). PAF waste rock must be segregated, handled and disposed so as to mitigate against acid formation and pollution of water.</p>	<p>Recommendation - Continue to monitor and manage PAF during closure process as key potential issue.</p>	<p>Continue to monitor and manage PAF during closure process as key potential issue.</p>	<p>Action: Continue to monitor and manage PAF during closure process as key potential issue.</p>	<p>Current and ongoing</p>
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